STATEMENT OF BASIS

as required by LAC 33:IX.3109, for draft **Louisiana Pollutant Discharge Elimination System Permit No. LA0123862; AI 156693; PER20080002** to discharge to waters of the **State of Louisiana** as per LAC 33:IX.2311.

The **permitting authority** for the Louisiana Pollutant Discharge Elimination System (LPDES) is:

Louisiana Department of Environmental Quality
Office of Environmental Services
P. O. Box 4313
Baton Rouge, Louisiana 70821-4313

I. **THE APPLICANT IS:** Northlake Environmental Engineering Services, Inc
Cypress Park
845 Galvez St.
Mandeville, LA 70448

II. **PREPARED BY:** Rachel Owens

DATE PREPARED: May 23, 2008

III. **PERMIT ACTION:** Issue LPDES permit LA0123862, AI 156693; PER20080002

LPDES application received: March 17, 2008

EPA has not retained enforcement authority.

IV. FACILITY INFORMATION:

A. The application is for the discharge of treated sanitary wastewater from a privately owned treatment works serving the Cypress Park Subdivision.

B. The permit application does not indicate the receipt of industrial wastewater.

C. The facility is located on the intersection of Park Dr. and Sherwood Dr. in Mandeville, St. Tammany Parish.

D. The treatment facility consists of a 120,000 GPD extended aeration treatment plant with disinfection by chlorination.

E. Outfall 001

Discharge Location: Latitude 30° 18' 38" North
Longitude 89° 54' 14" West

Description: treated sanitary wastewater

Expected Flow: 300 of homes x 400 gallons/day/home = 0.12 MGD

Calculations for gallons per day were based upon figures obtained from Chapter 15 of the State of Louisiana Sanitary Code, Department of Health and Hospitals, Office of Public Health.

V. RECEIVING WATERS:

The discharge is into the Cypress Bayou, thence into Bayou Lacombe in segment 040902 of the Lake Pontchartrain Basin. This segment is listed on the 303(d) List of impaired waterbodies.

The designated uses and degree of support for Segment 040902 of the Lake Pontchartrain Basin are as indicated in the table below[1/]:

Degree of Support of Each Use						
Primary Contact Recreation	Secondary Contact Recreation	Propagation of Fish & Wildlife	Outstanding Natural Resource Water	Drinking Water Supply	Shell fish Propagation	Agriculture
Not Supported	Full	Not Supported	Full	N/A	N/A	N/A

[1/]The designated uses and degree of support for Segment 040902 of the Lake Pontchartrain Basin are as indicated in LAC 33:IX.1123.C.3, Table (3) and the 2004 Water Quality Management Plan, Water Quality Inventory Integrated Report, Appendix A, respectively.

VI. ENDANGERED SPECIES:

The receiving waterbody, Subsegment 040902 of the Lake Ponchartrain Basin, has been identified by the U.S. Fish and Wildlife Service (FWLS) as habitat for the Gulf sturgeon, which is listed federally as a threatened species. However, this type of discharge is not listed in Section II.2 of the Implementation Strategy as requiring consultation with the U. S. Fish and Wildlife Service (FWS). 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. It was determined that the issuance of the LPDES permit is not likely to have an adverse effect on any endangered or candidate species or the critical habitat. The effluent limitations established in the permit ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat.

VII. HISTORIC SITES:

The discharge will be from a proposed facility. LDEQ has consulted with the State Historical Preservation Officer (SHPO) in a letter dated March 20, 2008, to determine whether construction-related activities could potential affect sites or properties on or eligible for listing on the National Register of Historic Places. SHPO's response letter, dated April 14, 2008, stated that the facility as proposed will have no potential effects.

