

LPDES PERMIT NO. LA0122572, AI NO. 144688, ACTIVITY NO. PER20060002

**LPDES STATEMENT OF BASIS
FOR THE DRAFT LOUISIANA POLLUTANT DISCHARGE ELIMINATION SYSTEM
(LPDES) PERMIT TO DISCHARGE TO WATERS OF LOUISIANA**

COMPANY/FACILITY: Safeland Storage, L.L.C.
Angelina Tank Farm
400 E. Kaliste Saloom Road, Suite 1300
Lafayette, Louisiana 70508

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

PREPARED BY: Elizabeth H. Johnson
Water Permits Division
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DATE PREPARED: February 13, 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 permit effective date: N/A
LPDES permit expiration date: N/A
- C. Date Application Received: October 17, 2006
Supplemental Information Received: February 5, 2007

2. FACILITY INFORMATION

- A. LOCATION: 3988 Highway 44 in Garyville, St. John the Baptist Parish
Latitude: 30° 03' 16", Longitude: 90° 38' 29"
- B. FACILITY TYPE/ACTIVITY: Petroleum Products Bulk Storage Terminal

Safeland Storage, L.L.C. – Angelina Tank Farm (Safeland) is a proposed petroleum products bulk storage terminal that will receive liquid commodities by barge, ship, rail, pipeline and tanker trucks. These petroleum products will be stored in above ground storage tanks until distribution to commerce. The primary products proposed to be stored and distributed include gasoline, light and heavy crude oil, ethanol, light and mid petroleum distillates, heavy residual oils, vegetable oil and biodiesel. Product will be offloaded from the facility via barge, ship, rail, pipeline and tanker trucks. The facility

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proposes to discharge storm water runoff, tank draw wastewater, maintenance wash water, ship/barge bilge and ballast water, slop water, facility tank wash water, boiler blowdown water, and hydrostatic test water. All sanitary wastewater discharges will be sent to a local Publicly Owned Treatment Works (POTW).

According to application, Safeland proposes a stormwater runoff only discharge designated as Proposed Outfall 002. In accordance with LAC 33:IX.2511.B.14.h, only those portions involved in an industrial activity, including vehicle maintenance, at transportation facilities classified as Standard Industrial Classifications 5171 are considered to be engaged in industrial activity and require that the stormwater runoff to be permitted. The Proposed Outfall 002 is not involved in any industrial activity and therefore the Department does not require Proposed Outfall 002 to be a permitted outfall.

- C. TECHNOLOGY BASIS: 40 CFR Chapter I, Subchapter N, Effluent Guidelines and Standards, Parts 401 and 405 - 471 have been adopted by reference in LAC 33:IX.4903.

<u>Guideline</u>	<u>Reference</u>
NA	NA

Other sources of technology based limits:

LDEQ Stormwater Guidance, letter dated 6/17/1987, from J. Dale Givens (LDEQ) to Myron Knudson (EPA Region 6)
 Light Commercial Facilities General Permit (LAG480000)
 Hydrostatic Test Wastewater General Permit (LAG670000)
 Similar Outfall at Existing Facility
 Best Professional Judgment

- D. FEE RATE:

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

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3. OUTFALL INFORMATION

Outfall 001:

Discharge Type: Combined stormwater runoff and previously monitored tank draw down wastewater (Internal Outfall 101), boiler blowdown (Internal Outfall 201) and hydrostatic test wastewater (Internal Outfall 301).

Treatment: None. Some settling may occur in the storm water retention pond prior to discharge.

Location: At the point of discharge from the stormwater retention pond prior to combining with other waters.
 Latitude 30° 04' 32", Longitude 90° 37' 38"

Flow: 1.046 MGD

Discharge Route: Unnamed drainage ditch, thence to the Hope Canal, thence to Dutch Bayou, thence to Lake Maurepas

Internal Outfall 101:

Discharge Type: Tank draw down water from the petroleum storage tanks, stormwater runoff from the equipment pads, maintenance wash water, ship/barge bilge and ballast, slop water and facility tank wash water.

Treatment: Biological treatment followed by sedimentation.

Location: At the point of discharge from the wastewater treatment facility, located at the south end of the facility, prior to combining with other waters.
 Latitude 30° 04' 26", Longitude 90° 37' 55"

Flow: 0.001 MGD

Discharge Route: Combines with the effluent at Outfall 001

Internal Outfall 201:

Discharge Type: Boiler blowdown water

Treatment: None

Location: At the point of discharge from three (3) boilers directly downstream of the Boiler Blowdown discharge pipe prior to mixing with other waters
 Latitude 30° 03' 42", Longitude 90° 38' 05"

Flow: 0.005 MGD

Discharge Route: Combines with the effluent at Outfall 001

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Internal Outfall 301:

Discharge Type: Hydrostatic test wastewater
Location: At the point of discharge from the vessel or pipeline being tested prior to combining with other waters.
Treatment: None
Flow: 0.150 MGD
Discharge Route: Combines with the effluent of Outfall 001

4. RECEIVING WATER

Stream: Unnamed drainage ditch, thence to the Hope Canal, thence to Dutch Bayou, thence to Lake Maurepas.
Basin and Subsegment: Lake Pontchartrain, 040602
Designated Uses: a. primary contact recreation
b. secondary contact recreation
c. propagation of fish and wildlife

5. COMPLIANCE HISTORY

Not Applicable. This permitting action is for first time issuance of a LPDES permit to a proposed facility.

