

INSPECTION REPORT

Inspection Entry Date/Time	09/26/2024 10:55 AM (CT)	Announced: No	
Inspection Exit Date/Time	09/26/2024 02:08 PM (CT)	Access: Granted	
Weather			
Media	Water		
Statute(s)/Program(s)	Clean Water Act, NPDES, WWTP		
Type of Inspection	Compliance Evaluation Inspection (CEI)		
Permittee Name	Lafayette Consolidated Government - East WWTP		
Facility or Site Name	Lafayette Consolidated Government - East WWTP		
Facility/Site Physical Address	144 Judy St		
City, State, Zip Code	Lafayette, LA 70501		
County/Borough/Parish	Lafayette Parish		
Facility GPS Coordinates	30.218582, -92.002676		
Mailing Address (If different)			
City, State, Zip Code			
FRS ID	110055604083		
Permit Number(s) (If Applicable)	LA0036382		
SIC and/or NAICS	4952		
Regulatory Representatives Participating in Inspection:			
Title	Name	Organization	
US EPA -Inspector	Sharron Crayton	EPA REGION 6	
ES Senior	Shane Miller	LDEQ	
ESI	Beau Powers	LDEQ	
ESII	Matt Henry	LDEQ	
Lead Inspector:			
Kenneth AuBuchon	KENNETH AUBUCHON		Digitally signed by KENNETH AUBUCHON Date: 2024.12.05 14:23:52 -06'00'
	EPA REGION 6	aubuchon.kenneth@epa.gov	(281) 983-2151
Supervisor Review:			
Roberto Bernier	ROBERTO BERNIER		Digitally signed by ROBERTO BERNIER Date: 2024.12.10 08:10:00 -06'00'
	EPA REGION 6	bernier.roberto@epa.gov	(214) 665-8376

SECTION I – INTRODUCTION**Site Entry and Inspection Objectives**

EPA REGION 6 Lead Inspector, Kenneth AuBuchon, arrived at the Lafayette Consolidated Government – East WWTP (the “Site” or “Facility”), located at 144 Judy St, Lafayette, LA 70501, at 10:55 AM (CT) on 09/26/2024 for an unannounced inspection. EPA REGION 6 Lead Inspector presented credentials to Jasper Francis and informed him that this was an EPA REGION 6 inspection to determine compliance as authorized by Clean Water Act (CWA) Section 308 and implementing regulations. This report is based on information supplied by the Lafayette Consolidated Government representatives, direct observations made by the EPA REGION 6 inspectors, records and reports maintained by the permittee and other information including: photographs taken by EPA REGION 6 inspector(s), physical evidence collected by the EPA REGION 6 inspector(s), measurements taken by EPA REGION 6 inspector(s), verbal or written statements made by information supplied by the Lafayette Consolidated Government representatives during or subsequent to the on-site inspection, and materials, processes, data, photographs, or documents shown, demonstrated, or submitted to the EPA REGION 6 inspector(s) by the Lafayette Consolidated Government representatives during or subsequent to the on-site inspection. In addition, information gathered prior to or subsequent to the inspection from a review of EPA, State, and/or public records may be included in this report.

This inspection was an EPA Lead CEI, which also provided required On-the-Job training to new EPA staff and training to LDEQ staff. At the opening meeting we went over the objectives of the inspection and explained that this inspection was to determine compliance status with permit conditions and other program requirements, verify the accuracy of information submitted to EPA and/or LDEQ, and verify the adequacy of sampling and monitoring conducted by the facility.

