NPDES PERMIT NO. OK0044865
STATEMENT OF BASIS

FOR THE DRAFT NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) PERMIT TO DISCHARGE TO WATERS OF THE UNITED STATES

APPLICANT

Southern Star Central Gas Pipeline
Superior Receipt Meter
1600 North 13th Street
Blackwell, OK 74631

ISSUING OFFICE

U.S. Environmental Protection Agency
Region 6
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PREPARED BY

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DATE PREPARED

March 12, 2014

PERMIT ACTION

It is proposed that the facility be issued a first-time NPDES permit for a 5-year term in accordance with regulations contained in 40 Code of Federal Regulations (CFR) 122.46(a).

40 CFR CITATIONS: Unless otherwise stated, citations to 40 CFR refer to promulgated regulations listed at Title 40, Code of Federal Regulations, revised as of March 7, 2014.

DOCUMENT ABBREVIATIONS

For brevity, Region 6 used acronyms and abbreviated terminology in this Statement of Basis document whenever possible. The following acronyms were used frequently in this document:

BAT	Best Available Technology Economically Achievable
BOD_5	Biochemical oxygen demand (five-day unless noted otherwise)
BPJ	Best professional judgment
CFR	Code of Federal Regulations
cfs	Cubic feet per second
COD	Chemical oxygen demand
COE	United States Corp of Engineers
CPP	Continuing Planning Process
CWA	Clean Water Act
DMR	Discharge monitoring report
ELG	Effluent limitation guidelines
EPA	United States Environmental Protection Agency
ESA	Endangered Species Act
F&WS	United States Fish and Wildlife Service
HT	Hydrostatic Testing
IP	Procedures to Implement the Oklahoma Surface Water Quality standards
mg/L	Milligrams per Liter (one part per million)
MGD	Million gallons per and Intrastate Surface Waters
MQL	Minimum quantification level
NPDES	National Pollutant Discharge Elimination System
OAC	Oklahoma Administrative Code
ODEQ	Oklahoma Department of Environmental Quality
O&G	Oil and grease
OWQS	Oklahoma Surface Water Quality Standards
OWRB	Oklahoma Water Resources Board
RP	Reasonable potential
SIC	Standard industrial classification
s.u.	Standard units (for parameter pH)
SWQB	Surface Water Quality Bureau
TMDL	Total maximum daily load
TRC	Total residual chlorine
TSS	Total suspended solids
µg /L	Micrograms per Liter (one part per billion)
WET	Whole effluent toxicity
WQMP	Water Quality Management Plan
WQS	Water Quality Standards

I. APPLICANT ACTIVITY

Under the SIC code 4922, Natural Gas Transmission, the applicant plans to operate a natural gas pipeline from the Wakita Compressor Station to the Ambrose Plant Station located approximately one mile west of the Blackwell Compressor Station, from 720 PSIG to 775 PSIG Maximum Allowable Operating Pressure. Hydrostatic test will be conducted along the entire 34.2 mile section of the pipeline.

The facility has an existing pipeline, Line N with residual hydrocarbons, which will be treated for increased levels of oil and grease using activated carbon filters. The facility will fill the existing Line N with approximately 2,640,000 gallons of water to perform wash and rinse operation prior to hydrostatic test. The hydrostatic test water will be passed through bay filters to remove suspended solids. The bag filters will be disposed of at an authorized disposal facility by the vendor. Carbon filters shall be treated by the vendor and the oil & grease recovered.

II. DISCHARGE LOCATION

As described in the application, there is one discharge location in the State of Oklahoma. The discharge point showing outfall number, discharge coordinates: latitude and longitude, county, average flow rate in millions gallons per day (MGD), receiving water, and the waterbody identification numbers are shown in the following table:

Outfall Reference Number	Discharge Coordinates Latitude Deg° Min' Sec" Longitude Deg° Min' Sec"	County	Average Flow MGD	Receiving Water	Waterbody ID #
001	36° 51' 50" N 97° 54' 38" W	Grant	2.88	Wakita Creek flows to Pond Creek, then to Salt Fork Arkansas River to Arkansas River to Mississippi River	OK621000050110_00

III. STREAM STANDARDS

The general criteria and numerical criteria which make up the stream standards are provided in the EPA-approved Oklahoma Water Quality Standards (Title 785, Chapter 45) promulgated by the Oklahoma Water Resources Board including all amendments which are effective as of July 1, 2013.

