STATEMENT OF BASIS

as required by LAC 33:IX.3109, for draft **Louisiana Pollutant Discharge Elimination System Permit No. LA0070769; AI 52350; PER20060001** 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:** Potpourri Village, Inc.
Potpourri Village
1000 Renaud Drive #98
Scott, LA 70583

II. **PREPARED BY:** Todd Franklin

DATE PREPARED: March 8, 2006

III. **PERMIT ACTION:** reissue LPDES permit LA0070769, AI 52350; PER20060001

A Minor Modification request was received on January 30, 2003, requesting that LPDES permit LA0070769 be transferred from Rene Mouton, Inc. to Eagle Gas, Inc. Eagle Gas, Inc. is now Potpourri Village, Inc.

LPDES application received: February 1, 2006

EPA has not retained enforcement authority.

LPDES permit issued: February 1, 2001
LPDES permit expired: January 31, 2006

IV. **FACILITY INFORMATION:**

A. The application is for the discharge of treated sanitary wastewater from a privately owned treatment facility serving the Potpourri Village Trailer Park.

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

C. The facility is located at 1000 Renaud Drive in Scott, Lafayette Parish.

D. The treatment facility consists of a package treatment plant including extended aeration, a sludge holding tank, a barscreen, and dual air blowers. Disinfection is by chlorination.

E. Outfall 001

Discharge Location: Latitude 30° 15' 18" North
Longitude 92° 3' 49" West

Description: treated sanitary wastewater

Average Expected Flow: 159 mobile homes @ 300 GPD each = 47,700 GPD
2 homes @ 400 GPD each = 800 GPD
10 employees @ 20 GPD each = 200 GPD
51 pupils @ 15 GPD each = 765 GPD

Total Expected Flow: 49,465 GPD

Type of Flow Measurement which the facility is currently using:

V-Notch Weir

V. RECEIVING WATERS:

The discharge is into a parish drainage ditch; thence into Coulee Mine; thence into the Vermilion River in segment 060801 of the Vermilion - Teche River Basin. This segment is not listed on the 303(d) list of impaired waterbodies.

The designated uses and degree of support for Segment 060801 of the Vermilion - Teche River Basin are as indicated in the table below[1/]:

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

[1/]The designated uses and degree of support for Segment 060801 of the Vermilion - Teche River 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 060801 of the Vermilion - Teche River 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 21, 2005, from Watson (FWS) to Gautreaux (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. 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 is from an existing facility location, which does not include an expansion beyond the existing perimeter. Therefore, there should be no potential effect to sites or properties on or eligible for listing on the National Register of Historic Places, and in accordance with the 'Memorandum of

Understanding for the Protection of Historic Properties in Louisiana Regarding LPDES Permits' no consultation with the Louisiana State Historic Preservation Officer is required.

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 modification 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

For additional information, contact:

Mr. Todd Franklin
Permits Division
Department of Environmental Quality
Office of Environmental Services
P. O. Box 4313
Baton Rouge, Louisiana 70821-4313

IX. PROPOSED PERMIT LIMITS:

Subsegment 060801; Vermilion River-Headwaters at Bayou Fusilier-Bourbeaux junction to New Flanders Bridge, Hwy. 3073; is not listed on LDEQ's Final 2004 303(d) list as impaired. However, subsegment 060801 was previously listed as impaired for phosphorus, nitrogen, organic enrichment/low DO, pathogen indicators, suspended solids/turbidity/siltation, and carbofuran, for which the below TMDLs have been developed. The Department of Environmental Quality reserves the right to impose more stringent discharge limitations and/or additional restrictions in the future to maintain the water quality integrity and the designated uses of the receiving water bodies based upon additional TMDLs and/or water quality studies. The DEQ also reserves the right to modify or revoke and reissue this permit based upon any changes to established TMDLs for this discharge, or to accommodate for pollutant trading provisions in approved TMDL watersheds as necessary to achieve compliance with water quality standards.

The following TMDL's have been established for subsegment 060801:

1999 Review and Assessment of the 1987 Vermilion River Watershed TMDL for Dissolved Oxygen

This TMDL re-established that NPDES permits for individual point sources in the Vermilion Watershed should continue to be issued on the basis of flow rates as follows:

FLOW RATE	PERMIT LIMITS
greater than 25,000 gpd	May – Dec.: 10 mg/l $CBOD_5$/5 mg/l NH_3-N/5 mg/l DO Jan.- April: 20 mg/l $CBOD_5$/10 mg/l NH_3-N/5 mg/l DO
25,000 gpd or less	secondary limits year round

Therefore, this discharge will be permitted accordingly.

