



Lion Environmental, LLC

14938 Jefferson Hwy, Baton Rouge, LA 70817 (225) 931-8071

7/16/2020

Proposal for position of Laboratory Compliance Manager.

The intent of this proposal is to present an alternative to the current status quo of operating the wastewater lab for the city of Hammond. I believe that this proposal will save the city money, streamline the process, increase the quality of the data, and meet all of the regulatory requirements of the EPA and LADEQ.

The Hammond permit currently requires sampling for BOD, TSS, Fecal Coliform, Total Residual Chlorine, and pH five days a week. Historically, these tests are being run Monday through Friday in the Hammond Wastewater Laboratory located next to the Treatment Plant. The tests are being run on this schedule:

- 1) Total Residual Chlorine & pH within 15 minutes of collection daily**
- 2) Fecal Coliform within 8 hours of collection daily**
- 3) BOD analyses of three days (Monday, Tuesday, and Wednesday) are being set up on Wednesday. The Monday sample must be set up by 10 am to comply with 48 hour holding time assuming the sample compositor ending time is 10 am Monday. These BODs are then finalized on the following Monday after five days in an incubator.**
- 4) BOD analyses of two days (Thursday & Friday) is accomplished on Friday and finalized on the following Wednesday after five days in an incubator.**
- 5) TSS is either being analyzed on the same schedule as the BODs or all five samples are being run together on Friday at the discretion of the analyst. TSS has a seven day holding time.**

The reason for this level of batching is to minimize the number of QA/QC samples required in a given week. These include a blank, a Lab Control Sample (LCS), a sample duplicate, and a sample spike. These five QC samples must be run in each daily batch. Total Residual Chlorine and Fecal Coliform do not have a spike but Fecal Coliform requires a blank be run at beginning and ending of the daily batch. The test of pH only requires an LCS sample. Because Fecal Coliform has to be run daily, the lab is running the test five times to get one result.

Additional non-regulatory testing such as COD & Ammonia is often done on samples from various places in the lab and at different lift stations in the city. These are done on a very automated HACH system and does not require the QA/QC samples like the compliance monitoring above.

In order to save money on staff salary, lab supplies, and expensive QA/QC program, I am suggesting that the BOD, TSS, and Fecal Coliform samples go to Pace Analytical who is currently doing Metals, Total Nitrogen, Low Level Mercury, Bioassay, and other miscellaneous testing. The samples can be picked up Monday, Tuesday, Wednesday, and Thursday by a Pace courier. Currently, there is not a Pace courier in the area on Friday so the options are to dispatch a Hammond staff member to Pace lab in St. Rose (Vernon has done this many times) or pay Pace a surcharge for arranging the pickup. The daily Total Residual Chlorine & pH that has to be done within 15 minutes of collection can be done by Hammond Staff. The in-house COD & Ammonia can be done by Hammond Staff. Both Wanda and Vernon are trained to do all of this.

The price for a full set of BOD, TSS, and Fecal Coliform including pickup Monday through Thursday would be \$87.50 per day. The lab cost for Friday delivered to Pace in St Rose would be \$80. A scheduled weekly pickup by Pace Analytical on Friday would be \$75. For turkey service, including the scheduled pick up on Friday, the annual cost would only be \$26,650. If Hammond delivers samples on Friday, the annual cost goes down to \$22,360.

Advantages of moving BOD, TSS, & Fecal Coliform work to Pace Analytical:

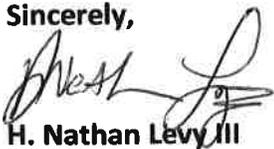
- 1) Proven track record with the city since the purchase of A & E Testing on November 1, 2018.
- 2) No longer need to keep Hammond Lab up to date with the Method Update Rule requirements.
- 3) Retention of Marie Levy as dedicate Project Manager for 30 years of continuity.
- 4) Pace Labs have backup for all analysts so no need to worry about who covers who for sickness and vacation.
- 5) Pace Labs has a location in St Rose and Baton Rouge to backup each lab.

Nathan Levy of Lion Environmental, LLC will act as an independent contractor for the city of Hammond. Responsibilities would be the following:

- 1) Receiving and reviewing all Pace Analytical lab reports (daily, quarterly, semiannual, and annual analyses). Any non-conforming results will be investigated with Pace Analytical. Any permit violations will be emailed to contacts of your choice.
- 2) Interfacing with the LADEQ on matters such as Permit Application, permit violation, and or compliance issues.
- 3) Production all of the regulatory reports on the attached list in a timely manner.
- 4) Spend time with designated Hammond Staff to insure they are trained to perform daily pH and TRC analyses and transmit data daily.
- 5) Meet with Guy Palermo or his designate as needed to go over data and reports, discuss any issues, and insure smooth operation of the Treatment Plant.
- 6) Meet with designated staff as needed to review process of daily pH and TRC to ensure compliance with state and federal regulations.
- 7) Perform compliance audits of lab as needed to make sure samples are being collected properly and lab work is being documented correctly.
- 8) Meet with designated staff as needed to review process of analyzing non-regulatory samples for ammonia and COD and make sure it is done in a timely manner to assist in the plant operation.
- 9) Administrate Federally mandated annual DMR QA Study to including obtaining Hammond PO number and ordering check standards for pH and Residual Chlorine, review of data from provider, and initialize any corrective action required.

If I have missed any items in the eight above, please let me know. The cost of Lion Environmental, LLC to provide this service would be \$4,530 per month or \$54,360 per year. I look forward to working with the city of Hammond in this position of contract Laboratory Compliance Manager.

Sincerely,



H. Nathan Levy III

President

Lion Environmental, LLC

Nathan.Levy@LionEnvironmental-LLC.com

Summary of all reports and paperwork completed annually:

- 1. DMRs- monthly**
- 2. DMRs- Quarterly (metals and nitrogen)**
- 3. DMRs-Semi Annual (total metals and toxicity)**
- 4. Quarterly DEQ Administrative Order progress report**
- 5. Various DEQ responses throughout year**
- 6. MWPP report**
- 7. Mercury Minimization Report**
- 8. Sludge Report**
- 9. Stormwater – (quarterly and annual summary)**
- 10. ERA Lab proficiency testing (required to maintain lab certification)**
- 11. Review of the all lab results completed in house and from contract lab.**