EPA United States Environmental Protection Agency

Region 6 Compliance Assurance and Enforcement Division

INSPECTION REPORT

Inspection Date(s):	04/09/2024		
Media:	Water		
Regulatory Program(s)	Clean Water Act		
Company Name:	American Sugar Refining, Inc.		
Facility Name:	American Sugar Refining, Inc.		
Facility Physical Location:	7415 N Peters St		
(city, state, zip code)	Arabi, LA 70032		
Mailing address:	1 North Clematis Street, Suite 200		
(city, state, zip code)	West Palm Beach, FL 33401		
County/Parish:	Palm Beach County		
Facility Contact:	Elizabeth Mendonca	Plant Manager	
	Elizabeth.Mendonca@asr-group.com		
	504-332-1102		
FRS Number:			
Identification/Permit Number:	LA0005665		
Media Number:			
NAICS:			
SIC:	2062		

Personnel participating in inspection:			
Michael Williams	EPA/ 6EN-WMH	Inspector	281-983-2150
Amber Mase	LDEQ	Inspector	504-736-7701
Kaitlyn Tabors	LDEQ	Inspector	504-736-7701
Elizabeth Mendonca	American Sugar Refining	Plant Manager	504-332-1102

EPA Lead Inspector Signature/Date	Digitally signed by MICHAEL WILLIAMS Date: 2024.05.29 09:17:51 -05'00'	
	Michael D. Williams	Date
Supervisor Signature/Date	ROBERTO BERNIER Digitally signed by ROBERTO BERNIER Date: 2024.05.30 07:40:46 -05'00'	
	Roberto Bernier	Date

Section I - Introduction

PURPOSE OF THE INSPECTION

EPA Region 6 inspector, Michael Williams, arrived at the American Sugar Refinery Plant at 9:30 am on April 9, 2024, for an unannounced NPDES wastewater treatment inspection. During the opening conference, I met with Elizabeth Mendonca, Plant Manager. Ms. Mendonca was informed that this was an EPA lead compliance evaluation inspection to determine compliance with the facility's National Pollutant Discharge Elimination System (NPDES) permit and the Clean Water Act. The scope of the inspection was with permit LA0005665, facility operations, and maintenance under the Clean Water Act. The inspection was conducted under the authority of the NPDES permit program, in accordance with the Federal CWA.

The information presented in this report is based on the materials and information supplied by American Sugar Refinery, Inc. representatives, observations made during the inspection, and records and reports maintained by the permittee.

FACILITY DESCRIPTION

American Sugar Refining, Inc. is the proprietor of the "Domino Sugar" refinery, where raw cane sugar undergoes refining processes to yield various products such as granulated white sugar, powdered sugar, and liquid sugar. The raw sugar is melted using sugar-laden water known as "sweet water," followed by the extraction of impurities from the liquified sugar. This refined product then undergoes filtration and decolorization processes involving press filtration and bone char filtration. The resulting high purity liquified sugar is crystallized, dried, and packaged into finished products. The only waste generated in this refining process is calcium carbonate mud. Finished products are distributed via trucks and rails, while raw sugar is imported using trucks and barges.

WASTEWATER TREATMENT DESCRIPTION

The wastewater treatment plant (WWTP) is specifically engineered to purify sugar-laden service water, known as "sweet water," utilized for rinsing spent bone char, a type of activated charcoal integral to the sugar refining process. Initially, the sugar-laden service water is channeled by gravity into the west aeration basin within the WWTP, where aqueous ammonia is introduced. Here, the water undergoes a cyclical process between the West and East aeration basins, where mesophilic bacteria aerobically break down organic carbons present in the water. Dissolved oxygen is infused into the aeration basins through large paddles called agitators. Subsequently, the effluent water from the East aeration basin flows by gravity into the clarifier, where solids are separated through gravimetric means. These solids settle at the bottom of the clarifier and are then re-circulated back into either the West or East aeration basins. Some solids can be redirected into the South retention basin to regulate the desired Mixed Liquor Suspended Solids (MLSS) concentration in the aeration system. Within the South retention basin, solids settle, and the resulting supernatant is directed to the North retention basin, where it is subsequently pumped back into the East aeration basin. Any excess clarified supernatant overflows from the clarifier into the clearwell, from where it is pumped to the east yard pump, leading to Outfall 001. Additionally, a manifold is in place on the clearwell pumps to facilitate the pumping of clarifier effluent waters back into the West aeration basin if further reduction of organic carbon is needed.

Section II- Observations

This inspection revealed the following observations:

- American Sugar Refinery, Inc. has ceased the practice of storing raw sugar at the docks due to concerns over unauthorized discharge into the receiving stream, which was noted during the last EPA inspection. To address this issue, the facility has taken steps to fill gaps in the dock floor, as it is situated directly above the stream, thus mitigating the risk of bypass. Currently, the loading docks are utilized for equipment storage purposes.

- To prevent sweetwater from infiltrating the facility's stormwater drainage system and avoid its treatment in the WWTP, a comprehensive sweetwater surge protection system has been deployed throughout the premises. This system, comprised of pumps, retention basins, and sump wells strategically placed across the facility, enables continuous cycling of sweetwater within the refining process. Initiated in October 2023, the project underwent installation in three phases, culminating in its completion by March 2024. By implementing this surge protection system, an estimated minimum of 63,000 lbs of BOD annually will be prevented from entering the river. This was implemented due to the frequency of exceedance of BOD.

