

NPDES PERMIT NO. LA0127737
FACT SHEET

FOR THE DRAFT NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM
(NPDES) PERMIT TO DISCHARGE TO WATERS OF THE UNITED STATES

APPLICANT

Coushatta Tribe of Louisiana WWTP
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ISSUING OFFICE

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DATE PREPARED

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PERMIT ACTION

It is proposed that the facility be issued a first-time National Pollutant Discharge Elimination System (NPDES) permit for a 5-year term in accordance with regulations contained in 40 Code of Federal Regulations (CFR) 122.46(a).

RECEIVING WATER – BASIN

Unnamed Tributary, Bayou Blue, Mermentau River, Louisiana

DOCUMENT ABBREVIATIONS

In the document that follows, various abbreviations are used. They are as follows:

7Q10	The lowest 7-day average flow that occurs (on average) once every 10 years
BAT	Best available technology economically achievable
BCT	Best conventional pollutant control technology
BPT	Best practicable control technology currently available
BMP	Best management plan
BOD	Biochemical oxygen demand (five-day unless noted otherwise)
BPJ	Best professional judgment
CaCO ₃	Calcium carbonate
CD	Critical dilution
CFR	Code of Federal Regulations
CBOD	Carbonaceous oxygen demand
cfs	Cubic feet per second
CFU	Colony forming units
COD	Chemical oxygen demand
COE	United States Corp of Engineers
CWA	Clean Water Act
DAF	Dissolved air flotation
LDEQ	Louisiana Department of Environmental Quality
DMR	Discharge monitoring report
DO	Dissolved Oxygen
ELG	Effluent limitation guidelines
EPA	United States Environmental Protection Agency
ESA	Endangered Species Act
FCB	Fecal coliform bacteria
F&WS	United States Fish and Wildlife Service
ug/L	Micrograms per liter (one part per billion)
mg/L	Milligrams per liter (one part per million)
MGD	Million gallons per day
MPN	Most probable number
NPDES	National Pollutant Discharge Elimination System
SQL	Minimum quantification level
O&G	Oil and grease
POTW	Publicly owned treatment works
RAS	Return activated sludge
RP	Reasonable potential
SIC	Standard industrial classification
s.u.	Standard units (for parameter pH)
TBELs	Technology-based effluent limitations
TDS	Total dissolved solids
TMDL	Total maximum daily load
TRC	Total residual chlorine
TSS	Total suspended solids
USGS	United States Geological Service
UV	Ultraviolet Light
WET	Whole effluent toxicity
WLA	Waste-load Allocation
WQBELs	Water quality-based effluent limitations
WQMP	Water Quality Management Plan
WWTP	Wastewater treatment plant

As used in this document, references to State water quality standards and/or rules, regulations and/or management plans may mean the State of Louisiana and/or Tribal or both.

I. CHANGES FROM THE PREVIOUS PERMIT

First-time issuance

II. APPLICANT ACTIVITY

Coushatta Tribe of Louisiana (CTOLA) Reservation encompasses 154 acres in Allen Parish, Louisiana, approximately 3 miles north of the Elton, Louisiana. Under the Standard Industrial Classification Code 4952, CTOLA is currently operating a municipal wastewater treatment plant (Wastewater Treatment Plant A) with a design capacity of 0.032 million gallons per day (MGD) serving a population of approximately 302. Sanitary wastewater is collected throughout the Administrative and Housing Complex and flows via gravity to Wastewater Treatment Plant A.

The discharge from Wastewater Treatment System A (WWTPA) is to an unnamed tributary of Bayou Blue on the Coushatta Tribe of Louisiana reservation, thence to Bayou Blue of the Bayou Nezpique watershed (Subsegment 050304) in the Mermentau River Basin, Louisiana. The outfall of WWTPA (Outfall 001) is located at Latitude 30° 31' 37.29" North and Longitude 92° 43' 7.01" West.

Coushatta Tribe of Louisiana has been building a second facility (Wastewater Treatment Plant B) to replace WWTPA, which has had no NPDES permit. This facility is located approximately 0.7 miles from WWTPA and has the same design capacity as WWTPA. The construction of Wastewater Treatment Plant B (WWTPB) is anticipated to be completed at the end of 2024. When the planned force main is completed, wastewater will be routed to Wastewater Treatment Plant B (WWTPB). The WWTPA will then cease to operate.

When WWTPB is completed and in operation, its discharge will go to the same receiving waters. The outfall of WWTPB (Outfall 002) is located at Latitude 30° 31' 13.0" North and Longitude 92° 42' 32.2" West.

The facility will be required to supply post-construction latitude/longitude coordinates of the Outfall 002 as part of the permit.

III. EFFLUENT CHARACTERISTICS

Table 1 lists the effluent data of Wastewater Treatment Plant A provided in submitted Form 2A. The effluent of Wastewater Treatment Plant B is anticipated to have similar profile.

Table 1: Wastewater Treatment Plant A Effluent Data

Parameter	Max
Flow (gpm)	32,500 GPD
Biochemical Oxygen Demand, 5-day (BOD ₅)	12.3 mg/L
Total Dissolved Solids (TDS)	NA
pH, standard units	6.93 s.u.
Fecal coliform bacteria	29 CFU/100 ml
Temperature (winter)	64.5 °F
Temperature (summer)	NA
Total Suspended solids (TSS)	2.8 mg/L
Ammonia (as N)	<20 mg/L
Dissolved oxygen	7.03 mg/L
TRC	0.1 mg/L
Oil and grease	6.3 mg/L
Lead, total recoverable	<0.0005 mg/L
Hardness (as CaCO ₃)	21.4 mg/L

IV. REGULATORY AUTHORITY/PERMIT ACTION

In November 1972, Congress passed the Federal Water Pollution Control Act establishing the NPDES permit program to control water pollution. These amendments established technology-based or end-of-pipe control mechanisms and an interim goal to achieve “water quality which provides for the protection and propagation of fish, shellfish, and wildlife and provides for recreation in and on the water”; more commonly known as the “swimmable, fishable” goal. Further amendments in 1977 of the CWA gave EPA the authority to implement pollution control programs such as setting wastewater standards for industry and established the basic structure for regulating pollutants discharges into the waters of the United States. In addition, it made it unlawful for any person to discharge any pollutant from a point source into navigable waters, unless a permit was obtained under its provisions. Regulations governing the EPA administered NPDES permit program are generally found at 40 CFR §122 (program requirements & permit conditions), §124 (procedures for decision making), §125 (technology-based standards) and §136 (analytical procedures). Other parts of 40 CFR provide guidance for specific activities and may be used in this document as required.

