

**LPDES PERMIT NO. LA0124401 (Agency Interest No. 159541)****LPDES Statement of Basis****FOR THE DRAFT LOUISIANA POLLUTANT DISCHARGE ELIMINATION SYSTEM  
(LPDES) PERMIT TO DISCHARGE TO WATERS OF LOUISIANA**

- I. Company/Facility Name:** Petroplex International, L.L.C.  
Petroplex International, L.L.C. Tank Farm  
842 Main Street  
Baton Rouge, Louisiana 70802
- II. Issuing Office:** Louisiana Department of Environmental Quality (LDEQ)  
Office of Environmental Services  
Water Permits Division  
Post Office Box 4313  
Baton Rouge, Louisiana 70821-4313
- III. Prepared By:** Laketha Ferguson revised by Paula M. Roberts  
Industrial Water Permits Section  
Water Permits Division  
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- Date Prepared:** July 7, 2009
- IV. Permit Action/Status:**
- A. Reason for Permit Action:
- Proposed initial issuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term following regulations promulgated at LAC 33:IX.2365/40 CFR 122.46.
- B. LPDES permit: N/A, first time permit issuance
- C. Application submittal date: Application submitted on August 26, 2008.
- V. Facility Information:**
- A. Location – 1407 La. Hwy. 18 in Vacherie, Louisiana  
(Latitude 30°01'13", Longitude 90°42'08")
- B. Applicant Activity –
- According to the application, Petroplex International, L.L.C./Petroplex International, L.L.C. Tank Farm will supply a stable stock of petroleum commodities to serve local and regional refiners and distributors. Liquid

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commodities will be received and offloaded by barge, ship, rail, pipeline, and tanker trucks. The commodities will be stored in above ground storage tanks. The primary commodities to be stored and distributed will include gasoline, light crude oil, heavy crude oil, ethanol, light petroleum distillates, mid petroleum distillates, heavy residual oils, vegetable oil, and bio-diesel.

The facility infrastructure will include steam generating equipment used to heat viscous materials in tank and piping to sustain flow; a wastewater treatment system designed to treat industrial wastewater generated at the facility; a sanitary wastewater treatment unit and diesel powered internal combustion engines for back up power and pump capacity.

Tank draws, stormwater from equipment pads, maintenance washwater, ship/barge bilge, ballast and slop water, compressor condensate, steam condensate, facility tank wash water and other miscellaneous oily water streams that may be generated during equipment maintenance and operation will be stored in the facility "slop tank." This water will then be sent to the facility wastewater treatment tank. This wastewater will be routed to the stormwater retention pond and discharged to the Mississippi River via Outfall 001.

Boiler blowdown and steam condensate will be discharged through an internal outfall and routed to the stormwater retention pond and discharged to the Mississippi River via Outfall 001.

Hydrostatic test water from clean tanks will be discharged from the tank into internal ditches or pipes and routed to the stormwater retention pond where it will be pumped and discharged to the Mississippi River via Outfall 001.

Sanitary wastewater from bathrooms, showers, sinks and breakroom kitchens will be treated on-site and discharged through an internal outfall to the retention pond where it will be pumped and discharged to the Mississippi River via Outfall 001.

The facility will utilize a vapor recovery system to reclaim loading vapors and a thermal oxidizer will control air emissions of vapors not collected by the vapor recovery unit.

Stormwater from non process areas will be collected in a system of internal ditches within the facility and flow south towards Hwy. 3127. The internal ditch discharges to a ditch along Hwy. 3127 as it intersects a culvert running beneath Hwy. 3127. The culvert flows into Bayou Lassene and thence into Lac Des Allemands.

- C. Technology Basis - (40 CFR Chapter 1, Subchapter N, Effluent Guidelines and standards, Parts 401, 405-415 and 417-471 have been adopted by reference at LAC 33:IX.4903.

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Technology limitations in the draft permit are based upon best professional judgment (BPJ) and current office practices for similar discharges from LPDES General Permits LAG480000 and LAG670000.

