To: Restivo, Angela[Restivo.Angela@epa.gov]
From: Wooster, Richard
Sent: Mon 2/27/2017 8:12:57 PM
Subject: RE: LOOP AI#4634....another reason we must move on LOOP (ASAP)

I ain't afraid of no ghosts. . .

If staff want to move ahead this week or next, I'm open to doing so provided we are presented with a clear path to follow, and a solid rationale for doing so. Ideally we should get a briefing that presents multiple perspectives and provides the basis for which we consider most defensible. We also should be planning ahead with respect to the higher degree of vetting/reporting we must do these days on any action - - especially any which are particularly sensitive.

richard

Richard A. Wooster

Acting Associate Director

NPDES Permits & TMDLs Branch

(214) 665-6473

From: Restivo, Angela
Sent: Monday, February 27, 2017 1:38 PM
To: Wooster, Richard <Wooster.Richard@epa.gov>
Subject: FW: LOOP AI#4634....another reason we must move on LOOP (ASAP)

Per our conversation I am forwarding you an update on LOOP.

From: Schwab, Kay
Sent: Monday, February 27, 2017 11:54 AM
To: Bogdan, Silvia <bogdan.silvia@epa.gov>; Chen, Isaac <Chen.Isaac@epa.gov>
Cc: Restivo, Angela <Restivo.Angela@epa.gov>
Subject: RE: LOOP AI#4634....another reason we must move on LOOP (ASAP)

Works for me if Rich/Stacey/Angela/Brent feel comfortable with that so we can at least respond to Scott Guilliams, LDEQ, *in a timely manner,* (perhaps partially/informally – just bringing LDEQ up to speed with what Silvia has put together on "why biomonitoring IS applicable at this facility/how to do it" and "explain" how R6 did slightly *"misinterpreted"* what EPA HQs stated previously on this situation, etc.… ??

(We should still brief Stacey also when she returns …the week March 13 or asap.)

Bill met with LDEQ on Jan 17/18, 2017, and brought back the news that Scott felt like we were "back where we started." Scott contacted Rich the next week (~ Jan 26/27, 2017) & there was an information call with Scott to hear his thoughts. It is now a month later……..

Perhaps this is a good time to negotiate --

1) LOOP needs to get on with discharging from requested "new/modification" outfalls, &

2) EPA (/LDEQ) need toxicity monitoring in the permit for regulatory and environmental reasons. ("FWP Use" is not being met in Subsegment.)

We must create a level playing field for all (i.e., SPRs & offshore have toxicity monitoring).

If a precedent is set for "special" requirements for LOOP t could be an additional challenge in future permits if other permittees also want "special" requirements ….

Just some thoughts,

Thanks

K

From: Bogdan, Silvia
Sent: Monday, February 27, 2017 11:03 AM
To: Schwab, Kay <Schwab.Kay@epa.gov>; Chen, Isaac <Chen.Isaac@epa.gov>
Cc: Restivo, Angela <Restivo.Angela@epa.gov>
Subject: RE: LOOP AI#4634....another reason we must move on LOOP (ASAP)

Maybe we should work with Rich instead of waiting to brief Stacey until mid-March?

From: Schwab, Kay
Sent: Monday, February 27, 2017 10:59 AM
To: Bogdan, Silvia <bogdan.silvia@epa.gov>; Chen, Isaac <Chen.Isaac@epa.gov>
Cc: Restivo, Angela <Restivo.Angela@epa.gov>
Subject: FW: LOOP AI#4634....another reason we must move on LOOP (ASAP)

FYI----------

From: Jenniffer L. Sheppard [mailto:Jenniffer.Sheppard@LA.GOV]
Sent: Monday, February 27, 2017 9:53 AM
To: Schwab, Kay <Schwab.Kay@epa.gov>
Subject: FW: LOOP AI#4634

I guess Doug's ears must have been burning Friday because this e-mail regarding LOOP was waiting for us this morning.

I did respond back and tell him that we were working with you guys to resolve the issues soon. I also told him that we were unable able to modify an expired permit, so any changes would need to take place in the reissuance permit.

Jenniffer Sheppard

Louisiana Department of Environmental Quality

Industrial Water Permits Manager

P.O. Box 4313

Baton Rouge, LA 70821-4313

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Fax (225) 219-3309

From: Doug LaBar [mailto:doug.labar@c-ka.com]
Sent: Sunday, February 26, 2017 12:18 PM
To: Sonja Loyd
Cc: Jenniffer L. Sheppard
Subject: LOOP AI#4634

Hello Sonja,

Can you provide me with an update on the draft permit?

LOOP submitted a request on 8/10/16 for new Outfall 029 (reverse osmosis reject water from the control platform at the marine terminal). This water is critical to the facility's operation and by not permitting it, the facility has had to make other arrangements for water supply at a significant cost and effort.

I assume the delay is EPA's review of the Outfall 004 (brine) situation. If we cannot get a final permit soon, is it possible to expedite and modify the permit just to add the new Outfall 029? Or can we finalize the permit and agree to review and resolve the brine situation during the next permit cycle? We need options to help resolve this issue. Please help us to facilitate this. Thanks.

If you have any questions, please feel free to contact me.

Doug LaBar

Senior Environmental Scientist

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