To: Kaspar, Paul[kaspar.paul@epa.gov]
From: Jenniffer L. Sheppard
Sent: Tue 4/8/2014 2:15:41 PM
Subject: RE: LOOP

Paul,

LOOP is a major facility that currently has biomonitoring established at Outfall 015 (cooling water). Upon review of the permit application, it was noted that the permittee stated that all pollutants were believed absent.

Please let me know what Claudia says...I'm certain we can work towards a solution that everyone will be happy with.

Jenniffer Sheppard
Louisiana Department of Environmental Quality
General and Industrial Water Permits
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-----Original Message-----
From: Kaspar, Paul [mailto:kaspar.paul@epa.gov]
Sent: Friday, April 04, 2014 4:05 PM
To: Jenniffer L. Sheppard
Cc: Schwab, Kay; Scott Guilliams; Hosch, Claudia
Subject: RE: LOOP

Jenniffer,

Thanks for passing along the information earlier this week. Just wanted to let you know that our technical folks still have some concerns regarding biomonitoring for the Brine Discharge. I'll be asking Kay to coordinate the input received, but I still need to speak with Claudia on the issue. She has been out of the office for the past couple weeks and will not return until Tuesday. I'm sure it'll be a busy day upon her Tuesday return, so I'll do my best to get this permit issue in front of her then.

A question for my education, since this is a major facility, wouldn't normal permitting procedures call for biomonitoring?

Anyway, wanted to keep you posted on where we were. Hope it's been a good week and hope you have a great weekend.

Paul Kaspar
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-----Original Message-----
From: Jenniffer L. Sheppard [mailto:Jenniffer.Sheppard@LA.GOV]
Sent: Tuesday, April 01, 2014 5:19 PM

To: Kaspar, Paul
Subject: LOOP

Paul,

In regard to the comment concerning the addition of toxicity requirements at Outfall 004, attached is a link (http://edms.deq.louisiana.gov/app/doc/view.aspx?doc=1928310&ob=yes) to the 1990 final permit (including the fact sheet) prepared by EPA for this facility. On page 26 of this document (under Biomonitoring and Aquatic Bioaccumlation), EPA stated that "no biomonitoring or aquatic bioaccumulation requirements are recommended". Therefore, no biomonitoring requirements have been added to this outfall since this determination was made.

As for Part II language requiring the facility to request approval prior to using oxygen scavengers at Outfall 004, language regarding this condition is already included in the preliminary draft permit (see Part I, page 3 - Footnote 2 and Part II, page 2 - Section J). However, the LDEQ is proposing to add language under the TMDL section of the fact sheet to address the Dissolved Oxygen (USEPA - IRC 5) suspected cause of impairment in Subsegment 021102 which will include wording related to the condition mentioned above. Below is the proposed language that will be added under the TMDL Section of the fact sheet for Outfall 004:

"Subsegment 021102, Barataria Basin Coastal Bays and Gulf Waters to the State 3 mile limit, is listed in LDEQ's Final 2010 Integrated Report as not supporting one or more of its designated uses; the suspected cause is Dissolved Oxygen (DO) (USEPA - Category 5) . This facility's permit includes a condition that requires pre-approval by LDEQ prior to using oxygen scavengers or corrosion inhibitors. If these additives were to be added to the discharges at this outfall, this facility could potentially contribute to the standards not being met for DO. Based on information provided by the facility, these additives have not been used at this outfall in over 20 years. The condition that requires pre-approval by the LDEQ prior to using these additives will be continued in the draft permit to ensure that the facility will not cause or contribute to the waterbody not meeting its standards. See Part I of the draft permit, page 3 (Footnote 2) and Part II of the draft permit, page 2 - Section J."

Please let me know if the items above will alleviate the issues we spoke about yesterday. If you guys are ok with this approach, we'll send over the replacement pages for the TMDL section that add the additional language provided above.

Jenniffer Sheppard
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