MISSOURI STATE OPERATING PERMIT

In compliance with the Missouri Clean Water Law, (Chapter 644 R.S. Mo. as amended, hereinafter, the Law), and the Federal Water Pollution Control Act (Public Law 92-500, 92nd Congress) as amended,

Permit No. MO-0104671

Owner: City of Ewing
Address: P.O. Box 346, Ewing, MO 63440

Facility Name: Ewing Wastewater Treatment Facility
Facility Address: Lakeview Drive terminus, Ewing, MO 63440

Legal Description: See Page 2
UTM Coordinates: See Page 2

Receiving Stream: See Page 2
First Classified Stream and ID: See Page 2
USGS Basin & Sub-watershed No.: See Page 2

is authorized to discharge from the facility described herein, in accordance with the effluent limitations and monitoring requirements as set forth herein:

FACILITY DESCRIPTION

See Page 2

This permit authorizes only irrigation of wastewater under the Missouri Clean Water Law and the National Pollutant Discharge Elimination System; it does not apply to other regulated areas. This permit may be appealed in accordance with Section 644.051.6 of the Law.

October 1, 2017 December 1, 2020
Effective Date Modification Date

Edward B. Galbraith, Director, Division of Environmental Quality

December 31, 2021
Expiration Date

Chris Wieberg, Director, Water Protection Program
FACILITY DESCRIPTION (continued)

Permitted Feature #001 – POTW – SIC #4952
The use or operation of this facility shall be by or under the supervision of a Certified “D” Operator.
Four-cell storage lagoon / pump station / wastewater is irrigated to the surface / sludge is retained in lagoon.
Design population equivalent is 600.
Design Flow is 74,452 gallons per day (Design Flow plus 10-year rainfall minus evaporation, does not account for inflow and infiltration)
Average design flow is 60,000 gallons per day (dry weather flows).
Actual flow is 58,000 gallons per day.
Design sludge production is 9.0 dry tons per year.

Legal Description: SE ¼, SE ¼, Sec. 6, T60N, R7W, Lewis County
UTM Coordinates: X= 609938, Y= 4430834
Receiving Stream: Tributary to Middle Fork Fabius River (C) (3960)
First Classified Stream and ID: 100K Extent Remaining Stream (C) (3960)
USGS Basin & Sub-watershed No.: (07110002-0306)

Storage Basin:
Maximum Operating Level: 1 feet of freeboard (storage basin water level in feet below the overflow level)

<table>
<thead>
<tr>
<th>Storage volume (min to max water levels, in gallons):</th>
<th>Cell #1</th>
<th>Cell #2</th>
<th>Cell #3</th>
<th>Cell #4</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>3,004,686</td>
<td>879,887</td>
<td>716,811</td>
<td>2,623,864</td>
<td>7,225,248</td>
</tr>
</tbody>
</table>

Storage Capacity (in Days):
Design for Dry weather flows: 120.4 days
Design with 1-in-10 year flows: 96.7 days

Permitted Feature #002 – Fixed Sprinkler Irrigation Field

Legal Description: SE ¼, Sec. 5, T60N, R7W, Lewis County
UTM Coordinates: X = 611005, Y = 4430984
Receiving Stream: Tributary to Middle Fabius River
First Classified Stream and ID: Middle Fabius River (P) (0063)
USGS Basin & Sub-watershed No.: (07110002-0306)

Wastewater Irrigation Design Parameters:
Minimum irrigation volume per year at Design Flow: 21,900,000 gallons
Irrigation areas: 20.16 acres at design loading
Irrigation rates: 0.2 inch/hour; 1.0 inch/day; 3.0 inches/week; 40 inches/year
Field slopes: less than 12 percent
Equipment type: fixed sprinklers
Vegetation: pasture
Irrigation rate is based on: Hydraulic loading rate
The permittee is authorized to conduct irrigation of wastewater as specified in the application for this permit. The final limitations shall become effective on **December 1, 2020** and remain in effect until expiration of the permit. The irrigation of wastewater shall be controlled, limited and monitored by the permittee as specified below:

### Table A-1

**IRRIGATION SYSTEM LIMITATIONS AND MONITORING REQUIREMENTS**

<table>
<thead>
<tr>
<th>STORAGE BASIN PARAMETER(S)</th>
<th>UNITS</th>
<th>FINAL LIMITATIONS</th>
<th>MONITORING REQUIREMENTS</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>DAILY TOTAL</td>
<td>WEEKLY TOTAL</td>
</tr>
<tr>
<td>Storage Basin Freeboard**</td>
<td>feet</td>
<td>*</td>
<td>*</td>
</tr>
<tr>
<td>Precipitation</td>
<td>inches</td>
<td>*</td>
<td>*</td>
</tr>
</tbody>
</table>

**MONITORING REPORTS SHALL BE SUBMITTED MONTHLY; THE FIRST REPORT IS DUE JANUARY 28, 2021.**

### Table A-2

**IRRIGATION SYSTEM LIMITATIONS AND MONITORING REQUIREMENTS**

<table>
<thead>
<tr>
<th>IRRIGATION OPERATIONAL MONITORING PARAMETER(S)</th>
<th>UNITS</th>
<th>FINAL LIMITATIONS</th>
<th>MONITORING REQUIREMENTS</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>DAILY TOTAL</td>
<td>WEEKLY TOTAL</td>
</tr>
<tr>
<td>Irrigation Period</td>
<td>hours</td>
<td>*</td>
<td>*</td>
</tr>
<tr>
<td>Volume Irrigated</td>
<td>gallons</td>
<td>*</td>
<td>*</td>
</tr>
<tr>
<td>Irrigation Area</td>
<td>acres</td>
<td>*</td>
<td>*</td>
</tr>
<tr>
<td>Irrigation Rate</td>
<td>inches</td>
<td>*</td>
<td>*</td>
</tr>
</tbody>
</table>

**MONITORING REPORTS SHALL BE SUBMITTED MONTHLY; THE FIRST REPORT IS DUE JANUARY 28, 2021.**

* Monitoring requirement only.

** Storage Basin Freeboard shall be reported as storage basin water level in feet below the overflow level.

*** Monitoring data from each Permitted Feature shall be reported separately.

### B. STANDARD CONDITIONS

In addition to specified conditions stated herein, this permit is subject to the attached Parts I, II, & III standard conditions dated August 1, 2014, May 1, 2013, and August 1, 2019, and hereby incorporated as though fully set forth herein.
C. SPECIAL CONDITIONS

1. Emergency Discharges.
   (a) Monitoring. Any emergency discharge shall be monitored for the parameters in the table below at least once during the discharge event. Additional monitoring may be required by the Department on a case-by-case basis. The facility shall submit test results, along with the number of days the storage basin(s) has discharged during the month, via the Electronic Discharge Monitoring Report (eDMR) Submission System by the 28th day of the month after the discharge ceases. Permittee shall monitor for the following constituents:

<table>
<thead>
<tr>
<th>Constituent</th>
<th>Units</th>
</tr>
</thead>
<tbody>
<tr>
<td>Effluent Flow</td>
<td>MGD</td>
</tr>
<tr>
<td>Biochemical Oxygen Demand</td>
<td>mg/L</td>
</tr>
<tr>
<td>Total Suspended Solids</td>
<td>mg/L</td>
</tr>
<tr>
<td>Ammonia as N</td>
<td>mg/L</td>
</tr>
<tr>
<td>pH – Units</td>
<td>SU</td>
</tr>
<tr>
<td>Oil &amp; Grease</td>
<td>mg/L</td>
</tr>
<tr>
<td>E. coli*</td>
<td>#/100mL</td>
</tr>
</tbody>
</table>

   * Sampling for E. coli is only required during the recreational months of April – October.

   (b) Authorized Discharges. An emergency discharge from wastewater storage structures may only occur if rainfall exceeds the 10-year 365-day rainfall event (chronic) or the 25-year 24-hour rainfall event (catastrophic). The facility shall make all reasonable attempts to return the water level in the lagoon to below the maximum operating level. Design Storm Maps and Tables can be found at http://ag3.agebb.missouri.edu/design_storm/. For this facility:

<table>
<thead>
<tr>
<th>Lewis County</th>
<th>Data Collected: 07/24/2017</th>
</tr>
</thead>
<tbody>
<tr>
<td>10-year 365-day rainfall event</td>
<td>46.7 inches</td>
</tr>
<tr>
<td>25-year 24-hour rainfall event</td>
<td>5.7 inches</td>
</tr>
</tbody>
</table>

   (c) Unauthorized Discharges. Discharge for any other reason than what is stated in 1(b) of this Special Condition shall constitute a permit violation and shall be reported in accordance with Standard Conditions Part 1 Section B.2.b. Unauthorized discharges are to be reported to the Northeast Regional Office during normal business hours or by using the online Sanitary Sewer Overflow/Facility Bypass Application located at: http://dnr.mo.gov/modnrcag/ or the Environmental Emergency Response spill-line at 573-634-2436 outside of normal business hours.

2. Wastewater Irrigation System.
   (a) No-discharge facility requirements. Wastewater shall be stored and irrigated during suitable conditions so that there is no discharge from the storage basins or irrigation sites.

   (b) Storage Basin Operating Levels - No-discharge Systems. The minimum and maximum operating water levels for the storage basin(s) shall be clearly marked in each of the storage basins where the water levels can be manipulated by valves. Each storage basin shall be operated so that the maximum water elevation does not exceed one foot below the Emergency Spillway except due to exceedances of the 10-year 365-day rainfall event or 25-year 24-hour rainfall event as detailed in Special Condition 1. Wastewater shall be irrigated whenever feasible based on soil, weather conditions, and permit requirements. To ensure maximum storage capacity for the winter months when soil conditions may not be suitable for wastewater irrigation, the storage basin(s) shall be lowered to the two-foot minimum operating level during the months of September through November unless the department approves a specific deviation from this requirement.

   (c) Emergency Spillway. Lagoons and earthen storage basins should have an emergency spillway to protect the structural integrity of earthen structures during operation at near full water levels and in the event of overflow conditions. The spillway shall be at least one foot below top of berm.

   (d) General Irrigation Requirements. The wastewater irrigation system shall be operated so as to provide uniform distribution of irrigated wastewater over the entire irrigation site. A complete ground cover of vegetation shall be maintained on the irrigation site unless the system is approved for row crop irrigation. The wastewater irrigation system shall be capable of irrigating the annual design flow during an irrigation period of 100 days or less per year. If the facility determines that night time irrigation is needed, the facility shall submit a night time irrigation plan to the Department’s Water Protection Program for review and approval. Night time irrigation shall only occur when the Department has approved the night time irrigation plan.