### D. Fee Rate -

1. Fee Rating Facility Type: Minor
2. Complexity Type: II
3. Wastewater Type: III
4. SIC code: 5171, 4226

## VI. Receiving Waters: Mississippi River (Outfalls 001 and Internal Outfalls 101, 201, 301, and 401); Lac Des Allemands (Outfall 002)

A. River Basin and Subsegment: Mississippi, 070301

B. Designated Uses: primary contact recreation, secondary contact recreation, and fish and wildlife propagation, drinking water supply

A. River Basin and Subsegment: Barataria, 020202

B. Designated Uses: primary contact recreation, secondary contact recreation, and fish and wildlife propagation

## VII. Outfall Information:

### Outfall 001

- A. Type of wastewater – The intermittent discharge of tank draw wastewater, stormwater runoff from equipment pads, maintenance washwater, ship/barge bilge, ballast and slop water, compressor condensate, steam condensate, tank and equipment washwater, boiler blowdown and steam condensate, hydrostatic test wastewater and treated sanitary wastewater
- B. Location – At the point of discharge from the retention pond prior to combining with other waters (Latitude 30°01'17", Longitude 90°42'11")
- C. Treatment – none
- D. Flow – Intermittent, 310,000 GPD
- E. Receiving waters – effluent pipe, thence into the Mississippi River
- F. Basin and segment – Mississippi River Basin, Segment 070301

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### Internal Outfall 101

- A. Type of wastewater – The intermittent discharge of tank draw water from petroleum storage tanks, stormwater runoff from equipment pads, maintenance washwater, ship/barge bilge, ballast and slop water, compressor condensate, steam condensate and tank and equipment washwater
- B. Location – At the point of discharge from the last treatment unit prior to combining with other waters at Outfall 001 (Latitude 30°00'14", Longitude 90°41'42")
- C. Treatment – aerated biological activated sludge  
– solid settlement
- D. Flow – Intermittent, 140,000 GPD
- E. Receiving waters – effluent pipe, thence into the internal holding pond, thence into the Mississippi River via Outfall 001
- F. Basin and segment – Mississippi River Basin, Segment 070301

### Internal Outfall 201

- A. Type of wastewater – The intermittent discharge of boiler blowdown and steam condensate
- B. Location – At the point of discharge from three boilers thence into internal ditches prior to combining with other waters at Outfall 001 (Latitude 30°00'46", Longitude 90°41'51")
- C. Treatment – none
- D. Flow – Intermittent, 5000 GPD
- E. Receiving waters – effluent pipe, thence into the internal holding pond, thence into the Mississippi River via Outfall 001
- F. Basin and segment – Mississippi River Basin, Segment 070301

### Internal Outfall 301

- A. Type of wastewater – The intermittent discharge of hydrostatic test wastewater

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- B. Location – At the point of discharge from the piping or vessel being tested prior to combining with other waters at Outfall 001 (Latitude 30°00'52", Longitude 90°41'59")
- C. Treatment – none
- D. Flow – Intermittent, 150,000 GPD
- E. Receiving waters – Mississippi River via Outfall 001
- F. Basin and segment – Mississippi River Basin, Segment 070301

### Internal Outfall 401

- A. Type of wastewater – The intermittent discharge of treated sanitary wastewater
- B. Location – At the point of discharge from the last treatment unit prior to discharge into the internal holding pond and combining with other waters at Outfall 001 (Latitude 30°01'00", Longitude 90°42'00")
- C. Treatment – aerated biological activated sludge
  - solid settlement
  - disinfection
- D. Flow – Intermittent, 6000 GPD
- E. Receiving waters – effluent pipe, thence into the internal holding pond, thence into the Mississippi River via Outfall 001
- F. Basin and segment – Mississippi River Basin, Segment 070301

### Outfall 002

- A. Type of wastewater – The intermittent discharge of uncontaminated stormwater runoff from non-process areas for the entire site
- B. Location – At the point of discharge from the internal ditches within the facility prior to combining with other waters (Latitude 29°58'55", Longitude 90°41'13")
- C. Treatment – none
- D. Flow – Intermittent flow is variable

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- E. Receiving waters – into internal ditches, thence into the Parish drainage ditch, thence into Bayou Lasseigne, thence into Lac Des Allemands
- F. Basin and segment – Barataria Basin, Segment 020202

## VIII. Proposed Permit Limits and Rationale:

The following section sets forth the principal facts and the significant factual, legal, methodological, and policy questions considered in preparing the draft permit.

