

Monthly/Quarterly
LDEQ Non Compliance reports
October 2017- September 2018

October 10, 2017

Office of Environmental Compliance

LADEQ

P.O. Box 4312

Baton Rouge, Louisiana 70821-4312

Attn.: Scott B. Pierce

RE: City of Hammond South Slough Wetland Wastewater Assimilation Project
Amended compliance order
Enforcement Tracking No. WE-C-15-01070C
Agency Interest No. 19578

RESPONSE

1. BOD EXCEEDANCES

Month	Parameter	Permit Limit	Reported Sample Value	Explanation
November 2016	<ul style="list-style-type: none">• BOD Monthly Average• TSS Weekly Average• Total Mercury Weekly Average	30mg/l 135mg/l 004 lb/day	34.0mg/l 37.4mg/l 0 lb/day	High flow, high Ammonia and insufficient aeration Wrong value entered into computer, see DMR table attached Data entered in computer: incorrect, see DMR table attached
December 2016	BOD Monthly Average	30mg/l	24.0mg/l	The computer entry on the DMR portal has the correct value
February 2017	<ul style="list-style-type: none">• BOD Monthly Average• BOD Monthly Average• BOD Weekly Average	2002 lb/day 30mg/l 45 mg/l	2801lb/day 34.1mg/l 54.9mg/l	All exceeds due to high flow, high ammonia and insufficient aeration
May 2017	BOD Monthly Average	30mg/l	34.7mg/l	All exceeds due to high flow, high ammonia and insufficient aeration
July 2017	BOD Monthly	2002 lb/day	2066lb/day	High flow

2. Metals

Month	Parameter	Permit Limit	Reported Sample Value	Explanation
November 2016	Total Mercury Weekly Average	.004lb/day	0 lb/day	With limits, see DMR table attached
December 2016	Total Mercury Weekly Average	.004lb/day	.03lb/DAY	High flow
July 2017	Total Copper Monthly Average	.85lb/day	1.04lb/day	High Flow

It has been determined by both consulting engineers and wastewater operators that there are 3 main reasons for the continued BOD excursions. Inadequate aeration, high ammonia levels and reduced retention time. To address these issues the following improvements are planned with the near future.

- A. Supplement the aeration process with fixed aeration placed at bottom of cell#1 and with 3 new 100HP blowers
- B. Relocate the floating aerators placed in cell #1 in late 2016 to cell#2.
- C. Construct a new "Cell 2B" adjacent to cell #2 routing the partially treated wastewater from "old cell 2" to "new cell 2B". This will add an additional 8 million gallons of storage., which will increase detention time and allow for greater high flow treatment
- D. Add ammonia removal process between "new cell 2B" and cell 3.

The estimated cost for this project 1, 900, 000 and estimated start date of December 1, 2017 with procurement of funds. Below is an estimated time table of work and the completion of the project.

City of Hammond Wastewater Ungraded Project	
Procure Funds	Dec. 1, 2017
Complete plans, specifications, and bidding documents	Dec. 15, 2017
Advertising for bids	Dec. 22, 2017
Pre- bid conference	Jan. 9, 2018
Open Bids	Jan. 19, 2018
Award Bids	Jan. 23, 2018
Pre- Construction Conference	Feb., 5, 2018
Begin Construction	Feb. 12, 2018
Complete Construction – estimated 300 days	Dec. 9, 2018
Punch List work completed	Jan. 9, 2019

Full permit compliance for BOD's March 1, 2019

3. COPPER AND MERCURY METAL EXCEEDANCES: Copper metal and Mercury metal loading exceedance were both due to very high flow during the sampling period.

If you have any questions regarding the City of Hammond's response to the Amended Compliance Order of September 7, 2017, please contact Guy Palermo at (985)277-5962.

