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From: Schwab, Kay
Sent: Wed 3/11/2015 8:12:18 PM
Subject: LOOP
LA0049492 LOOP_Initial NPDES Permit_effective_050179.pdf
LA0049492 LOOP_NPDES Permit_effective_050285.pdf
LA0049492 LOOP_NPDES Permit_effective_051290.pdf

Hi Sonja,

We are continuing to follow up on the things discussed in our call on March 4, 2015, and hope to have more information in the next few weeks.

Just FYI, I am passing along some information that folks may not be aware of regarding the source of the "old studies."

The first attachment is LOOP's initial permit which became effective May 1, 1979. Part III, P. 25 of 26, under "Other Requirements," states:

"The Department of Transportation license requires studies prior to construction of outfall 004 to aid in making a final decision on location and potential adverse effects. EPA should receive the results of these studies as identified by Annex A, part (2) at least 90 days prior to any construction related to the brine outfall system.

Monitoring shall be conducted in accordance with the requirements of the U.S. Department of Transportation license (Annex A part 8) and the Louisiana Offshore Terminal Authority.

EPA shall be kept informed on monitoring plan development and results of such monitoring. If the monitoring plan proposed is judged by EPA to be inadequate to provide the needed information to evaluate environmental effects, this permit may be modified to require additional monitoring.

Unacceptable adverse impacts due to LOOP operations as revealed by the environmental monitoring required above may require that this permit be modified to alleviate such impacts."

The next two NPDES permits which were effective May 2, 1985 and May 12, 1990 (attached). Neither of these included any NPDES permit requirements for studies. (The next permit was not issued until 2003. This joint NPDES/LPDES permit became effective February 1, 2003).

Thanks,

K

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