27. Weekly average, other than for fecal coliform bacteria, is the highest allowable arithmetic mean of the daily discharges over a calendar week, calculated as the sum of all "daily discharge(s)" measured during a calendar week divided by the number of "daily discharge(s)" measured during that week. When the permit establishes weekly average concentration effluent limitations or conditions, and flow is measured as continuous record or with a totalizer, the weekly average concentration means the arithmetic average (weighted by flow) of all "daily discharge(s)" of concentration determined during the calendar week where C = daily discharge concentration, F = daily flow and n = number of daily samples; weekly average discharge

$$= \frac{C_1F_1 + C_2F_2 + \ldots + C_nF_n}{F_1 + F_2 + \ldots + F_n}$$

When the permit establishes weekly average concentration effluent limitations or conditions, and the flow is not measured as a continuous record, then the weekly average concentration means the arithmetic average of all "daily discharge(s)" of concentration determined during the calendar week.

The weekly average for fecal coliform bacteria is the geometric mean of the values for all effluent samples collected during a calendar week.

28. Sanitary Wastewater Term(s):

a. 3-hour composite sample consists of three effluent portions collected no closer together than one hour (with the first portion collected no earlier than 10:00 a.m.) over the 3-hour period and composited according to flow, or a sample continuously collected in proportion to flow over the 3-hour period.

b. 6-hour composite sample consists of six effluent portions collected no closer together than one hour (with the first portion collected no earlier than 10:00 a.m.) over the 6-hour period and composited according to flow, or a sample continuously collected in proportion to flow over the 6-hour period.

c. 12-hour composite sample consists of 12 effluent portions collected no closer together than one hour over the 12-hour period and composited according to flow, or a sample continuously collected in proportion to flow over the 12-hour period. The daily sampling intervals shall include the highest flow periods.

d. 24-hour composite sample consists of a minimum of 12 effluent portions collected at equal time intervals over the 24-hour period and combined proportional to flow or a sample continuously collected in proportion to flow over the 24-hour period.

STATEMENT OF BASIS (AI No. 149448)

for draft Louisiana Pollutant Discharge Elimination System permit No. LA0122815 to discharge to waters of the State of Louisiana.

THE APPLICANT IS: T & P Services, Inc.
2414 Lazybrook
Houston, TX 77008

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: 2 May 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. NPDES permit - NPDES permit effective date: N/A
NPDES permit expiration date: N/A
EPA has not retained enforcement authority.

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

D. Date Application Received: 16 March 2007

2. FACILITY INFORMATION

A. FACILITY TYPE/ACTIVITY – proposed mobile barge and ship cleaning facility

The proposed facility is mobile and operates on the Mississippi River between mile markers 44 and 187. The barges and ships cleaned do not contain ballast water and the cleaned barge doesn't discharge ballast water during or after being cleaned. This company uses boats owned by other marine service companies to move from place to place on the river. The company rents its equipment which is carried with them to clean the different boats. The vessels are ocean-going ships and closed top barges. The majority of vessels cleaned by this company are ships, only a few barges are cleaned.

B. FEE RATE
1. Fee Rating Facility Type: minor
2. Complexity Type: II
3. Wastewater Type: II
4. SIC code: 4491

B. LOCATION - operating between Mississippi River Mile Markers 44 and 187; Plaquemines, St. Bernard, Orleans, Jefferson, St. Charles, St. John the Baptist, St. James and Ascension Parishes.

3. OUTFALL INFORMATION

Outfall 001

Discharge Type: dry commodity washwater from closed top barges and ships
Treatment: none
Location: at the point of discharge from the barge being washed
Flow: intermittent
Discharge Route: to the Mississippi River

Outfall 002

Discharge Type: coal and coke washwater from closed top barges and ships
Treatment: none
Location: at the point of discharge from the barge being washed
Flow: intermittent
Discharge Route: to the Mississippi River

Outfall 003

Discharge Type: ship hold washwater
Treatment: none
Location: at the point of discharge from the ship being washed
Flow: intermittent
Discharge Route: to the Mississippi River

4. RECEIVING WATERS

STREAM - Mississippi River between mile marker 44 and 187

BASIN AND SEGMENT - Mississippi River Basin, Segment 070301

DESIGNATED USES -
a. primary contact recreation
b. secondary contact recreation
c. propagation of fish and wildlife
d. drinking water supply

5. TMDL STATUS

The discharges from T & P Services, Inc. are to the Mississippi River, Subsegment 070301 of the Mississippi River Basin. Subsegment 070301 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. WQMD: There are no open, appealed, or pending OEC enforcement actions as of May 2, 2007.