Sincerely,

Guy Palermo
Superintendent, Water & Sewer Department

Cc: Mayor Panepinto
Dr.Lacy Landrum
Vernon Banks
Chuck Spangler



City of Hammond
Water & Sewer Department
Guy Palermo, Superintendent

Pete Panepinto, Mayor

P.O. Box 2788 Hammond, LA 70404-2788 * PH (985) 277-5962 * FAX (985) 277-5959

May 24, 2018

Office of Environmental Compliance
LDEQ
P.O. Box 4312
Baton Rouge, La 70821-4312

RE: City of Hammond, Compliance Order
Fourth Quarter 2017 Progress Report
Enforcement Tracking No. WE-C-15-01070C
Agency Interest No. 19578

Dear Mr. Pierce,

Please accept this letter as the, 2017 Fourth Quarter Compliance progress report that was due by January 15, 2018. Changes in personnel at the City of Hammond, specifically in the position of Environmental Lab Supervisor, caused the quarterly progress report to be overlooked. After 40 years of working for the City, Dr. Patrick Settoon retired. Wendy Montalbano was hired to fill the position, and she has been performing weekly testing, developing new monitoring procedures and ensuring the City provides safe drinking water and effective sewer treatment services.

At the end of 2017, for the fourth quarter time period, the City of Hammond, was on track with the timeline that was submitted in the October 10, 2017 letter. In December 2017, the Hammond began complying information to complete the application to the Clean Water Revolving Loan Fund to secure the money needed for the project. At that time there had been no changes made to the timeline. Below is the original schedule that since has been updated. We anticipated that the schedule would shift a few months, but we were unsure how much time as the loan pre-application had just begun.

City of Hammond Wastewater Ungraded Project	
Procure Funds	Dec. 1, 2017
Complete plans, specifications, and bidding documents	Dec. 15, 2017
Advertising for bids	Dec. 22, 2017
Pre- bid conference	Jan. 9, 2018
Open Bids	Jan. 19, 2018
Award Bids	Jan. 23, 2018

Pre- Construction Conference	Feb., 5, 2018
Begin Construction	Feb. 12, 2018
Complete Construction – estimated 300 days	Dec. 9, 2018
Punch List work completed	Jan. 9, 2019

If you have any question regarding the City of Hammond's response to the Amended Compliance Order, please contact, Wendy Montalbano at 985-277-5971, or montalbano_wa@hammond.org.

Sincerely,

Guy Palermo
Superintendent, Water & Sewer Department.

Cc: Mayor Panepinto
Dr. Lacy Landrum
Chuck Spangler



City of Hammond
Water & Sewer Department
Guy Palermo, Superintendent

Pete Panepinto, Mayor

P.O. Box 2788 Hammond, LA 70404-2788 * PH (985) 277-5962 * FAX (985) 277-5959

May 24, 2018.

Office of Environmental Compliance
LDEQ
P.O. Box 4312
Baton Rouge, La 70821-4312

RE: City of Hammond, Compliance Order
First Quarter 2018 Progress Report
Enforcement Tracking No. WE-C-15-01070C
Agency Interest No. 19578

Dear Mr. Pierce,

Please accept this late response as the required progress report for the 2018, First Quarter that was due to your office by April 15, 2018. As stated in the previous letter, changes in personnel change between Dr. Patrick Settoon, who has retired and Wendy Montalbano, the new City of Hammond Environmental Lab Supervisor, has caused the quarterly progress report to overlook. Ms. Montalbano now had a tracking system in place to ensure these quarterly reports are sent to your office timely.

On January 26, 2018 the City of Hammond formally submitted the pre- application to the Clean Water Revolving Loan Fund. Hammond received a pre-approval letter from LDEQ concerning the loan on February 19, 2018. The City then submitted a Categorical Exclusion Request on May 3, 2018. Currently the City is completing the full application for CWRLF and plans to submit the application by June of 2018.

At this time the City of Hammond is requesting to have the timeline amended to the updated schedule below.

Completed Full Application to CWRLF	June, 2018
Soil Boring Complete	June, 2018
Application to Bond Commission for funding for CWRLF	July 19, 2018
Completed plans, specifications and bidding documents	July 20, 2018
Advertising for Bids	August 22, 2018
Pre-bid Conference	September 6, 2018
Award Bids	September 25, 2018
Pre- Construction Conference	October 13, 2018
Begin Construction	October 24, 2018
Complete Construction- estimated at 300 days	August 19, 2019
Punch List for work Completed	September 18, 2019

Full permit compliance for BOD is expected by August 19, 2019

If you have any question regarding the City of Hammond's response to the Amended Compliance Order, please contact, Wendy Montalbano at 985-277-5971, or montalbano_wa@hammond.org.

