STATEMENT OF BASIS (AI No. 3492)

for the draft modified Louisiana Pollutant Discharge Elimination System permit No. **LA0045942** to discharge to waters of the State of Louisiana.

THE APPLICANT IS: LBC Baton Rouge, LLC
Sunshine Terminal
1725 Highway 75
Sunshine, LA 70780

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

PREPARED BY: Lisa Kemp

DATE PREPARED: June 24, 2008

1. PERMIT STATUS

A. Reason For Permit Action:

Modification of an existing Louisiana Pollutant Discharge Elimination System (LPDES) permit to add Outfall 008, following regulations promulgated at LAC 33:IX.3105. In accordance with LAC 33:IX.3105.B.2, only those permit limitations and conditions pertaining to the draft modification(s) are open for public comment. This new outfall will be in the same service as Outfalls 003, 004, and 006 of the current permit. Outfall 008 will drain new Tank Farm G. LBC requests to include Outfall 008 with all Outfall 003, 004, and 006 sampling conditions and any other requirements.

B. LPDES permit - LPDES permit effective date: April 1, 2005
LPDES permit expiration date: March, 31, 2010
This permit was modified effective June 1, 2005 to reflect a reduced monitoring frequency for Outfall 002.
EPA has not retained enforcement authority.

C. Date Modification Request Received: March 10, 2008

2. FACILITY INFORMATION

A. FACILITY TYPE/ACTIVITY – petro/chemical bulk liquid storage and transfer facility

LBC Baton Rouge, LLC Sunshine Terminal is an existing bulk liquid storage terminal engaged in the storage and handling (loading/unloading) of miscellaneous liquid products. The facility is not a manufacturing or production facility. Products stored and handled at the facility include petrochemicals, petroleum/oils, acids, bases, pesticides, and others based on customer demand. The site consists primarily of above ground storage tanks and loading/unloading facilities. Products are transferred in and out of the facility via trucks, railcars, barges, and ships. The facility operates two boilers for steam generation but does not have cooling towers. The facility does not own the products that it stores and handles, nor does it own the trucks, railcars, or marine vessels involved in

product transportation. Water discharged from the facility includes stormwater, sanitary wastewater, steam condensate, maintenance cleaning/utility water, hydrostatic test water, and boiler blowdown. See Attachment A of the current permit for a list of products handled and/or stored at the facility.

B. FEE RATE – per 2004 statement of basis
   1. Fee Rating Facility Type: minor
   2. Complexity Type: II
   3. Wastewater Type: III
   4. SIC code: 4226

C. LOCATION - 1725 Highway 75 in Sunshine, Iberville Parish
   Latitude 30°17'21", Longitude 91°9'26"

3. PROPOSED MODIFICATIONS

1. Add Outfall 008 for discharges from the new Tank Farm G.
2. Modify the wastestream description and sample location for Outfall 007 (hydrostatic test waters) to include the new Tank Farm G.
3. BTEX testing language in Footnote 6 has been updated for Outfall 007.
4. Updated reporting requirements have been added to Outfall 007 – Footnotes 8 and 9.
5. Modify Part II, Paragraph N to include Outfall 008. See Part II, Modified Page 11 of the draft permit modifications.
6. Part II, Paragraph O, Discharge Monitoring Reports, has been updated per current guidance. See Part II, Modified Pages 17-18 of the draft permit modifications.

4. OUTFALL INFORMATION

Outfall 007

1. The wastestream description for Outfall 007 currently reads:

   Outfall 007 – the intermittent discharge of hydrostatic test water from Tank Farms A, B, C, D, E, or F

   The wastewater description for Outfall 007 has been changed to:

   Outfall 007 – the intermittent discharge of hydrostatic test water from Tank Farms A, B, C, D, E, F, or G

2. The sample location for Outfall 007 currently reads:

   Outfall 007 – at the point of discharge from the pipe or tank being tested prior to combining with Outfalls 001, 002, 003, 004, or 006

   The sample location for Outfall 007 has been changed to:

   Outfall 007 – at the point of discharge from the pipe or tank being tested prior to combining with Outfalls 001, 002, 003, 004, 006, or 008

3. Footnote 6 for Outfall 007 currently reads:

   (*6) Total BTEX shall be measured as the sum of benzene, toluene, ethylbenzene, ortho-xylene, meta-xylene, and para-xylene, as quantified by EPA methods 602, 624, 8020, or 8240.