IV. DISCHARGE DESCRIPTION

The facility is up-rating a 34.2 miles section of the 26-inch Line N natural gas pipeline from the Wakita Compressor Station to the Ambrose Plant Station. The existing line will be hydrostatically tested in three sections. The hydrostatic discharge water will be treated and discharged approximately 1,600 feet southeast of the intersection of N2860 Road and Kay Road (E0100) near the dry creek bed of Wakita Creek. Discharges will go from the dry creek bed of Wakita Creek, approximately 6 miles prior to reaching the first water body at Pond Creek. Pond Creek travels 37 miles before flowing into the Salt Fork Arkansas River, traversing 67 miles further to the Arkansas River and flowing nearly 600 miles to the Mississippi River and out to the Gulf of Mexico.

Discharges from Outfall 001 are to receiving waters in waterbody identification number, OK621000050110_00, Wakita Creek, then to Pond Creek of the Upper Arkansas River Basin. The designated uses for waterbody identification number, OK621000050110_00 are Public and Private Water Supply (PPWS), Warm Water Aquatic Community (WWAC), Primary Body Contact Recreation (PBCR), Aesthetics, and Agriculture.

The facility provided an estimate of the daily maximum and average for some pollutants and is listed below:

Pollutants	Max Concentration, mg/l	Average Concentration, mg/l
Surfactants	0	0
Oil & Grease	15	<15
TRC	0.1	<0.1
TSS	45	<45
Benzene	0.050	<0.050
BTEX	20 µg/l	< 20 µg/l

V. TENTATIVE DETERMINATION

The EPA has made a tentative determination, after consultation with the ODEQ to issue a first – time permit to the applicant for the activities described.

VI. DRAFT PERMIT RATIONALE

The proposed effluent limitations for those pollutants proposed to be limited are based on regulations promulgated at 40 CFR 122.44. The draft permit limits are based on either technology-based effluent limits pursuant to 40 CFR 122.44(a), on best professional judgment (BPJ) in the absence of guidelines, and/or requirements pursuant to 40 CFR 122.44(d), whichever are more stringent.

A. REASON FOR PERMIT ISSUANCE

An NPDES Application for a Permit to Discharge (Form 1 & 2D) dated December 18, 2013, was received on December 27, 2013, and was deemed administratively complete on March 7, 2014. In an email dated March 4 & 6, 2014, an authorized representative of the facility submitted supplemental discharge information.

B. OPERATION AND REPORTING

The permittee must submit DMR’s quarterly, beginning on the effective date of the permit, lasting through the expiration date of the permit or termination of the permit, to report on all limitations and monitoring requirements in the permit.

C. TECHNOLOGY-BASED EFFLUENT LIMITATIONS/CONDITIONS

Regulations promulgated at 40 CFR122.44 (a) require technology-based effluent limitations to be placed in NPDES permits based on ELG's where applicable, on BPJ in the absence of guidelines, or on a combination of the two. There are no published ELG's for this type of activity. Permit limits are proposed based on BPJ. Since hydrostatic test water discharges are batch discharges of short term duration, limits in this Permit will be expressed in terms of daily maximum concentrations rather than in terms of mass limitations, as allowed by 40 CFR 122.45(e) and (f). Limitations for Oil & Grease, TSS, TOC and pH are proposed in the permit. The proposed limitation for TSS is 45 mg/l maximum, TOC is 50 µg/L, and Oil & Grease is 15 mg/l maximum. The draft permit will not propose mass limits since the flow is variable and intermittent. Concentration limits will be protective of the stream uses.

D. WATER QUALITY SCREENING

1. General Comments

The Clean Water Act in Section 301 (b) requires that effluent limitations for point sources include any limitations necessary to meet water quality standards. Federal regulations found at 40 CFR 122.44(d) state that if a discharge poses the reasonable potential to cause an in-stream excursion above a water quality criterion, the permit must contain an effluent limit for that pollutant. If the discharge poses the reasonable potential to cause an in-stream violation of narrative standards, the permit must contain prohibitions to protect that standard.

