

INSPECTION REPORT

Inspection Entry Date/Time	02/01/2024 10:30 AM (CT)	Announced: No
Inspection Exit Date/Time	02/01/2024 02:20 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	Westwood Regional STP	
Facility or Site Name	Westwood Regional STP	
Facility/Site Physical Address	Fairway Dr., East of Hwy 190	
City, State, Zip Code	Mandeville, LA 70471	
County/Borough/Parish		
Facility GPS Coordinates	30.409396, -90.076196	
Mailing Address (If different)		
City, State, Zip Code		
FRS ID	110009924733	
Permit Number(s) (If Applicable)	LA0063991	
SIC and/or NAICS	4952	
Regulatory Representatives Participating in Inspection:		
Title	Name	Organization
Environmental Scientist	Zoila Osteicoechea	LDEQ
Environmental Scientist	Jerod Goudy	LDEQ
Environmental Scientist	Amber Mase	LDEQ
Lead Inspector:		
Kenneth Aubuchon	KENNETH AUBUCHON	
	Digitally signed by KENNETH AUBUCHON Date: 2024.04.02 08:48:44 -05'00'	
	EPA REGION 6	aubuchon.kenneth@epa.gov (281) 983-2151
Supervisor Review:		
Roberto Bernier	ROBERTO BERNIER	
	Digitally signed by ROBERTO BERNIER Date: 2024.04.02 10:30:54 -05'00'	
	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 Westwood Regional STP (the “Site” or “Facility”), located at Fairway Dr., East of Hwy 190, Mandeville, LA 70471, at 10:30 AM (CT) on 02/01/2024 for an unannounced inspection. EPA REGION 6 Lead Inspector presented credentials to Glenn Daughdrill and informed them 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 Westwood Regional STP representatives, direct observations made by the EPA REGION 6 inspector, 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 Westwood Regional STP 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 Westwood Regional STP 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 was an EPA lead Compliance Evaluation Inspection accompanied by LDEQ Inspectors. Inspection objectives and credentials were presented during the opening meeting with the facility.

Attendees

Organization	Attendee Name	Title	Present in Opening Conf.	Present in Closing Conf.
EPA REGION 6	Kenneth Aubuchon	Lead Inspector	Yes	Yes
LDEQ	Zoila Osteicoechea	Environmental Scientist	Yes	Yes
LDEQ	Jerod Goudy	Environmental Scientist	Yes	Yes
LDEQ	Amber Mase	Environmental Scientist	Yes	Yes
St. Tammany Parish	Glenn Daughdrill	Crew Leader	Yes	Yes
St. Tammany Parish	Fernando Davis	Compliance Supervisor	Yes	Yes

Facility/Site Description

EPA REGION 6 lead inspector confirmed the following facility information:

The Westwood Regional STP provides wastewater services to a portion of the unincorporated areas of St Tammany Parish - between the towns of Mandeville & Covington. There is a mix of residential and light commercial service connections. The collection systems gravity flow to lift stations, then force main piped to the equalization tank at the Westwood facility before entering the treatment plant. The treatment process consists of extended aeration with activated sludge return process with a combination of two separate treatment plant trains. Disinfection is with a liquid chlorine feed. The on-site digester utilized for sludge thickening prior to belt press dewatering is used as a regional digester/sludge processing facility for Tammany Utilities owned treatment plants. Decanted supernatant from the digester & water from the belt press dewatering operations flow to the on-site equalization tank.

Facility/Site Information

Location(s)

Location/Area/Sub-area	Description
1. Equalization Tank	The Westwood facility provides wastewater services to a portion of the unincorporated areas of St Tammany Parish - between the towns of Mandeville & Covington. There is a mix of residential and light commercial service connections. The collection systems gravity flow to lift stations, then force main piped to the equalization tank at the Westwood facility. The Equalization Tank is 300 to 400 gallons and is aerated.
2. Sludge Digester / Dewatering	The on-site digester utilized for sludge thickening prior to the belt press is used as a regional digester/sludge processing facility for St. Tammany Utilities owned treatment plants. Supernatant from the digester & water from the belt press operations flow to the on-site equalization tank. The belt press / de-watering unit produces sludge cake, which is land applied by Breaux Services in Kiln, Mississippi (Permit Number LAJ019917).
3. Treatment System	The treatment system was reviewed at the time of the inspection from influent to discharge. The treatment process consists of extended aeration with activated sludge return process with a combination of two separate treatment plant trains. Disinfection is with a liquid chlorine feed. No de-chlorination processes were observed during the site tour.
4. Outfall 001	Effluent is discharged from Outfall 001 to the Bayou Tete L'Ours thence into the Tchefuncte River to Lake Pontchartrain.
5. Laboratory	Curtis Environmental Services, Inc.; 185 Belle Terre Blvd., LaPlace, Louisiana 70068. Lab Certification #01984.