V. DRAFT PERMIT RATIONALE AND PROPOSED PERMIT CONDITIONS

A. OVERVIEW OF TECHNOLOGY-BASED VERSUS WATER QUALITY STANDARDS-BASED EFFLUENT LIMITATIONS AND CONDITIONS

The proposed effluent limitations for those pollutants proposed to be limited are based on regulations promulgated at 40 CFR 122.44. The draft permit limits are based on either technology-based effluent limit pursuant to 40 CFR 122.44(a), on BPJ in the absence of guidelines, Tribal and/or State of Louisiana WQS and/or requirements pursuant to 40 CFR 122.44(d), whichever are more stringent.

It is proposed that the permit be issued for a 5-year term following regulations promulgated at 40 CFR §122.46(a). The permittee submitted their application and addenda to EPA on October 24, 2023, and March 25, 2024. The application was determined to be complete April 2, 2024.

The facility is a new discharger as defined in 40 CFR 122.2 and 40 CFR 122.29 and not a new source.

B. TECHNOLOGY-BASED EFFLUENT LIMITATIONS/CONDITIONS

Regulations promulgated at 40 CFR §122.44 (a) require TBELs to be placed in NPDES permits based on ELGs where applicable, on BPJ in the absence of guidelines, or on a combination of the two. In the absence of promulgated guidelines for the discharge, permit conditions may be established using BPJ procedures. EPA establishes limitations based on the following technology-based controls: BPT, BCT, and BAT. These levels of treatment are:

BPT - The first level of technology-based standards generally based on the average of the best existing performance facilities within an industrial category or subcategory.

BCT - Technology-based standard for the discharge from existing industrial point sources of conventional pollutants including BOD, TSS, fecal coliform bacteria, pH, and O&G.

BAT - The most appropriate means available on a national basis for controlling the direct discharge of toxic and non-conventional pollutants to navigable waters. BAT effluent limits represent the best existing performance of treatment technologies that are economically achievable within an industrial point source category or subcategory.

The facility is a POTW treating sanitary wastewater. POTW's have technology based ELG's established at 40 CFR Part 133, Secondary Treatment Regulation. Pollutants with ELG's established in this section are CBOD₅, TSS and pH. CBOD₅ limits of 25 mg/L for the 30-day average and 40 mg/L for the 7-day average and 85% percent (minimum) removal are found at 40 CFR §133.102(a)(4). TSS limits, 30 mg/L for the 30-day average and 45 mg/L for the 7-day average, and 85% percent (minimum) removal, are, also, found at 40 CFR §133.102(b). ELG's for pH are between 6-9 s.u. and are found at 40 CFR §133.102(c). Regulations at 40 CFR §122.45(f)(1) require all pollutants limited in permits to have limits expressed in terms of mass such as pounds per day. When determining mass limits for POTW's, the plant's design flow is used to establish the mass load. Mass limits are determined by the following mathematical relationship:

$\text{Loading in lbs/day} = \text{pollutant concentration in mg/L} * 8.345 \text{ lbs/gal} * \text{design flow in MGD}$

30-day average TSS loading = 30 mg/L * 8.345 lbs/gal * 0.0325 MGD

30-day average TSS loading = 8.14 lbs/day

7-day average TSS loading = 45 mg/L * 8.345 lbs/gal * 0.0325 MGD

7-day average TSS loading = 12.02 lbs/day

30-day average CBOD₅ loading = 25 mg/L * 8.345 lbs/gal * 0.0325 MGD

30-day average CBOD₅ loading = 6.78 lbs/day

7-day average CBOD₅ loading = 40 mg/L * 8.345 lbs/gal * 0.0325 MGD

7-day average CBOD₅ loading = 10.85 lbs/day

A summary of the technology-based limits for the facility is:

Final Effluent Limits 0.032 MGD design flow

TABLE 1: Discharge Limitations

EFFLUENT CHARACTERISTICS	30-Day Avg.	7-Day Avg.	30-Day Avg.	7-Day Avg.
Flow	N/A	N/A	Measure MGD	Measure MGD
CBOD ₅	6.78 lbs/day	10.85 lbs/day	25 mg/L ^{*2}	40 mg/L ^{*2}
CBOD ₅ , % removal, minimum ^{*1}	≥85%	---	---	---
TSS	8.14 lbs/day	12.02 lbs/day	30 mg/L	45 mg/L
TSS, % removal, minimum ^{*1}	≥85%	---	---	---
pH	N/A	N/A	6 - 9 standard units ^{*3}	

Footnotes:

- (1) % Removal is calculated using the following equation: [(average monthly influent concentration – average monthly effluent concentration) ÷ average monthly influent concentration] * 100.
- (2) The CBOD₅ concentrations based on stream segment specific WQS are more stringent than CBOD₅ technology-based limits of 25 mg/L (30-day Average) and 40 mg/L (7-day Average). Mass loadings will be recalculated based on the more stringent concentrations. See Part V.3.f below.
- (3) The pH based on stream segment specific WQS are more stringent than pH technology-based limits of 6.0-9.0 standard units. See Part V.3.a below.

V. WATER QUALITY BASED LIMITATIONS

1. General Comments

Water quality-based requirements are necessary where effluent limits more stringent than technology-based limits are necessary to maintain or achieve federal, tribe or state water quality standards. Under Section 301(b)(1)(C) of the CWA, discharges are subject to effluent limitations based on federal, tribes or state WQS.

The Coushatta Tribe of Louisiana is not approved as Treatment as a State and does not have WQS. The discharge from WWTPA and new WWTPB is to an unnamed tributary of Bayou Blue on the Coushatta Tribe of Louisiana reservation, thence to Bayou Blue of the Bayou Nezpique watershed (Subsegment 050304) in the Mermentau River Basin. Louisiana Water Quality Standards do not apply directly to the discharge. Due to proximity of facility point of discharge to the waters under State of Louisiana NPDES program authority (i.e., 1.5 miles), the discharge from this facility will

have a reasonable potential to impact the waters where the State of Louisiana has NPDES permitting authority. The 40 CFR §122.4(d) requires NPDES permits be protective of a downstream state's water quality standards. Therefore, limitations of the discharge must be made to protect WQS established by the State of Louisiana. Applying the Louisiana WQS would also serve to protect the quality of the waters on the Coushatta Tribe of Louisiana reservation. Effluent limitations and/or conditions established in the draft permit are in compliance with applicable State WQS and applicable State water quality management plans to assure that WQS of the receiving waters are protected and maintained or attained.