The narrative and numerical stream standards are provided in OWQS, as amended (OAC 785:45), and implementation criteria contained in OACs 785:46 and 252:690, promugated by the OWRB, effective as of July 1, 2013, and Department of Environmental Quality (DEQ), respectively. This is to ensure that no point-source will be allowed to discharge any wastewater which: (1) results in instream aquatic toxicity; (2) causes a violation of an applicable narrative or numerical state water quality standard; (3) results in the endangerment of a drinking water supply; or (4) results in aquatic bioaccumulation which threatens human health.

2. Reasonable Potential

EPA develops draft permits to comply with State WQS, and for consistency, attempts to follow OWQS, OWQS implementation criteria in OAC 785:46 and OAC 252:690, and the CPP document where appropriate. However, EPA is bound by the State's WQS, not State guidance, including the OWQS implementation, in determining permit decisions. EPA performs its own technical and legal review for permit issuance, to assure compliance with all applicable State and Federal requirements, including State WQS, and makes its determination based on that review.

In the RP screening process, the 95th percentile effluent concentration, or estimate thereof if the effluent data set is not sufficiently large to determine it directly, is used to compute an instream concentration according to the regulatory mixing zone equations defined in OAC 785:46. The computed instream concentrations are then compared with the applicable criteria to determine whether RP is exhibited. If RP is exhibited, in accordance with 40 CFR 122.44(d)(1)(vi) and OAC 252:690, a wasteload allocation and criterion long term average is computed for each applicable criterion. Water quality-based permit limitations are calculated for each pollutant

exhibiting RP for all applicable criteria. The most stringent of the resulting monthly average permit limitations is established in the draft permit for each pollutant requiring such limitations.

The applicant proposes to draw water from the City of Blackwell municipal water supply to conduct its hydrostatic testing. Line N is an existing pipeline with potential residual hydrocarbons. Hydrostatic test water will contact existing pipe, and no chemical additives will be put into the hydrostatic test discharge water, of approximately 2,600,000 gallons. As a result, no contaminants are expected to be present in the hydrostatic test water discharge at amounts that would pose a reasonable potential to exceed State WQS. Surfactants will be added in the wash water and disposed of at an approved facility.

The hydrostatic test water is to be discharged into another water body from which it was taken. As a result, intake credits are not authorized for all outfalls to account for in-situ waterbody conditions for only TSS.

3. Reasonable Potential-Calculations

a. pH

The daily minimum and daily maximum permit limits of 6.0 standard units to 9.0 standard units on hydrostatic test permits are developed by other EPA Regions and States. OAC 785:45-5-12(f)(3) states, "pH values shall be between 6.5 and 9.0 in waters designated for fish and wildlife propagation; unless pH values outside that range are due to natural conditions." The water quality–based daily minimum pH limit of 6.5 is more stringent than the technology-based daily minimum pH limit of 6.0 standard units. As a result, the Oklahoma Water Quality Based limits of 6.5 standard units to 9.0 standard units are established in the proposed permit.

b. Narrative Limitations

1. Aesthetic Standards

OWQS, OAC 785:45-5-12(f) (4) states that narrative protection for aesthetic standards will propose that surface waters shall be maintained so that oil, grease, or related residue will not produce a visible film or globules of grease on the surface or coat the banks or bottoms of the watercourse; or cause toxicity to man, aquatic life, or terrestrial life. A narrative condition prohibiting the discharge of any visible sheen of oil or globules of oil or grease will be included in the proposed permit. In addition, the technology-based limit of 15 mg/l for Oil and Grease should assure that the narrative criterion is maintained.

2. Public and Private Water Supplies (OAC 785:45-5-10)

Test water being discharged from hydrostatic testing should not contain substances listed in Raw Water Numerical Criteria (785:45-5-10(1)) and Water Column Criteria to protect for the consumption of fish, flesh and water (785:45-5-10(6)) at levels which would have reasonable potential to violate numerical criteria.

3. Fish and Wildlife Propagation (OAC 785:45-5-12)

Test water being discharged from hydrostatic testing should not contain substances listed in Toxic Substances (785:45-5-12(f)(6)) and Water Column Criteria to protect for the consumption

of fish, flesh and water (785:45-5-10(6)) at levels which would have reasonable potential to violate numerical criteria.

4. Agriculture/Livestock and Irrigation (OAC 785:45-5-13)

The levels of chloride, sulfate and total dissolved solids in the test water should be the same as in the receiving water. Hydrostatic testing should not result in significant increases in levels of chloride, sulfate or total dissolved solids in the test water above levels contained in the fill water.

