Message

From: Bromley, Eugene [Bromley.Eugene@epa.gov]
Sent: 6/15/2020 4:04:33 PM
To: Bromley, Eugene [Bromley.Eugene@epa.gov]
Subject: FW: Deck Drainage Monitoring Requirements

From: Bromley, Eugene
Sent: Wednesday, April 8, 2020 1:31 PM
To: Jay Rao <JRao@dcorllc.com>
Cc: Weiss, Michael <weiss.michael@epa.gov>; Howell, Adam <Howell.Adam@epa.gov>
Subject: RE: Deck Drainage Monitoring Requirements

Jay,

I thought the following is what we decided from that last conference call:

- The existing sampling point for straight produced water would be maintained to measure compliance with the effluent guidelines requirement for oil and grease in the produced water (29/42 mg/l).
- Another sampling point would be set up for the commingled produced water/deck drainage discharge to test for all required parameters for produced water. For the commingled discharge, the sheen test ordinarily required for deck drainage would be superseded by the oil and grease monitoring requirement for produced water. A volume estimate for deck drainage would continue to be required for the deck drainage fraction of the commingled deck drainage/produced water discharge.
- If you have deck drainage that is discharged by itself, then the sheen test would be conducted along with the other requirements of Table 8 of the permit.

That may be what you're saying below, but I'm not quite sure.

Eugene Bromley
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From: Jay Rao <JRao@dcorllc.com>
Sent: Monday, April 6, 2020 2:15 PM
To: Bromley, Eugene <Bromley.Eugene@epa.gov>
Subject: Deck Drainage Monitoring Requirements

Dear Mr. Eugene Bromley,
Good afternoon, sir. Trust this finds you and your family safe and healthy under these testing times. By the way, during our last conference call with Mike Weiss and you , I forgot to ask you a very specific question with regard to Deck Drainage (Discharge # 004) monitoring and sampling requirement. As per Table-8 on page 21 of the permit(attached herewith for your reference) , we have to monitor the following:

- Estimated flow rate in BBls/day: Once a month

- Free Oil: No discharge
- Visual/Sheen on receiving water: Number of days sheen is observed

Please confirm whether or not I am correct.

We will strictly adhere to the above stipulations. As Mike and you wanted, we will go ahead and install two sampling points: one each for Deck drain and commingled stream(Deck Drain + Produced water). Samples collected from deck drain sampling point would be used for conducting EPA-approved static sheen test, if the test fails , discharge of deck drain would cease. And, the commingled stream sampling point would be designated as NPDES sampling point.

Please let me know your thoughts.
Best Regards,
Jay Rao
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(805)701-6975(Cell)

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