



# TERRITORIAL SEAS AND PRODUCED WATER DISCHARGES

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LOUISIANA DEPARTMENT OF ENVIRONMENTAL QUALITY  
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## Purpose

- I. Discuss comments received on the Minimum Study Requirements Presented in the 1<sup>st</sup> Stakeholders Meeting held on February 23, 2012 and changes as a result of these comments. (Jenniffer Sheppard)
- II. Discuss the timeline for issuance of the 1<sup>st</sup> LPDES permit with the new requirements. (Melvin Mitchell)
- III. Seek input from stakeholders on their plans for coordination/performing the study.



# I. Comments received on the Minimum Study Requirements Presented in the 1<sup>st</sup> Stakeholders Meeting held on February 23, 2012



# Summary of Comments Received on the Minimum Study Requirements

**LDEQ received 6 comments from 1 entity.**

- 1. The commenter was concerned that the study (including the Minimum Study Requirements and the subsequent industry design) documents should be “living” documents and allow for alterations if necessary.**
  - *LDEQ concurred with this assessment and has revised the Minimum Study Document to include a provision that states any changes to the study are subject to approval by LDEQ.*
  
- 2. The commenter requested the ability to respond to the Department after the study design has been submitted regarding acceptance/disapproval of the study design.**
  - *LDEQ concurred with this request and has added a provision to the Minimum Study Requirements to state that consultation with industry would be a part of the permitting process.*



## Summary of Comments Received on the Minimum Study Requirements

3. **The commenter was concerned that a potential outcome of the study may be that discharges of produced water are allowable, but that the Department's discharge limits should be amended. The commenter offered recommendations to the language to allow the facility time to alter their permit limits.**
  - *LDEQ concurred with this request and has revised the Minimum Study Document to include a provision that states that the facility will have 2 years left in the effectiveness of the permit after submission of the study results to LDEQ to either meet the appropriate discharge conditions or do away with the produced water.*
  
4. **The commenter has requested the ability to utilize the results from previous studies.**
  - *LDEQ concurred with this request and has added a provision to the Minimum Study Requirements to state that industry may propose the use of existing data for components of the study. However, the data must be consistent with the minimum study requirements and scientific justification shall be provided to show how the data is applicable/relevant to the territorial seas and that portion of the study.*



# Summary of Comments Received on the Minimum Study Requirements

5. **The commenter had concerns about what is considered typical edible tissue**
  - *Edible Tissue has been defined. See “edible tissue”, as described in Protocol for Issuing Public Health Advisories for Chemical Contaminants in Recreationally Caught Fish and Shellfish (LDHH, LDEQ, LDWF, and LDAF 2012).*
  
6. **The commenter has noted that it may be difficult to find the exact species listed in the scope of work Section (2.3).**
  - *LDEQ concurred with this comment and has added a statement to Section 2.3 that states the species listed in the chart are examples of what should be collected.*



# II. Timeline for Issuance of 1<sup>st</sup> LPDES Permit with Study Requirements



# Timeline for Issuance of 1<sup>st</sup> LPDES Permit

## TIMELINE GUIDANCE FOR LPDES PERMIT ISSUANCE - O&G PRODUCED WATER DISCHARGES

	April 1, 2012	A + 90 days (3 months) (*1)	A + 180 days (6 months) (*2)	A + 240 days (8 months)	A + 270 days (9 months)	A + 420 days (14 months)	A + 1320 days (44 months)				
Applications Due for Produced Water Dischargers. <b>EVENT COMPLETED</b>	Permit Public Notice - 1 <sup>st</sup> LPDES Draft Permit for Produced Water Discharges to (*1) <b>provided the application is technically complete and requires no additional information</b> - Stakeholder meeting held.	Permit Issued 1 <sup>st</sup> LPDES for Produced Water Discharges <b>(*2)provided no comments are received during public notice/public comment period</b>	Permit Effective 1 <sup>st</sup> LPDES for Produced Water Discharges	Study Design Submitted to LDEQ (Industry - Wide)	LDEQ Approve/Deny - Industry-Wide Study Design <b>Approval</b> of Industry-Wide Study Design means that produced water can continue to be discharged while the study is taking place <b>Denial</b> of Industry-Wide Study Design means that dischargers must cease discharging produced water immediately.	Regulated community submit study summary, results, and conclusion evaluating the ecological risk and human health assessment of produced water discharges in the territorial seas environment. <u>LDEQ will review the results of the study prior to making a decision on the permit renewals.</u> If the study does not support the discharge of produced water, the facility will have 2 years left in the effectiveness of the permit after the submission of the study results to LDEQ to do away with produced water discharges.					

**PLEASE NOTE: THIS TIMELINE IS FOR PLANNING PURPOSES ONLY AND WILL CHANGE**

**LEGEND**

A= Date Application is Administratively Complete (including IT analysis and all analytical data) - May 3, 2012

revised 5/25/12 - jls



# III. Input from Stakeholders on plans for coordination/performing the study



# Questions?

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