**Outfall 001** – Intermittent discharge of tank draw water from petroleum storage tanks, stormwater runoff from equipment pads, maintenance washwater, ship/barge bilge, ballast and slop water, compressor condensate, steam condensate and tank and equipment washwater, boiler blowdown and steam condensate, hydrostatic test wastewater and treated sanitary wastewater

Parameter	Proposed Permit Limitations		Monitoring Frequency
	Monthly Avg mg/L	Daily Max mg/L	
Flow	Report	Report	1/month
TOC	---	50 mg/L	1/month
Oil & Grease	---	15 mg/L	1/month
pH	6.0 s.u. (Min)	9.0 s.u. (Max)	1/month

### **EFFLUENT LIMITATIONS BASIS for Outfall 001:**

Flow - The requirement to report flow is based upon LAC 33:IX.2707.I.1.b.

TOC and Oil & Grease - Limitations are based upon BPJ in accordance with this Office's guidance on stormwater, letter dated 6/17/87, from J. Dale Givens (LDEQ) to Myron Knudson (EPA Region 6).

pH - Requirements are based upon LAC 33:IX.1113.C.1.

**Internal Outfall 101** – Intermittent discharge of tank draw water from petroleum storage tanks, stormwater runoff from equipment pads, maintenance washwater, ship/barge bilge, ballast and slop water, compressor condensate, steam condensate and tank and equipment washwater

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Parameter	Proposed Permit Limits		Monitoring Frequency
	Monthly Avg mg/L	Daily Max mg/L	
Flow	Report	Report	1/month
COD	----	125	1/month
TSS	----	45	1/month
Total BTEX	----	250 µg/L	1/month
Benzene	----	50 µg/L	1/month
Chlorides	----	500	1/month

**EFFLUENT LIMITATIONS BASIS for Outfall 101:**

Flow - The requirement to report flow is based upon LAC 33:IX.2707.1.1.b.

COD, TSS, Benzene, and Total BTEX: Limitations are based upon BPJ and office practices for permitting similar outfalls from LPDES General Permit LAG480000 for Light Commercial Facilities effective August 1, 2001.

Chlorides: Limitations are based upon BPJ and office practices for permitting similar discharges.

**Internal Outfall 201** – Intermittent discharge of boiler blowdown and steam condensate

Parameter	Proposed Permit Limitations		Monitoring Frequency
	Monthly Avg mg/L	Daily Max mg/L	
Flow	Report	Report	1/month
TOC	---	50 mg/L	1/month
Oil & Grease	---	15 mg/L	1/month

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**EFFLUENT LIMITATIONS BASIS for Outfall 201:**

Flow: The requirement to report flow is based upon LAC 33:IX.2707.1.1.b.

TOC and Oil & Grease - Limitations are based upon BPJ in accordance with this Office's guidance on stormwater, letter dated 6/17/87, from J. Dale Givens (LDEQ) to Myron Knudson (EPA Region 6).

**Internal Outfall 301** – Intermittent discharge of hydrostatic test wastewater

Parameter	Proposed Permit Limits		Monitoring Frequency
	Monthly Avg mg/L	Daily Max mg/L	
Flow	Report	Report	1/discharge event
TOC	----	50 mg/L	1/discharge event
TSS	----	90 mg/L	1/discharge event
Oil & Grease	----	15 mg/L	1/discharge event
pH	6.0 s.u.(min)	9.0 s.u.(max)	1/discharge event
Benzene	----	50 µg/L	1/discharge event
Total BTEX	----	250 µg/L	1/discharge event
Total Lead	----	50 µg/L	1/discharge event

**EFFLUENT LIMITATIONS BASIS for Outfall 301:**

Flow, TSS, Oil and Grease, and pH shall be measured on discharges from all new and existing pipelines, flowlines, vessels, or tanks. In addition, Total Organic Carbon (TOC) shall be measured on discharges from existing pipelines, flowlines, vessels, or tanks which have previously been in service; (i.e., those which are not new). Benzene, Total BTEX, and Total Lead shall be measured on discharges from existing pipelines, flowlines, vessels, or tanks which have been used for the storage or transportation of liquid or gaseous petroleum hydrocarbons.

