STATEMENT OF BASIS

as required by LAC 33:IX.3109, for draft **Louisiana Pollutant Discharge Elimination System Permit No. LA0122131**; **AI 136152**; **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: West Baton Rouge Parish Council
Erwinville Wastewater Treatment Facility
West Baton Rouge Parish Governmental Building
800 North Alexander
Port Allen, LA 70764

II. PREPARED BY: Todd Franklin

DATE PREPARED: May 17, 2006

III. PERMIT ACTION: Issue LPDES permit LA0122131, AI 136152; PER20060001

LPDES application received: March 6, 2006

IV. FACILITY INFORMATION:

A. The application is for the discharge of treated sanitary wastewater from a proposed publicly owned treatment works serving Erwinville (south of US Highway 190 and east and west of LA Highway 413). According to the application, the constuction for this proposed facility will end in June 2007 and begin meeting final permit limitations and monitoring requirements by July 2007.

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

C. The facility is located at the end of Cypress Street, off LA Highway 413 in Erwinville, West Baton Rouge Parish.

D. The treatment facility consists of a field extended aeration activated sludge mechanical wastewater treatment plant with a center mechanical clarifier. Disinfection is by chlorination.

E. Outfall 001

Discharge Location: Latitude 30° 31' 58" North
Longitude 91° 24' 53" West

Description: treated sanitary wastewater

Design Capacity: 0.125 MGD

Type of Flow Measurement which the facility is currently using:

Combination Totalizing Meter / Continuous Recorder

V. RECEIVING WATERS:

The discharge is into a roadside ditch; thence into Bayou Poydras in segment 120102 of the Terrebonne Basin. This segment is listed on the 303(d) list of impaired waterbodies.

The designated uses and degree of support for Segment 120102 of the Terrebonne 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	Full	Not Supported	N/A	N/A	N/A	N/A

[1/]The designated uses and degree of support for Segment 120102 of the Terrebonne 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 120102 of the Terrebonne 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 will be from a proposed facility. LDEQ has consulted with the State Historic Preservation Officer (SHPO) in a letter dated March 14, 2006, 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 April 13, 2006, stated that the facility as proposed will have no potential effects.

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 120102, Bayou Poydras, is listed on LDEQ's Final 2004 303(d) List as impaired for nutrients (EPA – Category 5), organic enrichment/low DO (EPA – Category 5), sedimentation/siltation, suspended solids, pathogen indicators, sulfates, and TDS. To date no TMDLs have been completed for this waterbody. A reopener clause will be established in the permit to allow for the requirement of more stringent effluent limitations and requirements as imposed by a TMDL. Until completion of TMDLs for the Terrebonne Basin, those suspected causes for impairment which are not directly attributed to the sanitary wastewater point source category have been eliminated in the formulation of effluent limitations and other requirements of this permit. Additionally, suspected causes of impairment which could be attributed to pollutants which were not determined to be discharged at a level which would cause, have the reasonable potential to cause or contribute to an excursion above any present state water quality standard were also eliminated.

According to a phone conversation on March 21, 2006, with Mr. David Colson of Professional Engineering Consultants Corporation, the Erwinville Wastewater Treatment Facility is being built to treat about 300 homes that are currently being treated by individual septic systems. It is anticipated that this new treatment facility will have equivalent or better treatment processes than the individual septic systems. Therefore, this facility should not contribute any more pollutant loading than what is already being introduced into the receiving water body. Therefore the permit limitations shall be based on the current state policy. However, for information gathering purposes, a quarterly reporting requirement shall be placed into the permit for the following parameters: NH_3-N, sulfates, and TDS.

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
~~BOD_5~~	~~10~~	~~10 mg/l~~	~~15 mg/l~~	~~Limits are set in accordance with the Statewide Sanitary~~ Effluent Limitations Policy (SSELP) for facilities of this treatment type and size.
TSS	16	15 mg/l	23 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.
NH_3-N	Report	Report (mg/l)	Report (mg/l)	Because the receiving waterbody is impaired for nutrients and organic enrichment/low DO, "Report" of NH_3-N is proposed for information gathering purposes.
Sulfates	Report	Report (mg/l)	Report (mg/l)	Because the receiving waterbody is impaired for sulfates, "Report" of sulfates is proposed for information gathering purposes.
TDS	Report	Report (mg/l)	Report (mg/l)	Because the receiving waterbody is impaired for TDS, "Report" of TDS is proposed for information gathering purposes.

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

According to LAC 33:IX.3705.A.1., POTW's must treat to at least secondary levels. Therefore, in accordance with LAC 33:IX.5905.C., the pH shall not be less than 6.0 standard units nor greater than 9.0 standard units at any time.

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:

There are no previous LWDPS, NPDES, or LPDES issued permits for this facility.

XI. ENFORCEMENT AND SURVEILLANCE ACTIONS:

A) Inspections

There have been no inspections performed at this facility as of May 3, 2006.

B) Compliance and/or Administrative Orders

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

C) DMR Review

There are no DMRs on file for this facility as of May 3, 2006.

XII. ADDITIONAL INFORMATION:

Please be aware that the Department will be conducting a TMDL in the Terrebonne Basin scheduled for completion in 2007. The Department of Environmental Quality reserves the right to impose more stringent discharge limitations and/or additional restrictions as a result of the TMDL. 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.

Final effluent loadings (i.e. lbs/day) have been established based upon the permit limit concentrations and the design capacity of 0.125 MGD.

Effluent loadings are calculated using the following example:

BOD_5: 8.34 lb/gal x 0.125 MGD x 10 mg/l = 10 lb/day

At present, the Monitoring Requirements, Sample Types, and Frequency of Sampling as shown in the permit are standard for facilities of flows between 0.10 and 0.50 MGD.

Effluent Characteristics	Monitoring Requirements	
	Measurement Frequency	Sample Type
Flow	Continuous	Recorder

BOD_5	2/month	Grab
Total Suspended Solids	2/month	Grab
Fecal Coliform Bacteria	2/month	Grab
pH	2/month	Grab
NH_3-N	1/quarter	Grab
Sulfates	1/quarter	Grab
TDS	1/quarter	Grab

Pretreatment Requirements

Based upon consultation with LDEQ pretreatment personnel, general pretreatment language will be used due to the lack of either an approved or required pretreatment program.

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 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, West Baton Rouge Parish Council, Erwinville Wastewater Treatment Facility, March 6, 2006.