Section III- Areas of Concern

This inspection revealed the following areas of concern:

- American Sugar Refinery, Inc. uses Pace Analytical Services, LLC (PACE) in St. Roses, LA as their contract lab to analysis Biochemical Oxygen Demand (BOD), Total Suspended Solids, Total Nitrogen and Total Phosphorus. However, upon reviewing the data from January 2024 to March 2024, it was found that many sample results did not meet the quality control conditions specified in the 23rd edition of Standard Methods 5210. The results may still be report when noted but also indicate potential issues with the lab or toxic effects of the sample.
    - Pace Analytical Services frequency of issues with various BOD QA/QC problem identifiers is concerning.
    - Samples received on March 21 and 27, 2024 failed to be within the acceptable limits for GGA. On the 21st the result was 85.8mg/L and 27th 128mg/L. Samples GGA should be within +/-30.5mg/L of 198mg/L.
    - During the analysis on January 19, 2024, the blanks failed to be within the acceptable limits. The average uptake in a 5 day must not be greater than .2mg/L in blanks.
    - Pace Analytical Services is required to select the sample with the highest dissolved oxygen (DO) concentration, when all dilutions result in a residual of less than 1mg/L after 5 days. Pace standard operating procedures (SOP) states it is selecting the greatest dilution to collect the BOD for samples with less than 1mg/L. The greatest dilution generally will produce the DO concentration but not always.
    - Pace Analytical arbitrarily selected what is reportable for diluted samples that result in a depletion less than 2mg/L after 5 days of initial reading of DO as written in their SOP.

When all dilutions for a sample result in less than 2mg/L, they are required to select the largest volume of sample and calculate the result. If the sample greatest volume used was less than 50mL, Pace is reporting non detect.

- No follow-up reports explaining issues noted when samples did not meet quality control conditions.

- American Sugar Refinery, Inc. failed to report number of exceedances on discharge monitoring reports (DMRs). The facility is required to report each occurrence the facility exceeds their permitted daily maximum quantity/loading or concentration.

Section IV – LIST OF APPENDICES

- Appendix A – Photos
- Appendix B – Pace Analytical and American Sugar Refinery DMR

Appendix 1

Photograph Log

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 1

Location: Domino Sugar Refinery		
City: Arabi	County/Parish: St. Bernard	State: LA

