STATEMENT OF BASIS

as required by LAC 33:IX.3109, for draft **Louisiana Pollutant Discharge Elimination System Permit No. LA0111686; AI 27679; PER20070002** 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:** Westin Services, L.L.C.
P.O. Box 205
New Llano, LA 71461

II. **PREPARED BY:** Eura DeHart

DATE PREPARED: June 25, 2008

III. **PERMIT ACTION:** Reissue LPDES permit LA0111686, AI 27679; PER20070002

LPDES application received: July 18, 2007

EPA has not retained enforcement authority.

LPDES permit issued: April 25, 2001
LPDES permit expired: April 30, 2006

IV. FACILITY INFORMATION:

A. The application is for the discharge of treated wastewater from the processing of sewage sludge by Westin Services, L.L.C. The facility will receive sewage sludge (including but not limited to domestic septage and port-o-let wastes) via pump trucks. The wastewater will undergo treatment in an oxidation pond. The solids will be stored for a maximum of six months prior to disposal at a permitted landfill. The facility receives 8,000-10,000 gpd of sewage sludge for processing which is discharged into the oxidation pond where it undergoes natural biodegradation. Per the application, the water collected in the pond exits the pond via evaporation.

The facility also handles grease trap waste. However, grease trap waste streams are not commingled with the sewage sludge wastewater stream and are not discharged to the oxidation pond. All grease trap wastes are sent offsite for disposal.

The facility also has one on-site mechanical sewage treatment plant, 500 gallons in capacity, which serves the office building. The effluent from this mechanical sewage treatment plant is discharged via field pipe onto the property. Per the application, none of the effluent from the mechanical sewage treatment plan is discharged offsite, into ditches, streams, or other water way or conveyance.

The previous permit for the facility contained two outfalls, Outfall 001 and Outfall 002. The facility has since constructed a new oxidation pond and does not discharge wastewaters associated with the grease trap operation. Therefore, Outfall 001 and Outfall 002 shall be terminated and Outfall 003 is authorized with the issuance of this permit.

B. The facility is located at 194 Ida Stephens Road in Leesville, Vernon Parish.

C. The treatment facility consists of an oxidation pond.

D. Outfall 003

Description: treated wastewater generated by the processing of sewage sludge

Estimated Flow: 0.01 MGD (based on volume received by the facility)

V. RECEIVING WATERS:

The facility is located within geographical boundaries of the Subsegment 110506 of the Sabine River Basin. This segment is not listed on the 303(d) list of impaired waterbodies.

The designated uses and degree of support for Subsegment 110506 of the Sabine River Basin are as indicated in the table below[1/]:

Overall Degree of Support for Segment 110506	**Degree of Support of Each Use**						
Full	Primary Contact Recreation	Secondary Contact Recreation	Propagation of Fish & Wildlife	Outstanding Natural Resource Water	Drinking Water Supply	Shell fish Propagation	Agriculture
	Full	Full	Full	N/A	N/A	N/A	N/A

[1/]The designated uses and degree of support for Subsegment 110506 of the Sabine River Basin are as indicated in LAC 33:IX.1123.C.3, Table (3) and the 2006 Water Quality Management Plan, Water Quality Inventory Integrated Report, Appendix A, respectively.

VI. ENDANGERED SPECIES:

The receiving waterbody, Subsegment 110506 of the Sabine 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 27, 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. 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 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. Eura DeHart
Water Permits Division
Department of Environmental Quality
Office of Environmental Services
P. O. Box 4313
Baton Rouge, Louisiana 70821-4313

IX. PROPOSED PERMIT LIMITS:

Final Effluent Limits:

OUTFALL 003

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.	Weekly Avg.	Basis
BOD_5	30 mg/l	45 mg/l	Limits are set through BPJ and are consistent with the Statewide Sanitary Effluent Limitations Policy (SSELP) for sewage treatment facilities of this size.
TSS	90 mg/l	135 mg/l	Since there is no numeric water quality criterion for TSS, and in accordance with the current Water Quality Management Plan, the TSS effluent limitations shall be based on a case-by-case evaluation of the treatment technology being utilized at a facility. Therefore, a Technology Based Limit has been established through Best Professional Judgement for the type of treatment technology utilized at this facility.

*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.

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.

4) **Priority Pollutants Threshold Values**

This Office has established the following list of priority pollutants with threshold limits intended as action levels. Should a substance exceed the established threshold limit, the permittee shall notify the Office of Environmental Compliance of the exceedence, in writing, within five (5) days. At this time, the facility shall institute a study to determine the source of the substance. Within sixty (60) days of written notification the permittee shall submit a written account of the nature of the study and the measures being taken to secure abatement. Failure to comply with any provision of this paragraph shall constitute a violation of this permit. The Department reserves the right to establish effluent limitations for any of the parameters listed below based upon the results of submitted analyses.

a. 40 CFR Part 136 Analytical Requirements

Unless otherwise specified in this permit, monitoring shall be conducted according to analytical, apparatus and materials, sample collection, preservation, handling, etc., procedures listed at 40 CFR Part 136 (in its entirety as per LAC 33:IX.2531, Subchapter N, Adoption by Reference) in effect on the effective date of this permit. Appendices A, B, and C to Part 136 are specifically referenced as part of this requirement. Amendments to 40 CFR Part 136 promulgated after the effective date of this permit shall supersede these requirement as applicable.

