Message

From: Wu, Jennifer [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=885E149E9BDD4094BF34508D7454CDFA-WU, JENNIFER]
Sent: 8/31/2018 7:15:33 PM
To: Cool, Richard [Cool.Richard@epa.gov]
CC: Franklin, Richard [Franklin.Richard@epa.gov]
Subject: RE: FYI: WA hydro permits status

Hey Rick (cc: Richard),

That's great. If/when you get the OK, I'll set up a time for us to sit down to go over the permit. Richard, if you're interested in listening in, feel free to let me know. I also thought about including language from the Oil Accountability Programs in the permits. It seems like a good opportunity to reinforce each other's programs and also efficient for the Corps to be able to comply with the permits and OAP at the same time. Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

Do you all work with BOR and the Grand Coulee? I understand they don't have requirements to do an OAP.

Re: timeline, I should be done with the parts of the permit that you're interested in by mid-next week and then am looking for comments the 12th or 13th, if possible, before I go out for request for 401 cert around the Sept 14 – 18 timeframe. However, I'm not going out for public comment until after we get the cert, so we could make more changes if you're busy the next couple of weeks. Thanks. - Jenny

From: Cool, Richard
Sent: Friday, August 31, 2018 8:00 AM
To: Wu, Jennifer <Wu.Jennifer@epa.gov>
Cc: Franklin, Richard <Franklin.Richard@epa.gov>
Subject: RE: FYI: WA hydro permits status

Jenny:

I have an email into Jeff and Kate about their OK for me to spend time reviewing the BMP requirement portion of your permit(s). I think they will agree that it is a prudent use of my time but I wanted to make sure they had buy in.

I think Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

Ex. 5 Deliberative Process (DP)

So I guess NPDES Permits Unit gets the first shot at deciding how to parse this issue and I will watch for your draft permit . . . . please be sure to give us some guidance on how quickly we have to review and respond so we can plan our time accordingly.

Thanks for your efforts on this BMP OAP stuff. It's really an important issue and I am glad to see NPU wade in . . .

Rick

From: Wu, Jennifer
Sent: Thursday, August 30, 2018 4:46 PM
To: Franklin, Richard <Franklin.Richard@epa.gov>; Cool, Richard <Cool.Richard@epa.gov>
Cc: Moon, Wally <Moon.Wally@epa.gov>; Kenknight, Jeff <Kenknight.Jeff@epa.gov>; Spaulding, Kate <Spaulding.Kate@epa.gov>
Subject: FYI: WA hydro permits status

Hi Richard and Rick (cc: to Wally, Jeff, and Kate),

Just a quick update on the Washington hydroelectric facility NPDES permits. I got to visit a few dams last week and this week (LoMo, Dalles, Bonneville, Grand Coulee), and met with Ken Duncan, Don Redman, and Jeff DeWinkler (BOR, Grand Coulee). Ken and Don said they really appreciated working with both of you. I'm in the process of honing in on permit limits and monitoring. They will be Ex. 5 Deliberative Process (DP) pH of 6.5 to 8.5, monthly monitoring for oil and grease, and continuous or monthly temperature monitoring for cooling water. There will be a requirement to use EALs unless technically infeasible. I also modified the BMP plan to include site-specific requirements for evaluating risks from oil leaking along with many other BMP requirements to minimize, track, and manage oil. I should have a preliminary draft by the end of next week, and I'll share that with you, especially the BMP requirement section which might be most relevant to your programs.

Re: external communications, just an FYI that I'm giving a short 10-15 minute presentation on the permit to the Federal Caucus on September 18 and will be doing one for interested tribes around that time. If you want to listen in, please let me know and I can send you the information. I'm also talking with Columbia RiverKeeper sometime late next week/early the following week. If you have any questions, feel free to let me know. Thanks again for your insights into the facilities!

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