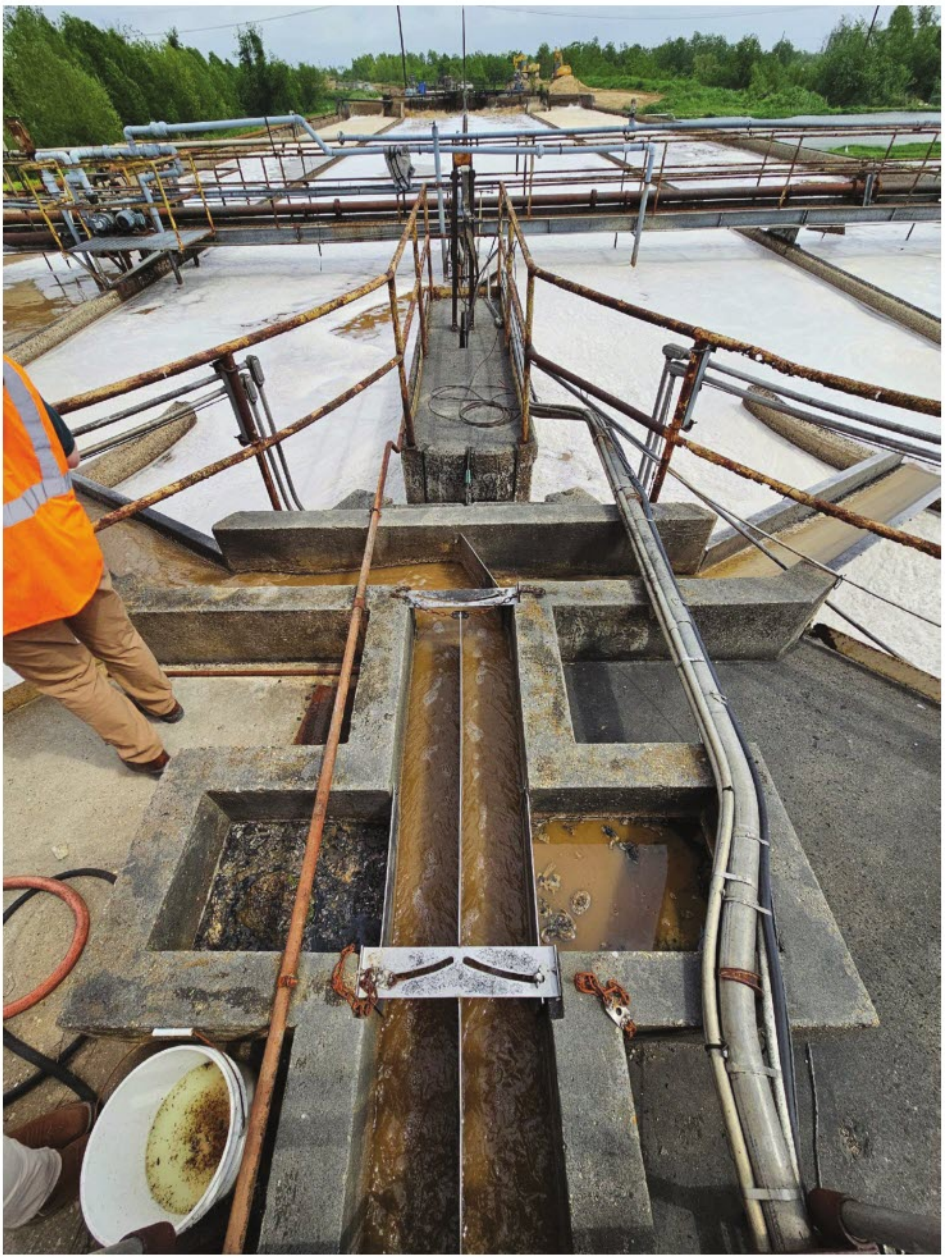
Aeration Basin

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 2

Location: Domino Sugar Refinery		
City: Arabi	County/Parish: St. Bernard	State: LA



Aeration Basin

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 3

Location: Domino Sugar Refinery		
City: Arabi	County/Parish: St. Bernard	State: LA

Clarifier

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 4

Location: Domino Sugar Refinery		
City: Arabi	County/Parish: St. Bernard	State: LA

Internal Outfall

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 5

Location: Domino Sugar Refinery		
City: Arabi	County/Parish: St. Bernard	State: LA

Outfall 002

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

Photograph Log

Photo No. 6

Location: Domino Sugar Refinery		
City: Arabi	County/Parish: St. Bernard	State: LA

Outfall 001 Sampling Point. Outfall discharge is submerged.

Appendix B

Pace Analytical Services, LLC

LAB Bench Sheets & SOP

American Sugar Refining, Inc.

DMR

SKALAR

Incomplete Dilution Series. Did not produce result with the QC required depletion of 2mg/L and residual of 1mg/L after 5 days. Did not record the final DO for 10ml Sample volume.

