From: Jamie Phillippe
To: Schaub, Mike
Subject: RE: 2016 TR 304(a) Recommendations and TR website verbiage
Date: Wednesday, September 18, 2019 12:56:39 PM
Attachments: WQ097_FO.docx

Mike,
The attached version of proposed rule WQ097 is the cleanest version. In addition to the differences highlighted below, I found three more differences between the proposed rule and the one you reviewed that I missed:

1) Regarding WQS Variance language in LAC 33:IX.1109.E.1.c (page 13 of 90): The last sentence mentioning 401 WQC's was meant to be removed. It is the intention to keep WQS variance only with 402/LPDES permits. LDEQ Legal considers 401 WQC's non-permit actions, and WQS variances not applicable to them.
2) Regarding Chlordane in Table 1 (page 24 of 90): The brackish ALC criterion was missing a leading zero before the decimal point.
3) Regarding LAC 33:IX.1115.A.1 (page 35 of 90): The second sentence refers to language that was struck out. I've corrected it.

Please let me know if you have any questions.
Thanks,
Jamie

From: Schaub, Mike <Schaub.Mike@epa.gov>
Sent: Tuesday, September 17, 2019 11:24 AM
To: Jamie Phillippe <Jamie.Phillippe@LA.GOV>
Subject: RE: 2016 TR 304(a) Recommendations and TR website verbiage
Thanks Jamie. Let me take a look at everything and I'll get back to you with any questions.

Mike Schaub
Water Quality Standards Program
Water Division
US EPA Region 6-Dallas
214-665-7314

From: Jamie Phillippe <Jamie.Phillippe@LA.GOV>
Sent: Tuesday, September 17, 2019 9:16 AM
To: Schaub, Mike <Schaub.Mike@epa.gov>
Subject: 2016 TR 304(a) Recommendations and TR website verbiage
Mike,
I've attached files related to the 2016 TR. First is draft language for updating LDEQ's TR webpage. I'm waiting to hear from our regulation development section to determine whether anything else needs to be added to the webpage. I also need to coordinate (probably with Al) on getting the TR webpage updated.
Next is the 304(a) Recommendations document, describing all substances reviewed for the 2016 TR and the agency's actions. This document will have a link on the TR webpage prior to rulemaking/public comment.
Last is the final version of proposed rule WQ097. The only differences between this version and the one you commented on are found in Tables 1 and 1A. The biggest difference is no change to HHC values. I'm keeping the CAS#'s in Table 1 and added missing CAS#'s in Table 1A. Also in Table 1, I

added missing commas for two four digit criteria for consistency (bromoform brackish ALC (1,790) and tetrachloroethylene brackish ALC (1,020)).

After work on the BLM/Selenium QAPP and USGS Minerals project reaches a resting point, I'll draft up a Louisiana TR Process/Timeline guidance document. On the phone, I considered having the Report of Findings and 304(a) Recommendation documents being one and issued at the end of the TR cycle. Now, I believe these documents should be separate, with the 304(a) document and any remaining rules not completed during the TR cycle rounding out the process.

Please let me know if you have any questions on these documents.

Later this week, I may have something to pass by you and Russell concerning the USGS Mineral projects. As I understand it, chloride ALC is being looked at for revision and I'd like to know if there are any significant changes to the methodology; specifically, consideration of sodium and/or potassium cations.

Thanks,

Jamie