STATEMENT OF BASIS (AI No. 150828)

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0123056 to discharge to waters of the State of Louisiana.

THE APPLICANT IS: Steve Kent Trucking, Inc.
PO Box 148
Lottie, LA 70756

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

PREPARED BY: Maxon Graham

DATE PREPARED: 18 July 2007

1. PERMIT STATUS

A. Reason For Permit Action:
First time issuance of a Louisiana Pollutant Discharge Elimination System (LPDES) permit for a 5-year term.

B. LPDES permits –
LPDES permit effective date: N/A
LPDES permit expiration date: N/A

C. Date Application Received: 29 June 2007

2. FACILITY INFORMATION

A. FACILITY TYPE/ACTIVITY – Office/dispatch building and vehicle maintenance shop for trucking company

This facility will house an office to dispatch trucks for load pick-up, and a vehicle maintenance shop. Trucks will be parked on-site until dispatched for hauling. The trucks will then be loaded at the customer's site and the waste hauled to an approved facility. The interior of the tanks and trailers will be washed and the trucks will be brought back to the dispatch/maintenance facility clean. The only washing that will occur on-site at 3456 Sligo Road will be exterior washing of the vehicles. Minor maintenance will be performed on-site, such as changing brakes, starter, alternator, etc. There will be NO complete overhauls or extensive work on vehicles at this site. Exterior washwater will be treated through a 1000 gallon oil and water separator and then through the sewage treatment system for further treatment. At this point the commingled water will be discharged from the sewage treatment plant through sprinklers located on the northern end of the property. After sprinkler application the water will go through local drainage then into Horseshoe Creek. Stormwater for the facility will flow into Horseshoe Creek as well.

B. FEE RATE

1. Fee Rating Facility Type:	minor
2. Complexity Type:	II
3. Wastewater Type:	II
4. SIC code:	4213, 7542

C. LOCATION - 3456 Sligo Road, Haughton, Bossier Parish
Latitude 32° 27' 30", Longitude 93° 32' 48"

3. OUTFALL INFORMATION

Outfall 001

Discharge Type:	treated sanitary wastewater and previously monitored exterior vehicle washdown wastewater
Treatment:	mechanical treatment plant with sprinkler system
Location:	at the point of discharge from the sewer treatment plant before discharge through sprinkler system
Flow:	1500 gpd
Discharge Route:	discharge from sprinkler system, then runoff into local drainage thence into Horseshoe Creek

Outfall 101

Discharge Type:	exterior vehicle washdown wastewater
Treatment:	oil and water separator then into sewer treatment plant before discharge through sprinkler system
Location:	at the point of discharge from the oil and water separator prior to introduction into sewer treatment plant
Flow:	500 gpd
Discharge Route:	from oil and water separator to Outfall 001

4. RECEIVING WATERS

STREAM - Horseshoe Creek via local drainage from sprinkler application of wastewater

BASIN AND SEGMENT - Red River Basin, Segment 100502

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

5. TMDL STATUS

Subsegment 100502, Lake Bistineau, is not listed on LDEQ's Final 2004 303(d) List as impaired, and to date no TMDL's have been established. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by any future TMDLs.

6. PROPOSED EFFLUENT LIMITS

BASIS - See Rationale below.

7. COMPLIANCE HISTORY/COMMENTS

A. Compliance History - No records of compliance actions were found.
B. DMR Review/Excursions - No DMR data were available for review since this is a first time issuance.

8. ENDANGERED SPECIES

The receiving waterbody, Subsegment 100502 of the Red 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 September 29, 2006 from Watson (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.

9. HISTORIC SITES

The discharge will be from a proposed facility. LDEQ has consulted with the State Historic Preservation Officer (SHPO) in a letter dated July 5, 2007 to determine whether construction-related activities could potentially affect sites or properties on or eligible for listing on the National Register of Historic Places.

10. 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 discharge described in the application.

11. 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 Steve Kent Trucking, Inc.

1. **Outfall 001** - treated sanitary wastewater, previously monitored vehicle and equipment washwater – estimated flow is 1000 gpd

Parameter	Limitation		Reference
	Monthly Average	Daily Maximum	
Flow	Report	Report	LAG480000; BPJ*; similar discharges
pH – Allowable Range (s.u.)	6.0 (minimum)	9.0 (maximum)	LAG480000; BPJ*; similar discharges
TSS	---	45 mg/L	LAG480000; BPJ*; similar discharges
BOD_5	---	45 mg/L	LAG480000; BPJ*; similar discharges
Fecal Coliform Colonies	---	400 / 100 mL	LAG480000; BPJ*; similar discharges

Treatment: mechanical treatment plant
Monitoring Frequency: all parameters shall be monitored semi-annually at the point of discharge from the sewage treatment plant prior to mixing with waters of the state.
Limits Justification: the limits and monitoring frequencies for this permit are based on BPJ, current guidance for similar discharges from other facilities, and the Light Commercial General Permit (LAG480000), effective August 1, 2001.

2. **Outfall 101** – exterior vehicle and equipment washwater - estimated flow is 500 gpd

Parameter	Limitation		Reference
	Monthly Average	Daily Maximum	
Flow	Report	Report	LAG480000; BPJ*; similar discharges
Soaps and/or Detergents	Report	N/A	LAG480000; BPJ*; similar discharges
TSS	---	45 mg/L	LAG480000; BPJ*; similar discharges
COD	200 mg/L	300 mg/L	LAG480000; BPJ*; similar discharges
Oil and Grease	---	15 mg/L	LAG480000; BPJ*; similar discharges
Visible Sheen	---	No Presence	LAG480000; BPJ*; similar discharges

Treatment: 1000 gpd oil and water separator
Monitoring Frequency: visible sheen shall be monitored daily and **all other parameters** quarterly at the point of discharge from the oil and water separator prior to mixing with outfall 001.
Limits Justification: the limits and monitoring frequencies for this permit are based on BPJ, current guidance for similar discharges from other facilities, and the Light Commercial General Permit (LAG480000), effective August 1, 2001.

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." This facility does not clean tanks. Only exterior of trucks and tanks are cleaned.

EPA Guidelines for Metal Products and Machinery (40 CFR Part 438) are applicable; however, more stringent state requirements are being placed in the permit.

*	Existing permits for similar outfalls
BPJ	Best Professional Judgement
s.u.	Standard Units

NOTE
For outfalls containing concentration limits, the usage of concentration limits is based on BPJ for similar outfalls since the flow is estimated.

STORM WATER POLLUTION PREVENTION PLAN (SWP3) REQUIREMENT

A SWP3 is included in the permit because in accordance with LAC 33:IX.2511.A.1, storm water discharges shall not be required to obtain an LPDES permit "... except... discharges associated with industrial activity." In accordance with LAC 33:IX.2511.B.14.a-k, facilities classified as SIC code 4213 are considered to have storm water discharges associated with industrial activity.

The SWP3 shall be prepared, implemented, and maintained within (6) months of the effective date of the final permit. The plan should identify potential sources of storm water pollution and ensure the implementation of practices to prevent and reduce pollutants in the storm water discharges associated with industrial activity at the facility (see Narrative Requirements for the AI).