2. State of Louisiana Water Quality Numerical Standards

a. General Comments

The Louisiana State Standards are found at Title 33 Environmental Quality Part IX Water Quality Subpart 1 Water Pollution Control. The general and specific stream standards are provided in LAWQS (LAC33.IX.1113, effective on August 10, 2021). "Numerical criteria identified in LAC 33:IX.1123, Table 3, apply to specified water bodies, and their tributaries, distributaries, and interconnected streams and water bodies contained in the water management segment if they are not specifically named therein, unless unique chemical, physical, and/or biological conditions preclude attainment of the criteria (LAC 33:IX.1113.C.)". The appropriate criteria will be applied to specified water bodies and their tributaries, distributaries, and interconnected streams and water bodies contained in the water management segment if they are not specifically named. The facilities and their outfalls (i.e., Outfalls 001 and 002) are on Tribal land. The discharge is to an unnamed tributary of Bayou Blue on the Coushatta Tribe of Louisiana reservation, thence to Bayou Blue of the Bayou Nezpique watershed (Subsegment 050304) in the Mermentau River Basin. For the State of Louisiana, the Bayou Blue of the Bayou Nezpique watershed (Subsegment 050304) in the Mermentau River Basin has designated uses of primary contact recreation, secondary contact recreation, and fish and wildlife propagation. The 2022 State of Louisiana CWA §303(d) / §305(b) Integrated Report identifies Bayou Blue (Subsegment 050304) is impaired for Dissolved Oxygen, Lead and fecal coliform bacteria.

3. Permit Action

Regulations promulgated at 40 CFR §122.44(d) require limits in addition to, or more stringent than effluent limitation guidelines (technology based). For the purposes of this permit, EPA believes the specific characteristics of this effluent and this permit's effluent limitations will prohibit measurable instream degradation and will have the effect of maintaining water quality at current levels in both direct receiving water and downstream waterbodies. WQS that are more stringent than effluent limitation guidelines are as follows:

a. pH

The State of Louisiana WQS to protect the fish and wildlife propagation designated use, which is specified in the LAC33.IX.1123, requires pH to be between 6.0 to 8.5 s.u. This is more stringent

than the technology-based limits presented earlier. The draft permit shall establish 6.0 to 8.5 s.u. for pH based on the State's WQS.

b. Fecal Coliform Bacteria

The 2022 State of Louisiana CWA §303(d) / §305(b) Integrated Report has the primary contact recreation designated use not being supported, and fecal coliform bacteria was listed as the cause of impairment for Bayou Blue of the Bayou Nezpique watershed (Subsegment 050304) in the Mermentau River Basin. There is no fecal coliform bacteria TMDL developed for this subsegment yet. The State of Louisiana WQS require limitations for fecal coliform bacteria based on the protection of primary body contact recreation designated uses (LAC33.IX.1123C). For consistency with the State of Louisiana's policy, the draft permit will establish limitations for fecal coliform bacteria of 400 colonies/100 ml (daily maximum) and 200 colonies/100ml (30-day average), end of pipe. The limits are seasonal limitation and will be applied to the period from May 1 through October 31. The criteria for Secondary Body Contact Recreation (620 colonies/100ml, 30-day average and 2000 colonies/100 ml, daily maximum) will be applied to the remainder of the year.

c. Total Dissolved Solids (TDS), Sulfate and Chloride

State of Louisiana stream segment 050304 for TDS, Chloride, and Sulfate are 260 mg/L, 90 mg/L and 30 mg/L, respectively. No TDS, Chloride, and Sulfate data were reported in the application. The EPA proposes that TDS, Chloride, and Sulfate to be monitored once a year by 24-hour composite samples to determine if effluent limits will be required in the future permits.

d. Dissolved Lead

Louisiana's 2022 CWA §303(d) / §305(b) Integrated Report lists Bayou Blue (Subsegment 050304) as not supporting its designated use of fish and wildlife propagation because of lead from unknown sources. LDEQ developed a dissolved lead TMDL for the segment, which was approved by EPA. The approved TMDL indicates natural background loading is the dominant source of lead and did not impose any wasteload allocations nor permit limits on the point sources in the water segment. The submitted NPDES application indicates that no lead was detected in the facility's effluent. For this permit term, EPA does not impose any lead effluent limits nor monitoring requirements in the draft permit. However, if at any time, the TMDL(s) is revised and approved, this permit will be reopened to establish effluent limitations for the parameter(s) to be consistent with that TMDL. Modification of the permit is subject to the provisions of 40 CFR §124.5.

e. Dissolved Oxygen (DO)

The 2022 State of Louisiana CWA §303(d) / §305(b) Integrated Report identifies Bayou Blue (Subsegment 050304) is impaired for Dissolved Oxygen. LDEQ has developed several TMDLs for Bayou Blue (Subsegment 050304), which were approved by EPA. The EPA approved Bayou

Nezquipque DO TMDL established 5mg/L CBOD₅/2 mg/L NH₃/6 mg/L DO limits for facilities discharging to the segment (i.e., Oberlin STP, Elton STP, Basile STP and Jennings STP) to maintain DO of 3 mg/L for the segment. Based in the approved TMDL, EPA proposes that the 30-day average limits of 5 mg/L CBOD₅ and 2 mg/L ammonia (NH₃), and 6 mg/L instantaneous minimum DO in the draft permit to protect and maintain existing water quality and to prevent further degradation of water quality of receiving waters in accordance with 40 CFR 131.12.

4. Post Third Round Policy and Strategy

Section 101 of the Clean Water Act (CWA) states that "...it is the national policy that the discharge of toxic pollutants in toxic amounts be prohibited..." To ensure that the CWA's prohibitions on toxic discharges are met, EPA has issued a "Policy for the Development of Water Quality-Based Permit Limitations for Toxic Pollutants 49 FR 9016-9019, 9 March 1984." In support of the national policy, Region 6 adopted the "Policy for Post Third Round NPDES Permitting" and the "Post Third Round NPDES Permit Implementation Strategy" on October 1, 1992. The Regional policy and strategy are designed to ensure that no source will be allowed to discharge any wastewater which (1) results in instream aquatic toxicity; (2) causes a violation of an applicable narrative or numerical State water quality standard resulting in nonconformance with the provisions of 40 CFR 122.44(d); (3) results in the endangerment of a drinking water supply; or (4) results in aquatic bioaccumulation which threatens human health.

