Message

**From**: Shuart, Ryan [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=SHUART, RYAN]
**Sent**: 2/16/2017 7:45:19 PM
**To**: Lovell, John [Lovell.John@epa.gov]
**CC**: Copeland, Stephen [Copeland.Stephen@epa.gov]
**Subject**: RE: SAPA production based standard review (O & G exceedance)

.038441 mil. Off-lbs.= core
.0153764 mil off lbs.= shuttle

Best,

Ryan Shuart
NPDES Permits Branch
Phone: 215.814.2714

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**From:** Lovell, John
**Sent:** Thursday, February 16, 2017 2:40 PM
**To:** Shuart, Ryan <shuart.ryan@epa.gov>
**Cc:** Copeland, Stephen <Copeland.Stephen@epa.gov>
**Subject:** RE: SAPA production based standard review (O & G exceedance)

Yes, the lower production would result in a lower limit and in theory should mean that they discharge a lower loading of pollutants.

I took a look at the updated production rate determination spreadsheet and made a change to the calculation of the average so that it only looks at the last 5 years of data. That raised the average a little and eliminated one more production data point (a low one), but the value to use in the limits stays the same.

In terms of the limits, do you know what the production rate was that we used in the limits package? I seem to remember that the number we used was out of date when I put together that spreadsheet and I'm not sure whether we updated it based on the spreadsheet.

Thanks.

John Lovell
Pretreatment Coordinator
USEPA Region 3
1650 Arch Street
Philadelphia, PA 19103-2029
215-814-5790
215-814-2301 (fax)

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**From:** Shuart, Ryan
**Sent:** Thursday, February 16, 2017 2:16 PM
**To:** Lovell, John <Lovell.John@epa.gov>
**Cc:** Copeland, Stephen <Copeland.Stephen@epa.gov>
**Subject:** SAPA production based standard review (O & G exceedance)

John,

I reviewed the production based standard and added the last two years of data to the SAPA spreadsheet. This year has seen a reduction in production but no real trends in either direction. Wouldn't the drop in production lighten the loading of O & G or am I mistaken? The file is located here:

H:\3WP41\Pretreatment\IUS\CIUs\SAPA\Limits

Sincerely,

**Ryan Shuart**
NPDES Permits Branch
Water Protection Division
U.S. EPA Region III
1650 Arch Street
Philadelphia, PA 19103
Phone: 215.814.2714