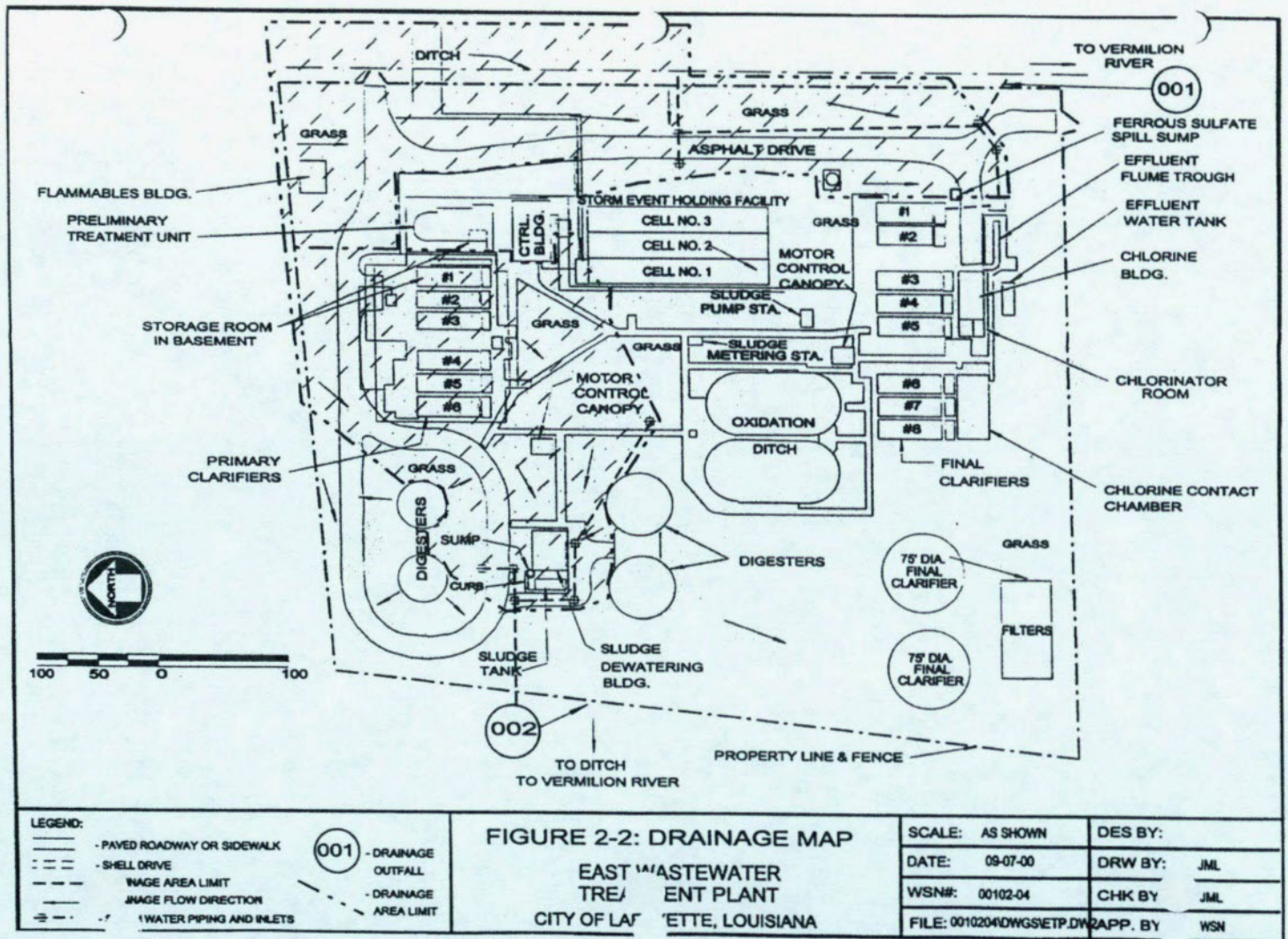
Attendees

Organization	Attendee Name	Title	Present in Opening Conf.	Present in Closing Conf.
EPA REGION 6	Kenneth Aubuchon	US EPA -Lead Inspector	Yes	Yes
EPA REGION 6	Sharron Crayton	US EPA -Inspector	Yes	Yes
LDEQ	Shane Miller	ES Senior	Yes	Yes
LDEQ	Beau Powers	ESI	Yes	Yes
LDEQ	Matt Henry	ESIII	Yes	Yes
Lafayette Consolidated Government	Martha Langley	Regulatory Compliance Specialist	Yes	Yes
Lafayette Consolidated Government	Jasper Francis	Chief Wastewater Plant Operator	Yes	Yes
Lafayette Consolidated Government	Kirt Talley	Welder II	Yes	Yes
Lafayette Consolidated Government	Tyler Melancon	Instrument Mechanic II	Yes	Yes
Lafayette Consolidated Government	Pat Edmond	Operator Supervisor	Yes	Yes

Facility/Site Description

EPA REGION 6 lead inspector confirmed the following facility information:

Preliminary treatment consists of mechanical screening and grit removal, followed by primary sedimentation, mechanically aerated oxidation ditches, and secondary clarification. Effluent is chlorinated and dechlorinated before discharge to the Vermilion River via effluent pipe. Sludge is anaerobically digested then mechanically and chemically dewatered before final application to permitted sites for beneficial reuse.