5. Primary Body Contact Recreation (OAC 785:45-5-16)

Hydrostatic test wastewater should not contain coliform bacteria, Escherichia coli, and Enterococci at significant levels.

c. Benzene

Studies show that benzene is an appropriate BAT parameter representing the toxic hydrocarbons which may be present in hydrostatic test water discharges from existing natural gas pipelines. Studies also show that the daily maximum level of benzene representing BAT is selected as 50 µg/L. The ODEQ WQS standard for Benzene is 0.022 mg/l (22 µg/l). Since the ODEQ WQS is more stringent than the BAT, benzene limit of 22 µg/l is proposed in the draft permit.

d. BTEX

Benzene, toluene, ethylbenzene, and xylenes are among the hydrocarbons typically found in water contaminated by liquid or gaseous petroleum hydrocarbons. Hydrocarbon condensates left by the natural gas are the major source of toxic pollutants in hydrostatic test water discharges from existing natural gas pipelines. The daily maximum level of BTEX representing BAT is 100µg/l. The ODEQ does not have BTEX standard. As a result, a BTEX daily maximum limit of 100µg/l is proposed in the draft permit.

e. Total Residual Chlorine

The facility will obtain water from the City of Blackwell, Oklahoma. The chemical used to de-chlorinate the hydrostatic test water is sodium thiosulfate pentahydrate. After the discharge water is treated with sodium thiosulfate pentahydrate in a frac tank, the discharge water is pumped through sock filters and hydrocarbon filters.

TRC shall be limited to 0.019 mg/l in Outfall 001 because the source water is from a municipal source. 0.019 mg/l is EPA's acute criteria for chlorine. The ODEQ does not have TRC standard. The effluent shall contain NO MEASURABLE total residual chlorine (TRC) at any time. NO MEASURABLE will be defined as no detectable concentration of TRC as determined by any approved method established in 40 CFR 136.

E. TECHNOLOGY BASED VERSUS WATER QUALITY STANDARDS BASED EFFLUENT LIMITATIONS AND CONDITIONS

Following regulations promulgated at 40 CFR122.44(l)(2)(ii), 122.44(d), and 130.32(b)(6), the draft permit limits are based on either technology-based effluent limits pursuant to 40 CFR122.44(a), on the results of or on State Water Quality Standards and requirements pursuant

to 40 CFR122.44(d), or on the results of an established and EPA approved Total Maximum Daily Load (TMDL), whichever are more stringent.

Numerical water quality based limitations have been placed in the permit for pH, TRC, & benzene. Technology-based effluent limitations are established in the proposed draft permit for TSS, oil & grease, BTEX, & TOC. The permittee shall not discharge if Benzene, BTEX, & TOC limits cannot be met. Narrative standards for oil, grease, or related residue have has been placed in the proposed permit. A technology-based limit of 15 mg/l for Oil and Grease should assure that the narrative criterion is maintained.

F. WHOLE EFFLUENT TOXICITY LIMITATIONS

There are no chemical specific limitations in the draft permit and the applicant has stated that no chemical additives such as corrosion inhibitors are being added to the HT water. There does not appear that the discharge will have a potential for toxicity. The draft permit does not propose any biomonitoring of the HT water.

G. FINAL EFFLUENT LIMITATIONS

See the draft permit for limitations.

H. MONITORING FREQUENCY

Regulations require permits to establish monitoring requirements to yield data representative of the monitored activity 40 CFR 122.48(b) and to assure compliance with permit limitations 40 CFR 122.44(i)(1). The monitoring frequencies are based on BPJ, taking into account the nature of the discharge

For ALL outfalls, monitoring for flow, TSS, Oil & Grease, benzene, BTEX, TOC, and pH shall be daily by grab sample, when discharging. TRC shall be monitored daily by instantaneous grab sample.

VII. IMPAIRED WATER - 303(d) LIST AND TMDL

According to the 2012 edition of the 303(d) list of impaired waters, the receiving stream for Outfall 001, Wakita Creek, then to Pond Creek of the Upper Arkansas River Basin (OK621000050110_00) is not listed for any of the pollutants in current EPA-approved 303(d) list. Therefore, no additional requirements beyond the previously described technology-based or water quality-based effluent limitations and monitoring requirements, are established in the draft permit.