   (e) Saturated/Frozen Conditions. There shall be no irrigation during ground frost; frozen, snow-covered, or saturated soil conditions; or when precipitation is imminent or occurring.
(f) **Slope Restrictions.** Wastewater irrigation on slopes exceeding 10%, the hourly irrigation rate shall not exceed one-half (1/2) the design sustained permeability and in no case shall exceed one-half (1/2) inch per hour.

(g) **Set Backs.** There shall be no irrigation within:
   1. 300 feet of any sinkhole, losing stream, or any other feature that may provide a connection to the ground water table and the surface;
   2. 300 feet from any existing potable water supply well not located on the property;
   3. 150 feet of dwelling or public use areas;
   4. 100 feet of any gaining perennial or intermittent streams or tributaries or any publicly or privately owned ponds or lakes. As a compliance alternative a 35-foot vegetative buffer that is permanently covered with perennial vegetation may be substituted for the 100 foot set-back requirement;
   5. 50 feet of the property line or public road.

(h) **Public Access Restrictions.** Public access shall not be allowed to public-use-area irrigation sites when irrigation is occurring.

(i) **Grazing and Harvesting of Forage Crops Restrictions.** Grazing of animals shall be deferred as per the following:
   1. From May 1 to October 31, the minimum deferment from grazing or forage harvesting shall be 14 days.
   2. From November 1 to April 30, the minimum deferment from grazing or forage harvesting shall be 30 days.

(j) **Irrigated Wastewater Disinfection.** Wastewater shall be disinfected prior to irrigation (not storage) to public-use-areas.

(k) **Agronomic Irrigation Rates.** Wastewater irrigation shall not exceed agronomic rates to ensure agricultural use of nutrients and prevent contamination of surface and groundwater. The agronomic rate is the amount of wastewater applied to a field to meet the fertilizer recommendation.

(l) **Equipment Checks during Irrigation.** The irrigation system and irrigation site shall be visually inspected at least once/day during wastewater irrigation to check for equipment malfunctions and runoff from the irrigation site.

3. Wastewater irrigation records shall be maintained and summarized into an annual operating report for the previous calendar year. This annual report is in addition to the reporting requirements listed in Table A and the report shall be kept onsite and made available to department personnel upon request. The summarized annual report shall include the following:
   (a) Record of maintenance and repairs performed during the year, average number of times per month the facility is checked to see if it is operating properly, and description of any unusual operating conditions encountered during the year;
   (b) The number of days the storage basin(s) has discharged during the year, the discharge flow, and the reasons discharge occurred; and
   (c) A summary of the irrigation operations for the year including: the number of days of irrigation, the total gallons irrigated, the total acres used, the irrigation rate in inches for the year, and the annual precipitation received at the facility.

4. **Electronic Discharge Monitoring Report (eDMR) Submission System.** Per 40 CFR Part 127 National Pollutant Discharge Elimination System (NPDES) Electronic Reporting Rule, reporting of effluent monitoring data and any report required by the permit (unless specifically directed otherwise by the permit) shall be submitted by the permittee via an electronic system to ensure timely, complete, accurate, and nationally consistent set of data about the NPDES program.
   (a) eDMR Registration Requirements. The permittee must register with the Department’s eDMR system through the Missouri Gateway for Environmental Management (MoGEM) before the first report is due. Registration and other information regarding MoGEM can be found at [https://dnr.mo.gov/mogem](https://dnr.mo.gov/mogem). Information about the eDMR system can be found at [https://dnr.mo.gov/env/wpp/edmr.htm](https://dnr.mo.gov/env/wpp/edmr.htm). The first user shall register as an Organization Official and the association to the facility must be approved by the Department. Regarding Standard Conditions Part I, Section B, #7, the eDMR system is currently the only Department approved reporting method for this permit unless a waiver is granted by the Department. See paragraph (c) below.
   (b) Electronic Submissions. To access the eDMR system, use the following link in your web browser: [https://apps5.mo.gov/mogems/welcome.action](https://apps5.mo.gov/mogems/welcome.action). If you experience difficulties with using the eDMR system you may contact edm@dnr.mo.gov or call 855-789-3889 or 573-526-2082 for assistance.
   (c) Waivers from Electronic Reporting. The permittee must electronically submit compliance monitoring data and reports unless a waiver is granted by the Department in compliance with 40 CFR Part 127. Only permittees with an approved waiver request may submit monitoring data and reports on paper to the Department for the period that the approved electronic reporting waiver is effective. The permittee may obtain an electronic reporting waiver by first submitting an eDMR Waiver Request Form: [http://dnr.mo.gov/forms/780-2692-f.pdf](http://dnr.mo.gov/forms/780-2692-f.pdf). The Department will either approve or deny this electronic reporting waiver request within 120 calendar days.
5. The full implementation of this operating permit, which includes implementation of any applicable schedules of compliance, shall constitute compliance with all applicable federal and state statutes and regulations in accordance with §644.051.16, RSMo, and the CWA section 402(k); however, this permit may be reopened and modified, or alternatively revoked and reissued:
   (a) To comply with any applicable effluent standard or limitation issued or approved under Sections 301(b)(2)(C) and (D), 304(b)(2), and 307(a) (2) of the Clean Water Act, if the effluent standard or limitation so issued or approved:
      (1) contains different conditions or is otherwise more stringent than any effluent limitation in the permit; or
      (2) controls any pollutant not limited in the permit.
   (b) To incorporate an approved pretreatment program pursuant to 40 CFR 403.8(a).

6. Permittee will cease discharge by connection to a facility with an area-wide management plan per 10 CSR 20-6.010(3)(B) within 90 days of notice of its availability.

7. Changes in existing pollutants or the addition of new pollutants to the treatment facility

   The permittee must provide adequate notice to the Director of the following:
   (a) Any new introduction of pollutants into the POTW from an indirect discharger which would be subject to section 301 or 306 of CWA if it were directly discharging those pollutants; and
   (b) Any substantial change in the volume or character of pollutants being introduced into that POTW by a source introducing pollutants into the POTW at the time of issuance of the permit.
   (c) For purposes of this paragraph, adequate notice shall include information on;
      (1) the quality and quantity of effluent introduced into the POTW, and
      (2) any anticipated impact of the change on the quantity or quality of effluent to be discharged from the POTW.

8. Report as no-discharge when irrigation does not occur during the report period.

9. It is a violation of the Missouri Clean Water Law to fail to pay fees associated with this permit (644.055 RSMo).

10. The permittee shall comply with any applicable requirements listed in 10 CSR 20-9. For lagoon systems that are designed as no-discharge systems followed by wastewater irrigation the monitoring frequencies of all applicable parameters have been reduced to twice a month. The operational monitoring frequencies contained in this permit shall not be construed by the permittee as a modification of the monitoring frequencies listed in 10 CSR 20-9. If further modification of the monitoring requirements and/or frequencies listed in 10 CSR 20-9 is needed, the permittee shall submit a written request to the Department for review and, if deemed necessary, approval.


   The permittee shall also submit a report to via the Electronic Discharge Monitoring Report (eDMR) Submission System annually, by January 28th, for the previous calendar year. The report shall contain the following information:
   (a) A summary of the efforts to locate and eliminate sources of excessive infiltration and inflow into the collection system serving the facility for the previous year.
   (b) A summary of the general maintenance and repairs to the collection system serving the facility for the previous year.
   (c) A summary of any planned maintenance and repairs to the collection system serving the facility for the upcoming calendar year. This list shall include locations (GPS, 911 address, manhole number, etc.) and actions to be taken.

12. All outfalls must be clearly marked in the field. Permitted features, including storage basins and irrigation sites, shall be marked on an aerial or topographic site map included with the Operation and Maintenance manual.

13. The permittee shall develop, maintain and implement an Operation and Maintenance (O&M) Manual that includes all necessary items to ensure the operation and integrity of the waste handling and wastewater irrigation systems, including key operating procedures, an aerial or topographic site map with the permitted features, irrigation fields, and irrigation buffer zones marked, and a brief summary of the operation of the facility. The O&M manual shall be made available to the operator and shall be reviewed and updated when there is a change in equipment or irrigation sites and at least every five years.
C. SPECIAL CONDITIONS (continued)

14. Reporting of Non-Detects:
   (a) An analysis conducted by the permittee or their contracted laboratory shall be conducted in such a way that the precision and accuracy of the analyzed result can be enumerated.
   (b) The permittee shall not report a sample result as “Non-Detect” without also reporting the detection limit of the test. Reporting as “Non Detect” without also including the detection limit will be considered failure to report, which is a violation of this permit.
   (c) The permittee shall provide the “Non-Detect” sample result using the less than sign and the minimum detection limit (e.g. <10).
   (d) Where the permit contains a Minimum Level (ML) and the permittee is granted authority in the permit to report zero in lieu of the < ML for a specified parameter (conventional, priority pollutants, metals, etc.), then zero (0) is to be reported for that parameter.
   (e) See Standard Conditions Part I, Section A, #4 regarding proper detection limits used for sample analysis.
   (f) When a parameter is not detected above ML, the permittee must report the data qualifier signifying less than ML for that parameter (e.g., < 50 µg/L, if the ML for the parameter is 50 µg/L). For reporting an average based on a mix of values detected and not detected, assign a value of “0” for all non-detects for that reporting period and report the average of all the results.

15. Access to the storage basin(s) and any associated wastewater irrigation equipment must be sufficiently restricted or secured to prevent entry by children, livestock and unauthorized persons as well as to protect the facility from vandalism.

16. At least one gate must be provided to access the wastewater treatment facility and provide for maintenance and mowing. The gate shall remain closed except when temporarily opened by the permittee to access the facility to perform operational monitoring, sampling, maintenance, or mowing. The gates shall also be temporarily opened for inspections by the Department. The gate shall be closed and locked when the facility is not staffed.

17. At least one (1) warning sign shall be placed on each side of the facility enclosure (does not pertain to irrigation fields) in such positions as to be clearly visible from all directions of approach. There shall also be one (1) sign placed for every five hundred feet (500') (150 m) of the perimeter fence. A sign shall also be placed on each gate. Minimum wording shall be SEWAGE TREATMENT FACILITY—KEEP OUT. Signs shall be made of durable materials with characters at least two inches (2") high and shall be securely fastened to the fence, equipment or other suitable locations.