Flow - This LPDES permit establishes a reporting requirement for monthly average flow and daily maximum flow once per event. These requirements are consistent with LAC 33:IX.2707.1.1.b and the LPDES General Permit for Hydrostatic Test Wastewater, LAG670000 effective February 1, 2008.

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TSS - This LPDES permit establishes a daily maximum limitation of 90 mg/L in accordance with LPDES General Permit for Hydrostatic Test Wastewater, LAG670000. The monitoring frequency is set at once per event by grab sample.

Oil & Grease - This LPDES permit establishes a daily maximum limitation of 15 mg/L in accordance with LPDES General Permit for Hydrostatic Test Wastewater, LAG670000. The monitoring frequency is set at once per event by grab sample.

Total Organic Carbon (TOC) - This LPDES permit establishes a daily maximum limitation of 50 mg/L in accordance with LPDES General Permit for Hydrostatic Test Wastewater, LAG670000. The monitoring frequency is set at once per event by grab sample.

Benzene, Total BTEX, and Lead - This LPDES permit establishes a daily maximum limitation of 50 g/L for Benzene, 250 g/L for Total BTEX, and 50 g/L for Lead in accordance with LPDES General Permit for Hydrostatic Test Wastewater, LAG670000. The monitoring frequencies are set at once per event by grab sample.

**Internal Outfall 401** – Intermittent discharge of treated sanitary wastewater

Parameter	Proposed Permit Limitations		Monitoring Frequency
	Monthly Avg mg/L	Weekly Avg mg/L	
Flow	Report	Report	1/6 months
BOD <sub>5</sub>	----	45	1/6 months
TSS	----	45	1/6 months
Fecal Coliform colonies/100 mL	----	400 *	1/6 months

\*Shall be reported as a daily maximum in lieu of a weekly average.

**EFFLUENT LIMITATIONS BASIS for Outfall 401:**

Flow: The requirement to report flow is based upon LAC 33:IX.2707.1.1.b.

BOD<sub>5</sub>, TSS, Fecal Coliform and pH: Limitations are based upon the LPDES Class I Sanitary General Permit (LAG530000) effective December 1, 2007.

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**Outfall 002 – Intermittent discharge of uncontaminated stormwater runoff**

Parameter	Proposed Permit Limitations		Monitoring Frequency
	Monthly Avg mg/L	Daily Max mg/L	
Flow	Report	Report	1/month
TOC	---	50 mg/L	1/month
Oil & Grease	---	15 mg/L	1/month
pH	6.0 s.u. (Min)	9.0 s.u. (Max)	1/month

**EFFLUENT LIMITATIONS BASIS for Outfall 002:**

Flow: The requirement to report flow is based upon LAC 33:IX.2707.I.1.b.

TOC and Oil & Grease: Limitations are based upon BPJ in accordance with this Office's guidance on stormwater, letter dated 6/17/87, from J. Dale Givens (LDEQ) to Myron Knudson (EPA Region 6).

pH: Requirements are based upon LAC 33:IX.1113.C.1.

**IX. Monitoring Frequencies:**

Monitoring frequencies for all outfalls are based upon office practices for similar discharges and applicable referenced general permits.

**X. Compliance History/DMR Review:**

This is a proposed facility; therefore, there is no current enforcement history available.

**XI. Endangered Species:**

The receiving waterbodies for Petroplex International, L.L.C./Petroplex International, L.L.C. Tank Farm are Subsegment 070301 of the Mississippi River Basin and Subsegment 020202 of the Barataria Basin. Segment 070301 of the Mississippi River Basin has been identified by the U.S. Fish and Wildlife Service (FWS) as habitat for the Pallid Sturgeon, which is listed as a threatened or endangered species. This draft permit has been submitted to the

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FWS for review in accordance with a letter dated November 17, 2008 from Rieck (FWS) to Nolan (LDEQ). As set forth in the Memorandum of Understanding between the LDEQ and the FWS, and after consultation with FWS, LDEQ has determined that the issuance of the LPDES permit is not likely to have an adverse effect upon the Pallid Sturgeon. Effluent limitations are established in the permit to ensure protection of aquatic life and maintenance of the receiving water as aquatic habitat. The more stringent of technology and water quality based limits (as applicable) have been applied to ensure maximum protection of the receiving water.

