STATEMENT OF BASIS (AI No. 19147)

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0054712 to discharge to waters of the State of Louisiana.

THE APPLICANT IS: Hess Corporation
Cameron Offshore Support Base
Post Office Box 721
Cameron, Louisiana 70631

ISSUING OFFICE: Louisiana Department of Environmental Quality (LDEQ)
Office of Environmental Services
Post Office Box 4313
Baton Rouge, Louisiana 70821-4313

PREPARED BY: Michelle Bickham

DATE PREPARED: November 25, 2009

1. PERMIT STATUS

A. Reason For Permit Action:

Permit reissuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term

B. LPDES permits – LA0054712
LPDES permit effective date: July 1, 2004
LPDES permit expiration date: June 30, 2009

C. Date Application Received: June 19, 2009**

**The facility qualifies for coverage under the multi-sector general stormwater permit; however, as per a conversation on November 20, 2009, they wish to maintain coverage under their individual permit.

2. FACILITY INFORMATION

A. FACILITY TYPE/ACTIVITY - offshore support base

Hess Corporation, Cameron Offshore Base is an existing offshore support base. The facility ships materials for drilling operations offshore. The materials include, but are not limited to, casings, production chemicals, groceries, and other tubular items.

B. FEE RATE
1. Fee Rating Facility Type: minor
2. Complexity Type: II
3. Wastewater Type: III
4. SIC code: 1389

C. LOCATION - 631 Wakefield Road, Cameron, Cameron Parish
Latitude 29° 48' 52", Longitude 93° 20' 43"

3. OUTFALL INFORMATION

Outfall 001

Discharge Type: stormwater runoff
Treatment: none
Location: at the point of discharge from the northeast corner of the facility
Flow: intermittent
Discharge Route: Calcasieu Ship Channel

Outfall 002

Discharge Type: stormwater runoff
Treatment: none
Location: at the point of discharge from the northwest corner of the facility
Flow: intermittent
Discharge Route: Calcasieu Ship Channel

4. RECEIVING WATERS

STREAM - Calcasieu Ship Channel

BASIN AND SEGMENT - Calcasieu River Basin, Segment 030401

DESIGNATED USES -
a. primary contact recreation
b. secondary contact recreation
c. propagation of fish and wildlife
e. oyster propagation

5. TMDL STATUS

Subsegment 030401 is listed on LDEQ's Final 2006 303(d) list as impaired for fecal coliform. To date, a TMDL has not yet been developed for fecal coliform for this waterbody. A reopener clause will be established in the permit to allow for the requirement of more stringent limitations and requirements as imposed by a future TMDL. This facility is not expected to discharge pollutants which would further contribute to the fecal coliform impairment. Therefore, requirements for fecal coliform will not be placed in the permit.

Subsegment 030401 was previously listed as impaired for priority organics for which the below TMDL's have been developed. The Department of Environmental Quality reserves the right to impose more stringent discharge limitations and/or additional restrictions in the future to maintain the water quality integrity and the designated uses of the receiving waterbodies based upon additional TMDL's and/or water quality studies. The DEQ also reserves the right to modify or revoke and reissue this permit based upon any changes to established TMDL's for this discharge, or to accommodate for pollutant trading provisions in approved TMDL watersheds as necessary to achieve compliance with water quality standards.

The following TMDL's have been established for subsegment 030401:

The TMDL for Priority Organics was completed May 2002. The TMDL states that there were no permitted discharges of priority organics to the Lower Calcasieu Estuary and Ship Channel, and the two facilities that might discharge priority organics are located well away from the main channel. It stated that there was no evidence that priority organics are causing impairments upstream of this subsegment. It further stated that this subsegment should be delisted for priority organics. Additionally, this facility is not anticipated to discharge priority organics.

6. CHANGES FROM PREVIOUS PERMIT

- Visible Sheen has been removed from Outfalls 001 and 002.

7. COMPLIANCE HISTORY/COMMENTS

There have been no recent inspections at the facility. A DMR review was conducted for the last two years. All DMR's were submitted with the existing permit. One excursion was found as follows:

Date	Parameter	Outfall	Reported Value	Permit Limits
3/09	Oil & Grease	002	19.0 mg/L	15 mg/L

8. EXISTING EFFLUENT LIMITS

Outfalls 001 and 002 – stormwater runoff

Parameter	**LPDES Permit**
	Daily Max
Flow - gpd	Report 1/quarter Est.
TOC	50 mg/L 1/quarter Grab
Oil and Grease	15 mg/L 1/quarter Grab
pH	6.0 - 9.0 s.u. 1/quarter Grab
Visible Sheen	No Presence 1/day Observation

9. ENDANGERED SPECIES

The receiving waterbody, Subsegment 030401 of the Calcasieu River Basin is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U.S. Fish and Wildlife Service (FWS). This strategy was submitted with a letter dated November 17, 2008 from Rieck (FWS) to Nolan (LDEQ). Therefore, in accordance with the Memorandum of Understanding between the LDEQ and the FWS, no further informal (Section 7, Endangered Species Act) consultation is required. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. Therefore, the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat.

10. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the "Memorandum of Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits" no consultation with the Louisiana State Historic Preservation Officer is required.

11. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharge described in the application.

12. PUBLIC NOTICES

Upon publication of the public notice, a public comment period shall begin on the date of publication and last for at least 30 days thereafter. During this period, any interested persons may submit written comments on the draft permit and may request a public hearing to clarify issues involved in the permit decision at this Office's address on the first page of the statement of basis. A request for a public hearing shall be in writing and shall state the nature of the issues proposed to be raised in the hearing.

Public notice published in:

Local newspaper of general circulation

Office of Environmental Services Public Notice Mailing List

Rationale for Hess Corporation

1. **Outfalls 001 and 002** - stormwater runoff (estimated flow is intermittent)

Pollutant	Limitation		Reference
	Monthly Avg	Daily Max	
	Mg/L		
Flow	---	Report	*; previous permit
TOC	---	50	*; previous permit
Oil & Grease	---	15	*; previous permit
pH	6.0 s.u.	9.0 s.u.	*; previous permit

Treatment: none

Monitoring Frequency: quarterly at the point of discharge from both discharge points

Limits Justification: Limits and monitoring frequencies are based on current guidance for similar discharges from other facilities and the previous permit

* Existing permits for similar outfalls
su Standard Units

NOTE
For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls since the flow is variable and estimated.

STORM WATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT

An SWP3 is included in the permit because in accordance with LAC 33:IX.2511.A.1, storm water discharges shall not be required to obtain an LPDES permit "... except... discharges associated with industrial activity." In accordance with LAC 33:IX.2511.B.14.a-k, facilities classified as SIC code 1389 are considered to have storm water discharges associated with industrial activity.

For first time permit issuance, the SWP3 shall be prepared, implemented, and maintained within six (6) months of the effective date of the final permit. **For renewal permit issuance**, the SWP3 shall be reviewed and updated, if necessary, within six (6) months of the effective date of the final permit. The plan should identify potential sources of storm water pollution and ensure the implementation of practices to prevent and reduce pollutants in storm water discharges associated with industrial activity at the facility (see Narrative Requirements for the AI).