

PETITION TO ADDRESS THE COUNCIL

2004-0171
St. Charles Parish Council Chairman
P. O. Box 302
Hahnville, LA 70057
(985) 783-5000

Today's Date: 4/26/04

4-27-04
ok per
Lance Marino

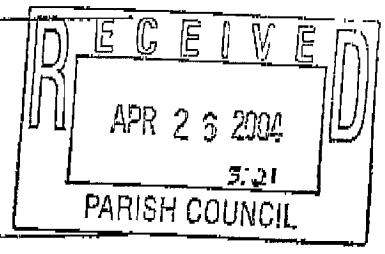
Dear Chairman:

Please place my name to address the Council on:

DATE: 5/3/04

SPECIFIC TOPIC: Luling Oxidation Pond & Re-
routing flows to the Hahnville
WWTP (Continued)

one subject only
(*see specific
guidelines on
reverse and
refer to
Parish Charter-
Article VII., Sec. 1.)



DOCUMENTS, IF ANY: YES / NO

NAME: Gwen Lafrene

ADDRESS: 355 Hwy 306
Bayou Church LA 70030

PHONE: (985) 758-7570

SIGNATURE: Gwen Lafrene

Dear Constituent

Thank you for your active participation. Your views and comments will be considered by the Council in making our decisions. The Council has a considerable amount of business to conduct in a limited amount of time, therefore, please note the following items that are expected of you:

- ✓ The Home Rule Charter provides for citizens to address the Council. It makes no provision for initiating debate, discussion, or question and answer sessions with Councilmembers or Administration Officials. Your right is also guaranteed to examine public documents as you prepare your presentation. Should you have any questions for Councilmembers and/or Department Heads as you prepare, please forward such inquiries to the Council Office to insure a timely response. Should you wish to speak to any Official or Department personally, a complete list of contact information will be furnished at your request.
 - ✓ Please be brief and limit your comments to the specific subject matter on which you have requested to address the Council.
 - ✓ Please forward supporting documents to the Council Secretary for distribution to the Parish Council before your scheduled appearance in order for the Council to prepare themselves, if necessary
 - ✓ Upon completion of your allotted time to address the Council, please respect the time given to Councilmembers to respond to your comments by not interrupting or interjecting remarks.
 - ✓ **Slanderous remarks and comments will not be tolerated.** If slanderous remarks or comments are made, your opportunity to address the Council will end, regardless of the remaining time left to address the Council.
 - ✓ Repetitious comments and subject matter will be strictly limited
- A confirmation letter will follow when your name is placed on the agenda.

Sincerely,

Lance Marino
LANCE MARINO
COUNCIL CHAIRMAN

re: pet

(OVER)

Hartman Engineering, Inc.

Consulting Engineers

September 12, 2000*

Steven M. Fall, P.E., Director
Public Works and Wastewater
P.O. Box 705
Luling, Louisiana 70070

Subject: Luling Oxidation Pond Improvement Costs*

Dear Mr. Fall:

* Based on the Parish's decision to implement wastewater reuse at the Luling Oxidation Pond, Hartman Engineering, Inc. (HEI) has provided a revised estimate of the needed improvements at this facility that refines the estimates contained in HEI's letter of August 28, 2000. The following table provides cost estimates based on actual bid prices, comparisons with similar projects, and experience:

Recommended Items for Improvements/Upgrade

TYPE	ITEM	COST ESTIMATE	
	Remove Water Hyacinths		
		Physical Removal	\$ 30,000
		Improve Berm	\$ 7,000
		Landfilling	\$ 4,000
O&M		Subtotal	\$ 41,000
Capital	Treatment Capacity Upgrade (3.0 MGD)	\$	370,000
Capital/Engineering	Reduce Infiltration and Inflow (annual cost)	\$	300,000
O&M	Add Polymer to Sand Filter (annual cost)	\$	60,000
	Security and Safety Controls		
		Fence	\$ 20,000
		Emergency Gas Scrubber	\$ 350,000
Capital/Engineering		Subtotal	\$ 370,000
	Wastewater Reuse/Wetlands Treatment		
Engineering		Use Attainability Analysis	\$ 120,000
Engineering		Wetlands Permit/Outfall Design	\$ 84,000
O&M		Annual Monitoring	\$ 45,000
Capital		Construction	\$ 40,000
O&M		Additional Operating Expenses	\$ 3,000
		Subtotal	\$ 292,000
	Contingency (20%)	\$	287,000
		TOTAL	\$ 1,720,000 *

Hartman Engineering, Inc.