Facility/Site Information

Responsible official	Craig Gautreaux
Type of primary flow meter	V-Notch Weir / Ultrasonic Flow
What sort of failure alarm does the plant have?	SCADA System relay back to main office
What portion of the plant does the backup power operate?	Generator back up 100% (Diesel / 1500-gallon storage tank)
How do you manage your biosolids?	Belt Press / Class C / Landfarm – No storage, sent directly to land application Farms

Have any bypasses or overflows happened at the plant or in the collection system in the last year?	No
Have any hydraulic overloads occurred at the plant?	Plant has a 3-million-gallon retention basin
Backup electrical power source, and does it turn on automatically?	Manually switched
What is your overflow/emergency capacity (overflow basins, holding tanks, redundancy) and do you have sufficient spare parts?	No issues
How often do you visually inspect the outfall(s) and flow measuring devices?	Daily
Secondary flow measuring devices? If so, what type and are comparisons made between the primary and secondary flow measurements?	Ultra sonic - calibrated annually / monthly staff gauge check
Type(s) of primary flow measuring device(s)?	v-notch
Industrial Users	PHI (Petroleum Helicopter Inc.)
Are there any plans for renovation or additional equipment to allow for increased wastewater flow?	10-year plan / Digester size - new clarifiers - / efficiency not capacity
Is there currently any portion of the treatment train that is non-operational?	all functional
Do you accept waste from septage haulers? If so, what problems have you experienced?	No
Do you use in-house or contract out for laboratory analyses? (including for metals or WET testing?)	In-house and central lab
Operation schedule (days of operation, # shifts/day, # operators/shift, coverage overnight, weekends & emergencies), and is staffing sufficient for proper operation?	Manned 24 – 7
Outfalls: (and do the numbers, locations, and receiving waters match the permit?)	Outfall 001 - discharge to the Vermilion River via effluent pipe SW001 - is runoff from eastern side of facility
Contributing (or shared) Jurisdictions	NA
WWTP Approx. # of residents served	22,500 population
WWTP Design Capacity & Average Daily Flow	8MGD – Design Flow / 4MGD – Average Flow / 1.5MGD – Time of the inspection
How often is secondary flow meter calibrated by an electrical technician?	Monthly
How often is the secondary flow meter calibration checked against the primary flow meter?	Yearly

Location(s)

Location/Area/Sub-area	Description
Collection System	Collection system consists of 48 lift stations with 80% of system in clay pipe constructed before 1978 undergoing rehabilitation the other 20% is newer construction. 5 forced mains into the Plant
Storm water	Stormwater outfall 001 is runoff from eastern side of facility. Stormwater outfall 002 (SW002) was closed 10-15 years ago.
Treatment system	Preliminary treatment consists of mechanical screening and grit removal, followed by primary sedimentation, mechanically aerated oxidation ditches, and secondary clarification. Effluent is chlorinated and dechlorinated before discharge to the Vermilion River via effluent pipe. Sludge is anaerobically digested then mechanically and chemically dewatered before final application to permitted sites for beneficial reuse.

SECTION II – OBSERVATIONS

Location: Storm water		
Observation #: KA1-OB-001	Date: 09/26/2024	Weather:
Storm water outfall 002 was closed 10-15 years ago. Area drained to outfall 002 was diverted to headworks, drainage area includes belt press dewatering process and its truck load area. Area drains a larger than expected area and should be included as source water in permit application.		

Location: Laboratory		
Observation #: KA1-OB-002	Date: 09/26/2024	Weather:
pH buffer/standards were not demonstrated to be within expiration dates. Chloride samples were being analyzed with Hach cl meter. Chlorine standards were outside of expiration dates.		

SECTION III – RECORDS REVIEW**SECTION IV – SAMPLING ACTIVITIES AND ANALYTICAL RESULTS**

No sampling was conducted.

SECTION V - AREA OF CONCERN

Area(s) of Concern may not be in sequential order.

The presentation of Area(s) of Concern does not constitute a formal compliance determination or violation.

