

**Region 6 Compliance Assurance and Enforcement Division
INSPECTION REPORT**

Inspection Date(s):	07/20/2022		
Media:	Water		
Regulatory Program(s)	Clean Water Act		
Company Name:	Town of Lake Arthur		
Facility Name:	Town of Lake Arthur WWTP		
Facility Physical Location:	185 W Third St		
(city, state, zip code)	Town of Lake Arthur, LA 70549		
Mailing address:	P.O. Drawer AK		
(city, state, zip code)	Town of Lake Arthur, LA 70549		
County/Parish:	Jefferson Parish		
Facility Contact:	Sherry Crochet	Mayor	
	337-774-2211		
FRS Number:			
Identification/Permit Number:	LA0020133		
Media Number:	AI#19451		
NAICS:	221320		
SIC:	4952		
Personnel participating in inspection:			
Michael Williams	EPA/ 6EN-WMH	Inspector	281-983-2150
Abel Toup IV	Town of Lake Arthur	Operator	337-458-3741
EPA Lead Inspector Signature/Date			
	Michael D. Williams 		Date 9/22/22
Supervisor Signature/Date	Bernier, Roberto		Digitally signed by Bernier, Roberto Date: 2022.09.22 07:55:57 -05'00'
	Roberto Bernier		Date

Section I - Introduction

PURPOSE OF THE INSPECTION

EPA Region 6 inspector, Michael Williams, arrived at the Town of Lake Arthur at 10:31 am on July 20, 2022, for an unannounced NPDES wastewater treatment plant inspection. During the opening conference, I met with Abel Toup IV, city operator. Mr. Toup 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 LA0020133, 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 Town of Lake Arthur representatives, observations made during the inspection and records and reports maintained by the permittee.

FACILITY DESCRIPTION

The Town of Lake Arthur Wastewater Treatment Plant has a design flow of the plant is .75 mgd per the most recent permit application. The headworks consist of a bar screen. There is a grit chamber that has never operated, as stated by operator, Abel Toup IV. The treatment is supposed to have a single train of a combined oxidation orbital racetrack and intraclarifier or BOAT clarifier. The intraclarifier is in the form of an elongated clarifier vessel positioned on the top of a section of the center partition between the ditch sidewalls so that the overall clarifier vessel extends laterally into both of a pair of flow channels formed between the ditch sidewalls and the center partition, but is spaced from the ditch sidewalls so as to minimize impediment of the mixed liquor flow being treated in the channels. A gated inlet below the flow surface is provided in the first half of the bow of the vessel facing into the mixed liquor flow for diverting a portion of the flow into the clarifier. That flow portion is distributed over the entire width of the vessel and arrested in flow velocity so that settling of sludge can be performed downstream in the vessel. Clarified liquid removal troughs are provided at the stern end of the vessel and sludge ports are provided in the vessel bottom to transport settled sludge into the mixed liquor flowing under the vessel width. The facility is equipped with a belt press to dewater sludge. The site uses UV light for disinfection. The plant discharges into unnamed canal thence into Lake Arthur via Outfall 001 of the permit.

Section II- Observations

This inspection revealed the following observations:

The Town of Lake Arthur Wastewater Treatment Plant is in poor condition and not operable. The plant is not providing any treatment. The Town of Lake Arthur notified Louisiana Department of Environmental Quality (LDEQ) on May 9, 2022, that it anticipated a bypass of its treatment works. The plant accumulated a solid inventory that prohibit adequate treatment of the influent. (Attachment A) On the day of the inspection, the north aerator collapsed and needed to be repaired prior to any removal of solids. The town has never connected the grit chamber. The plant has been neglected. The plant has a long history of exceeding permit limits or effluent violations. LDEQ approved the bypass on July 13, 2022. (Attachment B) LDEQ state the Town of Lake Arthur will disinfect with chlorination prior to

discharge. The Town of Lake Arthur currently does not chlorinate but uses UV light which is ineffective because of the solid inventory.

Section III- Areas of Concerns

This inspection revealed the following areas of concerns:

The Town of Lake Arthur has violated Section B. General Conditions of their LPDES Permit LA0020133. The permittee shall at all times properly operate and maintain all facilities and systems of treatment which are installed or used by the permittee to achieve compliance with the conditions of the permit.

- There is no exact date or scheduled of when the bypass is to end included the approval letter.
- The Town of Lake Arthur has failed to operate the treatment plant as designed. The facility has several units that are bypassed or are not operable that are supposed to be a part of the process.
- The Town of Lake Arthur has been issued several enforcement orders from the State of Louisiana Department of Environmental Quality without penalty. These orders have yet to bring Lake Arthur into compliance.