Steven M. Fall, P.E., Director
September 12, 2000
Page 2 of 3

In addition to these items, the Department has requested that HEI provide a comparison between the use of ultraviolet disinfection (UV) and chemical disinfection with chlorine removal by sulfur dioxide. This work is in progress and will be submitted under separate cover.

Of the items listed above, the items listed as "Remove Water Hyacinths," "Add Polymer to Sand Filter," "Security and Safety Controls," and "Wastewater Reuse/Wetlands Treatment" are high priority items. The removal of the hyacinths, addition of polymer, and wastewater reuse/wetlands treatment program are all needed to improve performance of the Pond and to have the Administrative Order (AO) lifted from this facility. Recall that the EPA intends to issue a new AO encompassing both the Pond and the Ama Wastewater Treatment Plant. It is likely that this new AO will have a compliance schedule as well as fines and penalties for non-compliance as seen with the Parish's Regionalization AO.

The water hyacinths in the Pond now cover 30 acres of the 55 acre available. While these do provide some limited treatment, they will die, with the change in the weather, in the next several months and sink to the bottom of the Pond. This will cause two detrimental impacts to the Pond. First, the degradation of this biomass will place an additional biochemical oxygen demand (BOD) load in the Pond; one which the Pond may not be able to meet and that will lead to probable violations of the Pond's restrictive discharge permit. The second impact is that the seeds left by these dying plants will spawn a new generation in the spring which will lead to an unending cycle of growth, death, and permit violations. Parish maintenance workers have already experienced the frustration caused by this aquatic weed since it has disabled several of the Pond's aerators thus further limiting the Pond's treatment capacity. Please note that every technical report prepared for the Parish on the Pond has recommended removal of the hyacinths.

The original sand filter design and filter operation manual noted that the Pond's sand filter would not be able to perform at design efficiency without the addition of polymer. This is because many of the solids contained in the Pond's discharge are too small, i.e. algae, to be filtered without the aid of polymers. Despite these facts, the Parish has never used polymer at the Pond. Addition of the polymer should improve filter efficiency and improve compliance with the Pond's ability to remove both BOD, nearly 20 percent of which is settleable, and total suspended solids (TSS) from the final effluent.

Wastewater Reuse/Wetlands Treatment is critical in allowing the Pond to comply with its discharge permit. Rather than providing improved treatment within the pond, this program will actually increase the Pond's permit limit to at least 30 mg/L BOD and 30 mg/L TSS. Currently the Pond operates under a 10 mg/L BOD and 15 mg/L TSS limit. If the Pond had a 30/30 effluent discharge permit today, only six (6) permit excursions would have occurred since December of 1998 as compared with 43 actual discharge violations which have occurred in that same time. Coupled with the above improvements, the Pond should be able to maintain compliance with its permit provided that flow is not significantly increased.

Hartman Engineering, Inc.

Steven M. Fall, P.E., Director
September 12, 2000
Page 3 of 3

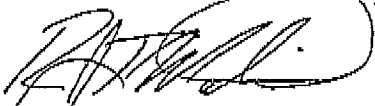
Furthermore, the Pond site currently houses twelve (12) one-ton cylinders of gaseous chlorine on site and two (2) one-ton cylinders of sulfur dioxide. There is an urgent need to protect the public welfare by both restricting access to the Pond site and by providing emergency chemical scrubbing in the event of an inadvertent chemical release. Should the Parish elect to use UV disinfection in lieu of chlorine, a chemical scrubber is obviously not need.

The infiltration/inflow control and treatment capacity upgrades noted in the above table are important additions that will minimize operation costs (electricity, wear and tear, etc.) and improve plant performance. However, though these are important steps in improving the reliability of the Pond, they are not of the same priority of those listed described in the preceding paragraphs.

Please contact me if you have any questions regarding the above or if you would like me to arrange a meeting to discuss the wetlands alternative.

Sincerely,

HARTMAN ENGINEERING, INC.


Robert J.T. Martin, P.E.

