



Pete Paucpluto  
Mayor  
May 3, 2018

Denise Bennett  
Deputy Secretary  
Louisiana Department of Environmental Quality  
602 N Fifth St  
Baton Rouge LA 70802

Re: CS221742-01  
City of Hammond South Wastewater Treatment Plant Improvements Project  
Categorical Exclusion Request

Deputy Secretary Bennett,

The City of Hammond is requesting a Categorical Exclusion for its South Wastewater Treatment Plant Improvements Project (CS221742-01). In accordance with LAC Title 33, Part IX, §2125.C.2.c, I am providing the following information.

#### Description of the Proposed Project

The SWTP was designed to process an average 4.1 MGD, with permitted effluent limits of 30/45 mg/L for BOD, 90/135 mg/L for TSS, 200/400 col./100 mL for FC, 6-9 SU for pH, and <0.1 mg/L for TRC.

Between November 2016 and July 2017, however, the SWTP was cited 6 times for significant exceedances of the BOD limit—despite a \$5 million CWSRF investment in 2013 to correct I/I in central Hammond and similarly prioritized areas and a nearly \$1 million LCDBG investment in 2014 to add pretreatment facilities to the SWTP.

A subsequent evaluation of the SWTP's pretreatment and treatment processes determined these BOD exceedances were most likely caused by: 1) inadequate aeration, closely correlated with heavy rainfall (Hammond receives about 64" of rain per year, and all but 1 of 25 BOD excursions in 2016 occurred after heavy rainfalls); 2) high ammonia levels, which translate to excessive oxygen requirements; and 3) insufficient detention time, especially during heavy rainfall, when flow can increase from 4.1 to over 6 MGD and, on rare occasions, has exceeded 11 MGD.

With \$2.1 million in new financing through the CWSRF, the City will make the following improvements to the SWTP: 1) replacing existing aerators and installing new aerators and blowers in existing pretreatment/treatment facilities and 2) constructing a new cell, "Cell 1B," adjacent to Cell 1 to allow for additional capacity of up to 8 MG and increased detention capability (existing aerators replaced as part of Step 1 would be relocated to this new cell). The new aerators and blowers will provide additional oxygen and ensure more aggressive, complete mixing, while the additional capacity, increased detention time, and additional aeration provided by Cell 1B will produce favorable conditions for nitrification to reduce ammonia levels—thus improving conditions at the SWTP to bring it into compliance with LDEQ.

A preliminary site plan is enclosed showing the proposed locations of Cell 1B and the aerators and blowers identified above.

### No Action Alternative

The City has explored alternatives to the proposed project—including \$5 million in I/I corrections to Hammond's sewer collection system and the addition of a \$1 million pretreatment facility to the SWTP. While these have improved conditions at the SWTP, they have not resolved BOD exceedances and contributing high ammonia levels nor provided additional capacity or increased detention time to manage heavy rainfalls, population growth (from just over 18,000 pre-Katrina to more than 20,000 today), new industries, and commercial and residential development.

Doing nothing is not an alternative.

The City has also carefully examined the costs associated with this project and found the project to be cost-effective. And an analysis of expenses and revenues—including those projected over the next several years—have demonstrated the City is financially capable of constructing, operating, and maintaining the proposed Cell 1B, aerators, and blowers identified above. In fact, when completed, the proposed project, which will increase capacity, detention time, aeration, and mixing to reduce ammonia and BOD levels, may reduce operational, maintenance, and repair costs by reducing strain on existing facilities and eliminating the need for corrective actions. The project's budget follows:

Item	Cost
Construction	\$1,769,800.00
Contingencies	\$145,200.00
Basic Engineering Services (Fixed Cost)	\$132,558.02
Construction Inspection	\$44,245.00
Testing Lab/QC	\$8,000.00
Miscellaneous Costs	\$196.98
<b>Total Cost:</b>	<b>\$2,100,000.00</b>

### Reasons for Categorical Exclusion

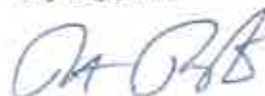
The proposed project involves minor upgrades of existing facilities and construction of new minor ancillary facilities on the same property as existing facilities.

The proposed project does NOT involve any of the non-categorically-excludable activities described under Title 33, Part IX, §2125.C.2.c.ii.(a)-(e), and none of the extraordinary circumstances identified in Title 33, Part IX, §2125.C.2.d. apply to the proposed project.

Additionally, the SWTP, which is solely owned by the City and located on land solely owned by the City, was environmentally cleared by LDEQ, OCD, SHPO, EPA, the Army Corps of Engineers, and others in May 2015 under the LCDBG Program.

Should your office require any additional information for this Categorical Exclusion, please do not hesitate to contact my Grants Manager, Charles Borchers IV, at 985-277-5647 or [borchers\\_cw@hammond.org](mailto:borchers_cw@hammond.org).

Very truly yours,



Pete Panepinto, Mayor



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**SOUTH PLANT WWTP  
 ARRANGEMENT UPGRADES**  
 For the  
 City of Hammond

SITE PLAN

DATE: 10/15/2014  
 DRAWN BY: J. W. SPANGLER  
 CHECKED BY: J. W. SPANGLER  
 SCALE: AS SHOWN

PROJECT NO. 14-001