B. DMR Review: There are no DMR's for this facility, as this is the initial issuance of an LPDES permit.

8. ENDANGERED SPECIES

The receiving waterbody, Subsegment 070301 of the Mississippi River Basin, has been identified by the U.S. Fish and Wildlife Service (FWS) as habitat for the Pallid Sturgeon and migratory waterfowl, which are listed as an endangered species. LDEQ has not submitted this draft permit to the FWS for review in accordance with a letter dated September 29, 2006 from Watson (FWS) to Brown (LDEQ). As set forth in the Memorandum of Understanding between the LDEQ and the FWS, and based on information provided by the FWS, LDEQ has determined that the issuance of the LPDES permit is not likely to have an adverse effect upon the Pallid Sturgeon and migratory waterfowl. 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.

9. HISTORIC SITES

The discharge is from an existing facility location, which does not include an expansion on undisturbed soils. 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.

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 T & P Services, Inc.

1. **Outfall 001:** dry commodity washwater from closed top barges and ships (non-oceangoing vessels)

Based on BPJ and on permits for similar facilities, no effluent limitations are established for washwaters from barges previously containing dry commodities including: aggregates (limestone, rock, etc.), grain, meal products, scrap products, fertilizers (urea, potash, ammonium nitrate, etc.), sugar, wood chips, paper, salt, barite, magnesium oxide, cement, iron ore . Best Management Practices (BMPs) for barge operations are listed in Part II.

2. **Outfall 002:** coal and coke washwater from closed top barges and ships (non-oceangoing vessels)

Pollutant	Limitation Mthly Avg:Daily Max (mg/l)	Reference
Flow-MGD	Report:Report	LAC 33:IX.2701.I.1.b
COD	250:400	Similar Discharges; BPJ
TSS	Report:Report	Similar Discharges; BPJ
pH	6.0 - 9.0 s.u.	Similar Discharges; BPJ

BPJ Best Professional Judgment

Treatment: none

Monitoring Frequency: TSS shall be observed once per month and Flow, COD and pH shall be observed once per week at the point of discharge from the barge being washed.

Limits Justification: Limits and Monitoring Frequency are based on current guidance for similar discharges from other facilities.

3. **Outfall 003:** ship hold washwater from ocean going vessels

Pollutant	Limitation Mthly Avg:Daily Max (mg/l)	Reference
Flow	Report:Report	LAC 33:IX.2701.I.1.b
BOD_5	22:61	40 CFR 442, Subpart C
TSS	26:58	40 CFR 442, Subpart C
Oil & Grease	16:36	40 CFR 442, Subpart C
Total Cadmium	---:0.020	40 CFR 442, Subpart C
Total Chromium	---:0.42	40 CFR 442, Subpart C
Total Copper	---:0.10	40 CFR 442, Subpart C
Total Lead	---:0.14	40 CFR 442, Subpart C
Total Mercury	---:0.0013	40 CFR 442, Subpart C
Total Nickel	---:0.58	40 CFR 442, Subpart C
Total Zinc	---:8.3	40 CFR 442, Subpart C
pH	6.0 - 9.0s.u.	40 CFR 442, Subpart C

BPJ Best Professional Judgment

Treatment: none

Monitoring Frequency: Flow, BOD_5, TSS, Oil & Grease and pH shall be observed once per week, Total Cadmium, Total Chromium, Total Copper, Total Lead, Total Mercury, Total Nickel, and Total Zinc shall be observed once per month at the point of discharge from the ship being washed.

Limits Justification: Limits and Monitoring Frequency are based on 40 CFR 442, Subpart C and on current guidance for similar discharges from other facilities.

This facility is 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 cleans ship holds containing chemicals.

Storm Water Pollution Prevention Plan (SWP3) Requirement

A SWP3 is required because in accordance with LAC 33:IX.2511.A.1.b, stormwater discharges that are associated with industrial activity shall be monitored. In accordance with LAC 33:IX.2511.B.14,stormwater runoff from facilities with the SIC code 4491 are considered to be associated with industrial activity. However, an SWP3 is not included in the permit because the facility is a water related operation only. Barge BMPs are comparable to the SWP3 requirements; therefore, the barge BMPs will be applied instead.