   Footnote 6 has been changed to read:

   (*6) Total BTEX shall be measured as the sum of benzene, toluene, ethylbenzene, ortho-xylene, meta-xylene, and para-xylene, as quantified using the methods prescribed by the latest approved 40 CFR 136, Tables A - G.

4. Updated reporting requirements have been added to Outfall 007 in Footnotes 8 and 9.

   Monthly Average:

   (*8) The month with the highest average monthly flow shall be reported.

   Daily Maximum:

   (*9) The highest result from an individual hydrostatic test must be reported.

Outfall 008

Discharge Type:	stormwater from inside Tank Farm G and associated operational areas (*), stormwater runoff from areas outside of Tank Farm G, steam condensate, fire water from equipment testing, utility water, and previously monitored hydrostatic test water
Treatment:	none
Location:	at the point of discharge to the ditch, north of Tank Farm G, east of Outfall 004, prior to combining with the other waters
Flow:	intermittent
Discharge Route:	by ditch to Bayou Paul

(*) Operational areas include pump stations, truck, rail, and marine loading/unloading containment, waste storage, etc.

5. RECEIVING WATERS

STREAM - Bayou Paul (Outfall 008)

BASIN AND SEGMENT – Lake Pontchartrain Basin, Subsegment 040201

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

6. TMDL STATUS

Subsegment 040201, Bayou Manchac – Headwaters to the Amite River, is listed on LDEQ's Final 2006 303(d) List as impaired for Ammonia, Phosphorus, Nitrogen (Nitrate + Nitrite as N), organic enrichment/low DO, pathogen indicators, chlorides, sulfates, and tds. Organic enrichment/low DO and pathogen indicators are listed as impaired due to on-site treatment systems. Chlorides, sulfates, and tds are listed as impaired due to site clearance (land development or redevelopment). To date no TMDLs have been completed for this waterbody. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by a TMDL. Until completion of TMDLs for the Lake Pontchartrain Basin, those suspected causes for impairment which are not directly attributed to the petro/chemical bulk liquid storage and transfer facility point source category have been eliminated in the formulation of effluent limitations and other requirements of this permit. Additionally, suspected causes of impairment which could be attributed to pollutants which were not determined to be discharged at a level which would cause, have the reasonable potential to cause or contribute to an excursion above any present state water quality standard were also eliminated.

Outfall 008 has the potential to discharge pollutants associated with the ammonia, phosphorus, nitrogen, chlorides, sulfates, and TDS impairments because of the storage of various chemicals, and the potential for leaks and spills during the transfer of the product at the pumps, tanks and pipes. Report requirements for TKN, nitrates-nitrites, total phosphorus, chlorides and sulfates were established in the current permit for Outfalls 001, 003, 004, and 006. These report requirements have also been established for Outfall 008 since this outfall will be in the same service as Outfalls 003, 004, and 006 of the current permit. The reported values will be used in the TMDL study for this waterbody. Upon completion of the TMDL, the report requirement will either be deleted, or a limit will be set.

Outfall 008 has the potential to discharge pollutants associated with the organic enrichment/low DO impairment. The organic enrichment/low DO impairment shall be addressed through the TOC parameter.

7. PROPOSED EFFLUENT LIMITS

BASIS - See Rationale, Page 7

8. COMPLIANCE HISTORY/COMMENTS

A. OEC – There are no records of open, appealed, or pending OEC enforcement actions as of July 9, 2008.

Compliance History:

1. Leak of approximately 15 bbls of Carbon Black Oil on January 7, 2008 due to steam coil failure.
2. Leak of approximately 10 gallons of Vacuum Gas Oil on January 7, 2008, source not identified.
3. Leak of Hydraulic Oil (sheen only) on September 13, 2006 at the dock.

4. There were no records on file of any recent inspections.

B. DMR Review/Excursions – DMRs were reviewed from Jan, 2006 to March, 2008. No excursions were reported.

9. ENDANGERED SPECIES

The receiving waterbody, Subsegment 040201 of the Lake Pontchartrain 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 October 24, 2007 from Boggs (FWS) to Brown (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 will be from a facility expansion. The new tank area was undisturbed prior to the start of construction. LDEQ consulted with the State Historic Preservation Officer (SHPO) in a letter dated June 25, 2008 to determine whether construction-related activities could potentially affect sites or properties on or eligible for listing on the National Register of Historic Places. SHPO's response letter, received on July 18, 2008, stated that there is one recorded archaeological site, 16IV159, the Isaac Ellison site, located within the Sunshine Terminal property boundary. Further consultation was made with SHPO on July 31, 2008 to determine if this archeological site is located in the same area as the new construction. In an email dated August 22, 2008, LDEQ received notification from SHPO that there is no issue with this site.