VIII. ANTIDEGRADATION

The Oklahoma Water Quality Standards, Antidegradation, OAC 785:45:3-1, sets forth the requirements to protect designated uses through implementation of the State WQS, OAC 785:46, Subchapter 13. There are no antidegradation restrictions listed in Appendix A of the OWQS for all the receiving waters to which the facility proposes to discharge (see Discharge Description in Section IV). As a result, no special requirements beyond Tier 1 protection (maintenance and

protection of designated uses, as herein described) are necessary as described in OAC 785:46, Subchapter 13, implementation of the state's antidegradation policy.

The limitations and monitoring requirements set forth in the proposed permit are developed from the State WQS and are protective of those designated uses. Furthermore, the policy sets forth the intent to protect the existing quality of those waters, whose quality exceeds their designated use. The proposed permit requirements are protective of the assimilative capacity of the receiving waters, which is protective of the designated uses of that water.

IX. ANTIBACKSLIDING

The proposed permit is a first-time issuance.

X. ENDANGERED SPECIES

The effects of EPA's permitting action are considered in the context of the environmental baseline. The environmental baseline is established by the past and present impacts of all Federal, State, or private actions and other human activities in an action area; the anticipated impacts of all proposed Federal projects in an action area that have already undergone formal or early ESA §7 consultation; and the impact of State or private actions that are contemporaneous with the consultation in process (50 CFR §402.02). Hydrostatic test water discharges occur after a pipeline has already been put in place following earth disturbing activities that have had to have received appropriate federal, state, and local authorizations putting the construction of pipeline itself into the environmental baseline. The scope of the evaluation of the effects of the discharge authorized by this permit was therefore limited to the effects related to the authorized discharge.

According to the most recent county listing available at US Fish and Wildlife Service (USFWS), IPAC-Information, Planning, and Conservation System Website http://ecos.fws.gov/ipac/, three species in Grant County are listed as Endangered or Threatened. These species are Least tern *(Sterna antillarum),* Whooping Crane (*Grus americana*), and Piping Plover *(Charadrius melodus.* Based on the following discussion, EPA has determined that the issuance of this permit will have no effect on these federally listed threatened or endangered species.

LEAST TERN *(Sterna antillarum)*

The Least tern populations have declined due to habitat destruction by permanent inundation, destruction by reservoir releases, channelization projects, alterations of Natural River or lake dynamics resulting in vegetational succession of potential nesting sites, and recreational use of potential nesting sites. Issuance of this permit is found to have no impact on the habitat of this species, as none of the aforementioned listed activities is authorized by this permitting action.

WHOOPING CRANE *(Grus americana)*

The tallest bird in North America, the Whooping Crane breeds in the wetlands of Wood Buffalo National Park in northern Canada and spends the winter on the Texas coast at Arkansas National Wildlife Refuge near Rockport. Cranes live in family groups made up of the parents and 1 or 2 offspring. In the spring, Whooping Cranes perform courtship displays (loud calling, wing flapping, and leaps in the air) as they get ready to migrate to their breeding grounds. Whooping

Cranes are endangered because much of their wetland habitat has been drained for farmland and pasture. Whooping Cranes are nearly 5 feet tall. They eat Blue crabs, clams, frogs, minnows, rodents, small birds, and berries. They are found in large wetland areas. Cranes are considered sacred in many parts of the world. In China, they are a symbol of long life.

The overall decline of whooping cranes has been attributed to habitat loss, direct disturbance and hunting by humans, predation, disease, and collisions with manmade features (CWS and USFWS 2005). The main threat to whooping cranes in the wild is the potential of a hurricane or contaminant spill destroying their wintering habitat on the Texas coast. Collisions with power lines and fences are known hazards to wild whooping cranes. The primary threats to captive birds are disease and parasites. Based on information available, EPA believes that this permit issuance will not affect the whooping crane.

PIPING PLOVER *(Charadrius melodus)*

A small plover has wings approximately 117 mm; tail 51 mm; weight 46-64 g (average 55 g); length averages about 17-18 cm. Inland birds have more complete breast band than Atlantic coast birds. The nonbreeding plovers lose the dark bands. In Laguna Madre, Texas, non-breeding home ranges were larger in winter than in fall or spring. The breeding season begins when the adults reach the breeding grounds in mid- to late-April or in mid-May in northern parts of the range. The adult males arrive earliest, select beach habitats, and defend established territories against other males. When adult females arrive at the breeding grounds several weeks later, the males conduct elaborate courtship rituals including aerial displays of circles and figure eights, whistling song, posturing with spread tail and wings, and rapid drumming of feet. The plovers defend territory during breeding season and at some winter sites. Nesting territory may or may not contain the foraging area. Home range during the breeding season generally is confined to the vicinity of the nest. Plovers are usually found in sandy beaches, especially where scattered grass tufts are present, and sparsely vegetated shores and islands of shallow lakes, ponds, rivers, and impoundments.