18. An all-weather access road shall be provided to the treatment facility.

19. The berms of the storage basin(s) shall be mowed and kept free of any deep-rooted vegetation, animal dens, or other potential sources of damage to the berms.

20. The facility shall ensure that adequate provisions are provided to prevent surface water intrusion into the storage basin(s) and to divert stormwater runoff around the storage basin(s) and protect embankments from erosion.

21. Wastewater Irrigation Sites. To add additional irrigation sites or to convert any of the land to public-use-areas, a construction permit, geohydrological evaluation, soils report, and permit modification may be required. The facility shall contact the Department for a written determination.
MISSOURI DEPARTMENT OF NATURAL RESOURCES
FACT SHEET
FOR THE PURPOSE OF CONSTRUCTION MODIFICATION
OF
MO-0104671
EWING WWTF

The Federal Water Pollution Control Act ("Clean Water Act" Section 402 Public Law 92-500 as amended) established the National Pollutant Discharge Elimination System (NPDES) permit program. This program regulates the discharge of pollutants from point sources into the waters of the United States, and the release of stormwater from certain point sources. All such discharges are unlawful without a permit (Section 301 of the "Clean Water Act"). After a permit is obtained, a discharge not in compliance with all permit terms and conditions is unlawful. Missouri State Operating Permits (MSOPs) are issued by the Director of the Missouri Department of Natural Resources (Department) under an approved program, operating in accordance with federal and state laws (Federal "Clean Water Act" and "Missouri Clean Water Law" Section 644 as amended). MSOPs are issued for a period of five (5) years unless otherwise specified.

As per [40 CFR Part 124.8(a)] and [10 CSR 20-6.020(1)(A)2.] a Factsheet shall be prepared to give pertinent information regarding the applicable regulations, rationale for the development of effluent limitations and conditions, and the public participation process for the Missouri State Operating Permit (operating permit) listed below.

A Factsheet is not an enforceable part of an operating permit. This Factsheet is for a Minor.

Part I – Proposed Construction

The facility proposes construction and installation of a fourth earthen storage basin, a land application pump station, and fixed head sprinklers to irrigate wastewater. Installation of all the necessary appurtenances to make the facility complete and usable to treat the waste from a population equivalent of 600 with an average design flow of 60,000 gallons per day (dry weather design flow). Construction was covered under CP0001910 with a Statement of Work Completed received on November 2020. See APPENDIX A – FACILITY LAYOUT.

The irrigation site is fenced and not available for public use therefore disinfection is not required.

Facility Description:
Four-cell storage lagoon / pump station / wastewater is irrigated to the surface / sludge is retained in lagoon.

Part II – Reason for the Modification

This operating permit is hereby modified to remove the schedule of compliance for ammonia. The facility proposes converting the existing discharging lagoons to a no-discharge surface wastewater irrigation system. Therefore, effluent limitations have been removed and permitted features such as the storage basins and fixed sprinklers irrigation site now have monitoring requirements.

Changes to the permit since the modification public notice, Standard Conditions Part 3 was updated and the special conditions related to edmrr and reporting of non-detects was updated.

Part III – Facility Information

Facility Type: POTW - SIC #4952

Have any changes occurred at this facility or in the receiving water body that effects effluent limit derivation?
☑ - Yes. Converting from a discharging lagoon system to a no-discharge wastewater irrigation system.

Application Date: May 9, 2017
PERMITTED FEATURE(S) TABLE:

<table>
<thead>
<tr>
<th>PERMITTED FEATURE</th>
<th>DESIGN FLOW (CFS)</th>
<th>TREATMENT LEVEL</th>
<th>EFFLUENT TYPE</th>
</tr>
</thead>
<tbody>
<tr>
<td>#001</td>
<td>0.09</td>
<td>Storage Basin(s)</td>
<td>Domestic</td>
</tr>
<tr>
<td>#002</td>
<td></td>
<td></td>
<td>Fixed Sprinkler Irrigation Field</td>
</tr>
</tbody>
</table>

Part IV – Operator Certification Requirements

☒ - This facility is required to have a certified operator.

As per [10 CSR 20-6.010(8) Terms and Conditions of a Permit], permittees shall operate and maintain facilities to comply with the Missouri Clean Water Law and applicable permit conditions and regulations. Operators or supervisors of operations at regulated wastewater treatment facilities shall be certified in accordance with [10 CSR 20-9.020(2)] and any other applicable state law or regulation. As per [10 CSR 20-9.020(2)(A)], requirements for operation by certified personnel shall apply to all wastewater treatment systems, if applicable, as listed below:

- Owned or operated by or for a
  ☒ - Municipalities
  ☐ - Federal agency
  ☐ - County
  ☐ - Public Sewer District

☐ - State agency
☐ - Private Sewer Company regulated by the Public Service Commission
☐ - Public Water Supply Districts

Each of the above entities are only applicable if they have a Population Equivalent greater than two hundred (200) or fifty (50) or more service connections.

This facility currently requires an operator with a D Certification Level. Please see Appendix B - Classification Worksheet. Modifications made to the wastewater treatment facility may cause the classification to be modified.

Operator’s Name: Douglas Lewis
Certification Number: 13498
Certification Level: D

The listing of the operator above only signifies that staff drafting this operating permit have reviewed appropriate Department records and determined that the name listed on the operating permit application has the correct and applicable Certification Level.

Part V – Operational Monitoring

☒ - As per [10 CSR 20-9.010(4)], the facility is required to conduct operational monitoring.

Part VI – Receiving Stream Information

While this facility is no discharge, a receiving stream is listed for the purposes of showing what stream would be affected in the event of an emergency release due to an acute or chronic rain event.

RECEIVING STREAM(S) TABLE: PERMITTED FEATURE #001

<table>
<thead>
<tr>
<th>WATER-BODY NAME</th>
<th>CLASS</th>
<th>WBID</th>
<th>DESIGNATED USES*</th>
<th>12-Digit HUC</th>
</tr>
</thead>
<tbody>
<tr>
<td>100K Extent Remaining Stream</td>
<td>C</td>
<td>3960</td>
<td>AQL, WBC-B, SCR, HHP, IRR, LWW</td>
<td>07110002-0306</td>
</tr>
<tr>
<td>Middle Fabius River</td>
<td>P</td>
<td>63</td>
<td>AQL, WBC-A, SCR, HHP, IRR, LWW, DWS</td>
<td></td>
</tr>
</tbody>
</table>

* As per 10 CSR 20-7.031 Missouri Water Quality Standards, the department defines the Clean Water Commission’s water quality objectives in terms of “water uses to be maintained and the criteria to protect those uses.” The receiving stream and 1st classified receiving stream’s beneficial water uses to be maintained are in the receiving stream table in accordance with [10 CSR 20-7.031(1)(C)].
Uses which may be found in the receiving streams table, above:

10 CSR 20-7.031(1)(C)1.:  
AQL = Protection of aquatic life (Current narrative use(s) are defined to ensure the protection and propagation of fish shellfish and wildlife, which is further subcategorized as: WWH = Warm Water Habitat; CDF = Cold-water fishery (Current narrative use is cold-water habitat); CLF = Cool-water fishery (Current narrative use is cool-water habitat); EAH = Ephemeral Aquatic Habitat; MAH = Modified Aquatic Habitat; LAH = Limited Aquatic Habitat. This permit uses AQL effluent limitations in 10 CSR 20-7.031 Table A for all habitat designations unless otherwise specified.)

10 CSR 20-7.031(1)(C)2.: Recreation in and on the water  
WBC = Whole Body Contact recreation where the entire body is capable of being submerged;  
WBC-A = Whole body contact recreation that supports swimming uses and has public access;  
WBC-B = Whole body contact recreation that supports swimming;

10 CSR 20-7.031(1)(C)3. to 7.:  
HHP (formerly HHF) = Human Health Protection as it relates to the consumption of fish;  
IRR = Irrigation for use on crops utilized for human or livestock consumption;  
LWW = Livestock and wildlife watering (Current narrative use is defined as LWP = Livestock and Wildlife Protection);  
DWS = Drinking Water Supply;  
IND = Industrial water supply

10 CSR 20-7.031(1)(C)8-11.: Wetlands (10 CSR 20-7.031 Table A currently does not have corresponding habitat use criteria for these defined uses)  
WSA = Storm- and flood-water storage and attenuation; WHP = Habitat for resident and migratory wildlife species;  
WRC = Recreational, cultural, educational, scientific, and natural aesthetic values and uses; WHC = Hydrologic cycle maintenance.

10 CSR 20-7.031(6):  
GRW = Groundwater

RECEIVING STREAM MONITORING REQUIREMENTS:  
No receiving water monitoring requirements recommended at this time.

Part VII – Rationale and Derivation of Effluent Limitations & Permit Conditions

ALTERNATIVE EVALUATIONS FOR NEW FACILITIES:  
As per [10 CSR 20-7.015(4)(A)], discharges to losing streams shall be permitted only after other alternatives including land application, discharges to a gaining stream and connection to a regional wastewater treatment facility have been evaluated and determined to be unacceptable for environmental and/or economic reasons.

☒ - The facility does not discharge to a Losing Stream as defined by [10 CSR 20-2.010(36)] & [10 CSR 20-7.031(1)(N)], or is an existing facility.

ANTI-BACKSLIDING:  
A provision in the Federal Regulations [CWA §303(d)(4); CWA §402(o); 40 CFR Part 122.44(l)] that requires a reissued permit to be as stringent as the previous permit with some exceptions.

☒ - Limitations in this operating permit for the reissuance of this permit conform to the anti-backsliding provisions of Section 402(o) of the Clean Water Act, and 40 CFR Part 122.44.

☒ - Information is available which was not available at the time of permit issuance (other than revised regulations, guidance, or test methods) and which would have justified the application of a less stringent effluent limitation at the time of permit issuance.

• The facility has installed a land application system with the design flow of 60,000 gpd and an application rate of 1.0 inch per day. The installation of a no discharge system justifies the removal of effluent limits and monitoring only.

• With the conversion to land application, the following parameters were removed: BOD5, TSS, Ammonia as N, WET test, pH, E. Coli and Oil and Grease.

