



# National Enforcement Investigations Center

## Case Results – Lafayette, LA

### Sanitary Sewer Overflow (SSO)

### Investigation Support & Training

#### NEIC's Support:

- Forensics-based field investigations accredited under ISO/IEC: 17025
- CWA expertise
- Inspection Training

#### NEIC's Other Capabilities:

- Laboratory analyses accredited under ISO/IEC: 17025, General Requirements for the Competence of Testing and Calibration Laboratories
- Interpretation of analytical results
- Statistical services
- Toxicological expertise
- CAA, 112r, EPCRA, and RCRA expertise

**Background:** The Lafayette Utilities System (Lafayette) operates four wastewater treatment plants (WWTPs) to serve the city of Lafayette and some unincorporated areas of Lafayette Parish, Louisiana. EPA Region 6 issued a series of enforcement orders to Lafayette beginning in the 1990s for Clean Water Act (CWA) noncompliance. Those orders were closed by 2008 after Lafayette had spent \$173 million for wastewater treatment plant and collection system upgrades.

**NEIC's support:** In April 2017, at the request of EPA Region 6, NEIC conducted a CWA compliance investigation at Lafayette that focused on sanitary sewer overflows (SSOs) that resulted in raw sewage spills. As part of the investigation, NEIC also provided training to two state inspectors and two EPA regional inspectors. Records reviewed during the inspection revealed that Lafayette's SSOs occurred 2 to 4 times more frequently than the median national benchmarks, as Lafayette reported 288 SSOs from 2014 through 2016.

The NEIC report documented that when reporting overflows in the collection system, Lafayette was not including all required information in its discharge monitoring report (DMR) submittals, and that Lafayette was not properly operating and maintaining all facilities and systems of treatment and control at its WWTPs. Furthermore, the utility was found to lack a public notification process for SSO events.



**Enforcement results:** In June 2018, EPA Region 6 issued an administrative order that resulted in:

- \$6.3 million in injunctive relief to reduce ongoing releases of sanitary waste (ammonia, biochemical oxygen demand [BOD], total suspended solids (TSS), and fecal coliform bacteria).
- Reduction of 25,000 gallons per eliminated SSO of untreated sewage discharges and associated contaminants.

EPA Region 6 reported that the inspectors who were trained during this project applied what they had learned to address similar CWA noncompliance at a nearby city's wastewater treatment system, which resulted in an administrative order to bring that facility into compliance.

#### How to obtain NEIC's support

NEIC provides environmental forensics support for criminal and civil enforcement cases. If you would like more information on NEIC or to request laboratory analysis, toxicological support, an investigation, technical assistance, or training from NEIC, please contact us at [neic\\_project\\_requests@epa.gov](mailto:neic_project_requests@epa.gov). You may also contact your regional enforcement coordinator for more information on requesting NEIC's support on civil projects and EPA's Criminal Investigation Division (CID) for support on criminal projects.