67191 bod

Seq.	Rack position	Identity	Sample Volume	Tot. dil.	Init	°C (initial)	Date / Time	Final	°C (final)	Date / Time Final	Depl	BOD	Avg.BOD	ErrorCalc	Avg. Seed Corr. Factor
1	1	Blank	0		8.69	19.5	02/22/2024 16:33:42	8.51	19.7	02/27/2024 13:22:32	0.18				
2	2	Blank	0		8.69	19.4	02/22/2024 16:33:42	8.39	19.7	02/27/2024 13:22:32	0.30				
3	3	Blank	0		8.69	19.5	02/22/2024 16:35:33	8.52	19.9	02/27/2024 13:24:13	0.17				
4	4	Seed	0		8.68	19.4	02/22/2024 16:35:33	4.24	19.9	02/27/2024 13:24:13	4.44				0.45033333333333331
5	5	Seed	0		8.69	19.5	02/22/2024 16:37:22	4.28	19.9	02/27/2024 13:26:19	4.41				
6	6	Seed	0		8.75	19.4	02/22/2024 16:37:22	4.09	20.0	02/27/2024 13:26:19	4.66				
7	7	GGA	6	50	8.69	19.5	02/22/2024 16:39:13	4.24	19.7	02/27/2024 13:28:41	4.45	177.47	175.13		
8	8	GGA	6	50	8.71	19.4	02/22/2024 16:39:13	4.38	19.7	02/27/2024 13:28:41	4.33	171.47			
9	9	GGA	6	50	8.68	19.5	02/22/2024 16:41:03	4.25	19.8	02/27/2024 13:30:41	4.43	176.47			
10	10	20308011001	25	12	8.73	19.4	02/22/2024 16:41:03	6.82	19.8	02/27/2024 13:30:41	1.91	12.11		<	
11	11	20308011001	75	4	8.66	19.6	02/22/2024 16:42:54	6.31	19.9	02/27/2024 13:32:41	2.35	5.80	5.21		
12	12	20308011001	200	1.5	8.82	19.8	02/22/2024 16:42:54	4.84	20.0	02/27/2024 13:32:41	3.98	4.62			
13	13	1532504	25	12	8.67	19.6	02/22/2024 16:44:44	6.97	19.9	02/27/2024 13:34:44	1.70	9.59		<	
14	14	1532504	75	4	8.73	19.5	02/22/2024 16:44:44	6.24	19.8	02/27/2024 13:34:44	2.49	6.36	6.43		
15	15	1532504	200	1.5	8.75	19.8	02/22/2024 16:46:35	3.51	19.9	02/27/2024 13:36:26	5.24	6.51			
16	16	20307986001	5	60	8.71	19.4	02/22/2024 16:46:35	5.61	19.9	02/27/2024 13:36:26	3.10	131.96	122.97		
17	17	20307986001	10	30	8.57	19.4	02/22/2024 16:48:27	3.87	20.0	02/27/2024 13:38:48	4.70	113.98			
18	18	20307986001	20	15	8.5	19.4	02/22/2024 16:48:27	0.9	20.0	02/27/2024 13:38:48	7.60	100.49		>	
19	1	20307986001	30	10	8.26	19.5	02/22/2024 16:50:18	0.75	19.9	02/27/2024 13:41:02	7.51	66.09		>	
20	2	20307986002	200	1.5	9.49	19.5	02/22/2024 16:50:18	6.78	19.9	02/27/2024 13:41:02	2.71	2.71	2.27		
21	3	20307986002	250	1.2	9.74	19.6	02/22/2024 16:52:09	7.32	20.0	02/27/2024 13:43:22	2.42	1.82			
22	4	20307993001	10	30	8.69	19.4	02/22/2024 16:52:09	7.53	19.9	02/27/2024 13:43:22	1.16	7.78		<	
23	5	20307993001	30	10	8.79	19.4	02/22/2024 16:54:18	7.43	20.0	02/27/2024 13:45:32	1.36	4.59		<	
24	6	20307993001	100	3	8.93	19.6	02/22/2024 16:54:18	6.66	20.1	02/27/2024 13:45:32	2.27	4.11	4.11		
25	7	20307987001	3	100	8.66	19.5	02/22/2024 16:56:09	6.37	20.0	02/27/2024 13:47:18	2.29	138.93	114.01		
26	8	20307987001	10	30	8.58	19.4	02/22/2024 16:56:09	4.71	19.9	02/27/2024 13:47:18	3.87	89.08			
27	9	20307987001	30	10	8.15	19.5	02/22/2024 16:58:02	0.87	19.9	02/27/2024 13:49:17	7.28	63.79		>	
28	10	20307987002	30	10	8.69	19.5	02/22/2024 16:58:02	6.88	20.0	02/27/2024 13:49:17	1.81	9.09		<	
29	11	20307987002	100	3	8.72	19.6	02/22/2024 16:59:54	5.12	20.0	02/27/2024 13:51:36	3.60	8.10	8.10		
30	12	20308126001	30	10	8.56	19.4	02/22/2024 16:59:54	6.41	20.0	02/27/2024 13:51:36	2.15	12.49	14.32		
31	13	20308126001	100	3	7.75	19.8	02/22/2024 17:01:46	1.47	20.1	02/27/2024 13:53:23	6.28	16.14			
32	14	20307974001	5	60	8.68	19.4	02/22/2024 17:01:46	7.52	20.0	02/27/2024 13:53:23	1.16	15.56		<	
33	15	20307974001	10	30	8.59	19.4	02/22/2024 17:03:45	7.2	20.0	02/27/2024 13:55:43	1.39	14.68		<	
34	16	20307974001	25	12	8.72	19.4	02/22/2024 17:03:45	7.3	20.0	02/27/2024 13:55:43	1.42	6.23		<	
35	17	20307974001	50	6	8.68	19.5	02/22/2024 17:05:38	6.86	20.0	02/27/2024 13:57:46	1.82	5.52	5.52	<<5.52	
36	18	20308017001	30	10	8.62	19.4	02/22/2024 17:05:38	6.87	20.0	02/27/2024 13:57:46	1.75	8.49		<	