ANTIDEGRADATION:  
In accordance with Missouri’s Water Quality Standard [10 CSR 20-7.031(3)], the Department is to document by means of Antidegradation Review that the use of a water body’s available assimilative capacity is justified. Degradation is justified by documenting the socio-economic importance of a discharging activity after determining the necessity of the discharge.

☒ - No degradation proposed and no further review necessary. Facility did not apply for authorization to increase pollutant loading or to add additional pollutants to their discharge.
AREA-WIDE WASTE TREATMENT MANAGEMENT & CONTINUING AUTHORITY:
As per [10 CSR 20-6.010(3)(B)], ...An applicant may utilize a lower preference continuing authority by submitting, as part of the application, a statement waiving preferential status from each existing higher preference authority, providing the waiver does not conflict with any area-wide management plan approved under section 208 of the Federal Clean Water Act or any other regional sewage service and treatment plan approved for higher preference authority by the Department.

BIOSOLIDS & SEWAGE SLUDGE:
Biosolids are solid materials resulting from domestic wastewater treatment that meet federal and state criteria for beneficial uses (i.e. fertilizer). Sewage sludge is solids, semi-solids, or liquid residue generated during the treatment of domestic sewage in a treatment works; including but not limited to, domestic septage; scum or solids removed in primary, secondary, or advanced wastewater treatment process; and a material derived from sewage sludge. Sewage sludge does not include ash generated during the firing of sewage sludge in a sewage sludge incinerator or grit and screening generated during preliminary treatment of domestic sewage in a treatment works. Additional information regarding biosolids and sludge is located at the following web address: http://extension.missouri.edu/main/DisplayCategory.aspx?C=74, items WQ422 through WQ449.

- Permittee is not authorized to land apply biosolids. Sludge/biosolids are stored in the lagoon. The permittee must submit a sludge management plan for approval that details removal and disposal plans when sludge is to be removed from lagoons.

COMPLIANCE AND ENFORCEMENT:
Enforcement is the action taken by the Water Protection Program (WPP) to bring an entity into compliance with the Missouri Clean Water Law, its implementing regulations, and/or any terms and conditions of an operating permit. The primary purpose of the enforcement activity in the WPP is to resolve violations and return the entity to compliance.

- The permittee/facility is currently under enforcement action. This facility is under enforcement action for failure to upgrade, failure to comply with effluent limits, causing pollution to waters of the state, and failure to collect influent samples in order to determine removal efficiency as required by the permit. An Abatement Order on Consent was entered into by the City and the Department on April 19, 2016 requiring the lagoon be upgraded.

ELECTRONIC DISCHARGE MONITORING REPORT (eDMR) SUBMISSION SYSTEM:
The U.S. Environmental Protection Agency (EPA) promulgated a final rule on October 22, 2015, to modernize Clean Water Act reporting for municipalities, industries, and other facilities by converting to an electronic data reporting system. This final rule requires regulated entities and state and federal regulators to use information technology to electronically report data required by the National Pollutant Discharge Elimination System (NPDES) permit program instead of filing paper reports. To comply with the federal rule, the Department is requiring all permittees to begin submitting discharge monitoring data and reports online. In an effort to aid facilities in the reporting of applicable information electronically, the Department has created several new forms including operational control monitoring forms and an I&I location and reduction form. These forms are optional and found on the Department’s website at the following locations:

Operational Monitoring Lagoon: http://dnr.mo.gov/forms/780-2801-f.pdf

Per 40 CFR 127.15 and 127.24, permitted facilities may request a temporary waiver for up to 5 years or a permanent waiver from electronic reporting from the Department. To obtain an electronic reporting waiver, a permittee must first submit an eDMR Waiver Request Form: http://dnr.mo.gov/forms/780-2692-f.pdf. Each facility must make a request. If a single entity owns or operates more than one facility, then the entity must submit a separate request for each facility based on its specific circumstances. An approved waiver is non-transferable.

The Department must review and notify the facility within 120 calendar days of receipt if the waiver request has been approved or rejected [40 CFR 124.27(a)]. During the Department review period as well as after a waiver is granted, the facility must continue submitting a hard-copy of any reports required by their permit. The Department will enter data submitted in hard-copy from those facilities allowed to do so and electronically submit the data to the EPA on behalf of the facility.

- The permittee/facility is currently using the eDMR data reporting system.
**PRETREATMENT PROGRAM:**
The reduction of the amount of pollutants, the elimination of pollutants, or the alteration of the nature of pollutant properties in wastewater prior to or in lieu of discharging or otherwise introducing such pollutants into a Publicly Owned Treatment Works [40 CFR Part 403.3(q)].

Pretreatment programs are required at any POTW (or combination of POTW operated by the same authority) and/or municipality with a total design flow greater than 5.0 MGD and receiving industrial wastes that interfere with or pass through the treatment works or are otherwise subject to the pretreatment standards. Pretreatment programs can also be required at POTWs/municipals with a design flow less than 5.0 MGD if needed to prevent interference with operations or pass through.

Several special conditions pertaining to the permittee’s pretreatment program may be included in the permit, and are as follows:
- Implementation and enforcement of the program,
- Annual pretreatment report submittal,
- Submittal of list of industrial users,
- Technical evaluation of need to establish local limitations, and
- Submittal of the results of the evaluation

- The permittee, at this time, is not required to have a Pretreatment Program or does not have an approved pretreatment program.

**REMOVAL EFFICIENCY:**
This facility is subject to the Secondary Treatment standard of 85% removal [40 CFR Part 133.102(a)(3) & (b)(3)]. Removal efficiency is a method by which the Federal Regulations define Secondary Treatment and Equivalent to Secondary Treatment, which applies to Biochemical Oxygen Demand 5-day (BOD₅) and Total Suspended Solids (TSS). This is a no-discharge facility, therefore removal efficiency is 100% and influent monitoring is not required.

**SANITARY SEWER OVERFLOWS (SSO) AND INFLOW AND INFILTRATION (I&I):**
Sanitary Sewer Overflows (SSOs) are defined as untreated sewage releases and are considered bypassing under state regulation [10 CSR 20-2.010(11)] and should not be confused with the federal definition of bypass. SSOs result from a variety of causes including blockages, line breaks, and sewer defects that can either allow wastewater to backup within the collection system during dry weather conditions or allow excess stormwater and groundwater to enter and overload the collection system during wet weather conditions. SSOs can also result from lapses in sewer system operation and maintenance, inadequate sewer design and construction, power failures, and vandalism. SSOs include overflows out of manholes, cleanouts, broken pipes, and other into waters of the state and onto city streets, sidewalks, and other terrestrial locations.

Inflow and Infiltration (I&I) is defined as unwanted intrusion of stormwater or groundwater into a collection system. This can occur from points of direct connection such as sump pumps, roof drain downspouts, foundation drains, and storm drain cross-connections or through cracks, holes, joint failures, faulty line connections, damaged manholes, and other openings in the collection system itself. I&I results from a variety of causes including line breaks, improperly sealed connections, cracks caused by soil erosion/settling, penetration of vegetative roots, and other sewer defects. In addition, excess stormwater and groundwater entering the collection system from line breaks and sewer defects have the potential to negatively impact the treatment facility.

Missouri RSMo §644.026.1.(13) mandates that the Department issue permits for discharges of water contaminants into the waters of this state, and also for the operation of sewer systems. Such permit conditions shall ensure compliance with all requirements as established by sections 644.006 to 644.141. Standard Conditions Part I, referenced in the permit, contains provisions requiring proper operation and maintenance of all facilities and systems of treatment and control. Missouri RSMo §644.026.1.(15) instructs the Department to require proper maintenance and operation of treatment facilities and sewer systems and proper disposal of residual waste from all such facilities. To ensure that public health and the environment are protected, any noncompliance which may endanger public health or the environment must be reported to the Department within 24 hours of the time the permittee becomes aware of the noncompliance. Standard Conditions Part I, referenced in the permit, contains the reporting requirements for the permittee when bypasses and upsets occur. The permit also contains requirements for permittees to develop and implement a program for maintenance and repair of the collection system. The permit requires that the permittee submit an annual report to the Department for the previous calendar year that contains a summary of efforts taken by the permittee to locate and eliminate sources of excess I & I, a summary of general maintenance and repairs to the collection system, and a summary of any planned maintenance and repairs to the collection system for the upcoming calendar year.
- At this time, the Department recommends the US EPA’s Guide for Evaluating Capacity, Management, Operation and Maintenance (CMOM) Programs at Sanitary Sewer Collection Systems (Document # EPA 305-B-05-002) or the Departments’ CMOM Model located at http://dnr.mo.gov/env/wpp/permits/docs/cmom-template.doc. For additional information regarding the Departments’ CMOM Model, see the CMOM Plan Model Guidance document at http://dnr.mo.gov/pubs/pub2574.htm. The CMOM identifies some of the criteria used to evaluate a collection system’s management, operation, and maintenance and was intended for use by the EPA, state, regulated community, and/or third party entities. The CMOM is applicable to small, medium, and large systems; both public and privately owned; and both regional and satellite collection systems. The CMOM does not substitute for the Clean Water Act, the Missouri Clean Water Law, and both federal and state regulations, as it is not a regulation.

**SCHEDULE OF COMPLIANCE (SOC):**

Per 644.051.4 RSMo, a permit may be issued with a Schedule of Compliance (SOC) to provide time for a facility to come into compliance with new state or federal effluent regulations, water quality standards, or other requirements. Such a schedule is not allowed if the facility is already in compliance with the new requirement, or if prohibited by other statute or regulation. A SOC includes an enforceable sequence of interim requirements (actions, operations, or milestone events) leading to compliance with the Missouri Clean Water Law, its implementing regulations, and/or the terms and conditions of an operating permit. See also Section 502(17) of the Clean Water Act, and 40 CFR §122.2. For new effluent limitations, the permit includes interim monitoring for the specific parameter to demonstrate the facility is not already in compliance with the new requirement. Per 40 CFR § 122.47(a)(1) and 10 CSR 20-7.031(10), compliance must occur as soon as possible. If the permit provides a schedule for meeting new water quality based effluent limits, a SOC must include an enforceable, final effluent limitation in the permit even if the SOC extends beyond the life of the permit.