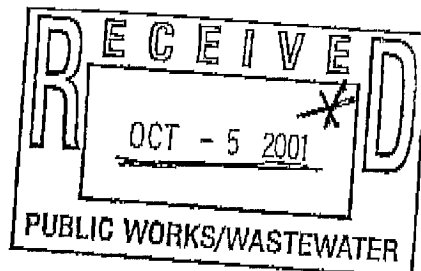
*cc Sammy Accardo

Comite Resources, Inc. B
11643 Pride Port Hudson Rd.
Zachary, LA 70791
225-654-8847
225-658-0029 fax

Comite Resources, Inc.

September 4, 2001 *

Greg Bush, Director
Dept. Of Public Works/ Wastewater
St. Charles Parish
P.O. Box 705
Luling, LA 70070



Re: Wetland Use Attainability Analysis - Project No.: S000601

Dear Mr. Bush:

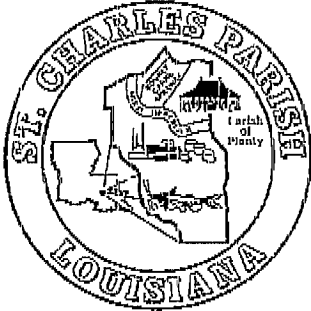
The purpose of this letter is request a one year no cost extension on this contract for the Wetland Use Attainability Analysis - Project No.: S000601.

This would mean an ending date of January 30, 2003. This request is because of the delay in obtaining permission for access and lack of boardwalks to the site as provided in Section 3.5 of the Contract. Permission was obtained from Rathborne on Aug. 1, 2001 for access to the site until August 1, 2002. This will provide ample time to complete the UAA study.

Work on the project will resume as soon as the boardwalks to the sites are complete. We will first finish establishing the research plots and putting out the litter traps. Initial measurements of stem growth will take place in the winter of 2001-2002, Final measurements will take place in the winter of 2002-2003.

If you have any questions about the report or invoice please telephone 225-654-8847. Thank you for your assistance.

The delay was the Parish's fault not Comite's.



ST. CHARLES PARISH

DEPARTMENT OF WASTEWATER

PO. BOX 705 • LULING, LOUISIANA 70070
(985) 783-5102 • (985) 783-5104 • FAX (985) 785-2207

ALBERT D. LAQUE
Parish President

GREGORY E. BUSH LTC, USA Retired
Director

April 1, 2004

Ms. Gwen Dufrene
3551 Highway 306
Des Allemands, LA. 70030

SUBJECT: Public Records Request

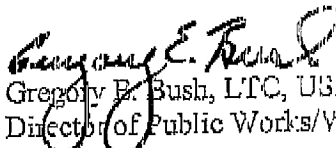
Dear Ms. Dufrene:

Reference your public records request for documentation showing a breakdown of the 12 separate projects we have accomplished to bring the pond into compliance. Enclosed is a list of improvements to the Luling Pond and approximate dollar amount which were successfully completed in the past three years. It should be noted that some projects were done in house and others were contracted out. For in house projects, the department does not track individual employees or their hours worked. For maintenance and repair projects, the department does not track individual employees or their hours worked and does not track equipment usage. Therefore, the total actual cost for in house projects or maintenance and repair projects cannot be determined.

Regarding your requests for documentation showing results. Enclosed is our most recent Discharge Monitoring Report.

The enclosed information should satisfy your public record requests. Since you have shown so much interest in the Luling Oxidation Pond, I would be more than happy to give you a tour of the pond to show you first hand the improvements we have made. Please contact my Administrative Assistant, Mrs. Ruby E. Dennis, at 783-5102, if you would like such a tour.

Sincerely,


Gregory E. Bush, LTC, USA, Retired
Director of Public Works/Wastewater

It doesn't

PERMITTEE NAME/ADDRESS:

Name: ST. CHARLES PARISH COUNCIL
 Address: P.O. BOX 302
 HAHNVILLE, LA. 70057

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES)

DISCHARGE MONITORING REPORT (DMR)

LA0032131 PERMIT NUMBER
 001 A DISCHARGE NUMBER

MAJOR

F - FINAL
 TOTAL FACILITY DISCHARGE
 EFFLUENT

*** NO DISCHARGE ***

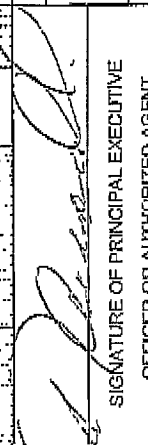
Facility: LULING OXIDATION POND

Location: LJLING, LA.