37	1	20308017001	100	3	8.31	19.8	02/22/2024 17:07:31	5.31	20.0	02/27/2024 13:59:33	3.00	6.30	6.30		
38	2	20308015001	30	10	8.62	19.4	02/22/2024 17:07:31	6.93	19.9	02/27/2024 13:59:33	1.69	7.89		<	
39	3	20308015001	100	3	8.2	19.5	02/22/2024 17:09:24	5.36	19.9	02/27/2024 14:01:36	2.84	5.82	5.82		
40	4	20308054001	1	300	8.72	19.3	02/22/2024 17:09:24	7.64	19.8	02/27/2024 14:01:36	1.08	53.80		<	
41	5	20308054001	3	100	8.62	19.4	02/22/2024 17:11:17	7.11	19.9	02/27/2024 14:03:35	1.51	60.93		<	
42	6	20308054001	10	30	8.66	19.4	02/22/2024 17:11:17	6.01	20.0	02/27/2024 14:03:35	2.65	52.48	52.48		
43	7	20308000001	1	300	8.66	19.4	02/22/2024 17:13:11	7.72	20.1	02/27/2024 14:05:32	0.94	11.80		<	
44	8	20308000001	3	100	8.71	19.3	02/22/2024 17:13:11	7.47	19.9	02/27/2024 14:05:32	1.24	33.93		<	
45	9	20308000001	5	60	8.66	19.4	02/22/2024 17:15:05	7.48	19.9	02/27/2024 14:07:17	1.18	16.76		<	
46	10	20308000001	10	30	8.69	19.3	02/22/2024 17:15:05	7.36	19.8	02/27/2024 14:07:17	1.33	12.88	12.88	<<12.88	
47	11	20308012001	30	10	8.42	19.4	02/22/2024 17:16:59	5.73	19.9	02/27/2024 14:09:01	2.69	17.89	17.89		
48	12	20308012001	100	3	7.29	19.6	02/22/2024 17:16:59	0.94	20.0	02/27/2024 14:09:01	6.35	16.35		>	
49	13	20308053001	0.1	3000	8.62	19.5	02/22/2024 17:18:59	7.43	20.1	02/27/2024 14:11:20	1.19	868.00		<	
50	14	20308053001	0.3	1000	8.61	19.3	02/22/2024 17:18:59	7.04	19.9	02/27/2024 14:11:20	1.57	669.33		<	
51	15	20308053001	1	300	8.64	19.4	02/22/2024 17:20:54	6.5	20.0	02/27/2024 14:13:05	2.14	371.80	384.83		
52	16	20308053001	3	100	8.61	19.3	02/22/2024 17:20:54	3.74	19.9	02/27/2024 14:13:05	4.87	396.93			
53	17	20308053001	5	60	8.47	19.4	02/22/2024 17:22:49	1.14	20.0	02/27/2024 14:15:09	7.33	385.76			
54	18	20308179001	30	10	8.66	19.5	02/22/2024 17:22:49	7.07	20.0	02/27/2024 14:15:09	1.59	6.89		<	
55	1	20308179001	100	3	8.69	19.8	02/22/2024 17:24:43	6.57	20.1	02/27/2024 14:17:31	2.12	3.66	3.66		
56	2	20308154001	30	10	8.68	19.5	02/22/2024 17:24:43	7.54	20.0	02/27/2024 14:17:31	1.14	2.39		<	
57	3	20308154001	100	3	8.64	19.6	02/22/2024 17:26:38	7.65	20.0	02/27/2024 14:19:16	0.99	0.27	0.27	<<0.27	
58	4	20308171004	3	100	8.38	19.3	02/22/2024 17:26:38	0.82	19.9	02/27/2024 14:19:16	7.56	665.93		>	
59	5	20308171004	10	30	7.67	19.4	02/22/2024 17:28:34	7.88	19.8	02/27/2024 14:21:38	-0.21	-33.32		<	
60	6	20308171004	30	10	6.28	19.5	02/22/2024 17:28:34	4.95	20.3	02/27/2024 14:21:38	1.33	4.29		FInit DO<7	
61	7	20308171004	100		1.61	19.2	02/22/2024 17:30:45								
62	8	20308171002	3	100	8.54	19.4	02/22/2024 17:30:45	6.89	20.0	02/27/2024 14:24:01	1.65	74.93			
63	9	20308171002	10		8.25	19.4	02/22/2024 17:33:17								
64	10	20308171002	30	10	8.57	19.4	02/22/2024 17:33:17	0.97	19.9	02/27/2024 14:25:29	7.60	66.99			
65	11	20308171002	100	3	8.16	19.5	02/22/2024 17:35:48	0.91	20.0	02/27/2024 14:27:34	7.25	19.05			
66	12	20308171003	3	100	8.64	19.5	02/22/2024 17:35:48	6.91	20.1	02/27/2024 14:27:34	1.73	82.93		<	
67	13	20308171003	10	30	8.54	19.6	02/22/2024 17:37:43	5.83	20.2	02/27/2024 14:29:57	2.71	54.28	48.24		
68	14	20308171003	30	10	8.61	19.4	02/22/2024 17:37:43	3.49	20.1	02/27/2024 14:29:57	5.12	42.19			
69	15	20308171003	100	3	8.33	19.6	02/22/2024 17:39:39	0.88	20.2	02/27/2024 14:32:12	7.45	19.65		>	
70	16	20308171001	3	100	8.67	19.4	02/22/2024 17:39:39	7.42	20.1	02/27/2024 14:32:12	1.25	34.93		<	
71	17	20308171001	10	30	8.58	19.5	02/22/2024 17:41:35	7.33	20.2	02/27/2024 14:34:34	1.25	10.48		<	
72	18	20308171001	30	10	8.66	19.5	02/22/2024 17:41:35	7.2	20.2	02/27/2024 14:34:34	1.46	5.59		<	
73	1	20308171001	100	3	8.58	19.8	02/22/2024 17:43:32	7.1	20.4	02/27/2024 14:36:50	1.48	1.74	1.74	<<1.74	
74	2		1												
75	3		1												

