STATEMENT OF BASIS ADDENDUM
LA0123790, AI 149858

1. **The Applicant Is:** Donald Farms, Inc.
907 Cheniere Drew Road
West Monroe, LA 71291

2. **Facility Type:** Alligator Farm and Processing Facility

3. **Application Received:** February 1, 2008; Revised Application Received September 30, 2008; Additional Information Received on November 13, 2008.

4. **Prepared By:** Molly McKean

5. **Date Prepared:** November 20, 2008

6. **Permit Type:** Issuance of LPDES permit LA0123790
LPDES Draft permit issued: April 28, 2008

7. **Changes to Statement of Basis :**

A. Part 2.A. Facility Information

Alligators are raised from egg to six feet in length. Adult alligators are fed a combination of chicken and commercial feed that is ground together on-site. Small alligators are fed a ground mixture of commercial feed and vitamin powder. Washwater from the grinder and food processing area is routed to the first pond in the treatment system via floor drains.

Alligators are processed for hides and meat onsite. The facility processes 520,000 lb/year live weight killed (LWK). Hides are pressure washed to deflesh, then soaked in a mixture of Clorox and salt. Salted hides are placed in wooden crates for shipment. Wastewater from the pressure washing operation is routed to the first pond via floor drains. Wash wastewater from feed carts and other equipment is routed to the first pond as well.

Wastewater from the alligator pens is piped into the first pond of the treatment system. The second cell of the system contains a discharge pipe that flows into an unnamed creek, thence into North Cheniere Creek. Note that the previous 3 cell system has been reworked into two deeper ponds. The facility has installed a land application system on adjacent forested land (south of the facility) owned by Donald Farms, Inc. A Best Management Practices (BMP) plan is currently under development with the Louisiana Department of Agriculture and Forestry (LDAF) for beneficial reuse of wastewater. The facility anticipates that all process wastewater will be utilized for irrigation purposes. However, this permit shall retain the outfall from the oxidation ponds as an emergency overflow. This permit shall include BMP plan minimum elements. The BMP plan itself shall be a working document maintained by Donald Farms Inc. This plan shall be available for review upon request.

On July 1, 2008 the effluent pipe from the septic tank was replaced with field lines. Therefore, sanitary wastewater is no longer discharged from this facility.

SIC Code 2011 has been added. Per LAC 33:IX.1319 the complexity for this SIC Code is II. However, the fee complexity points for this facility are set to 0 based on BPJ and other permitted facilities in this industry.

B. Part 3. Outfall Information

Outfall 001

Discharge Type:	washdown water from the alligator houses, feed preparation area, cart and vehicle washing area; ice machines and cooling system condensate, process wastewater from defleshing hides and processing meat for sale, and stormwater
Treatment:	2-cell oxidation pond system
Location:	at the point of discharge from the 2nd cell of the pond system, prior to mixing with any other waters
Flow:	81,000 GPD
Discharge Route:	an unnamed creek via local drainage; thence into North Cheniere Creek; thence into Cheniere Brake Lake

C. Part 6.B. Compliance History/Comments

1. March 20, 2008 – Compliance Order WE-C-07-0616 was issued. The facility was cited for discharging without a permit, ordered to submit an application to discharge, and given interim limits.

2. May 9, 2008 – A response to the above compliance order was submitted noting that the facility had submitted an LPDES permit application.

3. June 20, 2008 – A multimedia enforcement inspection was conducted as a follow up to Compliance Order WE-C-07-0616. The inspection noted numerous flies at the site, feed bags were being burned at the time of inspection, no samples were taken in May 08 (required by compliance order) and therefore no DMR was submitted, the ponds/effluent had odor, and there were solids in the receiving stream. Samples were taken at the time of inspection.

4. July 24, 2008 – A response to the above compliance order and inspection was submitted detailing a corrective action plan for the facility.

5. September 17, 2008 – An inspection was conducted in response to a complaint of poor air quality and excessive gnats/mosquitoes in a residential area. The inspector noted that there were few flies present at the time of inspection. There was an odor

from the primary cell of the treatment system. Upon follow up, the complainant insisted the facility was still discharging. The inspector returned to the facility on September 22, 2008. The old discharge pipe had been removed and no evidence could be found of a recent discharge. At the time of inspection, the water level was approx. 12" below the new overflow.

D. Changes to Rationale

This Revised Draft Permit proposes the following changes from the limitations and monitoring requirements put forth in the Draft Permit issued on April 28, 2008:

1. The wastewater description has been revised to include the discharge of wastewater from slaughtering of alligators, the processing of hides and meat for resale, vehicle washwater, and industrial stormwater. An Oil & Grease limit has been added.

2. BMP minimum elements and reporting/record-keeping requirements have been added to the narrative Part II Conditions of this permit to address the beneficial reuse/land application of wastewater from the oxidation pond treatment system.