5. Reasonable Potential

All applicable facilities are required to fill out appropriate sections of the Form 2A and 2S, to apply for an NPDES permit or reissuance of an NPDES permit. The new form is applicable not only to Publicly Owned Treatment Works (POTWs), but also to facilities that are like POTWs, but which do not meet the regulatory definition of "publicly owned treatment works" (like private domestics, or similar facilities on Federal property). The forms were designed and promulgated to "make it easier for permit applicants to provide the necessary information with their applications and minimize the need for additional follow-up requests from permitting authorities," per the summary statement in the preamble to the Rule. These forms became effective December 1, 1999, after publication of the final rule on August 4, 1999, Volume 64, Number 149, pages 42433 through 42527 of the FRL.

The amount of information required for minor facilities was limited to specific sections of these forms, because they are unlikely to discharge toxic pollutants in amounts that would impact state water quality standards. Supporting information for this decision was published as "Evaluation of the Presence of Priority Pollutants in the Discharges of Minor POTW's", June 1996, and was sent to all state NPDES coordinators by EPA Headquarters. In this study, EPA collected and evaluated data on the types and quantities of toxic pollutants discharged by minor POTWs of varying sizes from less than 0.1 MGD to just under 1 MGD. The Study consisted of a query of the EPA Permit Compliance System (PCS) database from 1990 to present, an evaluation of minor POTW data provided by the State agencies, and on-site monitoring for selected toxics at 86 minor facilities across the nation.

The facility is designated as a minor and does not need to fill out the expanded pollutant testing section Part D of Form 2A. There are no toxics that need to be placed in the draft permit except for TRC and PFAS described below.

a. Total Residual Chlorine

The facility indicated that they are using chlorine to control bacteria. For facilities that use chlorine, the limits may be expressed as total residual chlorine (TRC). Total Residual Chlorine shall be monitored any time chlorine is used within the treatment plant for disinfection, equipment cleaning, maintenance, or any other purposes. TRC limitations will be added to this permit consistent with the State WQS for the protection of freshwater aquatic organisms. The draft permit will propose a limitation of 33 µg/l for TRC. The implementation to protect WQS in Louisiana from chlorine toxicity is to limit chlorine as “no measurable amount”, defined as less than 33 ug/l instantaneous maximum. The effluent shall contain NO MEASURABLE total residual chlorine at any time. NO MEASURABLE will be defined as no detectable concentration of TRC as determined by any approved method established in 40 CFR 136. If any TRC analytical test result is less than the TRC MQL of 33 µg/l, or the more sensitive Method Detection Limit, a value of zero (0) may be reported.

b. Per- and Polyfluoroalkyl Substances (PFAS)

As explained at <https://www.epa.gov/pfas>, PFAS are a group of synthetic chemicals that have been in use since the 1940s. PFAS are found in a wide array of consumer and industrial products. PFAS manufacturing and processing facilities, facilities using PFAS in production of other products, airports, and military installations can be contributors of PFAS releases into the air, soil, and water. Due to their widespread use and persistence in the environment, most people in the United States have been exposed to PFAS. Exposure to some PFAS above certain levels may increase risk of adverse health effects (EPA’s Per- and Polyfluoroalkyl Substances (PFAS) Action Plan, EPA 823R18004, February 2019). The EPA is collecting information to evaluate the potential impacts that discharges of PFAS from wastewater treatment plants may have on downstream drinking water, recreational and aquatic life uses.

Since PFAS chemicals are persistent in the environment and may lead to adverse human health and environmental effects, the draft permit requires that the facilities conduct influent, effluent, and sludge sampling for PFAS according to the frequency outlined in the permit.

The purpose of this monitoring and reporting requirement is to better understand potential discharges of PFAS from this facility and to inform future permitting decisions, including the potential development of water quality-based effluent limits on a facility-specific basis. EPA is authorized to require this monitoring and reporting by CWA § 308(a), which states:

“SEC. 308. (a) Whenever required to carry out the objective of this Act, including but not limited to (1) developing or assisting in the development of any effluent limitation, or other limitation,

prohibition, or effluent standard, pretreatment standard, or standard of performance under this Act; (2) determining whether any person is in violation of any such effluent limitation, or other limitation, prohibition or effluent standard, pretreatment standard, or standard of performance; (3) any requirement established under this section; or (4) carrying out sections 305, 311, 402, 404 (relating to State permit programs), 405, and 504 of this Act—

(A) the Administrator shall require the owner or operator of any point source to (i) establish and maintain such records, (ii) make such reports, (iii) install, use, and maintain such monitoring equipment or methods (including where appropriate, biological monitoring methods), (iv) sample such effluents (in accordance with such methods, at such locations, at such intervals, and in such manner as the Administrator shall prescribe), and (v) provide such other information as he may reasonably require;”.

The EPA notes that there is currently not an analytical method approved in 40 CFR Part 136 for PFAS. As stated in 40 CFR § 122.44(i)(1)(iv)(B), in the case of pollutants or pollutant parameters for which there are no approved methods under 40 CFR Part 136 or methods are not otherwise required under 40 CFR chapter I, subchapter N or O, monitoring shall be conducted according to a test procedure specified in the permit for such pollutants or pollutant parameters. Therefore, the draft permit specifies that until there is an analytical method approved in 40 CFR Part 136 for PFAS, monitoring shall be conducted using Method 1633. The Adsorbable Organic Fluorine CWA wastewater method 1621 can be used in conjunction with Method 1633, if appropriate. This is consistent with the December 5, 2022, USEPA Memorandum, Addressing PFAS Discharges in NPDES Permits and Through the Pretreatment Program and Monitoring Programs, from Radhika Fox (available at <https://www.epa.gov/newsreleases/epa-issues-guidance-states-reduce-harmful-pfas-pollution>.)

In October 2021, EPA published a PFAS Strategic Roadmap (<https://www.epa.gov/pfas/pfas-strategic-roadmap-epas-commitments-action-2021-2024>) that described EPA’s commitments to action for 2021 through 2024. This roadmap includes a commitment to issue new guidance recommending PFAS monitoring in both state-issued and federally-issued NPDES permits using EPA’s recently published analytical Method 1633. In anticipation of this guidance, EPA has included PFAS monitoring in the draft permit using analytical Method 1633 (see <https://www.epa.gov/cwa-methods/cwa-analytical-methods-and-polyfluorinated-alkyl-substances-pfas> for more information). Table 2 lists Region 6 recommended PFAS monitoring frequencies for different facility type.

