To: Larsen, Brent[Larsen.Brent@epa.gov]; Restivo, Angela[Restivo.Angela@epa.gov]
Cc: Perea, Suzanna[Perea.Suzanna@epa.gov]; Chen, Isaac[Chen.Isaac@epa.gov]; Bogdan, Silvia[bogdan.silvia@epa.gov]
From: Schwab, Kay
Sent: Tue 3/7/2017 8:29:40 PM
Subject: ACTION Items - for 3/8/17- 3/17/17

Brent,

The first three facilities were listed previously and I updated slightly. The 4th one is "new."

Thanks

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1) Louisiana Offshore Oil Port (LOOP), LLC, Deepwater Port Complex, (joint venture of Marathon Pipe Line LLC, Valero Terminaling and Distribution Company, and Shell Oil Company) (LPDES Permit No. LA0049492, AI No. 4634), The existing wastewater permit which was jointly issued by EPA & LDEQ expired September 30, 2013. EPA and LDEQ are continuing to work together on the proposed reissuance of the permit regarding appropriate permit requirements for brine discharges. This situation is similar to the Strategic Petroleum Reserves (SPR) under the U.S. Department of Energy, (Big Hill Oil Storage, TX0092827, and Bryan Mound Oil Storage, TX0074012) which EPA reissued in Nov. 2014. (Note: LDEQ included LOOP as an FY2017 "Priority Permit." If it cannot be issued in FY 2017, EPA R6 must get EPA HQs approval to "switch" to another Priority Permit Candidate which LDEQ can issue in FY2017 to meet our R6 commitment for End-of Year.) Next steps include an internal meeting on March 15, 2017, followed by a call with LDEQ later in March 2017. The joint LDEQ/EPA permit will be reissued ASAP.

2) INVISTA S.à.r.l., wholly-owned subsidiary of Koch Industries, (formerly duPont), Victoria County (TPDES Permit No. TX0006050, Texas State Permit No. WQ0000476000). EPA R6 issued an Interim Objection and Request for Additional Information to TCEQ on July 25, 2012. TCEQ finally responded in November 2016 with a revised proposed permit package and also provided corrected information in January 2017. EPA R6 is currently re-reviewing the old and new documentation and will issue *either*: 1) a Withdrawal of Interim Objection Letter, if the issues have been resolved, **or** 2) a Follow-up Letter (re: the original July 25, 2012 action), stating specifically what the remaining issues are and offering suggestions for resolution, if appropriate. Letter to be issued to TCEQ in late-March 2017.

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3) Cal-Maine Foods, Inc., Cal-Maine Farms Pine Grove Complex (LPDES Permit No.

LA0115894, AI No. 94326) An Interim Objection and Request for Additional Information was *drafted* for issuance on October 7, 2016; however, LDEQ requested that LDEQ and EPA continue to work informally to resolve EPA's concerns regarding this Concentrated Animal Feeding Operation (CAFO) of approximately 800,000 laying hens which produces poultry eggs. LDEQ anticipates sending a revised proposed permit package to EPA R6 in the near future. EPA anticipates that LDEQ has resolved the concerns and EPA R6 expects to issue a Letter with any final comments by late-March 2017.

4) City of Baton Rouge/Parish of East Baton Rouge Parish Municipal Separate Storm Sewer System (MS4), (LPDES Permit No. LAS000101, AI No.90427), owned or operated by Louisiana Department of Transportation and Development (District 61) (AI No. 113707), City of Central (AI No. 165591), Louisiana State University (LSU) (AI No. 113708), Southern University (SU) (AI No. 113710).

R6 is currently reviewing this preliminary permit and proposes to issue a letter to LDEQ regarding the proposed reissuance of the Louisiana Pollutant Discharge Elimination System (LPDES) permit by the regulatory due date of March 17, 2017. (EPA R6 also has ongoing enforcement action with this permittee.)