11. TENTATIVE DETERMINATION

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to modify the permit to address changes to the discharges 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 LBC Baton Rouge, LLC

1. **Outfall 008** – stormwater from inside Tank Farm G and associated operational areas (*), stormwater runoff from areas outside of Tank Farm G, steam condensate, fire water from equipment testing, utility water, and previously monitored hydrostatic test water

   Outfall 008 will be in the same service as Outfalls 003, 004, and 006 of the current permit. Therefore, effluent limitations and monitoring requirements proposed for Outfall 008 will include all effluent limitations and monitoring requirements for Outfalls 003, 004, and 006 from the current LPDES permit LA0045942, which was effective on April 1, 2005.

Pollutant	Limitation Mo. Avg:Daily Max (mg/l)	Reference
Flow	Report:Report	**; current permit
TOC	---:50	**; current permit
Oil and Grease	---:15	**; current permit
TKN (*1)	---:Report	current permit; BPJ
Nitrate-Nitrite (*2)	---:Report	current permit; BPJ
Total Phosphorus (*3)	---:Report	current permit; BPJ
Chlorides (*4)	---:Report	current permit; BPJ
Sulfates (*5)	---:Report	current permit; BPJ
Total Phenols (*6)	---:500 ug/L	current permit; BPJ
pH	6.0 - 9.0 su	**; current permit
METALS		
Antimony (*7)	---:600 ug/L	current permit; BPJ
Arsenic (*7)	---:100 ug/L	current permit; BPJ
Beryllium (*7)	---:100 ug/L	current permit; BPJ
Cadmium (*7)	---:100 ug/L	current permit; BPJ
Chromium (*7)	---:150 ug/L	current permit; BPJ
Copper (*7)	---:500 ug/L	current permit; BPJ
Lead (*7)	---:150 ug/L	current permit; BPJ
Mercury (*7)	---:10 ug/L	current permit; BPJ
Nickel (*7)	---:500 ug/L	current permit; BPJ
Selenium (*7)	---:100 ug/L	current permit; BPJ
Silver(*7)	---:100 ug/L	current permit; BPJ
Thallium(*7)	---:100 ug/L	current permit; BPJ
Zinc (*7)	---:1000 ug/L	current permit; BPJ

Pollutant	Limitation	Reference
	Mo. Avg:Daily Max (mg/l)	
VOLATILE COMPOUNDS		
Acrolein (*7)	---:100 ug/L	current permit; BPJ
Acrylonitrile(*7)	---:100 ug/L	current permit; BPJ
Benzene(*7)	---:100 ug/L	current permit; BPJ
Bromoform(*7)	---:100 ug/L	current permit; BPJ
Carbon Tetrachloride(*7)	---:100 ug/L	current permit; BPJ
Chlorobenzene(*7)	---:100 ug/L	current permit; BPJ
Chlorodibromomethane(*7)	---:100 ug/L	current permit; BPJ
Chloroethane (*7)	---:100 ug/L	current permit; BPJ
2-Chloroethyl Vinyl Ether(*7)	---:100 ug/L	current permit; BPJ
Chloroform(*7)	---:100 ug/L	current permit; BPJ
Dichlorobromomethane (*7)	---:100 ug/L	current permit; BPJ
1,1-Dichloroethane(*7)	---:100 ug/L	current permit; BPJ
1,2-Dichloroethane(*7)	---:100 ug/L	current permit; BPJ
1,1-Dichloroethylene(*7)	---:100 ug/L	current permit; BPJ
1,2 Dichloroethylene (*7)	---:100 ug/L	current permit;BPJ
1,2-Dichloropropane(*7)	---:100 ug/L	current permit; BPJ
1,3-Dichloropropylene(*7)	---:100 ug/L	current permit; BPJ
Ethylbenzene (*7)	---:100 ug/L	current permit; BPJ
Methyl Bromide(*7)	---:100 ug/L	current permit; BPJ
Methyl Chloride(*7)	---:100 ug/L	current permit; BPJ
Methylene Chloride(*7)	---:100 ug/L	current permit; BPJ
1,1,2,2-Tetra-Chloroethane(*7)	---:100 ug/L	current permit; BPJ
Tetrachloroethylene(*7)	---:100 ug/L	current permit; BPJ
Toluene(*7)	---:100 ug/L	current permit; BPJ
1-2-Trans-Dichloroethylene(*7)	---:100 ug/L	current permit; BPJ
1,1,1-Trichloroethane(*7)	---:100 ug/L	current permit; BPJ
1,1,2-Trichloroethane(*7)	---:100 ug/L	current permit; BPJ
Trichlorethylene(*7)	---:100 ug/L	current permit; BPJ
Vinyl Chloride(*7)	---:100 ug/L	current permit; BPJ
Total Xylenes (*8)	---:100 ug/L	current permit; BPJ
ACID COMPOUNDS		
Phenol (*7)	---:100 ug/L	current permit; BPJ
2-Nitrophenol(*7)	---:100 ug/L	current permit; BPJ
4-Nitrophenol(*7)	---:100 ug/L	current permit; BPJ
2,4-Dinitrophenol(*7)	---:100 ug/L	current permit; BPJ
4,6-Dinitro-O-Cresol(*7)	---:100 ug/L	current permit; BPJ
P-Chloro-M-Cresol(*7)	---:100 ug/L	current permit; BPJ
Pentachlorophenol(*7)	---:100 ug/L	current permit; BPJ
p-Chlorophenol (*7)	---:100 ug/L	current permit; BPJ
2-Chlorophenol (*7)	---:100 ug/L	current permit; BPJ

