To: Chen, Isaac[Chen.Isaac@epa.gov]
From: Wilson, Scott
Sent: Wed 4/19/2017 6:18:48 PM
Subject: RE: LOOP comparison chart by Silvia

Isaac:

All these energy permits will need to be briefed up to Headquarters, but I'm trying to be sure how high ones like this need to go. When the briefing happens, I strongly suggest giving a much more specific rationale on why any changes need to be made. In the case of LOOP, also expect to answer the question on why this permit was let lapse for four years.

However, the LOOP permit and the SPR permits are not relevant to pipeline brine discharges in the OCS general permit. The conditions, locations, and the fact that the SPR and LOOP discharges occur many times at a the same location make them very different than pipeline brine discharges under the OCS general permit.

For the pipeline brines, the OCS permit fact sheet didn't give any real rationale other than saying it's salty and we think it could cause toxic effects. Brent's explanation yesterday that the brine is 10 to 100 times more salty than seawater didn't help the case. First, it is not possible for something to be 100 times more salty than seawater. That got Mike laughing and didn't help the Region's credibility. It would have been helpful to cite TDS data for the discharges and dispersion model results to show how much higher the TDS concentration is than seawater after dilution and whether that would be expected to exhibit toxic effects. There also wasn't any description of the discharges or that they would be short term discharges to which acute testing would be representative. That sort of factual explanation will be helpful in future briefings and will help to move these along in this rather adverse environment.

Scott Wilson

Energy Permitting Coordinator

Industrial Permits Branch

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1200 Pennsylvania Ave., NW

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From: Chen, Isaac
Sent: Wednesday, April 19, 2017 1:43 PM
To: Wilson, Scott <Wilson.Js@epa.gov>
Subject: RE: LOOP comparison chart by Silvia

Scott,

I sent that briefing sheet to you because we have proposed brine discharge WET testing in OCS GP. But, LOOP is also listed as high priority, Hqs may review it later.

From: Wilson, Scott
Sent: Wednesday, April 19, 2017 12:06 PM
To: Chen, Isaac <Chen.Isaac@epa.gov>
Cc: Larsen, Brent <Larsen.Brent@epa.gov>
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.

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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