Section IV – LIST OF APPENDICES

- Appendix A – Letter to LDEQ
- Appendix B – Letter from LDEQ granting bypass
- Appendix C – Photo Log

Appendix A

Lake Arthur Bypass Request



TOWN OF LAKE ARTHUR

"NATURE'S BEAUTY SPOT"

MAYOR SHERRY CROCHET

COUNCIL MEMBERS: DAVID HANKS RICKY MONCEAUX ROBERTA PALERMO AULDON ROBINSON SAMPSON LEJEUNE

CHIEF OF POLICE
KUBI B. TURNER

TOWN CLERK
MINDY MARCANTEL

TOWN ATTORNEY
RICHARD ARCENEUX

COURT MAGISTRATE
BENJAMIN A. CORMIER

June 21, 2022

Mr. Todd Franklin
LA DEQ
Water Permit Division
Post Office Box 4313
Baton Rouge, LA 70821-4313

RE: Town of Lake Arthur
Wastewater Treatment Facility
Anticipated Bypass
AI No. 19451
LPDES Permit No. LA0020133

Dear Mr. Franklin:

As discussed in our 5/9/22 zoom teleconference, the Town of Lake Arthur is informing LA DEQ of an anticipated bypass at the Town's wastewater treatment facility.

A large sludge and grit deposit has formed in the biological treatment unit (oxidation ditch) of the treatment facility. This large sludge deposit is hampering the efficiency of desirable biomass production as well as impacting the settling and return of activated sludge within the oxidation ditch.

We have engaged a professional engineer and a sludge dewatering specialty contractor to evaluate the situation and provide a recommendation to address the problem. It has been determined the problem cannot be addressed without taking the oxidation ditch offline. The existing treatment facility is a single train system and has no parallel or redundant system to divert flow through. Considering such anticipated bypass of the treatment facility will be required to remove the sludge deposit.

During this anticipated bypass, flow will be diverted into a preliminary treatment tank for inert solids screening, grit deposition and some biological sludge settling. The effluent from preliminary treatment and sludge dewatering process will be chlorinated prior to discharge into the receiving stream at or very near the permitted effluent discharge point. Sampling and analyzation of the effluent in accordance with the effluent discharge permit will be continued throughout the anticipated bypass. An estimation of the effluent discharge volume will also be documented on a daily basis.

Mr. Franklin
June 21, 2022
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The grit and biosolids deposit removed from the oxidation ditch will be partially dewatered, tested and disposed of by Big Mamou Bio-Solids, Inc.

We presently anticipate the duration of the sludge deposit removal and anticipated bypass to require a 30-day period. With approval of this anticipated bypass, the town anticipates performing this work in late Summer or early Fall of 2022.

A timely response to this request for approval of the "Anticipated Bypass" would sincerely be appreciated as the Town is anxious to move forward with this process. This is one of several planned activities for the Town's wastewater collection and treatment system in a diligent effort to achieve sustained compliance with wastewater effluent permit requirements.

Please don't hesitate to contact me should you have any questions or require additional information in this matter.

Sincerely,

Town of Lake Arthur

A handwritten signature in blue ink, appearing to read "Sherry Crochet", is written over the printed name.

Sherry Crochet, Mayor

Appendix B

LDEQ

Bypass Approval

JOHN BEL EDWARDS
GOVERNOR



CHUCK CARR BROWN, PH.D.
SECRETARY

State of Louisiana
DEPARTMENT OF ENVIRONMENTAL QUALITY
ENVIRONMENTAL SERVICES

Honorable Sherry Crochet, Mayor
Town of Lake Arthur
P.O. Drawer AK
Lake Arthur, LA 70549

JUL 13 2022

Permit Number: LA0020133
Agency Interest: 19451
Activity Number: PER20220003

Re: Wastewater Treatment Plant Improvements and Anticipated Bypass

Dear Mayor Crochet:

The Louisiana Department of Environmental Quality, Office of Environmental Services is in receipt of your letter dated June 21, 2022 regarding the need for an anticipated bypass of treatment. According to the letter, a large sludge and grit deposit has formed in the biological treatment unit (oxidation ditch) of the facility. This deposit is hampering the efficiency of biomass production and impacting the settling and return of the activated sludge. The oxidation ditch will need to be taken offline in order to determine the cause of this build up. The flow will be diverted into the preliminary treatment tank and bypass the oxidation ditch prior to chlorination and discharge.

Based on the information provided in the correspondence, the anticipated bypass is approvable under LAC 33:IX.2701.M.4.b. The following conditions are expected to be met for this bypass event:

1. Discharge Monitoring Reports shall continue to be submitted as required by the current Louisiana Pollutant Discharge Elimination System permit.
2. Within 5 days following the completion of the bypass, you will follow up with a written report that details the exact duration of the bypass, the estimated volume of material that was discharged, and any adverse impacts of the discharge on the receiving stream.

If you have any questions or comments regarding this response, please feel free to contact Rachel Davis by phone at (225) 219-3515 or by e-mail at rachel.davis@la.gov.

Sincerely,


Scott Williams, Administrator
Water Permits Division

cc: IO-W
ec: Todd Franklin
Water Permits Division

Permit Compliance Unit
Southwest Regional Office
Office of Environmental Compliance

Karl Aucoin
Aucoin and Associates, Inc.
k.aucoin@aucoinandassoc.com