SKALAR

Blanks exceed .2mg/L

Variance greater than 30% between reading for the sample. 660.07 vs 14.22

66428

Seq.	Rack position	Identity	Sample Volume	Tot. dil.	Init	°C (initial)	Date / Time	Final	°C (final)	Date / Time Final	Depl	BOD	Avg.BOD	ErrorCalc	Avg. Seed Corr. Factor
1	1	Blank	0		8.89	19.4	01/19/2024 15:01:42	1.36	19.7	01/24/2024 12:33:17	7.53			BD>,	
2	2	Blank	0		8.88	19.3	01/19/2024 15:01:42	1.37	19.6	01/24/2024 12:33:17	7.51			BD>,	
3	3	Blank	0		8.89	19.4	01/19/2024 15:03:30	2.39	19.4	01/24/2024 12:35:35	6.50			BD>,	
4	4	Seed	0		8.89	19.4	01/19/2024 15:03:30	4.61	19.4	01/24/2024 12:35:35	4.28				0.43966666666666682
5	5	Seed	0		8.88	19.5	01/19/2024 15:05:18	4.77	19.4	01/24/2024 12:37:53	4.11				
6	6	Seed	0		8.89	19.4	01/19/2024 15:05:18	4.09	19.8	01/24/2024 12:37:53	4.80				
7	7	GGA	6	50	8.87	19.5	01/19/2024 15:07:06	4.09	19.5	01/24/2024 12:40:11	4.78	195.03	196.37		
8	8	GGA	6	50	8.9	19.4	01/19/2024 15:07:06	4.07	19.7	01/24/2024 12:40:11	4.83	197.53			
9	9	GGA	6	50	8.88	19.4	01/19/2024 15:08:55	4.07	19.4	01/24/2024 12:42:30	4.81	196.53			
10	10	20304428001	10	30	8.87	19.4	01/19/2024 15:08:55	1.55	19.6	01/24/2024 12:42:30	7.32	193.22	101.95		
11	11	20304428001	30	10	8.89	19.5	01/19/2024 15:10:44	0.66	19.5	01/24/2024 12:44:31	8.23	73.51		>	
12	12	20304428001	100	3	8.93	19.7	01/19/2024 15:10:44	4.49	19.7	01/24/2024 12:44:31	4.44	10.68			
13	13	20304310001	3	100	8.87	19.4	01/19/2024 15:12:33	0.62	19.6	01/24/2024 12:47:03	8.25	737.07	737.07	>>737.1	
14	14	20304310001	10	30	8.82	19.3	01/19/2024 15:12:33	0.8	19.7	01/24/2024 12:47:03	8.02	214.22		>	
15	15	20304310001	30	10	8.65	19.4	01/19/2024 15:14:22	0.65	19.1	01/24/2024 12:49:22	8.00	71.21		>	
16	16	20304310002	30	10	8.85	19.4	01/19/2024 15:14:22	1.47	19.1	01/24/2024 12:49:22	7.38	65.01	65.01		
17	17	20304310002	100	3	8.78	19.6	01/19/2024 15:16:11	0.7	19.1	01/24/2024 12:51:41	8.08	21.60		>	
18	18	20304441001	30	10	8.85	19.5	01/19/2024 15:16:11	0.93	19.6	01/24/2024 12:51:41	7.92	70.41	70.41	>>70.4	
19	1	20304441001	100	3	8.88	19.9	01/19/2024 15:18:01	0.72	20.0	01/24/2024 12:54:01	8.16	21.84		>	
20	2	20304313001	0.1	3000	8.87	19.3	01/19/2024 15:18:01	0.7	19.9	01/24/2024 12:54:01	8.17	21,872.00	21,872.00	>>21872	
21	3	20304313001	0.3	1000	8.87	19.4	01/19/2024 15:19:51	0.64	19.9	01/24/2024 12:56:20	8.23	7,350.67		>	
22	4	20304313001	1	300	8.85	19.3	01/19/2024 15:19:51	0.72	19.9	01/24/2024 12:56:20	8.13	2,175.20		>	
23	5	20304313001	3	100	8.86	19.4	01/19/2024 15:21:41	0.58	19.9	01/24/2024 12:58:39	8.28	740.07		>	
24	6	20304313001	10	30	8.8	19.3	01/19/2024 15:21:41	0.88	19.9	01/24/2024 12:58:39	7.92	211.22		>	
25	7	20304334001	25	12	8.42	19.4	01/19/2024 15:23:31	0.64	20.0	01/24/2024 13:00:58	7.78	82.81	82.81	>>82.8	
26	8	20304334001	75	4	6.22	19.3	01/19/2024 15:23:31	0.72	19.9	01/24/2024 13:00:58	5.50	18.48		>Init DO<7	
27	9	20304334001	200	1.5	0.99	19.6	01/19/2024 15:25:41	0.53	19.9	01/24/2024 13:28:29	0.46	-0.63		<Init DO<7	
28	10	20304330001	30	10	8.69	19.2	01/19/2024 15:25:41	0.84	19.9	01/24/2024 13:03:17	7.85	69.71	69.71	>>69.7	
29	11	20304330001	100	3	8.23	19.4	01/19/2024 15:28:07	0.81	19.9	01/24/2024 13:30:31	7.42	19.62		>	
30	12	20304404001	5	60	8.85	19.2	01/19/2024 15:28:07	1.05	19.9	01/24/2024 13:05:20	7.80	415.24	415.24		
31	13	20304404001	10	30	8.71	19.3	01/19/2024 15:30:34	0.59	19.9	01/24/2024 13:07:22	8.12	217.22		>	
32	14	20304404001	25	12	8.72	19.2	01/19/2024 15:30:34	0.67	19.8	01/24/2024 13:07:22	8.05	86.05		>	
33	15	20304404001	50	6	8.51	19.3	01/19/2024 15:32:25	0.56	19.8	01/24/2024 13:09:42	7.95	42.42		>	
34	16	20304359001	25	12	8.59	19.1	01/19/2024 15:32:25	1.04	19.8	01/24/2024 13:09:42	7.55	80.05	42.19		
35	17	20304359001	75	4	7.69	19.4	01/19/2024 15:34:15	0.63	19.8	01/24/2024 13:12:02	7.06	24.72		>	
36	18	20304359001	200	1.5	4.85	19.5	01/19/2024 15:34:15	1.08	19.8	01/24/2024 13:12:02	3.77	4.34		Init DO<7	
37	1	20304328001	30	10	8.56	19.4	01/19/2024 15:36:32	0.59	20.0	01/24/2024 13:14:22	7.97	70.91		>	
38	2	20304328001	100	3	7.96	19.4	01/19/2024 15:36:32	1.14	19.9	01/24/2024 13:14:22	6.82	17.82	17.82		
39	3	20304329001	30	10	8.62	19.3	01/19/2024 15:38:24	1.63	19.9	01/24/2024 13:16:43	6.99	61.11	61.11		
40	4	20304329001	100	3	7.75	19.3	01/19/2024 15:38:24	0.71	19.8	01/24/2024 13:16:43	7.04	18.48		>	
41	5	20304403001	25	12	8.67	19.4	01/19/2024 15:40:15	0.66	19.9	01/24/2024 13:19:05	8.01	85.57	85.57	>>85.6	
42	6	20304403001	75	4	8.15	19.4	01/19/2024 15:40:15	0.58	19.9	01/24/2024 13:19:05	7.57	26.76		>	
43	7	20304403001	200	1.5	6.67	19.8	01/19/2024 15:42:07	0.56	19.9	01/24/2024 13:21:26	6.11	7.85		>Init DO<7	
44	8	20304436001	25	12	8.82	19.3	01/19/2024 15:42:07	0.69	19.9	01/24/2024 13:21:26	8.13	87.01		>	
45	9	20304436001	75	4	8.77	19.4	01/19/2024 15:44:18	2.4	19.9	01/24/2024 13:23:47	6.37	21.96	13.69		
46	10	20304436001	200	1.5	9.4	19.6	01/19/2024 15:44:18	4.91	19.8	01/24/2024 13:23:47	4.49	5.42			
47	11	20304440001	20	15	8.6	19.3	01/19/2024 15:46:10	0.8	19.9	01/24/2024 13:26:04	7.80	103.81		>	
48	12	20304440001	50	6	7.97	19.2	01/19/2024 15:46:10	3.53	19.9	01/24/2024 13:26:04	4.44	21.36	21.36		
49	13	20304424001	30	10	8.85	19.3	01/19/2024 15:48:08	0.63	19.9	01/24/2024 13:32:34	8.22	73.41		>	
50	14	20304424001	100	3	8.94	19.2	01/19/2024 15:48:08	1.19	19.8	01/24/2024 13:32:34	7.75	20.61	20.61		
51	15	1513652	30	10	8.87	19.2	01/19/2024 15:50:00	0.67	19.9	01/24/2024 13:34:55	8.20	73.21		>	
52	16	1513652	100	3	8.95	19.2	01/19/2024 15:50:00	2.78	19.8	01/24/2024 13:34:55	6.17	15.87	15.87		
53	17	20304470001	3	100	8.87	19.1	01/19/2024 15:51:53	0.75	19.9	01/24/2024 13:37:17	8.12	724.07		>	
54	18	20304470001	10	30	8.81	19.1	01/19/2024 15:51:53	1.11	19.9	01/24/2024 13:37:17	7.70	204.62	204.62		
55	1	20304470001	30	10	8.83	19.3	01/19/2024 15:53:46	0.66	20.0	01/24/2024 13:39:40	8.17	72.91		>	
56	2	20304470001	100	3	8.77	19.3	01/19/2024 15:53:46	0.73	19.9	01/24/2024 13:39:40	8.04	21.48		>	
57	3	20304470002	3	100	8.85	19.2	01/19/2024 15:55:38	1.37	19.9	01/24/2024 13:42:02	7.48	660.07	337.14		
58	4	20304470002	10	30	8.83	19.1	01/19/2024 15:55:38	0.67	19.8	01/24/2024 13:42:02	8.16	218.42		>	
59	5	20304470002	30	10	8.85	19.2	01/19/2024 15:57:30	0.71	20.0	01/24/2024 13:44:24	8.14	72.61		>	
60	6	20304470002	100	3	8.9	19.3	01/19/2024 15:57:30	3.28	20.1	01/24/2024 13:44:24	5.62	14.22			
61	7	20304470003	3	100	8.84	19.2	01/19/2024 15:59:24	0.62	20.1	01/24/2024 13:46:48	8.22	734.07		>	
62	8	20304470003	10	30	8.88	19.1	01/19/2024 15:59:24	1.37	19.9	01/24/2024 13:46:48	7.51	198.92	198.92		
63	9	20304470003	30	10	8.86	19.2	01/19/2024 16:01:18	0.96	20.0	01/24/2024 13:49:11	7.90	70.21		>	
64	10	20304470003	100	3	8.87	19.2	01/19/2024 16:01:18	0.63	20.0	01/24/2024 13:49:11	8.24	22.08		>	
65	11		0												
66	12		0												
67	13		0												
68	14		0												
69	15		0												
70	16		0												
71	17		0												
72	18		0												