Sincerely,

Guy Palermo
Superintendent, Water & Sewer Department.

Cc: Mayor Panepinto
Dr. Lacy Landrum
Chuck Spangler



City of Hammond
Water & Sewer Department
Guy Palermo, Superintendent

Pete Panepinto, Mayor

P.O. Box 2788 Hammond, LA 70404-2788 * PH (985) 277-5962 * FAX (985) 277-5959

July 6, 2018

Office of Environmental Compliance
LDEQ
P.O. Box 4312
Baton Rouge, La 70821-4312

RE: City of Hammond, Compliance Order
Second Quarter 2018 Progress Report
Enforcement Tracking No. WE-C-15-01070C
Agency Interest No. 19578

Dear Mr. Pierce,

Please accept this response as the required progress report for the 2018, Second Quarter that is due to your office by July 15, 2018.

As stated in previous progress report, on January 26, 2018 the City of Hammond formally submitted the pre-application to the Clean Water Revolving Loan Fund. Hammond received a pre-approval letter from LDEQ concerning the loan on February 19, 2018. The City then submitted a Categorical Exclusion Request on May 3, 2018. The completed, the full application for CWRLF and plans were submitted as to submit on June 5, 2018. A hard copy of the completed application is included with this letter for your records.

At this time the City of Hammond is awaiting a response from your office as to whether, The Office of Environmental Compliance will expect the revised timeline to complete the improvement project.

Completed Full Application to CWRLF	June, 2018
Soil Boring Complete	June, 2018
Application to Bond Commission for funding for CWRLF	July 19, 2018
Completed plans, specifications and bidding documents	July 20, 2018
Advertising for Bids	August 22, 2018
Pre-bid Conference	September 6, 2018
Award Bids	September 25, 2018
Pre- Construction Conference	October 13, 2018
Begin Construction	October 24, 2018
Complete Construction- estimated at 300 days	August 19, 2019
Punch List for work Completed	September 18, 2019

Full permit compliance for BOD is expected by August 19, 2019

If you have any question regarding the City of Hammond's response to the Amended Compliance Order, please contact, Wendy Montalbano at 985-277-5971, or montalbano_wa@hammond.org.

Sincerely,

Guy Palermo
Superintendent, Water & Sewer Department.

Cc: Mayor Panepinto
Dr. Lacy Landrum
Chuck Spangler



City of Hammond
Water & Sewer Department
Guy Palermo, Superintendent

Pete Panepinto, Mayor

P.O. Box 2788 Hammond, LA 70404-2788 * PH (985) 277-5962 * FAX (985) 277-5959

Non Compliance Report 11/07/17

To: Surveillance Division
Office of Water Resources
P.O. Box 44091
Baton Rouge, La 70804-4091

Re: Permit Number: LA0032338/1135
City of Hammond South Slough Wetland
Non Compliance October 2017

Violation	Permit Limit	Date of Violation	Duration of Violation	Cause of Violation	Corrective Action
BOD concentration 37.8 mg/L	30 mg/L	10/01/17- 10/31/17	30 day average	High flow , insufficient aeration	Currently awaiting facility improvements

Guy Palermo
City of Hammond
Water and Sewer Superintendent



City of Hammond
Water & Sewer Department
Guy Palermo, Superintendent

Pete Panepinto, Mayor

P.O. Box 2788 Hammond, LA 70404-2788 * PH (985) 277-5962 * FAX (985) 277-5959

Non Compliance Report 12/12/17

To: Surveillance Division
Office of Water Resources
P.O. Box 44091
Baton Rouge, La 70804-4091

Re: Permit Number: LA0032338/1135
City of Hammond South Slough Wetland
Non Compliance November 2017

Violation	Permit Limit	Date of Violation	Duration of Violation	Cause of Violation	Corrective Action
BOD concentration 36.5 mg/L	30 mg/L	11/01/17- 11/30/17	30 day average	High flow , insufficient aeration	Currently awaiting facility improvements