AOC Reference #: KA1-OB-001	Location: Storm water
Regulation and/or Permit Requirement	
LPDES Permit LA0036382 Standard Conditions for LPDES Permits Section D. Reporting Requirements	
8. Other Information	

Where the permittee becomes aware that it failed to submit any relevant facts in a permit application, or submitted incorrect information in a permit application or in any report to the state administrative authority, it shall promptly submit such facts or information.

AOC:

Storm water outfall 002 was closed 10-15 years ago. The area drained to SW002 was diverted to the facility headworks. The drainage area includes the belt press dewatering processes and its truck loading area. The area drained creates a large inflow source to the headworks during rain events due to the closure and diversion of the outfall. The diverted stormwater source from SW002 was not included into the facilities permit application.

Additional Notes:**AOC Reference #: KA1-OB-002****Location: Laboratory****Regulation and/or Permit Requirement**

LPDES Permit LA0036382 Standard Conditions for LPDES Permits Section C. Monitoring and Records
5. Monitoring Procedures

a. Measurements and analyses must be conducted according to test procedures approved under 40 CFR Part 136 or, in the case of sludge use or disposal, approved under 40 CFR Part 136 unless otherwise specified in 40 CFR Part 503, unless other test procedures have been specified in this permit.

b. The permittee shall calibrate and perform maintenance procedures on all monitoring and analytical instruments at intervals frequent enough to ensure accuracy of measurements and shall maintain appropriate records of such activities.

c. The permittee or designated laboratory shall have an adequate analytical quality assurance/quality control program to produce defensible data of known precision and accuracy. All quality control measures shall be assessed and evaluated on an on-going basis and quality control acceptance criteria shall be used to determine the validity of the data. All method specific quality control as prescribed in the method shall be followed. If quality control requirements are not included in the method, the permittee or designated laboratory shall follow the quality control requirements as prescribed in the

AOC:

1. Buffer solutions used for pH calibration were not demonstrated to be within expectation dates. See photos:

[IMG-20240926122811281180090.jpg](#)

[IMG-20240926122820282085465.jpg](#)

[IMG-2024092612290829865117.jpg](#)

[IMG-20240926122957295766282.jpg](#)

2. The DPD Chlorine standards used to verify DPD Chlorine meter calibration were expired. See photos:

[IMG-20240926131826182674652.jpg](#)

[IMG-20240926131834183474686.jpg](#)

Additional Notes: All expired pH buffer solutions were disposed of before exiting the facility.

Closing Conference

The EPA REGION 6 Lead Inspector held a closing conference with Facility personnel at 02:08 PM (CT) on 09/26/2024 for the inspection. During the closing conference, EPA REGION 6 Lead Inspector discussed the observations and Area(s) of Concern identified during the inspection. Observations and Area(s) of Concern have not yet been evaluated for a formal compliance determination.

Follow Up

No follow up was required after exiting the facility on 09/26/2024.

Communication Log

No additional information received by EPA REGION 6 after exiting the Facility on 09/26/2024.

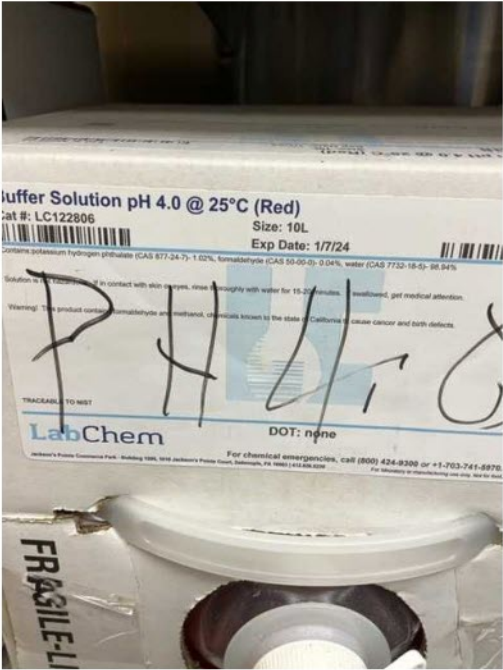
SECTION VII – LIST OF APPENDICES

1. Photo Log

APPENDIX 1: PHOTO LOG



September pH Calibration Log			IMG-202409261225302530123915.jpg
09/26/2024 12:25 PM (CT)	No CBI	No PII	Photographer: Kenneth Aubuchon
September pH Calibration Log			



Buffer Solution pH 4.0			IMG-20240926122811281180090.jpg
09/26/2024 12:28 PM (CT)	No CBI	No PII	Photographer: Kenneth Aubuchon
Expired Buffer Solution pH 4.0. All expired pH buffers were disposed of before exiting the facility.			