Vermilion River TMDL for Fecal Coliform

The *Vermilion River TMDL for Fecal Coliform* was finalized on April 5, 2001, addressing the presence of pathogen indicators in the watershed. As per this TMDL, "...there will be no change in the permit requirements based upon a wasteload allocation resulting from this TMDL." Therefore, Fecal Coliform effluent limitations will remain in this permit.

TMDL for TSS, Turbidity, and Siltation for the 15 Subsegments in the Vermilion River Basin

As per the *TMDL for TSS, Turbidity, and Siltation for the 15 Subsegments in the Vermilion River Basin*, point source loads are so small as to be insignificant, and because effective policies are in place to limit TSS discharges, no specific reductions from point sources are required. Therefore, TSS limits will remain as previously permitted.

TMDL for the Pesticide Carbofuran in the Mermentau and Vermilion-Teche River Basins

The *TMDL for the Pesticide Carbofuran in the Mermentau and Vermilion-Teche River Basins* was finalized on March 21, 2002, and states no point sources are known to discharge Carbofuran; therefore, no allocation was given to point source discharges in the Vermilion-Teche River Basin.

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
$CBOD_5$				Limits are set in accordance with the *1999 Review and Assessment of the 1987 Vermilion River Watershed TMDL for Dissolved Oxygen.*
May – December	N/A*	10 mg/l	15 mg/l	
January – April	N/A*	20 mg/l	30 mg/l	
TSS				Limits are set through Best Professional Judgement (BPJ) in a manner consistent with technology based limits and the previous permit.
May – December	N/A*	15 mg/l	23 mg/l	
January - April	N/A*	20 mg/l	30 mg/l	
Ammonia-Nitrogen				Limits are set in accordance with the *1999 Review and Assessment of the 1987 Vermilion River Watershed TMDL for Dissolved Oxygen.*
May – December	N/A*	5 mg/l	10 mg/l	
January - April	N/A*	10 mg/l	20 mg/l	

Effluent Characteristic	Monthly Avg. (lbs./day)	Monthly Avg.	Weekly Avg.	Basis
Dissolved Oxygen**	---	5 mg/l	N/A	Limits are set in accordance with the *1999 Review and Assessment of the 1987 Vermilion River Watershed TMDL for Dissolved Oxygen.*

*Concentration limits are used in accordance with LAC 33:IX.2709.F.1.b which states that mass limitations are not necessary when applicable standards and limitations are expressed in other units of measurement. LAC 33:IX.709.B references LAC 33:IX.711 which express BOD_5 and TSS in terms of concentration.

**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**

The pH shall not be less than 6.0 standard units nor greater than 9.0 standard units at any time. (Limits as established through BPJ considering BCT for similar waste streams in accordance with LAC 33:IX.5905.C.).

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:

LPDES Permit No. LA0070769: Issued: February 1, 2001
Expired: January 31, 2006

Effluent Characteristic	Discharge Limitations		Monitoring Requirements	
	Daily Avg.	Daily Max.	Measurement Frequency	Sample Type
Flow	Report	Report	1/week	Measure

$CBOD_5$				
April-November	10 mg/l	15 mg/l	1/month	Grab
December-March	20 mg/l	30 mg/l	1/month	Grab
TSS				
April-November	15 mg/l	23 mg/l	1/month	Grab
December-March	20 mg/l	30 mg/l	1/month	Grab
Ammonia-Nitrogen				
April-November	5 mg/l	10 mg/l	1/month	Grab
December-March	10 mg/l	20 mg/l	1/month	Grab
Dissolved Oxygen	5 mg/l minimum		1/month	Grab
Fecal Coliform				
Colonies/100 ml	200	400	1/month	Grab
pH	Range (6.0 su – 9.0 su)		1/month	Grab

XI. ENFORCEMENT AND SURVEILLANCE ACTIONS:

A) Inspections

A review of the files indicates the following most recent inspection was performed for this facility.