MONITORING PERIOD

FROM 04/02/01 TO 04/02/29

NOTE Read instructions before completing this form.

PARAMETER (32-37)	SAMPLE MEASUREMENT PERMIT REQUIREMENT	(3 Card Only) (46-53)		Loading Unit	Quantity or (54-61)		Quality or (46-53)		Concentration (64-61)		NO. EX (62-63)	Frequency of analysis (64-66)	Sample Type (69-70)
		Average	Maximum		Minimum	Average	Maximum	Unit					
00310 1 0 0	BOD - 5 DAY EFFLUENT GROSS VALUE	188.36	183	LBS/DAY	8.50	14.00	10	8/MO	24-Hr. Comp	0	8/MO	24-Hr. Comp	
00400 1 0 0	PH FIELD EFFLUENT GROSS VALUE	6.73	6.0	S.U.	7.14	9.0	15	2/WK	24-Hr. Comp	0	18/MO	GRAB	
00530 1 0 0	SOLIDS, TOTAL SUSPENDED EFFLUENT GROSS VALUE	118.36	275	LBS/DAY	5.75	9.00	15	2/WK	GRAB	0	8/MO	24-Hr. Comp	
50050 1 0 0	FLOW - MGD EFFLUENT GROSS VALUE	2.57	3.91	MGD	3.91	Report Daily Max	Report Daily Max	CONT.	TOTAL	0	CONT.	TOTAL	
50060 A 0 0	CL2 RESIDUAL EFFLUENT GROSS VALUE	0.099	0.099	MG/L	0.099	Daily Max	Daily Max	29/MO	GRAB	0	29/MO	GRAB	
74055 1 0 0	FEC COLI - MF - MFC EFFLUENT GROSS VALUE	200	400	#/100 ML	0.00	400	300	8/MO	GRAB	0	8/MO	GRAB	
NAME/TITLE PRINCIPAL EXECUTIVE OFFICER SAMMY J. ACCARDO ASSISTANT DIRECTOR TYPED OR PRINTED													
I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND SIGNATURE WITH THE INFORMATION SUBMITTED, AND BASED ON MY KNOWLEDGE OF THESE INDIVIDUALS, I AM IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT. SEE 18 U.S.C. 101 AND 33 U.S.C. 1103. (Penalty under these sections may include life or death.)													
SIGNATURE OF PRINCIPAL EXECUTIVE OFFICER OR AUTHORIZED AGENT 													
TELEPHONE (985) 783-5100 DATE 04/03/03 AREA CODE NUMBER 985 YEAR MO DAY 04 03 03													

COMMENT AND EXPLANATION OF ANY VIOLATIONS

(Reference all attachments here)

Luling Oxidation Pond

Built new outfall Structure	\$ 12,000.00
Repaired 2 of three curtains to restore plug flow	\$ 25,000.00
Constructed levee around 7 acre cell in pond & planted Hyacinths	-----
Reworked Sand Filter	\$ 5,000.00
Added 5 additional aerators	\$ 10,000.00
installed Chlorine Vacuum System for Safety	\$ 15,000.00
Reduced Chlorine from 12 tons to 6 tons	-----
Injected chemicals into 7 acre cell for algae control	\$ 5,000.00
Periodic cleaning of chlorination basin	-----
Periodic cleaning of dechlorination basin	-----
Maintain pond levee system	-----
Daily inspection of aerators	-----

\$ 72,000




ST. CHARLES PARISH
DEPARTMENT OF PUBLIC WORKS / WASTEWATER
P.O. BOX 705 LULING, LOUISIANA 70070
(985) 783-5100 FAX (985) 785-6503

ALBERT D. LAQUE
PARISH PRESIDENT

STEVEN M. FALL, P.E.
DIRECTOR

06/28/2001

TO: Lorrie Toups
Director Finance

FROM: Mr. Steven M. Fall, P.E. 
Director of Public Works/Wastewater

Subject: Memorandum -Force Main to Luling Oxidation Pond Supplemental Services

Gentlemen:

On June 19, 2000 Hartman Engineering was awarded the Engineering Contract for the above mentioned Project. On July 6, 2000 the Wastewater Department gave them authorization to begin Basic Design Services. On Nov 27, 2000 Hartman made a presentation to the Council (Construction Management Meeting) to reverse the flow from Bourg Lift Station to the Hahnville treatment facility. At this time my office gave them a verbal go ahead to model the sewer system to re-route the flow. Our formal letter was dated June 12, 2001. This was an oversight on my part due to the volume of work handled at this office. The letter should have been dated prior to Nov. 27, 2000. It was no secret that this is what we proposed to do as evidenced by the CM meeting. The supplemental services were authorized prior to the June 12, 2001 letter by the Department Director. Please pay the invoice.

If you have any questions or comments please contact me.

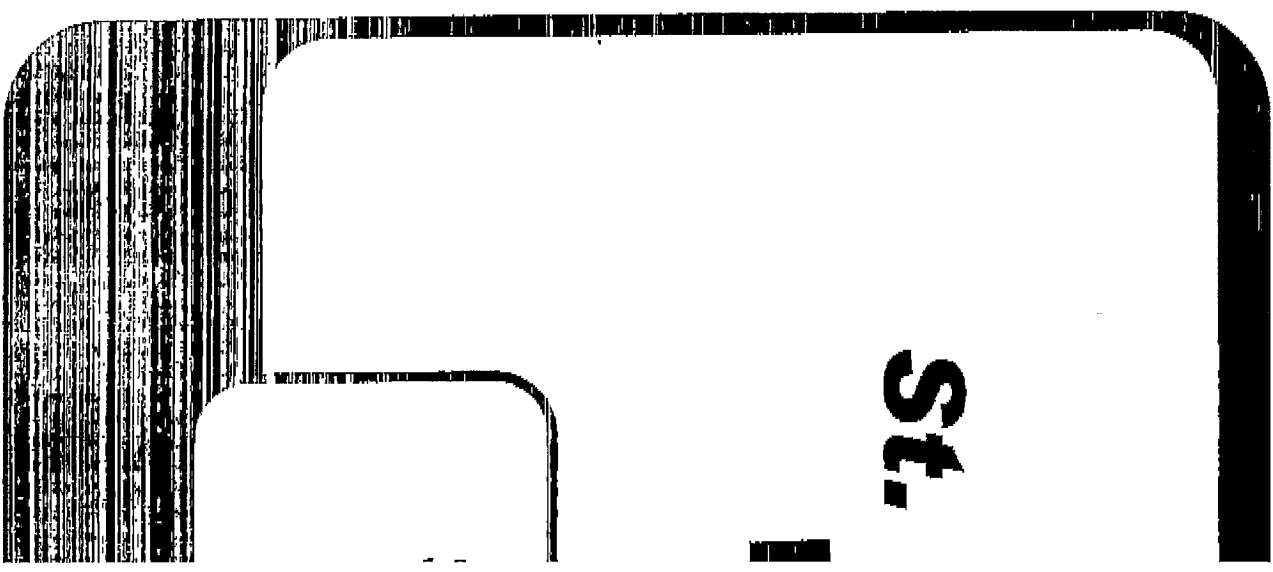
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Cc: Mr. Albert Laque- Parish President



64 6

St.





Charles Parish Wastewater

Sewer Use Rate
Assessment





ST. CHARLES PARISH
DEPARTMENT OF PUBLIC WORKS / WASTEWATER
P.O. BOX 705 LULING, LOUISIANA 70070
(985) 783-5100 FAX (985) 785-6503

ALBERT D. LAQUE
PARISH PRESIDENT

STEVEN M. FALL, P.E.
DIRECTOR

04/25/2001

TO: The Honorable Mr. Albert Laque
Parish President

FROM: Mr. Steven M. Fall, P.E. *SK*
Director of Public Works/Wastewater

Subject: Memorandum - Luling oxidation pond

Dear Mr. Laque:

The Parish Council did not approve the full sewer rate increase that was recommended by Gulf South Engineers. In doing so this has cut the capital-operating portion of the wastewater budget down to zero. We are rapidly approaching the summer months and have not been able to correct any problems at the Luling oxidation pond. The problems associated with the pond detailed below will cost well in excess of \$100,000. The wastewater Department is not adequately staffed to perform capital projects (expenditures under \$100,000) in house. Any Capital project exceeding \$100,000 must be bid out in accordance with public bid laws. To correct some or all of the ~~problems~~ we need a set of contract documents to bid with. Hartman Engineering is currently performing an analysis of the pond to help with any permitting or corrective action needed under environmental compliance. Hartman however, can not prepare a set of contract documents or do the design work needed for the pond under their program management contract. CDM has offered to perform the corrective design for under \$40,000 using supplemental services under the sewer regionalization program. Since the pond is part of the regionalization effort I don't see a problem with this. At the last council meeting some of the council members objected to this idea, therefore I think we need to have the Parish Attorney review this. Attached is the background information on the pond and a list problems, which need to be corrected immediately.

V
MF

Background:

Facultative Lagoons (Ponds) treat waste by utilizing algae and bacteria to degrade organic matter. The algae and bacteria eat wastes and nutrients and produce certain by-products from the digestion.

Facultative Lagoons (Ponds) treat waste inconsistently depending on climate conditions. Ponds depend upon the vagaries of nature for operating conditions.

The Ponds have three operating zones- (1) a surface zone which utilizes aerobic bacteria (bacteria that use oxygen to degrade organic matter) and algae to remove wastes (BOD5). Atmospheric diffusion (entrained oxygen) is important in this layer along with sunlight (algal photosynthesis). During summer months ponds can treat more waste in this zone because of larger algal blooms. (2) An intermediate zone that utilizes facultative bacteria (bacteria that are indifferent to the use of oxygen to degrade organic matter). This zone is part aerobic and part anaerobic. (3) A bottom zone where accumulated solids (sludge, etc.) are actively decomposed by anaerobic bacteria (bacteria that don't use oxygen to degrade organic matter).

The surface zone of the pond contains aquatic vegetation (water hyacinth). Water hyacinth remove algae from the effluent. The hyacinth remove nutrients and block energy (sunlight) from reaching algae. Thus, without nutrients and energy, the algae become inactive and settle to the bottom of the pond.

Problems with the Luling pond:

(1) Sludge accumulation - Organic material (BOD5) is stored at the bottom of the pond. This occurs when aquatic vegetation (hyacinth) dies during the winter months (cold weather kills), or when maintenance spraying occurs (herbicides). During the summer the temperature of the water increases and the organic material stored in the bottom layer begins to be broken down anaerobically and at higher levels. This becomes a problem when the oxygen demand on the surface of the pond is greater than the aerobic surface can produce. This causes discharge violations. More aerators are needed. About 340 HP (3ig Bucks).

(2) Hyacinth culture units needed in last cells of the pond - The hyacinth are free floating vegetation that mass together with heavy winds and blow through separation curtains and equipment causing damage. The hyacinth are needed to remove algae but only in the last portion of the treatment process. Hyacinth also need to be mechanically harvested on a five-week cycle to keep organic matter to a minimum and not sprayed with herbicides, which cause the dead plants to sink to the bottom of the pond.

(3) Smaller cells with equalization conduits are needed for easy maintenance- the pond is one large cell over 60 acres. It is very hard to maintain and is a safety concern if a levee fails.

(4) Recirculation of a portion of the effluent will help with overloads- no recirculation piping exists.

If you have any questions or comments please contact me.

Cc: Sammy Accardo
ADWW
Jan Evans
Hartman Engineering

SMF:smf

**TRANSCRIPT OF ST. CHARLES PARISH
OPERATIONS, MAINTENANCE AND
CONSTRUCTION MANAGEMENT COMMITTEE
MARCH 10, 2004**

(There was no quorum for this meeting, but was continued as a informational meeting. Even though it was **televised** there was audio difficulties. This transcript is from the audio tape of the meeting which was very hard to get . There was a question as to whether it could be released to the Public. The Council Records Department has the tape.)

Mr. Bush: "The Luling Pond Lift Station Development. Again **That's on hold pending further review of our administration order requirements.**

Mr. Ram: Yesterday ??? at the Council meeting , Gwen Dufrene was talking about the position of why this is not being fixed, and that maintenance, a few weeks ago, there was funding from Federal government 2001, 2002, 2003. Can you explain what happened, why this is not fixed.