Inspection Date(s):

09/26/2024 - 09/26/2024



Buffer Solution pH 7.0			IMG-20240926122820282085465.jpg
09/26/2024 12:28 PM (CT)	No CBI	No PII	Photographer: Kenneth Aubuchon
Expired Buffer Solution pH 7.0. All expired pH buffers were disposed of before exiting the facility.			



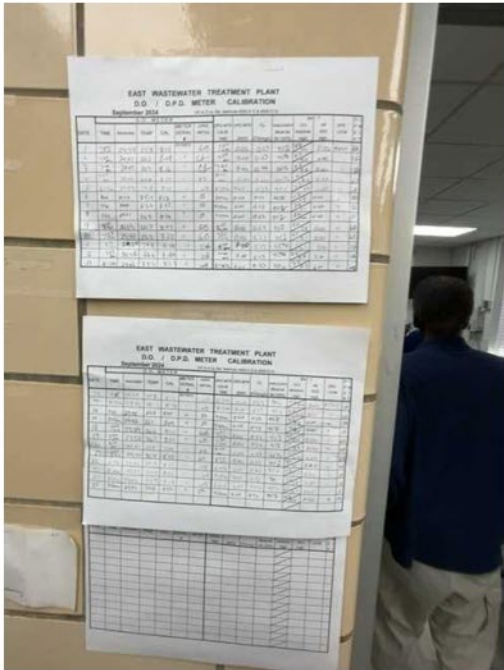
Buffer Solutions			IMG-2024092612290829865117.jpg
09/26/2024 12:29 PM (CT)	No CBI	No PII	Photographer: Kenneth Aubuchon
Expired Buffer Solutions. All expired pH buffers were disposed of before exiting the facility.			

Inspection Date(s):

09/26/2024 - 09/26/2024



Buffer Solutions			IMG-20240926122957295766282.jpg
09/26/2024 12:29 PM (CT)	No CBI	No PII	Photographer: Kenneth Aubuchon
Expired Buffer Solution. All expired pH buffers were disposed of before exiting the facility.			



DO / DPD Meter Calibration Log			IMG-20240926123410341077619.jpg
09/26/2024 12:34 PM (CT)	No CBI	No PII	Photographer: Kenneth Aubuchon
DO / DPD Meter Calibration Log			



Plant Influent Force Mains			IMG-20240926123926392677938.jpg
09/26/2024 12:39 PM (CT)	No CBI	No PII	Photographer: Kenneth Aubuchon
5 forced mains entering headworks of the facility.			



Plant Clarifier			IMG-202409261249164916119019.jpg
09/26/2024 12:49 PM (CT)	No CBI	No PII	Photographer: Kenneth Aubuchon
One of six plant clarifiers used at the facility.			



Oxidation Ditch			IMG-202409261257485748120255.jpg
09/26/2024 12:57 PM (CT)	No CBI	No PII	Photographer: Kenneth Aubuchon
Oxidation Ditch used the facility for biological treatment.			



Oxidation Ditch			IMG-202409261257515751122705.jpg
09/26/2024 12:57 PM (CT)	No CBI	No PII	Photographer: Kenneth Aubuchon
Oxidation Ditch used the facility for biological treatment.			

Inspection Date(s):

09/26/2024 - 09/26/2024



Flow meter			IMG-2024092613130013095039.jpg
09/26/2024 01:13 PM (CT)	No CBI	No PII	Photographer: Kenneth Aubuchon
Flow meter used to determine discharge.			



DPD Chlorine Standards			IMG-20240926131826182674652.jpg
09/26/2024 01:18 PM (CT)	No CBI	No PII	Photographer: Kenneth Aubuchon
Expired DPD Chlorine Standards used for calibration of chlorine meter.			

Inspection Date(s):

09/26/2024 - 09/26/2024



DPD Chlorine Standards			IMG-20240926131834183474686.jpg
09/26/2024 01:18 PM (CT)	No CBI	No PII	Photographer: Kenneth Aubuchon
Expired DPD Chlorine Standards used for calibration of chlorine meter.			