Table 2: PFAS Monitoring Frequencies

Facility Type ^{1,2}	Frequency
Minor (< 0.1 MGD)	Once/Term
Minor (0.1 < 1.0 MGD) ^{2,3}	3/Term
Major (if NOT in an applicable category) ²	Once/6 Months
Major (if IS in an applicable category) ²	Quarterly
Major (with required pretreatment OR discharge is > 5 MGD)	Quarterly

Footnotes:

1. These recommended frequencies are only for facilities where an applicable ELG for PFAS does not apply. These frequencies may be altered if an industry category is known or suspected to discharge PFAS or based on the permit writer's BPJ.
2. The December 5, 2022, USEPA memo from Radhika Fox recommends PFAS monitoring for all POTWs, including POTWs that do not receive industrial discharges, and industrial users in these industrial categories: organic chemicals, plastics & synthetic fibers (OCPSF); metal finishing; electroplating; electric and electronic components; landfills; pulp, paper & paperboard; leather tanning & finishing; plastics molding & forming; textile mills; paint formulating, and airports. The memo is available at <https://www.epa.gov/newsreleases/epa-issues-guidance-states-reduce-harmful-pfas-pollution>.
3. PFAS samples must be collected and analyzed in three separate calendar years

6. Whole Effluent Toxicity Testing

In the "Permitting Guidance Document for Implementing Louisiana Surface Water Quality Standards-Water Quality Management Plan Volume 3 (Version 9), dated July 5, 2022, whole effluent toxicity (WET) testing is required for all major dischargers (e.g., POTW > 1.0 mgd) and significant minor dischargers. This facility does not meet the design flow size, equal to or greater than 1.0 MGD, to be classified as a major discharger, and the discharge would not appear to pose a significant unaddressed toxic risk. Accordingly, the draft permit will not require WET testing.

7. Monitoring Frequency for Limited Parameters

Regulations require permits to establish monitoring requirements to yield data representative of the monitored activity (40 CFR 122.48(b)) and to assure compliance with permit limitations (40 CFR 122.44(i)(1)). The monitoring frequencies requirements in the draft permit are based on best professional judgement, considering the nature of the facility and its design flow. Dissolved Oxygen, pH, and TRC shall be measured and recorded daily using grab samples. Fecal coliform bacteria shall be measured and reported 2 times per week during the recreation period (May 1 – October 31) and 1 per week for non-recreation period (November 1 - April 30) by grab samples. TSS, Ammonia, and CBOD₅ shall be measured and reported twice per month by 24-hour composite samples. Total Dissolved Solids, Chloride and Sulfate shall be measured and reported once per year by 24-hour composite samples.

VI. SEWAGE SLUDGE PRACTICES

The permittee shall use only those sewage sludge disposal or reuse practices that comply with the federal regulations established in 40 CFR Part 503 "Standards for the Use or Disposal of Sewage Sludge". The specific requirements in the permit apply because of the design flow of the facility, the type of waste discharged to the collection system, and the sewage sludge disposal or reuse practice utilized by the treatment works. The permittee shall submit an Annual Sludge Status report in accordance with NPDES Permit LA0127737, Part I and Part IV.

VII. WASTEWATER POLLUTION PREVENTION REQUIREMENTS

The permittee shall institute programs directed towards pollution prevention. The permittee will institute programs to improve the operating efficiency and extend the useful life of the treatment system.

VIII. INDUSTRIAL WASTEWATER CONTRIBUTIONS

Based on information provided by the applicant, the facility does not receive industrial wastewater. As such is the case, EPA has determined that the permittee will not be required to develop a full pretreatment program. However, general pretreatment provisions have been included in the permit. Written notification to EPA prior to the addition of any waste stream not identified in this application is required as specified in Part III D1b:

“Any change in the facility discharge (including the introduction of any new source or significant discharge or significant changes in the quantity or quality of existing discharges of pollutants) must be reported to the permitting authority. In no case are any new connections, increased flows, or significant changes in influent quality permitted that will cause violation of the effluent limitations specified herein.”

IX. OPERATION AND REPORTING

The applicant is required to always operate the treatment facility at maximum efficiency; to monitor the facility's discharge on a regular basis; and report the results quarterly. Reporting requirements and the requirement of using EPA-approved test procedures (methods) for the analysis and quantification of pollutants or pollutant parameters are contained in 40 CFR 122.41(l) and 40 CFR 122.21 (e), respectively. As required by 40 CFR 127.16, all Discharge Monitoring Reports (DMRs) shall be electronically reported. The monitoring results will be available to the public via EPA's Enforcement and Compliance History Online (ECHO) web site at <https://echo.epa.gov>.

X. 303(d) LIST

The receiving stream, an unnamed tributary on Coushatta Tribe of Louisiana Reservation, is not listed on the 303(d) list. The facility has a low design flow of 0.032 MGD. Based on the engineering judgment of the permit writer, the facility discharge will not contribute to the degradation of its receiving waters. Therefore, there are no additional requirements, beyond the requirements discussed above, proposed in the permit.

XI. ANTIDegradation

A. General

The federal antidegradation policy is designed to protect existing uses and the level of water quality necessary to protect existing uses and provide protection for higher quality waterbodies and outstanding national water resources. The federal policy directs states to adopt a statewide policy that includes the following primary provisions. These provisions have since become used to classify water body quality as Tier 1, Tier 2, or Tier 3 waters (40 CFR 131.12):

- 1) Existing instream water uses and the level of water quality necessary to protect the existing uses shall be maintained and protected. [Tier 1]
- 2) Where the quality of waters exceed levels necessary to support propagation of fish, shellfish, and wildlife and recreation in and on the water, that quality shall be maintained and protected unless the State/Tribe finds, after full satisfaction of the intergovernmental coordination and public participation provisions of the State/Tribe's continuing planning process, that allowing lower water quality is necessary to accommodate important economic or social development in the area in which the waters are located. In allowing such degradation or lower water quality, the State shall assure water quality adequate to protect existing uses fully. Further, the State/Tribes shall assure that there shall be achieved the highest statutory and regulatory requirements for all new and existing point sources and all cost-effective and reasonable best management practices for nonpoint source control. [Tier 2]
- 3) Where high quality waters constitute an outstanding national resource, such as waters of national and State parks and wildlife refuges and waters of exceptional recreational or ecological significance, that water quality shall be maintained and protected. [Tier 3]

B. Antidegradation Analysis

New permits and reissued permits that will increase wasteload limits, incorporate new wasteload limits (either through new WQBEL's or from TMDLs), or new permits that institute wasteload limits are required to go through an antidegradation review process.