Seed Factor, sf = (DOI – DOF) x volume of seed added to samples / 10 (volume of seed in control bottles)

The following calculations can be used to calculate the Blank, LCS percent recovery and the Sample and Duplicate %RPD.

$$BLANK = DOI - DOF$$

$$\%LCSREC = \frac{LCSConc}{TrueValue} * 100$$

$$\%RPD = \left| \frac{(SampleConc - DupConc)}{Average} \right| * 100$$

10.2 Qualitative Identification

- Results are averaged if:
  - More than one sample dilution meets the criteria of a residual DO of at least 1 mg/L and a DO depletion of at least 2 mg/L
  - There is no evidence of toxicity at higher sample concentrations.
  - There is no evidence of an obvious anomaly
- If DO depletion is <2 mg/l and sample concentration is 100%, the DO depletion may be reported as the BOD
- If all dilutions result in a final DO of <1 mg/l, calculate the BOD using the lowest sample volume (greatest dilution) and qualify the data using a 'B1' qualifier
- If all dilutions result in a DO depletion of <2 mg/l, and the greatest volume used was <50ml, report the result as ND and calculate the BOD detection limit using the greatest sample volume (lowest dilution). Qualify the data using a 'B2' qualifier.

11.0 QUALITY CONTROL & METHOD PERFORMANCE

11.1 Quality Control

Prepare the following QC samples with each batch of samples. Refer to Appendix A for acceptance criteria and required corrective action(s).