SECTION II – OBSERVATIONS

Location: 4. Outfall 001		
Observation #: KA1-OB-001	Date: 02/01/2024	Weather:
The facility received a new permit on September 12, 2023. The new permit changed the monitoring requirements of sample type from grab to a 3-hr composite. The December 2023 DMR has a note that indicates that the change was not noticed on the new permit. Samples prior to January 2024 were grab samples and not the required 3-hr composite.		

Location: 3. Treatment System		
Observation #: KA1-OB-002	Date: 02/01/2024	Weather:
The facility's permit (LA0063991) requires that "the effluent shall contain No Measurable total residual chlorine". The facility's permit application has the de-chlorination feed chemical as sodium hypochlorite liquid however, sodium hypochlorite is a chlorination chemical NOT a de-chlorination chemical. During the inspection a de-chlorination system was not observed in the treatment process walk thru. In an email from Mr. Davis dated		

3/12/2024 he explains that "Due to an administrative oversight we did not have dichlorination at the time of the inspection, we have since ordered Sodium Bisulfite for the facility. I have attached the quote, invoice, and purchase order for the Sodium Bisulfite order."

Location: 5. Laboratory**Observation #:** KA1-OB-003**Date:** 02/01/2024**Weather:**

At the time of the inspection, holding times for chlorine sample analysis could not be determined. In an email dated 2/5/24, Mr. Davis explained that the chlorine analysis was not being conducted at the same time of the sample collection. Information was not provided to show holding times for chlorine samples were being met.

Location: 3. Treatment System**Observation #:** KA1-OB-004**Date:** 02/01/2024**Weather:**

At the time of the inspection, it was explained that the treatment system consisted of a combination of two separate treatment plant trains. The original tank system was constructed in 1997 with an expansion/upgrade in 2004 to increase the treatment plants capacity. The older tank system, being 25+ years in operation, was observed to be aged with several large, welded patches with concerning structural integrity.

Photo(s)

1. [P1010028.JPG](#)
2. [P1010031.JPG](#)
3. [P1010032.JPG](#)
4. [P1010033.JPG](#)
5. [P1010029.JPG](#)

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:** 4. Outfall 001**Regulation and/or Permit Requirement**

LPDES LA0063991 – Permit Requirements

Outfall 001 – Treated Sanitary Wastewater - Effluent Limitations and Monitoring Requirements: Such discharges shall be limited and monitored by the permittee as specified: Monitoring Requirements – Sampling Type – 3-hr composite.

AOC:

The facility received a new permit on September 12, 2023. The new permit changed the monitoring requirements of sample type from grab to a 3-hr composite. The December 2023 DMR has a note that indicates that the change was not noticed on the new permit. Samples prior to January 2024 were grab samples and not the required 3-hr composite.

Additional Notes:**AOC Reference #: KA1-OB-003****Location: 5. Laboratory****Regulation and/or Permit Requirement**

40 CFR 136.3 – Table II – Required Containers, Preservation Techniques, and Holding Times – Table IB – Inorganic Tests

Parameter number/name: 17. Chlorine, total residual – Maximum holding time: Analyze within 15 minutes

AOC:

At the time of the inspection, holding times for chlorine sample analysis could not be determined. In an email dated 2/5/24, Mr. Davis explained that the chlorine analysis is not conducted at the same time when the samples are collected.

Additional Notes:**AOC Reference #: KA1-OB-002****Location: 3. Treatment System****Regulation and/or Permit Requirement**

LPDES LA0063991 – Permit Requirements

Outfall 001 – Treated Sanitary Wastewater – Narrative Requirements N-4 (LAC 33: IX.2701) The effluent shall contain No Measurable total residual chlorine...

