DCOR, LLC
290 Maple Court, Suite 290
Ventura, Ca 93003

July 23, 2019

Mr. Eugene Bromley
NPDES Permit Section(WTR-2-3)
EPA Region 9
75 Hawthorne Street
San Francisco, CA 94105

Subject: DCOR Comments on Pre-Public Notice Draft OCS General Permit CAG 280000

Dear Mr. Eugene Bromley,

At the outset, DCOR thanks you for the opportunity to provide comments on the draft OCS General Permit CAG 280000.The following constitutes DCOR's comments:

1. Part II C.4: Well Treatment, Completion and Workover Fluids commingled with Produced Water

This section requires a workplan submittal within 12 months of the effective date of the permit to characterize well stimulation treatment fluids that is commingled with produced water before being discharged overboard.

- Baseline: We recommend waiving the requirement for testing the produced water prior to commingling, since it is already being monitored annually (Part II B.2)
- WET tests for commingled produced water: Due to logistics, uncertainty about the timely availability of species, problems associated with the spawning of the species and limited hold time for the samples, we request EPA to consider reducing the amount of toxicity samples from 7 straight days to just 1 day during peak stimulation fluid returns. In addition, DCOR proposes to do these WET tests only once during the term of the permit. Frequency may change, if the chemical composition changes significantly.
- Chemical Analyses of the expected constituents: DCOR proposes to do these analyses only on major components (as outlined in Safety Data Sheets), during peak stimulation/treatment returns. In addition, DCOR proposes to do this only once during the term of the permit. Frequency may change if the chemical composition changes significantly.

- We request EPA to exempt us from doing any tests on the anticipated Flowback from acid stimulation jobs, if the acid volume is below the "Acid Volume Threshold (AVT)" as stipulated in SB4.

2. Part II F.1. Miscellaneous Discharges- Discharge No. 0023

Pipeline Preservation Fluids discharge has been added as new discharge to the permit. We recommend adding "Pipeline Preservation Fluids" to the definition section in Part v of the new permit. The same definition may be used as it is in the Fact Sheet.

3. Fact Sheet Table 1 and Permit Appendix B- Perform Specific Requirements for Produced Water

Table 1 Fact Sheet lists Water Quality Criteria for some of the s-VOC which are 100 times lower than the 2004 permit and 10 times less than EPA Test Method's "Method Detection Limit (MDL)". We recommend EPA to increase the level of the criteria to at least match the MDL value of EPA test method.

If you have any question, please call me at (805)535-2078

Sincerely,

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