Mr. Bush: "**The funding, received from the EPA grant, is not specifically to fix the pond, its a common misconception.** The funding from EPA was a grant to assist the Parish in solving the administrative order for the Pond. All the funds spent on fixing parts of the Pond came from the Wastewater (internal) budget. **The rest of the grant money was used to pursue additional grant money with Mr. Faucheux efforts and Mr. Fabre and likewise permitting and ??**

Mr. Ram-"Did we get around ??? Million?

Mr. Bush;" No we did not. When you receive a grant from the EPA that dollar amount might be \$1.1 million. They then subtract their administrative costs and other costs associated with administration of the grant. So we came back , I think with roughly \$820,000 out of the original grant amount. The same was true with the second year when they gave \$240 something

thousand. Once you subtract out all of their fees, to the administer the money they're going to give to us, we're lucky if we have 70 or 80% left. **It is that money that we used to pursue. how we were going to solve problem with the administrative order of the pond.**

Ramchandran: "?????"

Mr. Bush: 1999 "There was the original order. Then there was subsequent orders issued. Each time we go through a series of discharge violations a new order is administered. So 1999, and in 2000, 2001 we keep having new orders issued. Each new order lists all the violations

Mr. Ramchandran: "This is the monthly discharge non-compliance?"

Mr. Bush: Right "The same report we sent to you. All these then show up on the next administrative order.

Mr. Ramchandran: "Administrative Order issued by EPA saying you shall ??????Luling Pond that what you are making a statement ??

Mr. Bush: That's the truth.??? a treated facility you are issued a permit. Because of that permit you are required to submit monthly reports that which shows your discharges.

Ramchandran: "That is standard procedure. The question is when did we decide we're not going to use the Oxidation Pond or when did the EPA say thou shall not use the oxidation pond because of your non-compliance's That where the problem is.... The Administrative Order.... Steven ? was telling me

Mr. Bush: "That was 2002"

Mr. Ramchandran: "2002"

Mr. Bush: "That's correct."

Mr. Ram: (this is section is hard to understand) "Why can't we fix this with maintenance and make this oxidation " when all the Why was it not maintained. All the things not met. What you sent to me 1997, 1998., 1999.

Mr. Bush: "Mr. Ram, the pond was not maintained prior to the year 2000. **And the pond was allowed to go into a state of decay, in 2000 and from 2000 to the present time, this administration has taken dramatic steps and has done 12 separate projects in attempt to bring the pond into compliance . Each of the steps were taken and during the winter months, December January, February, sometimes in March we are in compliance . But as soon as the warm weather comes back the algae comes back and we are now back into noncompliance. We have added aerators, we have added curtains, we have built levees, to try to separate, we have used chemicals to control the algae. That did not help. ???outfall?? They have all failed???. **It became, in my mind, economically ~~unfeasible to continue any attempts to bring the pond into compliance.~~** At that point, I wrote a letter, I briefed the council, and **I went to Dallas to talk to the EPA about that** and we came away with a plan to take the pond out of treatment process. In other words, it would no longer have its own permit..**

Ramchandran: "So we volunteered to do that, not that EPA told us we should do that".

Mr. Bush: "We volunteered that based on a mutual understanding between the EPA and the Parish they. They concurred completely with our plan to get out of the pond. At that point the administrative order will change. That's the plan, and that's the plan we want you to follow. **Because we made that agreement the grant money started to flow.** There's no doubt in my mind even with the efforts of Mr. Faucheux and Mr. Fabre, I don't think we would have gotten that money if we had tried to **precis and maintain the pond or tried to bring it back. ?exactly.**

Ramchandran: ?????Are we in compliance? "???????maintain whatever we could?"



Mr. Bush: "Yes, we're in compliance, because its cold. "

Mr. Ramchandran: "So, our discharges are meeting right now. And we have a deadline for 2006 for which we should be in compliance.

Mr. Bush: "In Full Compliance."

Mr. Ramchandran: "In full compliance, what is the scope. ??