Pollutant	Limitation Mo. Avg:Daily Max (mg/l)	Reference
ACID COMPOUNDS (cont.)		
2,4-Dichlorophenol (*7)	---:100 ug/L	current permit; BPJ
2,4,6-Trichlorophenol (*7)	---:100 ug/L	current permit; BPJ
2,4-Dimethylphenol (*7)	---:100 ug/L	current permit; BPJ
BASE/NEUTRAL COMPOUNDS		
1,2-Dichlorobenzene(*7)	---:100 ug/L	current permit; BPJ
1,2-Diphenylhydrazine(*7)	---:100 ug/L	current permit; BPJ
1,2,4-Trichlorobenzene(*7)	---:100 ug/L	current permit; BPJ
1,3-Dichlorobenzene(*7)	---:100 ug/L	current permit; BPJ
1,4-Dichlorobenzene(*7)	---:100 ug/L	current permit; BPJ
2-Chloronaphthalene(*7)	---:100 ug/L	current permit; BPJ
2,4-Dinitrotoluene(*7)	---:100 ug/L	current permit; BPJ
2,6-Dinitrotoluene(*7)	---:100 ug/L	current permit; BPJ
3,3-Dichlorobenzidine(*7)	---:100 ug/L	current permit; BPJ
3,4-Benzofluoranthene(*7)	---:100 ug/L	current permit; BPJ
4-Bromophenyl Phenyl Ether(*7)	---:100 ug/L	current permit; BPJ
4-Chlorophenyl Phenyl Ether(*7)	---:100 ug/L	current permit; BPJ
Acenaphthene(*7)	---:100 ug/L	current permit; BPJ
Acenaphthylene(*7)	---:100 ug/L	current permit; BPJ
Anthracene(*7)	---:100 ug/L	current permit; BPJ
Benzidine(*7)	---:100 ug/L	current permit; BPJ
Benzo (a) Anthracene(*7)	---:100 ug/L	current permit; BPJ
Benzo (a) Pyrene(*7)	---:100 ug/L	current permit; BPJ
Benzo, (g,h,i) Perylene(*7)	---:100 ug/L	current permit; BPJ
Benzo (k) Fluoranthene(*7)	---:100 ug/L	current permit; BPJ
Bis (2-Chloroethoxy) Methane(*7)	---:100 ug/L	current permit; BPJ
Bis (2-Chloroethyl) Ether(*7)	---:100 ug/L	current permit; BPJ
Bis (2-Chloroisopropyl) Ether(*7)	---:100 ug/L	current permit; BPJ
Bis (2-Ethylhexyl) Phthalate(*7)	---:100 ug/L	current permit; BPJ
Butyl Benzyl Phthalate(*7)	---:100 ug/L	current permit; BPJ
Chrysene(*7)	---:100 ug/L	current permit; BPJ
Dibenzo (a,h) Anthracene(*7)	---:100 ug/L	current permit; BPJ
Diethyl Phthalate(*7)	---:100 ug/L	current permit; BPJ
Dimethyl Phthalate(*7)	---:100 ug/L	current permit; BPJ
Di-N-Butyl Phthalate(*7)	---:100 ug/L	current permit; BPJ
Di-N-Octyl Phthalate(*7)	---:100 ug/L	current permit; BPJ
Fluoranthene(*7)	---:100 ug/L	current permit; BPJ
Fluorene(*7)	---:100 ug/L	current permit; BPJ
Hexachlorobenzene(*7)	---:100 ug/L	current permit; BPJ
Hexachlorobutadiene(*7)	---:100 ug/L	current permit; BPJ
Hexachlorocyclopentadiene(*7)	---:100 ug/L	current permit; BPJ
Hexachloroethane(*7)	-:100 ug/L	current permit; BPJ
Ideno (1,2,3-c,d) Pyrene(*7)	---:100 ug/L	current permit; BPJ