Food consists of worms, fly larvae, beetles, crustaceans, mollusks, and other invertebrates. The plovers prefer open shoreline areas, and vegetated beaches are avoided. It also eats various small invertebrates. It obtains food from surface of substrate, or occasionally probes into sand or mud.

Destruction of habitat, disturbance and increased predation rates due to elevated predator densities in piping plover habitat are described as the main reasons for this species' endangered status and continue to be the primary threats to its recovery. The remaining populations, whether on the breeding or wintering grounds, mostly inhabit public or undeveloped beaches. These populations are vulnerable to predation and disturbance.

Research of available material finds that the primary cause for the population decreases leading to threatened or endangered status for these species is destruction of habitat. Issuance of the permit will have no effect on this species, in that the discharge is not expected to contain these chemicals.

XI. HISTORICAL AND ARCHEOLOGICAL PRESERVATION CONSIDERATIONS

In a cover letter dated December 20, 2013, the permittee stated that the natural resource assessment for cultural and biological resources did not identify any significant environmental features near the discharge location. Therefore the issuance of the permit will have no impact on historical and/or archeological preservation.

XII. PERMIT REOPENER

The permit may be reopened and modified during the life of the permit if relevant portions of the Oklahoma WQS are revised or remanded. In addition, the permit may be reopened and modified during the life of the permit if relevant procedures implementing the WQS are either revised or promulgated. Should the State adopt a new WQS, and/or develop a TMDL, this permit may be reopened to establish effluent limitations for the parameter(s) to be consistent with that approved State standard and/or water quality management plan, in accordance with 40 CFR §122.44(d). Modification of the permit is subject to the provisions of 40 CFR §124.5.

XIII. VARIANCE REQUESTS

No variance requests have been received.

XIV. COMPLIANCE HISTORY

This is a first-time permit issuance.

XV. CERTIFICATION

The permit is in the process of certification by the Oklahoma Department of Environmental quality following regulations promulgated at 40 CFR 124.53. A draft permit and draft public notice will be sent to the District Engineer, Corps of Engineers; to the Regional Director of the U.S. Fish and Wildlife Service and to the National Marine Fisheries Service prior to the publication of that notice.

XVI. FINAL DETERMINATION

The public notice describes the procedures for the formulation of final determinations.

XVII. ADMINISTRATIVE RECORD

The following information was used to develop the proposed permit:

A. APPLICATION

NPDES Application for Permit to Discharge, Form 1 & 2D, dated December 18, 2013, and received on December 27, 2013 and was deemed administratively complete on March 07, 2014.

B. REFERENCES

"Implementation of the Oklahoma Water Quality Standards," Oklahoma Water Resources Board, Title 785, Chapter 46, https://www.owrb.ok.gov/util/rules/pdf_rul/current/Ch46.pdf effective as of July 1, 2013.

Implementation of Oklahoma Water Quality Standards in Permits, OAC 252:690, http://www.deq.state.ok.us/rules/690.pdf

Oklahoma Water Quality Standards, (Title 785, Chapter 45) promulgated by the Oklahoma Water Resources Board including all amendments which are effective as of July 1, 2013. http://water.epa.gov/scitech/swguidance/standards/upload/okwqs_chapter45.pdf

http://www.fws.gov/southwest/es/EndangeredSpecies/lists/ListSpecies.cfm

C. 40 CFR CITATIONS

Sections 122, 124, 125, 133, and 136

D. MISCELLANEOUS CORRESPONDENCE

Letter from Dorothy Brown, EPA, to Mr. Robert Bahnick, Vice President & Chief Operations Officer, Southern Star Central Gas Pipeline, Inc dated March 07, 2014, informing applicant that its' NPDES application received December 27, 2013, is administratively complete.

E-mails from Cindi Sedberry, Senior Account Manager at AECOM Environment to Maria Okpala, EPA, 3/04/2014 & 3/06/2014 on additional additional facility information.