The EPA conducted a complete antidegradation review for the proposed Coushatta Tribe of Louisiana WWTP permit, which is a new permit, to identify and address potential water quality impacts.

The discharge from the proposed WWTP enters an unnamed tributary on Coushatta Tribe of Louisiana Reservation travelling approximately 1.5 miles stream length thence to downstream waters under State of Louisiana authority, Bayou Blue. The EPA did not conduct any antidegradation analysis for the unnamed tributary on Coushatta Tribe of Louisiana tribal trust lands because of no available water quality monitoring data and Coushatta Tribe of Louisiana having no EPA approved water quality standards. The EPA only conducted an antidegradation analysis for Bayou Blue due to its proximity to the outfall and downstream of the outfall. The antidegradation analysis (1) assesses the nature and degree to which the proposed new facility would result in a lowering of Bayou Blue water quality, 2) determines whether resultant conditions would be protective of Bayou Blue beneficial uses, and (3) determines whether allowing any potential degradation would be consistent with maximum benefit to the people of Coushatta Tribe of Louisiana, given the economic and social benefits of the project, any potential

water quality impacts, and the cost and feasibility of alternatives that could prevent or minimize any potential water quality impacts.

a) Impact Assessment

To identify the degree to which Bayou Blue water quality would potentially be lowered by the proposed facility, EPA calculated the assimilative capacity of the receiving water and the change that would occur with the proposed facility. EPA used a recommended 10% reduction in available assimilative capacity (EPA Memorandum “Tier 2 Antidegradation Reviews and Significant Thresholds”, August 10, 2005) as a significance threshold.

The EPA calculated the change in the assimilative capacity, on a constituent-specific basis (i.e., Dissolved Oxygen), for Bayou Blue. The assimilative capacity is the concentration increment between the ambient water quality and the water quality standard (WQS). Utilization of assimilative capacity is calculated as the change in constituent concentration downstream of the outfall, which is approximately located just below the confluence of the unnamed tributary and Bayou Blue, R2, (i.e., conditions because of the proposed facility discharge) divided by the difference between the WQS and R2 (i.e., assimilative capacity under baseline conditions).

The Bayou Blue water quality under the future permitted discharge capacities (i.e., Bayou water quality at the downstream R2 station) is represented by a steady-state, mass-balance of data collected on the discharge effluent and Bayou at the upstream (R1) monitoring location. The downstream water quality was determined from the following equation:

$$C_{R2} = (C_{R1} \times Q_{R1} + C_{\text{Effluent}} \times Q_{\text{Effluent}}) / (Q_{R1} + Q_{\text{Effluent}})$$

Where:

Q_{R1} = Receiving stream critical low flow
 Q_{Effluent} = Facility design flow (0.032 MGD)
 C_{R1} = Parameter concentration at upstream of the outfall
 C_{R2} = Parameter concentration at downstream of the outfall
 C_{Effluent} = Effluent concentration

To assess the significance of any lowering of the water quality, EPA calculated the change in the assimilative capacity, on a constituent-specific basis, for Bayou Blue. The available assimilative capacity at baseline condition ($AAC_{\text{Baseline condition}}$) is the concentration increment between the ambient water quality and the water quality standard (WQS).

$$\text{Available Assimilative Capacity (AAC)} = (\text{WQS} - C_{R2}) \quad \text{at baseline condition}$$

The percentage of assimilative capacity used is calculated as the change in downstream constituent concentration, measured at R2, divided by the available assimilative capacity under baseline condition.

$$\% \text{ AAC Used} = 100 \times (C_{R2} \text{ Proposed condition} - C_{R2} \text{ Baseline condition}) / AAC_{\text{Baseline condition}}$$

The antidegradation analysis defaults to the lowest measurable flow (i.e., the critical condition when there is receiving water quality present to protect). There is one active U.S. Geological Survey (USGS) flow monitoring gage in the watershed (08011950-Bayou Blue near Kinder, Louisiana). The critical low flow (7Q10) is 0.02 cubic feet per second (0.1293 MGD) (“Low-flow Characteristics of Louisiana Streams”, USGS-Water Resources Technical Report No. 70, Louisiana Department of Transportation and Development, Baton Rouge, LA-Ensminger, P.A. and L.S. Wright 2003). The EPA, also, used the ambient surface water data from one of the LDEQ’s monitoring sites (i.e., Site No. 0653- Bayou Blue South of Soileau, Louisiana) for the antidegradation analysis.

Minor facilities are found unlikely to discharge toxic pollutants in amounts that would impact state water quality standards based on EPA’s information published as “Evaluation of the presence of Priority Pollutants in the Discharges of Minor POTW’s “ (June 1996). Bayou Blue does not have site-specific in-stream water quality standards for BOD₅ or CBOD₅, TSS, ammonia, percent removal, oil and grease, etc. No assimilative capacity determination was done for toxic pollutants nor for parameters having no specific water quality standards. The EPA did an assimilative capacity determination for DO. The results of the analysis indicate Coushatta Tribe of Louisiana WWTP discharge would lower Bayou Blue water quality more than the EPA recommended 10% assimilative capacity reduction significance threshold for DO for different water quality standards (see Table 3 below). The exceedance of 10 % assimilative capacity reduction significance threshold for DO warrants further analysis. EPA conducted a socioeconomic analysis based on the feasibility study submitted by the Coushatta Tribe of Louisiana to evaluate the justification for lowering the water quality in Bayou Blue.

Table 3: Assimilative Capacity Determination Results

Low Flow (cfs)	Effluent Limits (mg/L)	Plant Design Flow (cfs)	Ambient Parameter Conc. (mg/L)	Water Quality Std. (mg/L)	Parameter Conc. @R ₂ (Baseline) (mg/L)	Parameter Conc. @R ₂ (Proposed) (mg/L)	Available Assimilative Capacities (AAC)	Percent AAC Used
0.02	5	0.0495	5.4	3	5.4	5.1151	-2.4	11.8705

b) Feasibility Evaluation

The State and federal antidegradation policies require the evaluation of alternatives to the proposed project that would reduce or eliminate any potential substantial lowering of water quality. The Coushatta Tribe of Louisiana has been evaluating and planning the new wastewater treatment plant for several years. Several alternatives considered in the Coushatta Tribe of Louisiana’s planning process would reduce or eliminate the lowering of water quality, for certain constituents, resulting from new development discharge. Each alternative was assessed for feasibility in implementation, its effectiveness and implementation costs. The alternatives evaluated for the antidegradation analysis are:

- i. Wastewater Disposal without treatments (WDWT)
- ii. Individual Mechanical Systems (IMS)
- iii. Export wastewater to Elton POTW (EPOTW)

iv. Land Application Sites (LAS)

v. New Mechanical WWTP B (WWTPB)

Coushatta Tribe of Louisiana's planning process eliminated alternatives if the risk for noncompliance with NPDES requirements was unfavorable. In addition, if cost was high or very high with marginally favorable noncompliance risk, then such alternatives were eliminated (i.e., high cost of raw wastewater export to BBPOTW). The cost and infeasibility of treatment systems led to Coushatta Tribe of Louisiana's adoption of a new mechanical WWTPB as the proposed project.