AOC:

The facility's permit (LA0063991) requires that "the effluent shall contain No Measurable total residual chlorine". The facility's permit application has the de-chlorination feed chemical as sodium hypochlorite liquid however, sodium hypochlorite is a chlorination chemical NOT a de-chlorination chemical. During the inspection a de-chlorination system was not observed in the treatment process walk thru. In an email from Mr. Davis dated 3/12/2024 he explains that "Due to an administrative oversight we did not have dichlorination at the time of the inspection, we have since ordered Sodium Bisulfite for the facility. I have attached the quote, invoice, and purchase order for the Sodium Bisulfite order."

Additional Notes:

SECTION VI – CLOSING CONFERENCE AND FOLLOW UP

Closing Conference

The EPA REGION 6 Lead Inspector held a closing conference with Facility personnel at 02:20 PM (CT) on 02/01/2024 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 02/01/2024.

Communication Log

The following information was received by EPA REGION 6 on/after exiting the Facility on 02/01/2024.

Type	Location	Point of Contact	Job Title/Organization	Description	Contains PII	Date
Email		Fernando Davis	Compliance Supervisor/St Tammany Parish Government	This email was to explain how chlorine residuals are sampled and reported.	No	02/05/2024 02:26 PM (CT)
Email		Fernando Davis	Compliance Supervisor/St Tammany Parish Government	This email was to explain the dichlorination process at the facility.	No	03/12/2024 03:10 PM (CT)

SECTION VII – LIST OF APPENDICES

- 1. Photo Log
- 2. Document Log

APPENDIX 1: PHOTO LOG



Belt Press			P1010023.JPG
02/01/2024	No CBI	No PII	Photographer: Kenneth AuBuchon
Belt Press used for dewatering sludge that is sent for beneficial reuse.			



Equalization Tank			P1010022.JPG
02/01/2024	No CBI	No PII	Photographer: Kenneth AuBuchon
Equalization tank at the Westwood facility before entering the WWTP.			



Treatment Tanks			P1010028.JPG
02/01/2024	No CBI	No PII	Photographer: Kenneth AuBuchon
Treatment tanks used at the facility.			



Aeration Basin/Tank			P1010031.JPG
02/01/2024	No CBI	No PII	Photographer: Kenneth AuBuchon
Aeration Basin/Tank with several large, welded patches with concerning structural integrity.			



Aeration Basin/Tank			P1010032.JPG
02/01/2024	No CBI	No PII	Photographer: Kenneth AuBuchon
Aeration Basin/Tank with several large, welded patches with concerning structural integrity.			



Aeration Basin/Tank			P1010033.JPG
02/01/2024	No CBI	No PII	Photographer: Kenneth AuBuchon
Aeration Basin/Tank with several large, welded patches with concerning structural integrity.			



Treatment Tanks			P1010029.JPG
02/01/2024	No CBI	No PII	Photographer: Kenneth AuBuchon
Treatment tanks used at the facility. The tanks have several large, welded patches with concerning structural integrity.			

APPENDIX 2: DOCUMENT LOG

Document Type	Document Name	Contains CBI	Contains PII	Uploaded By	Date Received
Permit Renewal Application	12468489.pdf	No	No	Kenneth Aubuchon	04/01/2024
Communications	Westwood WWTP LA0063991.pdf	No	No	Kenneth Aubuchon	04/01/2024
Communications	RE_ Westwood WWTP LA0063991.pdf	No	No	Kenneth Aubuchon	04/01/2024
Communications	RE_ Westwood WWTP LA0063991_2.pdf	No	No	Kenneth Aubuchon	04/01/2024
Communications	Inv_240972_from_Thornton_Musso__Bellemin_Inc._10132 (002).pdf	No	No	Kenneth Aubuchon	04/01/2024
Communications	Est_2732_from_Thornton_Musso__Bellemin_Inc._11068 (002).pdf	No	No	Kenneth Aubuchon	04/01/2024
Communications	Purchase Order Internal - 22401633_N (002).pdf	No	No	Kenneth Aubuchon	04/01/2024