VIII. PUBLIC NOTICE:

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

Effluent Characteristic	Monthly Avg. (lbs./day)	Monthly Avg.	Weekly Avg.	Basis
TSS	5	5 mg/l	10 mg/l	Best Professional Judgement (BPJ) based on the letter from Ferguson (EPA) to Region 6 Program Managers dated 1/06/03
Ammonia-Nitrogen	2	2 mg/l	4 mg/l	Best Professional Judgement (BPJ) based on the letter from Ferguson (EPA) to Region 6 Program Managers dated 1/06/03
Dissolved Oxygen	---	5.0 mg/l	N/A	Best Professional Judgement (BPJ) based on the letter from Ferguson (EPA) to Region 6 Program Managers dated 1/06/03

**This Dissolved Oxygen limit is the lowest allowable average of daily discharges over a calendar month. When monitoring is conducted, the Dissolved Oxygen shall be analyzed immediately, as per 40 CFR 136.3.

Other Effluent Limitations:

1) **Fecal Coliform**

The discharge from this facility is into a water body which has a designated use of Primary Contact Recreation. According to LAC 33:IX.1113.C.5.b.i, the fecal coliform standards for this water body are 200/100 ml and 400/100 ml. Therefore, the limits of 200/100 ml (Monthly Average) and 400/100 ml (Weekly Average) are proposed as Fecal Coliform limits in the permit. These limits are being proposed through Best Professional Judgement in order to ensure that the water body standards are not exceeded, and due to the fact that existing facilities have demonstrated an ability to comply with these limitations using present available technology.

2) **pH**

According to LAC 33:IX.3705.A.1., POTW's must treat to at least secondary levels. Therefore, in accordance with LAC 33:IX.5905.C., the pH shall not be less than 6.0 standard units nor greater than 9.0 standard units at any time.

3) **Solids and Foam**

There shall be no discharge of floating solids or visible foam in other than trace amounts in accordance with LAC 33:IX.1113.B.7.

X. PREVIOUS PERMITS:

The discharge is from a new facility. There are no previously issued LPDES Permits

XI. ENFORCEMENT AND SURVEILLANCE ACTIONS:

A) Inspections

A review of the files indicates that no inspections have been performed at the proposed facility

For additional information, contact:

Ms. Rachel Owens
Water Permits Division
Department of Environmental Quality
Office of Environmental Services
P. O. Box 4313
Baton Rouge, Louisiana 70821-4313

IX. PROPOSED PERMIT LIMITS:

Subsegment 040902, Bayou Lacombe- Us Hwy 190 to Lake Pontchartrain, is listed on LDEQ's Final 2006 303(d) List as impaired for pathogen indicators and organic enrichment/ low DO. 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

Organic enrichment/ low DO

In accordance with a letter dated January 6, 2003, signed by Mr. Jack Ferguson of the US EPA to Region 6 State Program Managers, EPA considers facilities treating domestic sewage and designed to meet effluent limitations of 5/5/2/5 BOD_5/TSS/NH_3-N/DO, as meeting end-of-pipe water quality criteria for dissolved oxygen. The letter goes on to further state that a discharge meeting these effluent limits would maintain the minimum dissolved oxygen standard of 5 mg/L and therefore would not cause or contribute to the violation of water quality standards.

Pathogen Indicators

To protect the receiving waterbody against high levels of pathogenic organisms, fecal coliform limitations have been established in the permit.

Outstanding Natural Resource Water

Bayou Lacombe, Subsegment 040902, is a designated Outstanding Natural Resource Waterbody. In accordance with LAC 33:IX.111.G, this use designation applies only to Bayou Lacombe and not its tributaries or distributaries. Because the proposed discharge will be made into an unnamed ditch, thence into Cypress Bayou, this use designation does not apply.

Final Effluent Limits:

OUTFALL 001

Final limits shall become effective on the effective date of the permit and expire on the expiration date of the permit.

Effluent Characteristic	Monthly Avg. (lbs./day)	Monthly Avg.	Weekly Avg.	Basis
$CBOD_5$	5	5 mg/l	10 mg/l	Best Professional Judgement (BPJ) based on the letter from Ferguson (EPA) to Region 6 Program. Managers dated 1/06/03