1. Nonviable Alternatives

The WDWT, IMS, EPOTW and LAS are not considered as viable alternatives for treating new development's wastewater due to noncompliance risks, additional cost to Tribal members, and insufficient wastewater treatment performance. WDWT would violate EPA regulations involving discharge of wastewater into the environment. IMS would place additional expense on the CTOLA and their residents and would take excessive time to install.

Additionally, monitoring and maintaining multiple systems would place an undue burden on the CTOLA and their residents. EPOTW is not a viable option due to the excessive cost associated with the storage and transportation of the wastewater offsite. The Elton POTW is approximately 3.3 miles away. The LAS is considered a nonviable alternative to discharging wastewater because this alternative would limit daily flow, requires application site availability, depends on the absorption rates of the soil types near the WWTP A and B, and has the potential for a discharge in case of a malfunction. Coushatta Tribe of Louisiana did not conduct any further evaluations (i.e., costs and other impacts) for these alternatives since they are not viable.

2. Viable Alternatives

The closest centralized wastewater treatment and disposal system is POTW in Elton, Louisiana, approximately 3.3 miles away. A viable alternative is to export the new development's wastewater to existing Elton Publicly Owned Treatment Works (EPOTW). This would have the ability to eliminate any potential lowering of water quality in Bayou Blue. Coushatta Tribe of Louisiana evaluated multiple routes to convey wastewater generated from the proposed plant to EPOTW. The shortest route to the POTW consists of rural roadways and bridges that would not support the additional traffic of heavily laden vehicles for long periods of time. Likewise, to install a force main along this route it would require lift stations and two crossings of Water of the U.S. The scope of this type of project is cost prohibitive for the CTOLA.

Another considered viable alternative is to construct a new mechanical wastewater treatment plant to treat the wastewater from the CTOLA's administrative complex. The WWTP is a new mechanical system which utilizes the most modern technology to adequately treat the wastewater influent to the effluent limitations dictated by the NPDES. The use of a WWTP gives the CTOLA the best opportunity to provide wastewater treatment service to the CTOLA's administrative complex and the housing development while protecting water uses in the receiving stream.

c) Socioeconomic Considerations

The CTOLA plans to connect to and discharge from a new wastewater treatment plant (WWTP). The area served by the WWTP is situated on approximately 154 acres in the rural unincorporated portions of Allen Parish, Louisiana. The U.S. Census Bureau reports the total population of Allen Parish as 22,320 with 2.6% identifying as American Indian alone. The U.S. Census Bureau reports Allen Parish has a 20.9% poverty rate. The CTOLA reports approximately 960 members, many of whom will be served by the WWTP. The permitting of the WWTP will allow the CTOLA to provide wastewater treatment services to their employees and residents of this area while continuing to protect water resources.

d) Antidegradation Analysis Findings

The extent of water quality impacts from the proposed Coshatta Tribe of Louisiana WWTP project were primarily assessed based on cumulative assimilative capacity utilization – on a mass balance (concentration-based) approach for dissolved oxygen parameter. The use of available assimilative capacity for DO constituent exceeds the EPA recommended threshold for a detailed review of the socioeconomic benefits of the proposed project regarding the lowering of Bayou Blue water quality.

Wastewater components with potential to affect DO concentrations include biochemical oxygen demand/carbonaceous biochemical oxygen demand (BOD₅/CBOD₅) and ammonia. In aquatic environments, DO is reduced as BOD₅/CBOD₅ is introduced/increased, or through oxidation of ammonia to nitrite and nitrate. Re-aeration of downstream waters due to physical processes and photosynthesis tends to offset the oxygen demand of effluent as it flows downstream. The proposed facility discharge could potentially lower Bayou Blue's water quality with respect to DO in the future. To ensure no excursion of downstream State's DO water quality standards, the proposed NPDES permit contains the following limitations in Table 4 for carbonaceous biochemical oxygen demand (CBOD₅), ammonia, as nitrogen (NH₃-N), and DO.

Table 4: Proposed Effluent Limitations

Pollutants	30-Day Avg.	7-Day Avg.
CBOD ₅	5.0 mg/L	7.5 mg/L
NH ₃ -N	2.0 mg/L	3.0 mg/L
DO	6 mg/L (instantaneous minimum)	

Coshatta Tribe of Louisiana has been examining several designing options for the proposed facility to ensure that the proposed WWTP will, at the minimum, comply with the proposed NPDES permit limitations for DO, CBOD₅ and NH₃-N. Because future expected operations of the plant will achieve compliance with NPDES permit requirements, thereby assuring a water quality nuisance will not occur, EPA does not believe that Bayou Blue's beneficial uses will be adversely affected by the proposed facility.

The objective of the socioeconomic analysis is to determine if the lowering of Bayou Blue water quality is in the maximum interest of Tribal and non-tribal members. The socioeconomic

evaluation considered the social benefits and costs based on the ability to accommodate socioeconomic development. Given the current infrastructure, future development of destination resort would rely on Tribal's WWTP for wastewater collection and treatment. Should the changes in Bayou Blue water quality characterized herein be disallowed, such action would: (1) force future developments in the area to find alternative methods for disposing of wastewater or (2) prohibit planned and approved development within and adjacent to the area. The EPA believes, on balance, allowing the minor water quality degradation of Bayou Blue is in the best interest of the people in the area compared to evaluated alternatives.

Based on the assessment contained herein, it is determined that the proposed WWTP discharge will meet both required TBELs and WQBLs necessary to assure that a water quality nuisance will not occur and that beneficial uses are fully protected. The DO degradation in the receiving water that will occur because of the proposed facility discharge will not cause that water body to exceed applicable water quality objectives and would accommodate important socioeconomic development in the area while maintaining full protection of the beneficial uses of Bayou Blue year-round. An evaluation of several alternatives to determine their effects on water quality impacts and their ability to provide beneficial use protection did not identify any feasible alternative control measures that would more effectively maximize the interest of the Tribal and non-tribal members and accommodate the planned growth in the area, compared to the proposed project.