Pollutant	Limitation Mo. Avg:Daily Max (mg/l)	Reference
BASE/NEUTRAL COMPOUNDS (cont.)		
Isophorone(*7)	---:100 ug/L	current permit; BPJ
Naphthalene(*7)	---:100 ug/L	current permit; BPJ
Nitrobenzene(*7)	---:100 ug/L	current permit; BPJ
N-Nitrosodimethylamine(*7)	---:100 ug/L	current permit; BPJ
N-Nitrosodi-n-propylamine(*7)	---:100 ug/L	current permit; BPJ
N-Nitrosodiphenylamine(*7)	---:100 ug/L	current permit; BPJ
Phenanthrene(*7)	---:100 ug/L	current permit; BPJ
Pyrene(*7)	---:100 ug/L	current permit; BPJ
PESTICIDES/HERBICIDES		
Atrazine (*7)	---:100 ug/L	current permit; BPJ
Acetochlor (*7)	---:10 ug/L	current permit; BPJ
Alpha-Endosulfan(*7)	---:10 ug/L	current permit; BPJ
Beta-Endosulfan(*7)	---:10 ug/L	current permit; BPJ
Endosulfan Sulfate(*7)	---:10 ug/L	current permit; BPJ
Aldrin(*7)	---:10 ug/L	current permit; BPJ
Alpha-BHC(*7)	---:10 ug/L	current permit; BPJ
Beta-BHC(*7)	---:10 ug/L	current permit; BPJ
Gamma-BHC(*7)	---:10 ug/L	current permit; BPJ
Delta-BHC(*7)	---:10 ug/L	current permit; BPJ
Dieldrin(*7)	---:10 ug/L	current permit; BPJ
4,4'-DDE(*7)	---:10 ug/L	current permit; BPJ
4,4'-DDD(*7)	---:10 ug/L	current permit; BPJ
4,4'-DDT(*7)	---:10 ug/L	current permit; BPJ
Heptachlor(*7)	---:10 ug/L	current permit; BPJ
Endrin Aldehyde(*7)	---:10 ug/L	current permit; BPJ
Heptachlor Epoxide(*7)	---:10 ug/L	current permit; BPJ
Chlordane(*7)	---:10 ug/L	current permit; BPJ
Toxaphene(*7)	---:10 ug/L	current permit; BPJ
PCB-1242(*7)	(*9)	current permit; BPJ
PCB-1254(*7)	(*9)	current permit; BPJ
PCB-1221(*7)	(*9)	current permit; BPJ
PCB-1232(*7)	(*9)	current permit; BPJ
PCB-1248(*7)	(*9)	current permit; BPJ
PCB-1260(*7)	(*9)	current permit; BPJ
PCB-1016(*7)	(*9)	current permit; BPJ
2,3,7,8-TCDD (Dioxin)(*7)	---:5 ug/L	current permit; BPJ
Endrin(*7)	---:5 ug/L	current permit; BPJ

(*1) This parameter shall be monitored if any commodity that contains nitrogen compounds other than Nitrate-Nitrite has been handled and/or stored at the facility.

(*2) This parameter shall be monitored if any commodity that contains nitrates has been handled and/or stored at the facility.

(*3) This parameter shall be monitored if any commodity that contains phosphorus has been handled and/or stored at the facility.

