



STATE OF LOUISIANA
DEPARTMENT OF ENVIRONMENTAL QUALITY
OFFICE OF THE SECRETARY

September 25, 2025

Adam Assenza, Project Manager
Surface Transportation Board (Docket No. FD 36633)
Office of Environmental Analysis
395 E Street SW, Washington, DC 20423
E-Filing at www.stb.gov

RE: 250910/1030

**Plaquemines Port Harbor and Terminal District (PPHTD) – Construction and Operation Exemption –
Line of Railroad (Docket No. FD 36633)
Surface Transportation Board Funding
Plaquemines Parish**

Dear Mr. Assenza:

The Louisiana Department of Environmental Quality (LDEQ) has received your request for comments on the above referenced project.

After reviewing your request, the Department has no objections based on the information provided in your submittal. However, for your information, the following general comments have been included. Please be advised that if you should encounter a problem during the implementation of this project, you should immediately notify LDEQ's Single-Point-of-contact (SPOC) at (225) 219-3640.

- Please take any necessary steps to obtain and/or update all necessary approvals and environmental permits regarding this proposed project.
- If your project results in a discharge to waters of the state, submittal of a Louisiana Pollutant Discharge Elimination System (LPDES) application may be necessary.
- If the project results in a discharge of wastewater to an existing wastewater treatment system, that wastewater treatment system may need to modify its LPDES permit before accepting the additional wastewater.
- All precautions should be observed to control nonpoint source pollution from construction activities. LDEQ has stormwater general permits for construction areas equal to or greater than one acre. It is recommended that you contact Debbie Bissett (Debbie.Bissett@la.gov) or Melissa Reboul (Melissa.Reboul@la.gov) with the LDEQ Water Permits Division at (225) 219-3590 to determine if your proposed project requires a permit.
- If your project will include a sanitary wastewater treatment facility, a Sewage Sludge and Biosolids Use or Disposal Permit is required. An application form or Notice of Intent will need to be submitted if the sludge management practice includes preparing biosolids for land application or preparing sewage sludge to be hauled to a landfill. Additional information may be obtained on the LDEQ website at <https://deq.louisiana.gov/page/sewage-biosolids> or by contacting Ronda Burtch with the LDEQ Water Permits Division at (225) 219- 3213 or Ronda.Burtch@la.gov.



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- If any of the proposed work is located in wetlands or other areas subject to the jurisdiction of the U.S. Army Corps of Engineers, you should contact the Corps directly regarding permitting issues. If a Corps permit is required, part of the application process may involve a water quality certification from LDEQ.
- All precautions should be observed to protect the groundwater of the region.
- Please be advised that water softeners generate wastewaters that may require special limitations depending on local water quality considerations. Therefore if your water system improvements include water softeners, you are advised to contact the LDEQ Water Permits to determine if special water quality-based limitations will be necessary.
- Please refer to the following regulations as they may apply to your project: LAC 33:III.Chapter 28 (Lead-Based Paint Activities); LAC 33:III.Chapter 27 (Asbestos Training and Accreditation requirements); LAC 33:III.5151, Emission Standard for Asbestos (for any renovations or demolitions); and LAC 33:III.1305.Control of Fugitive Emissions (prevention of Particulate Matter from becoming airborne).
- If any solid or hazardous wastes, or soils and/or groundwater contaminated with hazardous constituents are encountered during the project, notification to LDEQ's Single-Point-of-Contact (SPOC) at (225) 219-3640 or SPOC@la.gov is required. Additionally, precautions should be taken to protect workers from these hazardous constituents.
- **The proposed project is located within three LDEQ defined water units: LA020802_00, LA020904_00, and LA020907_00. According to the LDEQ 2024 Integrated Report, units LA020904_00 and LA020907_00 have impairments for bacteria. Nonpoint source controls should be followed as outlined above, as disturbance and sedimentation during construction can worsen water quality.**
- **It seems that this project involves new construction over a large area, that extensive excavation may be needed to complete the project, and historic land uses have not been identified in the submittal. It is therefore advised that a site-specific environmental assessment be performed on the entire project corridor to address specific environmental concerns, and provide for worker safety.**

If the project will involve the removal or disturbance of any soils which may have contaminant concentrations that exceed the Screening Option Standards established by the LDEQ Risk Evaluation/Corrective Action Program (RECAP) Regulation, these materials may be considered a waste and disposed of at a permitted facility, or might be managed as part of a Solid Waste Beneficial Use or Soil Reuse Plan in accordance with LAC 33:VII.Chapter 11. Alternately, a site-specific RECAP Evaluation might be conducted and submitted to the LDEQ.

- **The following comments are provided by the Underground Storage Tanks Division (USTD) and are in response to SOV No. 250910/1030:**



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A file review indicates the following Agency Interest (AI) Number is located in the vicinity of your project in Plaquemines Parish, LA and at one time contained USTs on the properties that have been removed from the LDEQ database:

AI No. 12225; Citrus Lands of LA Inc.; Hwy 23 S 17 Miles South of Belle Chasse

If the project will involve the disturbance of any soils in former UST areas which may exceed the Screening Option Standards established by the LDEQ Risk Evaluation/Corrective Action Program (RECAP) Regulation, these materials may be considered a waste and disposed of at a permitted facility, or might be managed as part of a Solid Waste Beneficial Use or Soil Reuse Plan in accordance with LAC 33:VII.Chapter 11. Alternately, a site-specific RECAP Evaluation might be conducted and submitted to the LDEQ.

If any underground storage tanks are encountered during the project, they must be in compliance with the regulations found in LAC 33:XI of the Environmental Regulatory Code. If any contaminated soil or groundwater is encountered, the findings should be reported to LDEQ.

Currently, Plaquemines Parish is classified as attainment with the National Ambient Air Quality Standards and has no general conformity determination obligations.

Please send all Solicitation of Views (SOVs) requests and questions to SOVs@la.gov.

For Air Planning & Assessment question/inquiries, please contact Chance Henderson at Chance.Henderson@la.gov.

For Water Planning & Assessment question/inquiries, please contact Kori Blitch at Kori.Blitch@la.gov.

For Remediation question/inquiries, please contact Keith Horn at Keith.Horn@la.gov.

For Underground Storage Tank questions/inquiries, please contact Chris Means at Chris.Means@la.gov.

Sincerely,

Marissa Jimenez
Environmental Scientist Manager
Louisiana Department of Environmental Quality
Office of the Secretary