A SOC is not allowed:

- For effluent limitations based on technology-based standards established in accordance with federal requirements, if the deadline for compliance established in federal regulations has passed. 40 CFR § 125.3.
- For a newly constructed facility in most cases. Newly constructed facilities must meet applicable effluent limitations when discharge begins, because the facility has installed the appropriate control technology as specified in a permit or antidegradation review. A SOC is allowed for a new water quality based effluent limit that was not included in a previously public noticed permit or antidegradation review, which may occur if a regulation changes during construction.
- To develop a TMDL, UAA, or other study associated with development of a site specific criterion. A facility is not prohibited from conducting these activities, but a SOC may not be granted for conducting these activities.

In order to provide guidance to Permit Writers in developing SOCs, and attain a greater level of consistency, on April 9, 2015 the Department issued an updated policy on development of SOCs. This policy provides guidance to Permit Writers on the standard time frames for schedules for common activities, and guidance on factors that may modify the length of the schedule such as a Cost Analysis for Compliance.

- This permit does not contain a SOC.

**SEWER EXTENSION AUTHORITY SUPERVISED PROGRAM:**

In accordance with [10 CSR 20-6.010(6)(A)], the department may grant approval of a permittee’s Sewer Extension Authority Supervised Program. These approved permittees regulate and approve construction of sanitary sewers and pump stations, which are tributary to this wastewater treatment facility. The permittee shall act as the continuing authority for the operation, maintenance, and modernization of the constructed collection system. See http://dnr.mo.gov/env/wpp/permits/sewer-extension.htm.

- The permittee does not have a department approved Sewer Extension Authority Supervised Program.

**STORMWATER POLLUTION PREVENTION PLAN (SWPPP):**

In accordance with 40 CFR 122.44(k) Best Management Practices (BMPs) to control or abate the discharge of pollutants when:

1. Authorized under section 304(e) of the Clean Water Act (CWA) for the control of toxic pollutants and hazardous substances from ancillary industrial activities;
2. Authorized under section 402(p) of the CWA for the control of stormwater discharges;
3. Numeric effluent limitations are infeasible; or
4. The practices are reasonably necessary to achieve effluent limitations and standards or to carry out the purposes and intent of the CWA.

In accordance with the EPA’s Developing Your Stormwater Pollution Prevention Plan, A Guide for Industrial Operators, (Document number EPA 833-B-09-002) [published by the United States Environmental Protection Agency (USEPA) in February 2009], BMPs are measures or practices used to reduce the amount of pollution entering (regarding this operating permit) waters of the state. BMPs may take the form of a process, activity, or physical structure.
Additionally, in accordance with the Stormwater Management, a SWPPP is a series of steps and activities to (1) identify sources of pollution or contamination, and (2) select and carry out actions which prevent or control the pollution of stormwater discharges. The purpose of a SWPPP is to comply with all applicable stormwater regulations by creating an adaptive management plan to control and mitigate stream pollution from stormwater runoff. Developing a SWPPP provides opportunities to employ appropriate BMPs to minimize the risk of pollutants being discharged during storm events. The following paragraph outlines the general steps the permittee should take to determine which BMPs will work to achieve the benchmark values or limits in the permit. This section is not intended to be all encompassing or restrict the use of any physical BMP or operational and maintenance procedure assisting in pollution control. Additional steps or revisions to the SWPPP may be required to meet the requirements of the permit.

Areas which should be included in the SWPPP are identified in 40 CFR 122.26(b)(14). Once the potential sources of stormwater pollution have been identified, a plan should be formulated to best control the amount of pollutant being released and discharged by each activity or source. This should include, but is not limited to, minimizing exposure to stormwater, good housekeeping measures, proper facility and equipment maintenance, spill prevention and response, vehicle traffic control, and proper materials handling. Once a plan has been developed the facility will employ the control measures determined to be adequate to achieve the benchmark values discussed above. The facility will conduct monitoring and inspections of the BMPs to ensure they are working properly and re-evaluate any BMP not achieving compliance with permitting requirements. For example, if sample results from an outfall show values of TSS above the benchmark value, the BMP being employed is deficient in controlling stormwater pollution. Corrective action should be taken to repair, improve, or replace the failing BMP. This internal evaluation is required at least once per month but should be continued more frequently if BMPs continue to fail. If failures do occur, continue this trial and error process until appropriate BMPs have been established.

For new, altered, or expanded stormwater discharges, the SWPPP shall identify reasonable and effective BMPs while accounting for environmental impacts of varying control methods. The antidegradation analysis must document why no discharge or no exposure options are not feasible. The selection and documentation of appropriate control measures shall serve as an alternative analysis of technology and fulfill the requirements of antidegradation [10 CSR 20-7.031(3)]. For further guidance, consult the antidegradation implementation procedure (http://dnr.mo.gov/env/wpp/docs/AIP050212.pdf).

Alternative Analysis (AA) evaluation of the BMPs is a structured evaluation of BMPs that are reasonable and cost effective. The AA evaluation should include practices that are designed to be: 1) non-degrading; 2) less degrading; or 3) degrading water quality. The glossary of AIP defines these three terms. The chosen BMP will be the most reasonable and effective management strategy while ensuring the highest statutory and regulatory requirements are achieved and the highest quality water attainable for the facility is discharged. The AA evaluation must demonstrate why “no discharge” or “no exposure” is not a feasible alternative at the facility. This structured analysis of BMPs serves as the antidegradation review, fulfilling the requirements of 10 CSR 20-7.031(3) Water Quality Standards and Antidegradation Implementation Procedure (AIP), Section II.B.

If parameter-specific numeric exceedances continue to occur and the permittee feels there are no practicable or cost-effective BMPs which will sufficiently reduce a pollutant concentration in the discharge to the benchmark values established in the permit, the permittee can submit a request to re-evaluate the benchmark values. This request needs to include 1) a detailed explanation of why the facility is unable to comply with the permit conditions and unable to establish BMPs to achieve the benchmark values; 2) financial data of the company and documentation of cost associated with BMPs for review and 3) the SWPPP, which should contain adequate documentation of BMPs employed, failed BMPs, corrective actions, and all other required information. This will allow the department to conduct a cost analysis on control measures and actions taken by the facility to determine cost-effectiveness of BMPs. The request shall be submitted in the form of an operating permit modification; the application is found at: http://dnr.mo.gov/forms/index.html.

- At this time, the permittee is not required to develop and implement a SWPPP. As the permittee is a no-discharge facility, the use of best management practices to reduce stormwater flows into the treatment basin or into the application fields should be considered and employed.

**VARIANCE:**
As per the Missouri Clean Water Law § 644.061.4, variances shall be granted for such period of time and under such terms and conditions as shall be specified by the commission in its order. The variance may be extended by affirmative action of the commission. In no event shall the variance be granted for a period of time greater than is reasonably necessary for complying with the Missouri Clean Water Law §§644.006 to 644.141 or any standard, rule or regulation promulgated pursuant to Missouri Clean Water Law §§644.006 to 644.141.

- This operating permit is not drafted under premises of a petition for variance.

**WATER QUALITY STANDARDS:**
Per [10 CSR 20-7.031(4)], General Criteria shall be applicable to all waters of the state at all times including mixing zones. Additionally, [40 CFR 122.44(d)(1)] directs the Department to establish in each NPDES permit to include conditions to achieve water quality established under Section 303 of the Clean Water Act, including State narrative criteria for water quality.
40 CFR 122.41(m) - BYPASSES:
The federal Clean Water Act (CWA), Section 402 prohibits wastewater dischargers from “bypassing” untreated or partially treated sewage (wastewater) beyond the headworks. A bypass is defined as an intentional diversion of waste streams from any portion of a treatment facility, [40 CFR 122.41(m)(1)(i)]. Additionally, Missouri regulation 10 CSR 20-7.015(9)(G) states a bypass means the intentional diversion of waste streams from any portion of a treatment facility, except in the case of blending, to waters of the state. Only under exceptional and specified limitations do the federal regulations allow for a facility to bypass some or all of the flow from its treatment process. Bypasses are prohibited by the CWA unless a permittee can meet all of the criteria listed in 40 CFR 122.41(m)(4)(i)(A), (B), & (C). Any bypasses from this facility are subject to the reporting required in 40 CFR 122.41(l)(6) and per Missouri’s Standard Conditions I, Section B, part 2.b. Additionally, Anticipated Bypasses include bypasses from peak flow basins or similar devices designed for peak wet weather flows.

- This facility does not anticipate bypassing.

Part VIII – Permit Limits Determination

PERMITTED FEATURE #001 – STORAGE BASIN

- **Freeboard.** Monitoring requirement to verify adequate freeboard is maintained, so as to avoid and overflow of the storage basin.

- **Precipitation.** Monitoring requirement to ensure appropriate irrigation is conducted to account for accumulated water in the storage basin.

PERMITTED FEATURE #002 – IRRIGATION FIELD

- **Irrigation Period.** Monitoring requirement only. Monitoring for the Irrigation Period is included to determine if proper irrigation is occurring on the irrigation fields.

- **Volume Irrigated.** Monitoring requirement only. Monitoring for the Volume Irrigated is included to determine if proper irrigation is occurring on the irrigation fields.

- **Irrigation Area.** Monitoring requirement only. Monitoring for the Irrigation Area is included to determine if proper irrigation is occurring on the irrigation fields.

- **Irrigation Rate.** Monitoring requirement only. Monitoring for the Irrigation Rate is included to determine if proper irrigation is occurring on the irrigation fields.

**Sampling Frequency Justification:**
Sampling frequency has been determined to be appropriate so it has been retained from the previous state operating permit.

**Sampling Type Justification:**
Due to the discharge being from irrigation from a storage basin, a grab sample is a representative and appropriate sample type.

**Emergency Discharge Parameters** – BOD₅, TSS, Ammonia, pH, Oil & Grease, and *E. coli* are conventional pollutants found in domestic wastewater. These parameters shall be monitored daily for five consecutive days beginning within six (6) hours of discovery. Sampling shall then occur once per week until the discharge ceases. All samples shall be collected as grab samples. pH samples cannot be preserved and must be sampled in the field.
OUTFALL #001 – GENERAL CRITERIA CONSIDERATIONS:
In accordance with 40 CFR 122.44(d)(1), effluent limitations shall be placed into the permit for those pollutants which have been determined to cause, have the reasonable potential to cause, or contribute to an excursion above any State water quality standard, including State narrative criteria for water quality. The rule further states that pollutants which have been determined to cause, have the reasonable potential to cause, or contribute to an excursion above a narrative criterion within an applicable State water quality standard, the permit shall contain a numeric effluent limitation to protect that narrative criterion. In order to comply with this regulation, the permit writer will complete reasonable potential determinations on whether the discharge will violate any of the general criteria listed in 10 CSR 20-7.031(4). These specific requirements are listed below followed by derivation and discussion (the lettering matches that of the rule itself, under 10 CSR 20-7.031(4)). It should also be noted that Section 644.076.1, RSMo as well as Section D – Administrative Requirements of Standard Conditions Part I of this permit states that it shall be unlawful for any person to cause or permit any discharge of water contaminants from any water contaminant or point source located in Missouri that is in violation of sections 644.006 to 644.141 of the Missouri Clean Water Law or any standard, rule or regulation promulgated by the commission.