(*4) This parameter shall be monitored if any commodity that contains chlorides has been handled and/or stored at the facility.

(*5) This parameter shall be monitored if any commodity that contains sulfates has been handled and/or stored at the facility.

(*6) This parameter shall be monitored if any commodity that contains phenolic compounds has been handled and/or stored at the facility.

(*7) This parameter shall be monitored if any commodity that contains that specific parameter has been handled and/or stored at the facility.

(*8) This parameter shall be monitored if any commodity that contains xylene compounds has been handled and/or stored at the facility.

(*9) There shall be no discharge of polychlorinated biphenyls (PCBs).

* Operational areas include pump stations, truck, rail, and marine loading/unloading containment, waste storage, etc.

** LDEQ's guidance on stormwater, letter dated 6/17/87, from J. Dale Givens (LDEQ) to Myron Knudson (EPA Region 6)

BPJ Best Professional Judgement
su Standard Units

Treatment: none

Monitoring Frequency: flow, TOC, oil and grease, and pH shall be monitored once per quarter.

Specified parameters must be monitored once per quarter while the commodities containing one or more of the specified chemicals are being handled and/or stored at the facility, and once a month for two months thereafter. If the effluent limitation is exceeded during either of these two additional monitoring periods, then monitoring shall continue once per month until the limit is met for two consecutive months at which time monitoring for this parameter shall cease.

Monitoring for parameters with a report only requirement, including Total Kjeldahl Nitrogen, Nitrate-Nitrite, Total Phosphorus, Chlorides, and Sulfates, is required once per year when Outfall 008 could have been potentially affected with the handling and/or storage of commodities containing one or more of the specified chemicals.

Only Flow, TOC, oil and grease, and pH shall be monitored if stormwater from non-diked areas is the only discharge.

Limits Justification: flow, TOC, oil and grease, and pH limits are based on the current permit and on LDEQ's guidance on stormwater, letter dated 6/17/87, from J. Dale Givens (LDEQ) to Myron Knudson (EPA Region 6).

Because the receiving stream, Subsegment 040201, is impaired for nitrogen, phosphorus, chlorides and sulfates, TKN, nitrate-nitrite, phosphorus, chlorides and sulfates reporting requirements were established in the current permit for discharges to Subsegment 040201 based on BPJ because of the storage and transfer of chemicals containing pollutants associated with these impairments, and the potential for leaks and spills during the transfer of the products. Outfall 008 will discharge to Subsegment 040201. Based on BPJ and the current permit, these reporting requirements are established for Outfall 008 because of the storage and transfer of chemicals containing pollutants associated with these impairments and the potential for leaks and spills during the transfer of the products. The reported values will be used in the TMDL study for these waterbodies. Upon completion of the TMDL, the report requirement will either be deleted, or a limit will be set.

The Total Phenols parameter is included in the permit modification, based on BPJ and the current permit, because the facility may handle and/or store commodities that contain phenolic compounds, and there is potential for leaks and spills during the transfer of the products. The effluent limit is based on current LDEQ practices.

Total Xylenes, 1,2 Dichloroethylene, Acetochlor, and Atrazine limits are based on the current permit, and by BPJ because of the potential for the facility to handle and/or store commodities containing these chemicals.

All other parameters are included in the permit based on BPJ and the current permit because of the potential for the facility to handle and/or store commodities containing metals, volatile compounds, acid compounds, base/neutral compounds and pesticides/herbicides, and because there is potential for leaks and spills during the transfer of the products. The effluent limitations are based on state empirical limitations and are consistent with current LDEQ practices for permitting stormwater with potential to discharge these types of pollutants.

This facility is not subject to Effluent Limitations Guidelines for Transportation Equipment Cleaning, 40 CFR Part 442, because, in accordance with 40 CFR 442.1.a, "this part applies to discharges resulting from cleaning the interior of tanks used to transport chemical, petroleum or food grade cargos" and 40 CFR 442.1.b, "This part is not applicable to… wastewaters resulting from cleaning the interiors of drums, intermediate bulk containers, or closed top hoppers." This facility does not clean tanks used to transport cargo.

BPJ Best Professional Judgement

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

The current permit includes a requirement for an SWP3 because there is a potential for stormwater contamination from processes including loading and unloading chemicals and area washdown. Tank Farm G shall be addressed in the SWP3 for this facility.