Based on the analysis contained herein, the anticipated water quality changes in Bayou Blue are consistent with the state and federal antidegradation policies, provide important socioeconomic benefit to Tribal and non-tribal members, and will not result in water quality less than that prescribed in the policies, required to prevent a nuisance, or required to protect beneficial uses.

XII. ENDANGERED SPECIES CONSIDERATIONS

A U.S. Fish and Wildlife Service letter dated November 3, 2023, provided by Coushatta Tribe of Louisiana indicates that no potential significant adverse impacts to biological resources are anticipated from the proposed project.

XIII. HISTORICAL and ARCHEOLOGICAL PRESERVATION CONSIDERATIONS

The November 2, 2022, a desk top review of the Louisiana State Historic Preservation Office (SHPO) National Register from the Coushatta Tribe of Louisiana Historic Preservation indicates that no potential significant adverse impacts to archaeological, historical, architectural, or cultural resources are anticipated from the proposed project.

XIV. ENVIRONMENTAL JUSTICE

Executive Order 13985, Advancing Racial Equity and Supporting for Underserved Communities through the Federal Government signed on January 20, 2021, directs each federal agency to "make achieving environmental justice part of its mission by identifying and addressing, as appropriate,

disproportionately high and adverse human health or environmental effects of its programs, policies, and activities.” The EPA strives to enhance the ability of overburdened communities to participate fully and meaningfully in the permitting process for EPA-issued permits, including NPDES permits. “Overburdened” communities can include minority, low-income, tribal, and indigenous populations or communities that potentially experience disproportionate environmental harms and risks. As part of an agency-wide effort, the EPA Region 6 will consider prioritizing enhanced public involvement opportunities for EPA-issued permits that may involve activities with significant public health or environmental impacts on already overburdened communities. For more information, please visit <http://www.epa.gov/ejscreen>.

As part of the Permit development process, the EPA conducted a screening analysis to determine whether this Permit action could affect overburdened communities. The EPA used EJScreen 2.2, a nationally consistent geospatial tool that contains demographic and environmental data for the United States at the Census block group level. This tool is used to identify Permits for which enhanced outreach may be warranted.

The study area was chosen at the proposed 001 discharge, 5-miles downstream path following the flow from Bayou Blue on the Tribe, thence to Bayou Blue of the Bayou Nezpique watershed in the Mermentau River Basin. A 3-mile buffer around the path was selected to study the area with a population of 2,112 persons. No EJ Indexes score for the state percentile of the facility was above the 80th percentile (80%) and 84% of the population speak only English at home. These results indicate that all the percentiles are well below the 80 percentile and most of the population speak English at home. From the EJSCREEN guidelines and trainings, this area will not be a concern for Environmental Justice issues at this time.

XV. PERMIT REOPENER

The permit may be reopened and modified during the life of the permit if relevant procedures implementing the Water Quality Standards are either revised or promulgated by the Louisiana Department Environmental Quality, or Coushatta Tribe of Louisiana obtains treatment same as state and develops Tribal Water Quality Standards. Should Coushatta Tribe of Louisiana or the State adopt a tribal/state water quality standard, and/or develop or amend a TMDL, this permit may be reopened to establish effluent limitations for the parameter(s) to be consistent with that approved State standard and/or water quality management plan, in accordance with 40 CFR §122.44(d). Modification of the permit is subject to the provisions of 40 CFR §124.5.

XVI. CERTIFICATION

The Environmental Protection Agency has made a tentative determination to issue a first-time permit for the discharge described in the application. Permit requirements are based on NPDES regulations (40 CFR Parts 122 and 124). The permit is in the process of certification by EPA Region 6 since Coushatta Tribe of Louisiana does not have authorization to be treated in a similar manner as a state (TAS) for water quality standards. EPA intends to certify without conditions the draft permit proposed and will also accept comments on EPA’s CWA 401 Certification of the

permit. A draft permit and draft public notice will be sent to the District Engineer, Corps of Engineers, U.S. Department of Agriculture, Rural Development, and to the Regional Director of the U.S. Fish and Wildlife Service prior to the publication of that notice.

XVII. FINAL DETERMINATION

The public notice describes the procedures for the formulation of final determinations.

XVIII. ADMINISTRATIVE RECORD

The following information was used to develop the proposed permit:

A. APPLICATION(s)

EPA Application Forms 2A, 2S and addenda were received on October 2, 2023, and March 25, 2024

B. 40 CFR CITATIONS

§§ 122, 124, 125, 127, 131, 133, 136

C. STATE OF LOUISIANA REFERENCES

Louisiana Environmental Regulatory Code, August 2022

Permitting Guidance Document for Implementing Louisiana Surface Water Quality Standards Water Quality Management Plan.

2022 State of Louisiana CWA §303(d) / §305(b) Integrated Report

Bayou Nezpique Watershed TMDL for Dissolved Oxygen Including WLS for Nine Treatment Facilities-Subsegments 050301, 050302, 050303, and 050304, September 1985

Bayou Blue (Subsegment 050304), Louisiana, Final TMDL for Dissolve Lead, October 2010

D. MISCELLANEOUS REFERENCES

EPA Region 6 "Policy for Post Third Round NPDES Permitting" and "Post Third Round NPDES Permit Implementation Strategy," October 1, 1992.

EPA Memorandum "Tier 2 Antidegradation Reviews and Significant Thresholds", August 10, 2005

Wastewater Disposal Alternative Analysis and Social Economic Analysis, CK Associates, March 11, 2024

Trust Deed signed, sealed and delivered to Coushatta Tribe of Louisiana, November 14, 2006, providing proof that the both the proposed plant and discharge point are located on Coushatta Tribe of Louisiana Tribal land.

CK Associates' Section 106 Review Coushatta Tribe of Louisiana NPDES Permit Application- Desk top Review of the Louisiana State Historic Preservation Office (SHPO) National Register, November 2, 2022

United States Department of the Interior- Fish and Wildlife Service – Consistency letter for the project named 'CTOLA' for specified threatened and endangered species that may occur in your proposed project location pursuant to the Louisiana Endangered Species Act project review and guidance for other federal trust resources determination key (Louisiana DKey), November 3, 2023