(A) Waters shall be free from substances in sufficient amounts to cause the formation of putrescent, unsightly or harmful bottom deposits or prevent full maintenance of beneficial uses. This facility utilizes irrigation of domestic wastewater to the land surface and therefore does not discharge. No evidence of an excursion of this criterion has been observed by the department in the past and the facility has not disclosed any other information their permit application which has the potential to cause or contribute to an excursion of this narrative criterion. Additionally, there had been no indication to the department that the stream has had issued maintaining beneficial uses as a result of the wastewater irrigation. Therefore, based on the information reviewed during the drafting of this permit, and the fact that the facility does not discharge, no reasonable potential to cause or contribute to an excursion of this criterion exists.

(B) Waters shall be free from oil, scum and floating debris in sufficient amounts to be unsightly or prevent full maintenance of beneficial uses. Please see (A) above as justification is the same.

(C) Waters shall be free from substances in sufficient amounts to cause unsightly color or turbidity, offensive odor or prevent full maintenance of beneficial uses. Please see (A) above as justification is the same.

(D) Waters shall be free from substances or conditions in sufficient amounts to result in toxicity to human, animal or aquatic life. Please see (A) above as justification is the same.

(E) There shall be no significant human health hazard from incidental contact with the water. Please see (A) above as justification is the same.

(F) There shall be no acute toxicity to livestock or wildlife watering. Please see (A) above as justification is the same.

(G) Waters shall be free from physical, chemical or hydrologic changes that would impair the natural biological community. Please see (A) above as justification is the same.

Waters shall be free from used tires, car bodies, appliances, demolition debris, used vehicles or equipment and solid waste as defined in Missouri's Solid Waste Law, section 260.200, RSMo, except as the use of such materials is specifically permitted pursuant to section 260.200-260.247. The discharge from this facility is made up of treated domestic wastewater. No evidence of an excursion of this criterion has been observed by the department in the past and the facility has not disclosed any other information related to the characteristics of the discharge on their permit application which has the potential to cause or contribute to an excursion of this narrative criterion. Additionally, any solid wastes received or produced at this facility are wholly contained in appropriate storage facilities, are not discharged, and are disposed of offsite. This discharge is subject to Standard Conditions Part III, which contains requirements for the management and disposal of sludge to prevent its discharge. Therefore, this discharge does not have reasonable potential to cause or contribute to an excursion of this criterion.

Part IX – Cost Analysis for Compliance

Pursuant to Section 644.145, RSMo, when issuing permits under this chapter that incorporate a new requirement for discharges from publicly owned combined or separate sanitary or storm sewer systems or publicly owned treatment works, or when enforcing provisions of this chapter or the Federal Water Pollution Control Act, 33 U.S.C. 1251 et seq., pertaining to any portion of a publicly owned combined or separate sanitary or storm sewer system or [publicly owned] treatment works, the Department of Natural Resources shall make a “finding of affordability” on the costs to be incurred and the impact of any rate changes on ratepayers upon which to base such permits and decisions, to the extent allowable under this chapter and the Federal Water Pollution Control Act. This process is completed through a cost analysis for compliance. Permits that do not include new requirements may be deemed affordable.

- The Department is required to determine “findings of affordability” because the permit applies to a combined or separate sanitary sewer system for a publically-owned treatment works.
**Cost Analysis for Compliance** - The Department has made a reasonable search for empirical data indicating the permit is affordable. The search consisted of a review of Department records that might contain economic data on the community, a review of information provided by the applicant as part of the application, and public comments received in response to public notices of this draft permit. If the empirical cost data was used by the permit writer, this data may consist of median household income, any other ongoing projects that the Department has knowledge, and other demographic financial information that the community provided as contemplated by Section 644. 145.3. See Appendix C – Cost Analysis for Compliance from previous operating permit effective on December 1, 2014.

**Part X – Administrative Requirements**

On the basis of preliminary staff review and the application of applicable standards and regulations, the Department, as administrative agent for the Missouri Clean Water Commission, proposes to issue a permit(s) subject to certain effluent limitations, schedules, and special conditions contained herein and within the operating permit. The proposed determinations are tentative pending public comment.

**PERMIT SYNCHRONIZATION:**
The Department of Natural Resources is currently undergoing a synchronization process for operating permits. Permits are normally issued on a five-year term, but to achieve synchronization many permits will need to be issued for less than the full five years allowed by regulation. The intent is that all permits within a watershed will move through the Watershed Based Management (WBM) cycle together will all expire in the same fiscal year. This will allow further streamlining by placing multiple permits within a smaller geographic area on public notice simultaneously, thereby reducing repeated administrative efforts. This will also allow the Department to explore a watershed based permitting effort at some point in the future. Renewal applications must continue to be submitted within 180 days of expiration, however, in instances where effluent data from the previous renewal is less than 4 years old, that data may be re-submitted to meet the requirements of the renewal application. If the permit provides a schedule of compliance for meeting new water quality based effluent limits beyond the expiration date of the permit, the time remaining in the schedule of compliance will be allotted in the renewed permit. With permit synchronization, this permit will expire in the 4th Quarter of calendar year 2021.

**PUBLIC NOTICE:**
The Department shall give public notice that a draft permit has been prepared and its issuance is pending. Additionally, public notice will be issued if a public hearing is to be held because of a significant degree of interest in and water quality concerns related to a draft permit. No public notice is required when a request for a permit modification or termination is denied; however, the requester and permittee must be notified of the denial in writing. The Department must issue public notice of a pending operating permit or of a new or reissued statewide general permit. The public comment period is the length of time not less than 30 days following the date of the public notice which interested persons may submit written comments about the proposed permit. For persons wanting to submit comments regarding this proposed operating permit, then please refer to the Public Notice page located at the front of this draft operating permit. The Public Notice page gives direction on how and where to submit appropriate comments.

- The Public Notice period for this operating permit was public noticed November 22, 2017 to December 22, 2017. No comments received.

**DATE OF FACT SHEET: OCTOBER 31, 2017**

**COMPLETED BY:**

**EMILY CARPENTER, CONSTRUCTION PERMIT UNIT**
MISSOURI DEPARTMENT OF NATURAL RESOURCES
WATER PROTECTION PROGRAM
ENGINEERING SECTION
573-751-6569
emily.carpenter@dnr.mo.gov
Appendices

APPENDIX A – FACILITY LAYOUT:

Ewing WWTF Permitted Feature #001

Sprinkler Irrigation Site Permitted Feature #002
### APPENDIX B - CLASSIFICATION WORKSHEET:

<table>
<thead>
<tr>
<th>ITEM</th>
<th>POINTS POSSIBLE</th>
<th>POINTS ASSIGNED</th>
</tr>
</thead>
<tbody>
<tr>
<td>Maximum Population Equivalent (P.E.) served (Max 10 pts.)</td>
<td>1 pt./10,000 PE or major fraction thereof.</td>
<td>0</td>
</tr>
<tr>
<td>Maximum: 10 pt Design Flow (avg. day) or peak month; use greater (Max 10 pts.)</td>
<td>1 pt. / MGD or major fraction thereof.</td>
<td>0</td>
</tr>
<tr>
<td><strong>EFFLUENT DISCHARGE RECEIVING WATER SENSITIVITY:</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Missouri or Mississippi River</td>
<td>0</td>
<td></td>
</tr>
<tr>
<td>All other stream discharges except to losing streams and stream reaches supporting whole body contact</td>
<td>1</td>
<td></td>
</tr>
<tr>
<td>Discharge to lake or reservoir outside of designated whole body contact recreational area</td>
<td>2</td>
<td></td>
</tr>
<tr>
<td>Discharge to losing stream, or stream, lake or reservoir area supporting whole body contact recreation</td>
<td>3</td>
<td>3</td>
</tr>
<tr>
<td><strong>PRELIMINARY TREATMENT - Headworks</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Screening and/or comminution</td>
<td>3</td>
<td></td>
</tr>
<tr>
<td>Grit removal</td>
<td>3</td>
<td></td>
</tr>
<tr>
<td>Plant pumping of main flow (lift station at the headworks)</td>
<td>3</td>
<td></td>
</tr>
<tr>
<td><strong>PRIMARY TREATMENT</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Primary clarifiers</td>
<td>5</td>
<td></td>
</tr>
<tr>
<td>Combined sedimentation/digestion</td>
<td>5</td>
<td></td>
</tr>
<tr>
<td>Chemical addition (except chlorine, enzymes)</td>
<td>4</td>
<td></td>
</tr>
<tr>
<td><strong>REQUIRED LABORATORY CONTROL – performed by plant personnel (highest level only)</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Push – button or visual methods for simple test such as pH, settleable solids</td>
<td>3</td>
<td></td>
</tr>
<tr>
<td>Additional procedures such as DO, COD, BOD, titrations, solids, volatile content</td>
<td>5</td>
<td>5</td>
</tr>
<tr>
<td>More advanced determinations such as BOD seeding procedures, fecal coliform, nutrients, total oils, phenols, etc.</td>
<td>7</td>
<td></td>
</tr>
<tr>
<td>Highly sophisticated instrumentation, such as atomic absorption and gas chromatograph</td>
<td>10</td>
<td></td>
</tr>
<tr>
<td><strong>ALTERNATIVE FATE OF EFFLUENT</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Direct reuse or recycle of effluent</td>
<td>6</td>
<td></td>
</tr>
<tr>
<td>Land Disposal – low rate</td>
<td>3</td>
<td></td>
</tr>
<tr>
<td>High rate</td>
<td>5</td>
<td></td>
</tr>
<tr>
<td>Overland flow</td>
<td>4</td>
<td></td>
</tr>
<tr>
<td>Total from page <strong>ONE (1)</strong></td>
<td>----</td>
<td>8</td>
</tr>
</tbody>
</table>
### APPENDIX B - CLASSIFICATION WORKSHEET (CONTINUED):

