To: Lawrence, Rob[Lawrence.Rob@epa.gov]
Cc: Chen, Isaac[Chen.Isaac@epa.gov]; Larsen, Brent[Larsen.Brent@epa.gov]; Shaikh, Taimur[Shaikh.Taimur@epa.gov]; Wooster, Richard[Wooster.Richard@epa.gov]
From: Schwab, Kay
Sent: Wed 9/13/2017 2:15:32 PM
Subject: FW: LOOP: Summary of Follow up Action Items

Rob,

FYI – as we discussed this morning…

K

From: Dwyer, Stacey
Sent: Thursday, September 07, 2017 2:47 PM
To: thardy@roedelparsons.com; ccoopergates@loopllc.com
Cc: Honker, William <honker.william@epa.gov>; Scott Guilliams <Scott.Guilliams@LA.GOV>; Jenniffer L. Sheppard <Jenniffer.Sheppard@LA.GOV>; Gillespie, David <Gillespie.David@epa.gov>; Hayes, Mark <hayes.mark@epa.gov>; Schwab, Kay <Schwab.Kay@epa.gov>; Bogdan, Silvia <bogdan.silvia@epa.gov>
Subject: LOOP: Summary of Follow up Action Items

Tim Hardy and Cassandra Cooper-Gates,

Thank you for coming to Dallas on Tuesday, September 5th to discuss the LOOP permit. I want to summarize a few items that were agreed to during our meeting:

1) A discussion of how the operations of LOOP are different from other petroleum reserve operations (how is the brine discharged by LOOP different from other brine discharges?). In other words, how is LOOP distinguishable from operations with seemingly similar discharges?

2) LOOP representatives indicated that LOOP has been conducting in-situ monitoring every 5 years. EPA requested a copy of the last in-situ monitoring report and a discussion of how this information demonstrates that LOOP has not been impacting aquatic life.

3) Biomonitoring results at Outfall 004- LOOP indicated that biomonitoring was performed at

a critical dilution of 7.6%. LOOP will provide the results and laboratory reports in which it passed the chronic test for *Menidia beryllina* (fish), and failed the chronic test for *Mysidopsis bahia* (shrimp).

Also, EPA would like to see a written explanation and the laboratory data regarding the determination of ionic imbalance as the cause of the failure of chronic biomonitoring as well as a discussion on the inappropriateness of the method and species used for the chronic test.

LOOP representatives agreed, and EPA intends, to have a follow up conference call within the next week or so.

If there are other documents that you believe would help provide a good justification for the permit conditions LOOP is requesting, please let us know during our follow up call.

Thank you,

Stacey B. Dwyer, P.E.

Associate Director

NPDES Permits & TMDLs Branch

U.S. EPA Region 6

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