Mr. Bush: " **The initial plan to completely reroute the pond and to take everything to Hahnville is between \$12 to \$14 million. Unfortunately, that did not take into account future growth of the Parish. All it did was take the pond away from the administrative order and bring the parish into compliance. The result, the cost of that, the administration choose to come up with a subsequent plan on how we could fund and also take care of future growth. As part of that plan, we developed an economic plan to support that. We will probably approach the council the next month with that plan, with how we intend to fund it and how it will satisfy the future growth of the west bank and also eliminate the pond as a future problem. I have already discussed that plan with several council members, I discussed with many developers. I believe, I'm starting to get a concurrence among all those people that that is the way to go.**



Ramchandran: " The people with the knowledge says that's the way to go. My concern?????????"

Mr. Bush: " We're just pumping into the canal, the canal takes it back to the lake. It does not goes near the houses except the edges of the canal. What Comite, has suggested is actual discharge pipes and a pumping station that would take it across the canal and discharge at certain points within those two areas???"

Mr. Ramchandran: "???"send it to the swamp."

Mr. Bush: "No! No! **Comite does not treat, Comite accepts what we have treated. If we have not treated to a proper level, then they're study is somewhat in doubt.**"

Mr. Ram:"?????"discharge

Mr. Bush: "We made a real attempt to fix the pond and bring it into compliance.

????????????tape goes off then back on

Mr. Ramchandran: "EPA did not tell you can????

Mr. Bush: "What the EPA did, was take the plan we submitted, and attached it to

Mr. Ramchandran : "It is our plan, we volunteered to spend that money. We volunteered to fix it that way. It never came from EPA.

Mr. Bush: "We volunteered a plan to bring the pond into compliance which was to make it a viable treatment facility. The EPA accepted that, endorsed that and added that to the administrative order.

????????

Mr. Bush: "Fix the pond by a certain date or be fine \$27,500 per violation per day.

Mr. Duhe: " So really EPA has you over a barrel.?????"

Mr. Bush: "Don't forget, EPA issued the initial order in 1999. They will be more that happy to cooperate over a period of time. But at some point that time limit ends. If you don't have an effective plan in place, or have shown you

have made an attempt, they're not going to keep giving you extensions. There was no attempt to fix the pond until the year 2000 when the new administration took over. Since that time, we have proven to the EPA that we will go to any extent in an attempt to fix the pond. They have seen the failures, because everything we do we record in writing to the EPA. We record the results. Several times they have asked for additional precedent to help us determine why it failed. I think again it was a mutual concurrence between the Parish and the EPA that the best way to solve this problem was to eliminate the pond as a treatment facility. Certainly if Comite had finished their study in a timely manner, in accordance with their original contract we probably could have used part of that as part of our plan. But they didn't it took them an extra year to finish everything. We didn't have time and EPA wasn't willing to give us additional time while they waited on maybe if the report would come back.

Mr. Ramchandran: So the Army Corps???????/we would probably be in compliance. ??? much cheaper. \$100 to \$200,000 is cheaper than \$15,000,000.

Mr. Bush: "At the time, the report Mr. Fall had, did not recognize the degree of decay the pond had gone into. He thought, based on his (initial?) analysis that that money could be better spent to do certain things of which we did. Chlorinating, bergs, aerators and it failed. So I came in, I tried several things I that thought based on my experience, Mr. Accordo tried several things he thought might work. And nothing worked. to bring the Pond into compliance.

Councilman Faucheux: "Mr. Ram I understand where you are going." But you said something was done in 1999 that other things tried to accomplish. What was that.

Mr. Ram: goes on to explain ????

Mr. Bush: "What you are referring to is a process called blending. (he goes on to explain the process) They discuss I.

Mr. Ram- talks about the population growth and the capacity of the Hahnville plant capacity.

Mr. Ram-“You got a copy of the Montgomery Watson Report?

Mr. Bush: “Yes, I do. I have CH2Hill report, I’ve have the report by CDM, I have the report from Hartman, I have report from the Army Corps of Engineers, and the report from Comite.”

Mr. Ramchandran: “Basically, what I was looking roughly into was Montgomery Watson Report. Concept with the Parish maintaining chlorination???????improve the quality of discharge???

Mr. Bush: “The MW suggested improvements have been made. It does not work.”

Mr. Ramchandran: “Actually, I have a problem with that. I don’t understand why they don’t keep it up. Why its not being maintained.”

Mr. Bush: “I’ll explain why. The previous administration allowed the pond to reach the stage that , since 2000, two operators everyday in an attempt to bring that pond into compliance. Every other week