<table>
<thead>
<tr>
<th>ITEM</th>
<th>POINTS POSSIBLE</th>
<th>POINTS ASSIGNED</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>VARIATION IN RAW WASTE</strong> (highest level only) (DMR exceedances and Design Flow exceedances)</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Variation do not exceed those normally or typically expected</td>
<td>0</td>
<td>0</td>
</tr>
<tr>
<td>Recurring deviations or excessive variations of 100 to 200 % in strength and/or flow</td>
<td>2</td>
<td></td>
</tr>
<tr>
<td>Recurring deviations or excessive variations of more than 200 % in strength and/or flow</td>
<td>4</td>
<td></td>
</tr>
<tr>
<td>Raw wastes subject to toxic waste discharge</td>
<td>6</td>
<td></td>
</tr>
<tr>
<td><strong>SECONDARY TREATMENT</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Trickling filter and other fixed film media with secondary clarifiers</td>
<td>10</td>
<td></td>
</tr>
<tr>
<td>Activated sludge with secondary clarifiers (including extended aeration and oxidation ditches)</td>
<td>15</td>
<td></td>
</tr>
<tr>
<td>Stabilization ponds without aeration</td>
<td>5</td>
<td>5</td>
</tr>
<tr>
<td>Aerated lagoon</td>
<td>8</td>
<td></td>
</tr>
<tr>
<td>Advanced Waste Treatment Polishing Pond</td>
<td>2</td>
<td></td>
</tr>
<tr>
<td>Chemical/physical – without secondary</td>
<td>15</td>
<td></td>
</tr>
<tr>
<td>Chemical/physical – following secondary</td>
<td>10</td>
<td></td>
</tr>
<tr>
<td>Biological or chemical/biological</td>
<td>12</td>
<td></td>
</tr>
<tr>
<td>Carbon regeneration</td>
<td>4</td>
<td></td>
</tr>
<tr>
<td><strong>DISINFECTION</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Chlorination or comparable</td>
<td>5</td>
<td></td>
</tr>
<tr>
<td>Dechlorination</td>
<td>2</td>
<td></td>
</tr>
<tr>
<td>On-site generation of disinfectant (except UV light)</td>
<td>5</td>
<td></td>
</tr>
<tr>
<td>UV light</td>
<td>4</td>
<td></td>
</tr>
<tr>
<td><strong>SOLIDS HANDLING - SLUDGE</strong></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Solids Handling Thickening</td>
<td>5</td>
<td></td>
</tr>
<tr>
<td>Anaerobic digestion</td>
<td>10</td>
<td></td>
</tr>
<tr>
<td>Aerobic digestion</td>
<td>6</td>
<td></td>
</tr>
<tr>
<td>Evaporative sludge drying</td>
<td>2</td>
<td></td>
</tr>
<tr>
<td>Mechanical dewatering</td>
<td>8</td>
<td></td>
</tr>
<tr>
<td>Solids reduction (incineration, wet oxidation)</td>
<td>12</td>
<td></td>
</tr>
<tr>
<td>Land application</td>
<td>6</td>
<td></td>
</tr>
<tr>
<td>Total from page TWO (2)</td>
<td>----</td>
<td>5</td>
</tr>
<tr>
<td>Total from page ONE (1)</td>
<td>----</td>
<td>8</td>
</tr>
<tr>
<td>Grand Total</td>
<td>---</td>
<td>13</td>
</tr>
</tbody>
</table>

- A: 71 points and greater
- B: 51 points – 70 points
- C: 26 points – 50 points
- D: 0 points – 25 points
Section 644.145 RSMo requires the Department of Natural Resources (DNR) to make a “finding of affordability” when “issuing permits under” or “enforcing provisions of” state or federal clean water laws “pertaining to any portion of a combined or separate sanitary sewer system for publicly-owned treatment works.”

The Department is required to issue a permit with final effluent limits in accordance with 644.051.1.(1) RSMo, 644.051.1.(2) RSMo, and the Clean Water Act. The practical result of many affordability findings will be to allow longer compliance schedules to mitigate adverse impact to distressed populations resulting from the costs of upgrading the wastewater treatment facility. In the event that the City of Ewing cannot meet the tailored schedule of compliance due to financial hardship, the applicant should consider pursuit of a Use Attainability Analysis (UAA) under 40 CFR 131.10(g) for Department and EPA approval.

This finding of affordability is based on data available to the Department as provided by the permittee and what can be obtained from readily available sources. A request for information was sent to the permittee, seeking data for input into this analysis prior to its development. The Department currently uses software to estimate the cost for reconstruction of a treatment plant titled CAPNETWORKS (CapDet). CapDet is a preliminary design and costing software program from Hydromantis1 for wastewater treatment plants that uses national indices, such as the Marshall and Swift Index and Engineering News Records Cost Index for pricing in development of capital, operating, maintenance, material, and energy costs for each treatment technology. As the program works from national indices and each community is unique in its budget commitments and treatment design, the estimated costs are higher than actual costs. The cost estimates located within this document are for the construction of a brand new treatment facility as the Department must be able to estimate the cost of construction for every site-specific permit within the state. For the most accurate analysis, it is essential that the permittee provides the Department with current information about the City’s financial and socioeconomic situation.

**Facility Description: Three-cell lagoon / sludge is retained in lagoon**

**Flow evaluated: 60,000 gpd**

| Residential Connections: | 260 |
| Commercial Connections:   | 4   |
| **Total Connections for this facility:** | **264** |

**New Permit Requirements:**

The permit requires compliance with new effluent limitations for ammonia, which may require the design, construction and operation of new technology. The cost assumptions in this affordability analysis anticipate complete replacement of the existing treatment facility. To calculate the estimated user cost per 5,000 gallons, the Department used the equations currently being used in the Financial Assistance Center’s rate calculator. The equations account for replacement costs, debt retirement, capital costs, and an inflation factor. The calculator evaluates multiple technologies through CapDet at a range of flows, then using a linear interpolation developed the spreadsheet for high and low costs for treatment plants. Because the methods used to derive the analysis estimate costs that are greater than actual costs associated with an upgrade, it reflects a conservative estimate anticipated for a community. This is because it is not possible for the permit writer to determine what existing equipment and structures will be reused in the upgraded facility before an engineer completes a facility design.
Range of Anticipated Costs Associated with Complying with the New Requirements:

Costs associated with land application:
The total present worth estimated to purchase land and install a land application system is between $1,465,091 and $2,079,504 (CAPDETWORKS cost estimator was used). The user costs over a thirty year period are estimated to be between $20.35 and $28.97 per household per month. This estimates the purchase of a minimum of 6.67 acres and a maximum of 7.55 acres. Four regions divided by highways have been established to estimate the minimum storage time required and the amount of land necessary for land application within the State. The cost of land has been estimated based on county averages. The regions are north of Highway 36, between Highways 36 and 50, between Highways 50 and 60, and south of Highway 60. For communities that are divided by highways, the region selected is where the majority of the county resides. The low cost estimate for land application assumes that the community will not have to construct a new storage basin and the high cost estimate assumes the construction of a storage basin. The acreage estimated through CapDet does not reflect site-specific conditions and more or less land may be required based on site-specific considerations, such as streams, sinkholes, severe slopes, or roads. A no discharge facility, of which land application is the most common form, is required to be demonstrated as infeasible before a discharging system may be constructed per [10 CSR 20-6.010(4)(D)]. When land is available, it is the Department’s stance that land application is an important treatment option to be considered because of the expected lower cost over a longer term associated with construction, operation and maintenance. Also, the no discharge system is of value to the permittee when considering additional costs associated with possible future changes to Water Quality Standards.

Costs associated with mechanical treatment:
The total present worth estimated for complete replacement of the existing treatment facility in order to meet new ammonia effluent limits is between $1,009,800 and $2,617,838 (CAPDETWORKS cost estimator was used). This cost, if financed through user fees, might cost each household between $41.00 and $54.00 per month. The Department has estimated the construction and treatment costs for Sequencing Batch Reactor, Extended Aeration, Package Plant, and Oxidation Ditch technologies. All treatment technologies were set to meet effluent ammonia limits of less than 1.0 mg/L and losing stream criteria for BOD5 and TSS. Sludge handling, sludge treatment, and disinfection have not been included in the capital, operations and maintenance, and present worth cost estimations.

A community sets their user rates based on several factors. The percentage of the current user rate that is available to cover new debt is unknown to the Department. The new or upgraded facility may have lower operational costs than the existing facility. The costs estimated in CAPDETWORKS are associated with a new treatment plant. It is unknown to the Department why the user rates have been established to the current amount. CapDet does not evaluate individual communities other financial information or wastewater commitments, such as existing debts, MS4, pretreatment, Inflow/Infiltration work or that existing equipment could be reused. These commitments are further discussed in items five and seven below.

This affordability analysis does not dictate that a permittee will upgrade their facility, or how they will comply with the new permit requirements. For any questions associated with the CAPDETWORKS cost estimator, please contact the Engineering Section at 573-751-6621.

(1) A community’s financial capability and ability to raise or secure necessary funding:

<table>
<thead>
<tr>
<th>Current User Rates:</th>
<th>$20.90</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rate Capacity or Pay as You Go Option:</td>
<td>Pay as you go</td>
</tr>
<tr>
<td>Municipal Bond Rating (if applicable):</td>
<td>Not Applicable</td>
</tr>
<tr>
<td>Bonding Capacity:</td>
<td>Not provided by applicant</td>
</tr>
</tbody>
</table>

(General Obligation Bond capacity allowed by constitution:
cities=up to 20% of taxable tangible property
sewer districts=up to 5% of taxable tangible property)

<table>
<thead>
<tr>
<th>Current outstanding debt:</th>
<th>21,420</th>
</tr>
</thead>
<tbody>
<tr>
<td>Other indicators:</td>
<td>Not provided by applicant</td>
</tr>
</tbody>
</table>

Costs specific to the City of Ewing such as current debt retirement have not been added to the estimated user rate because the Department does not know how the current rate is structured or where the money from the rate is allocated.
(2) Affordability of pollution control options for the individuals or households of the community;

A Current Costs

- Current operating costs (exclude depreciation): Not provided by applicant
- Current user rate: $20.90

B-1 Estimated Costs for Mechanical Plant Pollution Control Options

- Estimated capital cost of pollution control options: $1,009,800 - $1,270,000
- Annual Cost of Operation and Maintenance: $73,372 - $108,154
- Estimated Resulting User Cost per Household per Month: $41 - $54
- Median Household Income: $35,651
- Cost per Household as a Percent of Median Household Income: 1.4% - 1.8%

CAPDET estimates the capital cost to finance a new mechanical treatment facility to be between $1,009,800 and $1,270,000. If financed through user costs, the future user costs have the potential to be between $41 and $54 per month. These costs assume a 5% interest rate over 20 years. The Department has estimated the construction and treatment costs for Sequencing Batch Reactor, Extended Aeration, and Oxidation Ditch technologies. All treatment technologies were set to meet effluent ammonia limits of less than 1.0 mg/L and losing stream criteria for BOD5 and TSS. Sludge handling, sludge treatment, and disinfection have not been included in the capital, operations and maintenance, and present worth cost estimations.