Guy Palermo
City of Hammond
Water and Sewer Superintendent



City of Hammond
Water & Sewer Department
Guy Palermo, Superintendent

Pete Panepinto, Mayor

P.O. Box 2788 Hammond, LA 70404-2788 * PH (985) 277-5962 * FAX (985) 277-5959

Non Compliance Report 02/08/18

To: Surveillance Division
Office of Water Resources
P.O. Box 44091
Baton Rouge, La 70804-4091

Re: Permit Number: LA0032338/1135
City of Hammond South Slough Wetland
Non Compliance January 2018

Violation	Permit Limit	Date of Violation	Duration of Violation	Cause of Violation	Corrective Action
BOD concentration Monthly Average 37 mg/L	30 mg/L	01/01/18- 01/31/18	30 day Average	High flow, insufficient aeration, pretreatment in disrepair	Currently awaiting facility improvements. Pretreatment system has been repaired
BOD concentration Weekly Average 47.1 mg/L	45 mg/L	01/01/2018- 01/31/2018	5 day Average	High flow, insufficient aeration, pretreatment in disrepair	Currently awaiting facility improvements. Pretreatment system has been repaired
BOD Load concentration Monthly Average 2941.1mg/L	2002 lb./day	01/01/2018- 01/31/2018	30 day Average	High flow, insufficient aeration, pretreatment in disrepair	Currently awaiting facility improvements. Pretreatment system has been repaired

Guy Palermo
City of Hammond
Water and Sewer Superintendent



City of Hammond
Water & Sewer Department
Guy Palermo, Superintendent

Pete Panepinto, Mayor

P.O. Box 2788 Hammond, LA 70404-2788 * PH (985) 277-5962 * FAX (985) 277-5959

Non Compliance Report

03/07/18

To: Surveillance Division
Office of Water Resources
P.O. Box 44091
Baton Rouge, La 70804-4091

Re: Permit Number: LA0032338/1135
City of Hammond South Slough Wetland
Non Compliance February 2018

Violation	Permit Limit	Date of Violation	Duration of Violation	Cause of Violation	Corrective Action
BOD concentration Monthly Average 33 mg/L	30 mg/L	01/01/18- 01/31/18	30 day Average	High flow, insufficient aeration, pretreatment in disrepair	Currently awaiting facility improvements. Pretreatment system has been repaired
BOD Load concentration Monthly Average 2176mg/L	2002 lb./day	01/01/2018- 01/31/2018	30 day Average	High flow, insufficient aeration, pretreatment in disrepair	Currently awaiting facility improvements. Pretreatment system has been repaired

Guy Palermo
City of Hammond
Water and Sewer Superintendent



City of Hammond
Water & Sewer Department
Guy Palermo, Superintendent

Pete Panepinto, Mayor

P.O. Box 2788 Hammond, LA 70404-2788 * PH (985) 277-5962 * FAX (985) 277-5959

Non Compliance Report

04/09/18

To: Surveillance Division
Office of Water Resources
P.O. Box 44091
Baton Rouge, La 70804-4091

Re: Permit Number: LA0032338/1135
City of Hammond South Slough Wetland
Non Compliance March 2018

Violation	Permit Limit	Date of Violation	Duration of Violation	Cause of Violation	Corrective Action
BOD concentration Monthly Average 34.9 mg/L	30 mg/L	01/01/18- 01/31/18	30 day Average	High flow and insufficient aeration	Currently awaiting facility improvements.
BOD Load concentration Monthly Average 2659.4mg/L	2002 lb./day	01/01/2018- 01/31/2018	30 day Average	High flow and insufficient aeration	Currently awaiting facility improvements.