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6. PROPOSED EFFLUENT LIMITS

Outfall 001: Combined stormwater runoff and previously monitored effluent from Internal Outfalls 101 and 301

EFFLUENT CHARACTERISTIC	MONTHLY AVERAGE	DAILY MAXIMUM	MEASUREMENT FREQUENCY ¹	SAMPLE TYPE	REFERENCE
Flow-MGD	Report	Report	1/month	Estimate	LAC 33:IX.2707.1.b
TOC	---	50 mg/L	1/month	Grab	BPJ; Stormwater Guidance
Oil and Grease	---	15 mg/L	1/month	Grab	BPJ; Stormwater Guidance
pH	6.0 S.U. (Min.)	9.0 S.U. (Max.)	1/month	Grab	BPJ; Stormwater Guidance

¹ When discharging.

Internal Outfall 101: Tank draw down water from the petroleum storage tanks, stormwater runoff from the equipment pads, maintenance wash water, ship/barge bilge and ballast, slop water and facility tank wash water

EFFLUENT CHARACTERISTIC	MONTHLY AVERAGE	DAILY MAXIMUM	MEASUREMENT FREQUENCY ¹	SAMPLE TYPE	REFERENCE
Flow-MGD	Report	Report	1/month	Estimate	LAC 33:IX.2707.1.1.b,
COD	---	125 mg/L	1/month	Grab	BPJ; Similar Outfall; LAG480000
TSS	---	45 mg/L	1/month	Grab	BPJ; Similar Outfall; LAG480000
Benzene	---	50 µg/L	1/event	Grab	BPJ; Similar Outfall; LAG480000
Total BTEX	---	250 µg/L	1/event	Grab	BPJ; Similar Outfall; LAG480000
Chlorides	---	500 mg/L	1/event	Grab	BPJ; Similar Outfall;

¹ When discharging.

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Internal Outfall 201: Boiler blowdown wastewater

EFFLUENT CHARACTERISTIC	MONTHLY AVERAGE	DAILY MAXIMUM	MEASUREMENT FREQUENCY ¹	SAMPLE TYPE	REFERENCE
Flow-MGD	Report	Report	1/month	Estimate	LAC 33:IX.2707.1.1.b,
TSS	30 mg/L	100 mg/L	1/month	Grab	BPJ; Similar Outfall; LAG480000
Total Residual Chlorine ²	---	Report	1/3 months	Grab	BPJ; Similar Outfall; LAG480000

^{1.} When discharging.

^{2.} Limit and monitoring for Total Residual Chlorine (TRC) are required only if chlorine or a chlorine compound is used as an anti-biofouling agent. Monitoring is required only during times of chlorination.

Internal Outfall 301: Hydrostatic test wastewater

EFFLUENT CHARACTERISTIC	MONTHLY AVERAGE	DAILY MAXIMUM	MEASUREMENT FREQUENCY ¹	SAMPLE TYPE	REFERENCE
Flow-MGD	Report	Report	1/event	Estimate	LAC 33:IX.2707.1.1.b
TSS	---	90 mg/L	1/event	Grab	BPJ; Similar Outfall; LAG670000
Benzene	---	50µg/L	1/event	Grab	BPJ; Similar Outfall; LAG670000
Total BTEX	---	250µg/L	1/event	Grab	BPJ; Similar Outfall; LAG670000
Lead	---	50µg/L	1/event	Grab	BPJ; Similar Outfall; LAG670000

^{1.} When discharging

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7. TMDL STATUS

Subsegment No. 040602 of the Lake Pontchartrain Basin is listed on the 2004 Final Integrated 303(d) List as impaired for pathogen indicators and non-native aquatic plants. To date, no Total Maximum Daily Loading (TMDL) assessments have been completed for this waterbody. The TMDL assessments for this subsegment are scheduled for completion in 2011 - 2012. Based on an evaluation of this proposed facility's discharges, it was determined that the permittee has no reasonable potential to discharge pathogen indicators since the sanitary wastewater discharges are tied into the local POTW. Although non-native aquatic plants are listed as a suspected cause of impairment, control measures are being implemented outside the scope of this permit which are expected to result in attainment of the subsegment's designated uses. A reopener clause has been placed in Part II of the permit to allow for more stringent or additional limitations or requirements to be placed in the permit, if needed, as a result of the TMDL.

8. ENDANGERED SPECIES

The receiving waterbody, Subsegment 040602 of the Lake Pontchartrain Basin, has been identified by the U.S. Fish and Wildlife Service (FWS) as habitat for the Gulf Sturgeon, which is listed as an endangered species. The 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 Gulf Sturgeon. Effluent limitations are established in the permit to ensure protection of aquatic life and maintenance of the receiving waste s aquatic habitat. The more stringent of technology and waste quality based limits (as applicable) have been applied to ensure maximum protection of the receiving water.

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 October 18, 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, dated November 16, 2006, indicated that the facility as proposed will have no potential effects.

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 discharges described in the application.

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11. STORMWATER POLLUTION PREVENTION PLAN (SWPPP) REQUIREMENT

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 stormwater discharges from the facility, either through permitted outfalls or through outfalls which are not listed in the permit or as sheet flow. The Part II condition requires a Storm Water Pollution Prevention Plan (SWP3) within six (6) months of the effective date of the final permit, along with other requirements. If the permittee maintains other plans that contain duplicative information, that plan could be incorporated by reference into the SWP3. Examples of these type plans include, but are not limited to Spill Prevention Control and Countermeasure 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 similar discharges of storm water associated with industrial activity, as defined at LAC 33:IX.2511.B.14 [40 CFR 122.26(b)(14)].

12. 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 proposed issuance of LPDES individual permits and may request a public hearing to clarify issues involved. This Office's address is 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:

A local newspaper of general circulation and
The Office of Environmental Services Public Notice Mailing List