The permittee may use other EPA approved test methods that provide more sensitive test results than those referenced in the permit.

b. If any individual analytical test result is less than the minimum quantification level (MQL) listed below, a value of zero (0) may be used as the test result for those parameters.

c. Priority Pollutant List

Pollutant	Threshold Limit (ug/l)	MQL Required (ug/l)
Total Arsenic	100	10
Total Cadmium	100	1
Total Copper	500	10
Total Lead	150	5
Total Mercury	10	0.2
Total Molybdenum	50	10
Total Nickel (freshwater)	500	40
Total Selenium	100	2
Total Zinc	500	20

X. PREVIOUS PERMITS:

LPDES Permit No. LA0111686: Issued: April 25, 2001
Expired: April 30, 2006

Outfall 001:

Effluent Characteristic	Discharge Limitations		Monitoring Requirements	
	Monthly Avg.	Daily Max.	Measurement Frequency	Sample Type
Flow	Report	Report	1/3 months	Estimate
BOD_5	30 mg/l	45 mg/l	1/3 months	Grab
TSS	30 mg/l	45 mg/l	1/3 months	Grab
Oil & Grease	---	15 mg/l	1/3 months	Grab
pH	6.0 (min)	9.0 (max)	1/3 months	Grab

Outfall 002:

Effluent Characteristic	Discharge Limitations		Monitoring Requirements	
	Monthly Avg.	Daily Max.	Measurement Frequency	Sample Type
Flow	Report	Report	1/3 months	Estimate
BOD_5	30 mg/l	45 mg/l	1/3 months	Grab
TSS	90 mg/l	135 mg/l	1/3 months	Grab
Oil & Grease	---	15 mg/l	1/3 months	Grab
Fecal Coliform	200	400	1/3 months	Grab
pH	6.0 (min)	9.0 (max)	1/3 months	Grab

XI. ENFORCEMENT AND SURVEILLANCE ACTIONS:

A) Inspections

The most recent water permit related inspection was conducted at the facility on May 16, 2006. The following was noted:

"On 05/16/06, I conducted a compliance evaluation inspection (CEI) at Westin Services located at 189 Ida Stephens Road Leesville, Louisiana. The facility operates under individual permit, LA0111686, issued by the State of Louisiana Department of Environmental Quality. I met with the President of the facility, Rupert White.

The facility operates a port-o-let distribution and service center. The receiving waters for the facility's outfall is: local drainage, thence to Bayou Castor, thence to Anacoco Bayou, thence to Sabine River (B/S 110506).

Prior to the site visit a records review was conducted at the Southwest Regional Office (SWRO). The facility had no prior non-compliance issues. The facility has a four-cell oxidation pond for treatment of the sanitary wastewater from the port-o-lets.

A physical inspection of the facility was conducted. The facility previously had a three-cell oxidation pond. A fourth cell was added last summer at the request of the Department of Health and Hospitals and the Department of Environmental Quality to achieve final closure of the grease processing part of the facility. The new cell was put in to now become the first cell. The other three cells had not been connected with over-flow pipes. I instructed Mr. White that this improvement needed to be finished soon as the first cell was reaching capacity. The permit showed the facility as having two discharge points, but it now only has one. There was no discharge at the time of inspection.

A closure meeting was conducted with Mr. White. I informed him of my findings and what is required as improvements to the oxidation pond. I also discussed the importance of re-applying for a new permit and making sure the modifications were reflected in the application."

B) Compliance and/or Administrative Orders

A Consolidated Compliance Order & Notice of Potential Penalty (Enforcement Tracking No. SE-CN-06-0208) was issued to the facility on January 8, 2007 for failure to complete closure of the tanks previously utilized to process solid waste during the permitted operation of the facility, in violation of the Approved Closure Plan/Implementation Schedule and LAC 33:VII.315.C.

C) DMR Review

A review of the files revealed that DMRs have not been submitted since March 2002.

XII. ADDITIONAL INFORMATION:

The Louisiana Department of Environmental Quality (LDEQ) 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 TMDL's. The LDEQ also reserves the right to modify or revoke and reissue this permit based upon any changes to established TMDL's 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.

In accordance with LAC 33:IX.2903, this permit may be modified, or alternatively, revoked and reissued, to comply with any applicable effluent standard or limitations issued or approved under sections 301(b)(2)(c) and (D); 304(b)(2); and 307(a)(2) of the Clean Water Act, if the effluent standard or limitations so issued or approved:

a) Contains different conditions or is otherwise more stringent than any effluent limitation in the permit; or

b) Controls any pollutant not limited in the permit; or

c) Requires reassessment due to change in 303(d) status of waterbody; or

d) Incorporates the results of any total maximum daily load allocation, which may be approved for the receiving water body.

At present, the **Monitoring Requirements, Sample Types, and Frequency of Sampling** as shown in the permit are standard for this type of facility.

Effluent Characteristics	Monitoring Requirements	
	Measurement Frequency	Sample Type
Flow	1/month	Estimate
BOD_5	1/quarter	Grab
Total Suspended Solids	1/quarter	Grab
Fecal Coliform Bacteria	1/quarter	Grab
pH	1/quarter	Grab
Priority Pollutants	1/6 months	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, Westin Services, L.L.C., Westin Services, L.L.C., July 18, 2007.