Date – June 12, 2003
Inspector - LDEQ
Findings and/or Violations -

- Permit excursions were noted for dissolved oxygen during seven months of 2002. The minimum requirement for dissolved oxygen is 5.0 mg/l. The excursions are as follows:
  - February 2002 Result 4.7 mg/l
  - March 2002 Result 4.6 mg/l
  - May 2002 Result 4.9 mg/l
  - June 2002 Result 4.3 mg/l
  - July 2002 Result 4.8 mg/l
  - September 2002 Result 4.9 mg/l
  - December 2002 Result 4.9 mg/l

B) Compliance and/or Administrative Orders

A review of the files indicates that no recent enforcement actions have been administered against this facility.

C) DMR Review

A review of the discharge monitoring reports for the period beginning April 2003 through March 2005 has revealed the following violations:.

Parameter	Outfall	Period of Excursion	Permit Limit	Reported Quantity
DO, Monthly Avg.	001	April 2003	5.0 mg/l minimum	4.9 mg/l
DO, Monthly Avg.	001	May 2003	5.0 mg/l minimum	4.6 mg/l
Fecal Coliform, Monthly Avg.	001	May 2003	200 cfu/100 ml	>1,000 cfu/100 ml
Fecal Coliform, Weekly Avg.	001	May 2003	400 cfu/100 ml	>1,000 cfu/100 ml

DO, Monthly Avg.	001	June 2003	5.0 mg/l minimum	4.7 mg/l
DO, Monthly Avg.	001	July 2003	5.0 mg/l minimum	4.3 mg/l
DO, Monthly Avg.	001	August 2003	5.0 mg/l minimum	4.3 mg/l
NH_3-N, Monthly Avg.	001	August 2003	5 mg/l	16.6 mg/l
NH_3-N, Weekly Avg.	001	August 2003	10 mg/l	16.6 mg/l
DO, Monthly Avg.	001	September 2003	5.0 mg/l minimum	4.5 mg/l
DO, Monthly Avg.	001	November 2003	5.0 mg/l minimum	3.5 mg/l
DO, Monthly Avg.	001	January 2004	5.0 mg/l minimum	4.2 mg/l

XII. ADDITIONAL INFORMATION:

The Department of Environmental Quality reserves the right to impose more stringent discharge limitations and/or additional restrictions in the future to maintain the water quality integrity and the designated uses of the receiving water bodies based upon additional water quality studies and/or TMDLs. The DEQ also reserves the right to modify or revoke and reissue this permit based upon any changes to established TMDLs for this discharge, or to accommodate for pollutant trading provisions in approved TMDL watersheds as requested by the permittee and/or as necessary to achieve compliance with water quality standards. Therefore, prior to upgrading or expanding this facility, the permittee should contact the Department to determine the status of the work being done to establish future effluent limitations and additional permit conditions.

At present, the Monitoring Requirements, Sample Types, and Frequency of Sampling as shown in the permit are standard for facilities of flows between 0.02 and 0.10 MGD.

Effluent Characteristics	Monitoring Requirements	
	Measurement Frequency	Sample Type
Flow	1/week	Measure
$CBOD_5$	1/month	Grab
Total Suspended Solids	1/month	Grab
Ammonia-Nitrogen	1/month	Grab
Dissolved Oxygen	1/month	Grab
Fecal Coliform Bacteria	1/month	Grab
pH	1/month	Grab

XIII TENTATIVE DETERMINATION:

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to reissue a permit for the discharge described in this Statement of Basis.

XIV REFERENCES:

Louisiana Water Quality Management Plan / Continuing Planning Process, Vol. 8, "Wasteload Allocations / Total Maximum Daily Loads and Effluent Limitations Policy," Louisiana Department of Environmental Quality, 2005.

Louisiana Water Quality Management Plan / Continuing Planning Process, Vol. 5, "Water Quality Inventory Section 305(b) Report," Louisiana Department of Environmental Quality, 1998.

Louisiana Administrative Code, Title 33 - Environmental Quality, Part IX - Water Quality Regulations, Chapter 11 - "Louisiana Surface Water Quality Standards," Louisiana Department of Environmental Quality, 2004.

Louisiana Administrative Code, Title 33 - Environmental Quality, Part IX - Water Quality Regulations, Subpart 2 - "The LPDES Program," Louisiana Department of Environmental Quality, 2004.

Low-Flow Characteristics of Louisiana Streams, Water Resources Technical Report No. 22, United States Department of the Interior, Geological Survey, 1980.

Index to Surface Water Data in Louisiana, Water Resources Basic Records Report No. 17, United States Department of the Interior, Geological Survey, 1989.

LPDES Permit Application to Discharge Wastewater, Potpourri Village, Inc., Potpourri Village, February 1, 2006.