Issue Paper

Honorable Mitch Landrieu, Mayor
City of New Orleans, Louisiana

Issue: Addition of monitoring requirements for brine water discharged at Outfall 004 in the joint EPA/LDEQ issued NPDES/LPDES permit, (LA0049492), Louisiana Offshore Oil Port (LOOP), LLC.

Message:

- Outfall 004 discharges into Subsegment 021102, the Gulf of Mexico, which is listed in the Final 2014 Integrated Report of Water Quality in Louisiana as not supporting one of its designated uses of fish and wildlife propagation (fishing).
- Maximum concentrations of brine discharge: chloride – 210,000 mg/l and TDS – 318,500 mg/l which may have potential to impact the designated uses of the waterbody. Seawater typically has a salinity of approximately 35,000 mg/l.
- EPA proposed a middle-ground option to LDEQ on September 22, 2016, to provide flexibility in gathering information regarding potential toxicity concerns for brine discharges at Outfall 004.

Background/Status:
LOOP has onshore oil storage at its Clovelly facility, which is 25 miles inland and connects to the port complex via a 48" pipeline. Naturally occurring salt domes provide 8 underground caverns which are used to store up to approximately 60 million barrels of crude oil. A sufficient supply of brine is critical to LOOP's operations to displace crude from the caverns when it is needed. Their brine discharge contains up to 210,000 mg/l chlorides and 318,500 mg/l of TDS while seawater typically has a salinity of approximately 35,000 mg/l. The existing wastewater permit expired September 30, 2013. LDEQ developed a draft permit and the facility commented on the draft permit, opposing the inclusion of biomonitoring requirements citing 1980/1981 studies conducted on effects of brine disposal. The inclusion of appropriate monitoring requirements at Outfall 004 in the LOOP, LLC permit is needed in order to support one of the receiving water's designated uses of fish and wildlife propagation (fishing). EPA proposed a middle-ground option to LDEQ on September 22, 2016, to provide flexibility in gathering information regarding potential toxicity concerns for brine discharges at Outfall 004.

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Issue: CLEAN HARBORS COLFAX, LLC Community Meeting

Message:

- The NPDES Permits and TMDLs Branch, along with other Region 6 representatives, participated in a community meeting in Alexandria, Louisiana, on November 17, 2016, in response to citizen concerns from the Central Louisiana Coalition for a Clean and Healthy Environment (CLCCHE).

Background/Status: Clean Harbors Colfax operates a hazardous waste treatment, storage, and disposal facility for the thermal treatment of reactive/explosive waste. The Louisiana Department of Environmental Quality (LDEQ) issued an Order to this facility on October 27, 2016, which in part, required the facility to immediately cease discharges from Outfall 001.

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