To: Chen, Isaac[Chen.Isaac@epa.gov]
Cc: Larsen, Brent[Larsen.Brent@epa.gov]
From: Wilson, Scott
Sent: Wed 4/19/2017 5:06:27 PM
Subject: RE: LOOP comparison chart by Silvia

Thanks for sending this. I will check with Deborah, but my guess is that this will need to be sent up the line, since it is a major energy facility. As you hopefully know now, any new limits or monitoring for energy related facilities can be politically incorrect, without a strong rationale for what is the problem and how it is important to resolve the issue.

The paper states that there is an aquatic life impairment; however, it would be helpful if it said what the 303(d) list states as the suspected reason. Can it be attributed to high TDS in discharges? The paper gets into the weeds a bit much on WET issues without really saying what environmental problem is being attempted to be solved. The p[aper also doesn't offer much information on why the WET test is problematic. Is the TDS too high at the critical dilution that would normally be applied to discharges in this area in Louisiana? Including information on what was the calculated dilution and the TDS at that dilution would be helpful. It would be helpful if the paper stated information on water depth and what the issue was with CORMIX modeling that couldn't be resolved, and what mixing zone is normally applied to other discharges in this situation in Louisiana. What was the permittee asking for in modeling that wasn't realistic? Are there other facilities in Louisiana that could be cited to show how this one doesn't do stuff that others have to do?

This is a fairly old facility, so there needs to be an explanation for why if WET testing wasn't required in the previous permits but needs to be added now.

Scott Wilson

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Industrial Permits Branch

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From: Chen, Isaac
Sent: Wednesday, April 19, 2017 10:40 AM
To: Wilson, Scott <Wilson.Js@epa.gov>
Cc: Larsen, Brent <Larsen.Brent@epa.gov>
Subject: FW: LOOP comparison chart by Silvia

Scott,

FYI. Attached is a briefing sheet about brine discharge from LOOP. The briefing sheet also includes some TDS and flow information from two similar facilities in Texas. EPA set flow limits for those two Texas facilities to protect aquatic life and we may consider a similar approach to restrict brine discharge volume within a specific time frame.

Isaac

From: Schwab, Kay
Sent: Wednesday, April 19, 2017 9:16 AM
To: Chen, Isaac <Chen.Isaac@epa.gov>
Cc: Bogdan, Silvia <bogdan.silvia@epa.gov>
Subject: LOOP comparison chart by Silvia

Isaac,

Per your request,

K