QC Check	Acronym	Frequency
Dilution Water Blank	MB	1 per batch of 20 or fewer samples. If batch exceeds 20 samples, every 20 samples.
Laboratory Control Sample	LCS	1 per batch of 20 or fewer samples. If batch exceeds 20 samples, every 20 samples.
Seed Control		As Required.
Sample Duplicate	DUP	1 per batch of 20 or fewer samples.
Dilution Result RPD	RPD	<30%
Incubator		

DMR Copy of Record

Permit

Permit #:	**LA0005665**	**Permittee:**	American Sugar Refining	**Facility:**	AMERICAN SUGAR REFINING, INC
Major:	Yes	**Permittee Address:**	7417 North Peters Street Arabi, LA 70032	**Facility Location:**	7417 NORTH PETERS STREET 7417 NO. PETERS ST. ARABI, LA 70032
Permitted Feature:	001 External Outfall	**Discharge:**	**001-A** MONTHLY REQUIREMENTS		

Report Dates & Status

Monitoring Period:	**From 01/01/24 to 01/31/24**	**DMR Due Date:**	**02/15/24**	**Status:**	**NetDMR Validated**

Considerations for Form Completion

For BOD and TSS with monitoring location of SC-See Comments, the permittee shall report the net values for BOD and TSS from Outfalls 001 and 002 (combined) per parameter (see permit for further details)

The Number of Exceedance are not reported

Principal Executive Officer

First Name:	Nicholas	**Title:**	environmental manager	**Telephone:**	504-401-2690
Last Name:	Andrault-Hingle				

No Data Indicator (NODI)

Form NODI: --

Parameter Code	Parameter Name	Monitoring Location	Season #	Param. NODI		Quantity or Loading Qualifier 1	Value 1	Qualifier 2	Value 2	Units	Quality or Concentration Qualifier 1	Value 1	Qualifier 2	Value 2	Qualifier 3	Value 3	Units	# of Ex.	Frequency of Analysis	Sample Ty
00310	**BOD, 5-day, 20 deg. C**	2 - Effluent Net	0	--	Sample	=	5499.29	=	11661.49	26 - lb/d									01/07 - Weekly	24 - COMP
					Permit Req.		Req Mon MO AVG		Req Mon DAILY MX	26 - lb/d									01/07 - Weekly	24 - COMP
					Value NODI															
X 00310	**BOD, 5-day, 20 deg. C**	SC - See Comments	0	--	Sample	=	6917.0	=	11917.51	26 - lb/d									01/07 - Weekly	24 - COMP
					Permit Req.	<=	3068.0 MO AVG	<=	8492.0 DAILY MX	26 - lb/d									01/07 - Weekly	24 - COMP
					Value NODI															
00400	**pH**	1 - Effluent Gross	0	--	Sample						=	7.47			=	7.53	12 - SU		01/07 - Weekly	GR - GRAB
					Permit Req.						>=	6.0 INST MIN			<=	9.0 INST MAX	12 - SU		01/07 - Weekly	GR - GRAB
					Value NODI															
00530	**Solids, total suspended**	2 - Effluent Net	0	--	Sample	=	20.5	=	27.0	26 - lb/d									01/07 - Weekly	24 - COMP
					Permit Req.		Req Mon MO AVG		Req Mon DAILY MX	26 - lb/d									01/07 - Weekly	24 - COMP
					Value NODI															
00530	**Solids, total suspended**	SC - See Comments	0	--	Sample	=	17.1	=	28.1	26 - lb/d									01/07 - Weekly	24 - COMP
					Permit Req.	<=	642.0 MO AVG	<=	1927.0 DAILY MX	26 - lb/d									01/07 - Weekly	24 - COMP
					Value NODI															
50050	**Flow, in conduit or thru treatment plant**	1 - Effluent Gross	0	--	Sample	=	11.51	=	15.13	03 - MGD									99/99 - Continuous	CA - CALC
					Permit Req.		Req Mon MO AVG		Req Mon DAILY MX	03 - MGD									99/99 - Continuous	CA - CALC
					Value NODI															

Submission Note

If a parameter row does not contain any values for the Sample nor Effluent Trading, then none of the following fields will be submitted for that row: Units, Number of Excursions, Frequency of Analysis, and Sample Type.

Edit Check Errors

Parameter Code	Parameter Name	Monitoring Location	Field	Type	Description	Acknowledge
00310	BOD, 5-day, 20 deg. C	SC - See Comments	Quantity or Loading Sample Value 2	Soft	The provided sample value is outside the permit limit. Please verify that the value you have provided is correct.	Yes
00310	BOD, 5-day, 20 deg. C	SC - See Comments	Quantity or Loading Sample Value 1	Soft	The provided sample value is outside the permit limit. Please verify that the value you have provided is correct.	Yes

Comments

see other notification report attached providing further information on BOD value outside of permit limit.

Attachments

Name	Type	Size
other-noncompliance-notification-report.pdf	pdf	98246.0

Report Last Saved By

American Sugar Refining

User:	NICHOLASAH
Name:	Nicholas Andrault-Hingle
E-Mail:	nicholas.andrault-hingle@asr-group.com
Date/Time:	2024-02-15 16:03 (Time Zone: -06:00)

Report Last Signed By

User:	EMENDONCA
Name:	Elizabeth Mendonca
E-Mail:	elizabeth.mendonca@asr-group.com
Date/Time:	2024-02-15 16:39 (Time Zone: -06:00)