### **XII. Historic Sites:**

The discharge will be from a proposed facility. LDEQ has consulted with the State Historic Preservation Officer (SHPO) in a letter dated October 15, 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, dated September 25, 2008, states that there is one recorded archaeological site within the property boundaries. Their Office has requested that a Phase I survey be conducted to insure that no significant archaeological sites are impacted upon development. As a result of that survey, SHPO stated in a letter dated December 19, 2009, that the facility as proposed will have no potential effects, however, future development plans will require additional site assessment.

### **XIII. Tentative Determination:**

On the basis of preliminary staff review, the Department of Environmental Quality has made a tentative determination to issue a permit for the discharges described in the application.

### **XIV. Variances:**

No requests for variances have been received by this Office.

### **XV. 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.

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Public notice published in:

Local newspaper(s) of general circulation

Department of Environmental Quality Public Notice Mailing List

### **XV. TMDL Waterbodies:**

The Petroplex International, L.L.C./Petroplex International, L.L.C. Tank Farm proposes to discharge tank draw wastewater, uncontaminated stormwater runoff, tank and equipment washwater, boiler blowdown wastewater and steam condensate, hydrostatic test wastewater and treated sanitary wastewater into the Mississippi River (Segment 070301). Segment 070301 is not listed on LDEQ's 2006 Final Integrated Report as impaired, and to date no TMDLs have been established.

The facility also discharges uncontaminated stormwater runoff to Segment 020202 of the Barataria Basin. This segment is currently impaired for organic enrichment/low DO and non native aquatic plants. TMDLs for this segment were completed on March 31, 2005. This office has determined that due to the nature of the discharges from Petroplex International, L.L.C./Petroplex International, L.L.C. Tank Farm Outfall 002, there is no potential to discharge pollutants that could contribute to organic enrichment or non native aquatic plants at levels that could cause or contribute to further impairment of the receiving stream.

A reopener clause will be included in the permit to allow for the establishment of more stringent effluent limitations and requirements as imposed by any future TMDLs.

### **XVI. Stormwater Pollution Prevention Plan (SWP3) Requirements:**

In accordance with LAC 33:IX.2707.1.3 and 4 [40 CFR 122.44(I)(3) and (4)], a Part II condition is proposed for applicability to all storm water discharges from the facility, either through permitted outfalls or through outfalls which are not listed in the permit or as sheet flow. For first time permit issuance, the Part II condition requires a Storm Water Pollution Prevention Plan (SWP3) within six (6) months of the effective date of the final permit. For renewal permit issuance, the Part II condition requires that the Storm Water Pollution Prevention Plan (SWP3) be reviewed and updated, if necessary, within six (6) months of the effective date of the final permit. If the permittee maintains other plans that contain duplicative information, those plans could be incorporated by reference to the SWP3. Examples of these type plans include, but are not limited to: Spill Prevention Control and Countermeasures Plan (SPCC), Best Management Plan (BMP), Response Plans, etc. The conditions will be found in the draft permit. Including Best Management Practice (BMP) controls in the form of a SWP3 is consistent with other LPDES and EPA permits regulating

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similar discharges of stormwater associated with industrial activity, as defined in LAC 33:IX.2522.B.14 [40 CFR 122.26(b)(14)].

**XVII. Permit Reopener Clause**

The draft permit has incorporated a requirement for the permittee is to submit Items V and VI of LPDES application Form 2C no later than two years after the commencement of discharge from the proposed facility as per LAC 33:IX.2501.K.5.f. Upon submittal of the appropriate Items, LDEQ may choose to modify, or alternatively revoke and reissue this permit to change effluent limitations based on the actual reported flow or production. Additionally, the permit may be reopened to incorporate the results of any total maximum daily load allocation, which may be approved for the receiving water body.