Message

From: Howell, Adam [Howell.Adam@epa.gov]
Sent: 6/29/2020 4:03:43 PM
To: Jay Rao [JRao@dcorllc.com]; Bromley, Eugene [Bromley.Eugene@epa.gov]
CC: Weiss, Michael [weiss.michael@epa.gov]
Subject: RE: Deck Drainage Monitoring Requirements

Hi Jay – Thank you for your follow through despite these difficult times and for sending these pictures of the sampling points. In order to close out this matter, we'd like to request that you send:

1) A narrative description and schematic of the piping leading to the three sampling points; and
2) Your sampling plan.

Hope you are doing well. Please feel free to call my if you have any questions.

Adam Howell
Clean Water Act Section
US EPA Region IX
(707) 845-8769
howell.adam@epa.gov

From: Jay Rao <JRao@dcorllc.com>
Sent: Friday, June 12, 2020 10:19 AM
To: Bromley, Eugene <Bromley.Eugene@epa.gov>
Cc: Weiss, Michael <weiss.michael@epa.gov>; Howell, Adam <Howell.Adam@epa.gov>
Subject: RE: Deck Drainage Monitoring Requirements

All,
Good Morning. As required by you, we have finished installation of the following sampling points (please see attached) at Platform Edith:

1. Commingled Produced Water
2. Deck Drainage
3. NPDES (produced water only).

We are very sorry that it got delayed because of Covid 19. In the meantime, if you have any question or need anything further, please let me know.

Thank you for your patience and perseverance.

Best regards,

Jay Rao
DCOR, LLC

From: Bromley, Eugene <Bromley.Eugene@epa.gov>
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 For the commingled discharge, the sheen test ordinarily required for deck drainage would be superseded by the oil and grease monitoring requirement for produced water.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
NPDES Permits Section (WTR-2-3)
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(415) 972-3510
(415) 947-3549 (fax)

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
DCOR, LLC
(805)535-2078

(805)701-6975(Cell)

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