3. Storm Water Pollution Prevention Plan requirements have been added based on the new SIC Code and inspector observations regarding severe housekeeping problems at the facility contributing to loading in the receiving stream.

Letters received during the comment period from the general public indicated that the facility was a concern to the surrounding community. Follow up inspections from the Enforcement Division of LDEQ and meetings with the facility's representatives determined that the facility was discharging process wastewater from skinning and cleaning of alligators in addition to the washwater from the alligator pens. The addition of this wastewater required the Revision of the Draft Permit.

Additionally, since the issuance of the Draft Permit the facility has decided to pursue a beneficial reuse/land application system that will ultimately result in the elimination of discharges to water of the State. The oxidation pond system has been enlarged to increase retention time. Irrigation systems have been purchased and installed on adjacent land owned by Donald Farms. Development of a BMP plan, including water and nutrient balance, is in progress. Permit conditions have been added to address the land application of wastewater from this facility. This permit does not authorize the land application of solids/sludge to any property. The facility proposes to reduce sludge volume by bacterial means and dispose of this material off-site.

Rationale for Donald Farms, Inc

1) **Outfall 001 -** washdown water from the alligator houses, feed preparation area, cart and ATV washing area; ice machines and cooling system condensate, process wastewater from defleshing hides and processing meat for sale, and stormwater (estimated flow is 81,000 GPD)

Pollutant	Discharge Limitations		Reference
	Monthly Avg (mg/L)	Daily Max (mg/L)	
Flow (GPD)	Report	Report	LAC 33:IX.2707.I.1.b
$CBOD_5$	25	40	(*1), (*3)BPJ
TSS	90	135	(*4), (*3), BPJ
Fecal Coliform colonies/100 ml	200	400	(*2), (*3), BPJ
Ammonia – Nitrogen	20	30	BPJ, (*3)
Oil & Grease	---	15	(*5), (*6)
pH	6.0 s.u. minimum	9.0 s.u. maximum	BPJ, (*2), (*3)

Treatment: two-cell oxidation pond
Monitoring Frequency: Monthly (when discharging)

Limits Justification:

40 CFR 451 does not apply to alligator farming operations. While 40 CFR 432 is applicable to the discharge of process water (washwater associated with defleshing hides and processing meat for sale), these mass-based limitations have not been applied in this permit. The new facility design calls for the oxidation ponds to function more as retention basins until the wastewater can be land applied. Outfall 001 is expected to discharge only during high rain events or during times when wastewater cannot be safely land applied. Therefore, the flow from Outfall 001 is expected to be highly intermittent and variable in nature. In cases where flow is variable, concentration limits have been deemed more appropriate for protection of the receiving waterbody.

Flow: Flow reporting is required by LAC 33:IX.2707.I.1.b.

$CBOD_5$, TSS: Limits are based on secondary treatment standards in LAC 33:IX.5905, BPJ, and similar, permitted facilities.

Fecal Coliform, pH: Limits are based on numerical criteria specified in LAC 33:IX.1113.C, BPJ, and similar, permitted facilities. The discharge from this facility is into a water body which has a designated use of Primary Contact Recreation and Secondary Contact Recreation.

According to LAC 33:IX.1113.C.5, the fecal coliform standards for this water body are 200 colonies/100 ml and 400 colonies/100 ml. The above fecal coliform limits are proposed through BPJ in order to ensure that the water body standards are not exceeded. Existing facilities have demonstrated an ability to comply with these limitations using presently available technology.

Ammonia-Nitrogen: Limit is based on similar, permitted facilities through BPJ. It has been included to prevent ammonia toxicity in the receiving stream.

Oil & Grease: An Oil & Grease limit is established based on LDEQ stormwater guidance and standard limits for vehicle washwater set forth in the Exterior Vehicle Wash General Permit. Additionally, this limit is intended to address residual alligator fats from hide pressure washing activities.

(*1) LAC 33:IX.5905
(*2) LAC 33:IX.1113.C
(*3) LA0102512, LA0111236 (permits for similar facilities)
(*4) Class I Sanitary General Permit
(*5) LDEQ's guidance on stormwater, letter dated 6/17/87, from J. Dale Givens (LDEQ) to Myron Knudson (EPA Region 6)
(*6) Exterior Vehicle Washwater General Permit, LAG750000

BPJ Best Professional Judgement
su Standard Units
GPD Gallons per Day

STORM WATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT

A 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 2011 are considered to have storm water discharges associated with industrial activity.

The SWP3 shall be prepared, implemented, and maintained within (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 the storm water discharges associated with industrial activity at the facility (see Narrative Requirements for the AI).

Part II Conditions

Best Management Plan (BMP) minimum elements and recordkeeping/reporting requirements have been added to the Other Conditions of this permit to address land application of wastewater at the facility.