

## Plain Language Summary

JGE Gas Solutions, LP (CN604797068 ) operates the Longview Gas Plant (RN100237502), a natural gas compression, treating, and liquids recovery facility. The facility is located at 3407 Camp Switch Road, in Longview, Gregg County, Texas 75604.

JGE Gas Solutions, LP is requesting to renew authorization for discharges from Outfall 001 and Outfall 002, under the Texas Pollutant Discharge Elimination System (TPDES) program. As discussed with the TCEQ, JGE Gas Solutions, LP is additionally requesting to remove whole effluent toxicity (WET) requirements from the permit. The TCEQ's *EPA approved Procedures to Implement the Texas Surface Water Quality Standards* apply WET requirements to certain continuous discharges that have the potential to cause instream toxicity. Due to the very infrequent nature of the discharges at Longview Gas Plant (it is not uncommon that no discharges occur during a several month period), WET testing is not appropriate as these discharges do not appear to meet the "continuous" criterion. The major amendment application is being submitted to remove the WET limit.

Furthermore, the WET language in the current permit (TX0000485), requires increased frequency of testing requirements upon a test failure and the requirement to conduct a toxicity reduction evaluation (TRE) upon failure of subsequent WET tests. The TRE would require additional WET testing or other testing with conditions that would require a WET limit, chemical specific limit, or other controls at the conclusion of the TRE. This type of WET testing is not appropriate for very infrequent discharges, as effluent would not be available for increased testing and conducting a TRE. As previously mentioned, it is not uncommon that no discharges occur over a several month period.

In addition, JGE Gas Solutions, LP is requesting that the permit limit for "total residual chlorine" be changed to total chlorine. The facility does not discharge domestic wastewater, so it is believed that total chlorine would be more appropriate. In lieu of changing the permit limit, it is requested that a provision be added in the Other Requirements of the permit to allow for the testing of total chlorine to address the total residual chlorine limit. Due to the location of the facility, it is not possible to get a sample to a laboratory to test for total residual chlorine in a timely manner to meet the sample holding time. The facility can test for free chlorine or total chlorine onsite.

Discharges from the facility are expected to contain facility treated process water and stormwater. Sources of process water include backwashing of heat exchangers, condensed steam from heat tracing, and stormwater from heater treater containment. This is only a very small fraction of process water at the facility. Additionally, the facility releases water from the cooling tower. This process water, which consists of the cooling tower/boiler blowdown, engine/compressor drain, and process stormwater, is routed to one of two separators (north separator and south separator) which are equipped with oil belt skimmers to remove oil. The waste oil is routed to a waste oil tank and trucked offsite. Separated water is pumped to a saltwater tank for disposal as needed. Stormwater is collected in three ponds (Pond 001, 002, and 003) at the facility. Stormwater is usually evaporated in these ponds or pumped to the saltwater tank for disposal. Stormwater is occasionally released from the settlement ponds through two (2) outfalls (001 and 002).