Guy Palermo
City of Hammond
Water and Sewer Superintendent



City of Hammond
Water & Sewer Department
Guy Palermo, Superintendent

Pete Panepinto, Mayor

P.O. Box 2788 Hammond, LA 70404-2788 * PH (985) 277-5962 * FAX (985) 277-5959

Non Compliance Report 05/09/18

To: Surveillance Division
Office of Water Resources
P.O. Box 44091
Baton Rouge, La 70804-4091

Re: Permit Number: LA0032338/1135
City of Hammond South Slough Wetland
Non Compliance April 2018

Violation	Permit Limit	Date of Violation	Duration of Violation	Cause of Violation	Corrective Action
BOD concentration Monthly Average 34.9 mg/L	30 mg/L	01/01/18- 01/31/18	30 day Average	High flow and insufficient aeration	Currently awaiting facility improvements.
BOD Load concentration Monthly Average 2659.4mg/L	2002 lb./day	01/01/2018- 01/31/2018	30 day Average	High flow and insufficient aeration	Currently awaiting facility improvements.

Guy Palermo
City of Hammond
Water and Sewer Superintendent



City of Hammond
 Water & Sewer Department
 Guy Palermo, Superintendent

Pete Panepinto, Mayor

P.O. Box 2788 Hammond, LA 70404-2788 * PH (985) 277-5962 * FAX (985) 277-5959

Non Compliance Report

06/07/18

To: Surveillance Division
 Office of Water Resources
 P.O. Box 44091
 Baton Rouge, La 70804-4091

Re: Permit Number: LA0032338/1135
 City of Hammond South Slough Wetland
 Non Compliance May 2018

Violation	Permit Limit	Date of Violation	Duration of Violation	Cause of Violation	Corrective Action
BOD concentration Monthly Average 36.8 mg/L	30 mg/L	05/01/18- 05/31/18	30 day Average	Insufficient aeration and 1 current aerator is in disrepair.	Currently awaiting facility improvements. Disrepair aerator has been repaired
BOD concentration weekly Average 53.7	45 lb./day	05/01/2018- 05/31/201 8	30 day Average	insufficient aeration, and 1 current aerator is in disrepair	Currently awaiting facility improvements. Disrepair aerator has been repaired
No Copper Sample Monthly Ave.		05/01/18- 05/31/18		Discrepancy in chain of custody to contract lab caused the samples to go unanalyzed for Copper	A tracking system has been put in place to ensure samples are taken in an accurate timely manner
No Zinc Sample Monthly Average		05/01/18- 05/31/18		Discrepancy in chain of custody to contract lab caused the samples to go unanalyzed for Copper	A tracking system has been put in place to ensure samples are taken in an accurate timely manner

Guy Palermo
 City of Hammond
 Water and Sewer Superintendent



City of Hammond
Water & Sewer Department
Guy Palermo, Superintendent

Pete Panepinto, Mayor

P.O. Box 2788 Hammond, LA 70404-2788 * PH (985) 277-5962 * FAX (985) 277-5959

Non Compliance Report 07/09/18

To: Surveillance Division
Office of Water Resources
P.O. Box 44091
Baton Rouge, La 70804-4091

Re: Permit Number: LA0032338/1135
City of Hammond South Slough Wetland
Non Compliance June 2018

Violation	Permit Limit	Date of Violation	Duration of Violation	Cause of Violation	Corrective Action
BOD concentration Monthly Average 34.05 mg/L	30mg/L	05/01/18-05/31/18	30 day Average	Insufficient aeration	Currently awaiting facility improvements.
BOD concentration Weekly Average 51.7	45 lb./day	05/01/18-05/31/18	30 day Average	insufficient aeration	Currently awaiting facility improvements

Guy Palermo
City of Hammond
Water and Sewer Superintendent



City of Hammond
Water & Sewer Department
Guy Palermo, Superintendent

Pete Panepinto, Mayor

P.O. Box 2788 Hammond, LA 70404-2788 * PH (985) 277-5962 * FAX (985) 277-5959

Non Compliance Report

August 16, 2018

To: Surveillance Division
Office of Water Resources
P.O. Box 44091
Baton Rouge, La 70804-4091

Re: Permit Number: LA0032338/1135
City of Hammond South Slough Wetland
Non Compliance **July 2018**

Violation	Permit Limit	Date of Violation	Duration of Violation	Cause of Violation	Corrective Action
BOD weekly concentration 46.4mg/L	45 mg/L	07/01/18- 07/31/18	45 weekly day average	insufficient aeration	Currently awaiting facility improvements

Guy Palermo
City of Hammond
Water and Sewer Superintendent