B-2 Estimated Costs for Land Application Pollution Control Options

- Estimated capital cost of pollution control options: $1,117,423 - $1,484,211
- Land Required: 41.45 – 46.35 acres
- Annual Cost of Operation and Maintenance: $33,020 - $50,357
- Estimated Resulting User Cost per Household per Month: $20.35 - $28.87
- Median Household Income: $35,651
- Cost per Household as a Percent of Median Household Income: 0.68% - 0.98%

CAPDET estimates the capital cost to finance a land application system to be between $1,117,423 and $1,484,211. If financed through user costs, the future user costs have the potential to be between $20.35 and $28.87 per month. These costs assume a 5% interest rate over 30 years. The estimated capital cost assumes the City of Ewing must purchase the land. If the City of Ewing already owns the land, the resulting costs will be less than what is described in Table B-2.

The estimated user rate is not added to the current user rate because the rate estimates takes into account the total replacement of the facility, including Operation & Maintenance (O&M), and Debt Retirement Costs.

The Estimated User Cost shown in Tables B-1 and B-2 is composed of two factors, Operation & Maintenance (O&M), and Debt Retirement Costs.

O&M costs shown in Tables B-1 and B-2 includes operations, maintenance, materials, chemical and electrical costs for the facility on an annual basis. It includes items that are expected to replace during operations, such as pumps. O&M is estimated between 15% and 45% of the user cost.

Debt retirement is associated with capital cost of this project, not existing debt the facility may have. Debt retirement is estimated between 50% and 85% of the user cost. Capital cost includes project costs from CapDet with design, inspection and contingency costs.
(3) An evaluation of the overall costs and environmental benefits of the control technologies:

On August 22, 2013, the U.S. Environmental Protection Agency (EPA) finalized new water quality criteria for ammonia, based on toxicity studies of mussels and gill breathing snails. When new water quality criteria are established by the EPA, states must adopt them into their regulations in order to keep their authorization to issue permits under the National Pollutant Discharge Elimination System. This permit renewal requires final effluent limitations for Ammonia as N based on Missouri Water Quality Standards (WQS) 10 CSR 20-7.031 and the Clean Water Act. Ammonia (NH₃) is toxic to early stages of aquatic life. NH₃ removal prevents damage to aquatic life and enables the receiving stream to support a healthier and diverse aquatic life community. The technologies evaluated by CapDet are a sequencing batch reactor, extended aeration mechanical plant, and an oxidation ditch. All technologies evaluated have demonstrated the capability of meeting the 2013 ammonia criteria when operated and maintained at a proper level. Land application is another option that has been evaluated within this document. Land application is of value to the permittee when considering costs associated with possible future changes with Water Quality Standards. Please see the Water Protection Program fact sheet titled “Changes to the Water Quality Standard for Ammonia” at http://dnr.mo.gov/pubs/pub2481.htm.

Land application in the state is divided into four regions, based on the minimum storage time, rainfall amounts, and land required for land application to occur. The regions are north of Highway 36, between Highways 36 and 50, between Highways 50 and 60, and south of Highway 60. For communities that are divided by highways, the region selected is where the majority of the county resides. The low cost estimate for land application assumes that the community will not have to construct a new storage basin and the high cost estimate assumes the construction of a storage basin.

For all mechanical treatment technologies calculated by the Department’s CapDet calculator, sludge handling, sludge treatment is not included in the capital, operations and maintenance, and annual or present worth costs. All treatment technologies were designed to meet effluent ammonia of less than 1.0 mg/L and losing stream criteria for BOD₅ and TSS of less than 10 mg/L.

(4) Inclusion of ongoing costs of operating and maintaining the existing wastewater collection and treatment system, including payments on outstanding debts for wastewater collection and treatment systems when calculating projected rates:

The community did not provide the Department with information, nor could it be found through readily available data.

(5) An inclusion of ways to reduce economic impacts on distressed populations in the community, including but not limited to low and fixed income populations. This requirement includes but is not limited to:

(a) Allowing adequate time in implementation schedules to mitigate potential adverse impacts on distressed populations resulting from the costs of the improvements and taking into consideration local community economic considerations.

(b) Allowing for reasonable accommodations for regulated entities when inflexible standards and fines would impose a disproportionate financial hardship in light of the environmental benefits to be gained.

<table>
<thead>
<tr>
<th>Potentially Distressed Populations – City of Ewing</th>
</tr>
</thead>
<tbody>
<tr>
<td>Unemployment                                  7.2%</td>
</tr>
<tr>
<td>Median Household Income (MHI) $35,651</td>
</tr>
<tr>
<td>Percent Change in MHI (1990-2012) +49.3 %</td>
</tr>
<tr>
<td>Percent Population Growth/Decline (1990-2012) -0.6 %</td>
</tr>
<tr>
<td>Change in Median Age in Years (1990-2012) +6.8</td>
</tr>
<tr>
<td>Percent of Households in Poverty 17.3 %</td>
</tr>
<tr>
<td>Percent of Households Relying on Food Stamps 19.5 %</td>
</tr>
</tbody>
</table>

Opportunity for cost savings or cost avoidance:

If available, connection to a larger centralized sewer system in the area may be more cost effective for the community. The permittee may apply for State Revolving Fund (SRF) financial support in order to help fund a Capital Improvements Plan. Other loans and grants also exist for which the facility may be eligible. Contact information for the Department’s Financial Assistance Center (FAC) and more information can be found on the Department’s website at http://dnr.mo.gov/env/wpp/srf/wastewater-assistance.htm.

If the permittee can demonstrate that the proposed pollution controls result in substantial and widespread economic and social impact, the permittee may use the Use Attainability Analysis (UAA) process to modify designated uses of the receiving water body.
Opportunity for changes to implementation/compliance schedule, new technology, site specific criteria, use attainability analysis: The facility may propose changes to the schedule of compliance based on their own cost estimate or financial information.

(6) **An assessment of other community investments relating to environmental improvements:**

The community did not report any other investments relating to environmental improvements.

(7) **An assessment of factors set forth in the United States Environmental Protection Agency's guidance, including but not limited to the "Combined Sewer Overflow Guidance for Financial Capability Assessment and Schedule Development" that may ease the cost burdens of implementing wet weather control plans, including but not limited to small system considerations, the attainability of water quality standards, and the development of wet weather standards:**

**Secondary indicators for consideration:**

<table>
<thead>
<tr>
<th>Indicators</th>
<th>Strong (3 points)</th>
<th>Mid-Range (2 points)</th>
<th>Weak (1 point)</th>
<th>Score</th>
</tr>
</thead>
<tbody>
<tr>
<td>Bond Rating Indicator</td>
<td>Above BBB or Baa</td>
<td>BBB or Baa</td>
<td>Below BBB or Baa</td>
<td>None</td>
</tr>
<tr>
<td>Overall Net Debt as a % of Full Market Property Value</td>
<td>Below 2%</td>
<td>2% - 5%</td>
<td>Above 5%</td>
<td>Not provided by facility</td>
</tr>
<tr>
<td>Unemployment Rate</td>
<td>&gt;1% below Missouri average</td>
<td>± 1% of Missouri average</td>
<td>&gt;1% above Missouri average</td>
<td>2</td>
</tr>
<tr>
<td>Median Household Income</td>
<td>More than 25% above Missouri MHI</td>
<td>± 25% of Missouri MHI</td>
<td>More than 25% below Missouri average</td>
<td>1</td>
</tr>
<tr>
<td>Property Tax Revenues as a % of Full Market Property Value</td>
<td>Below 2%</td>
<td>2% - 4%</td>
<td>Above 4%</td>
<td>Not provided by facility</td>
</tr>
<tr>
<td>Property Tax Collection Rate</td>
<td>Above 98%</td>
<td>94% - 98%</td>
<td>Below 94%</td>
<td>Not provided by facility</td>
</tr>
</tbody>
</table>

Secondary Indicators Average Score: 1.5
Residential Indicator (from Criteria #2 above): 0.68% - 1.8%

**Financial Capability Matrix:**

<table>
<thead>
<tr>
<th>Financial Capability Indicators Score from above</th>
<th>Low (Below 1%)</th>
<th>Mid-Range (Between 1.0% and 2.0%)</th>
<th>High (Above 2.0%)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Weak (below 1.5)</td>
<td>Medium Burden</td>
<td>High Burden</td>
<td>High Burden</td>
</tr>
<tr>
<td>Mid-Range (1.5 – 2.5)</td>
<td>Low Burden</td>
<td>Medium Burden</td>
<td>High Burden</td>
</tr>
<tr>
<td>Strong (above 2.5)</td>
<td>Low Burden</td>
<td>Low Burden</td>
<td>Medium Burden</td>
</tr>
</tbody>
</table>

Estimated Financial Burden: Low to Medium Burden

(8) **An assessment of any other relevant local community economic condition.**

The community did not report any other relevant local economic conditions.
Conclusion and Finding

As a result of new regulations, the Department is proposing modifications to the current operating permit that may require the permittee to upgrade the facility and construct new control technologies. The Department identified the actions for which an affordability analysis is required under Section 644.145 RSMo. Using this analysis, the Department finds that a land application system is the most practical and affordable option for your community.

The Department estimates the total present worth for complete replacement of the existing treatment facility in order to meet new ammonia effluent limits is between $1,009,800 and $2,617,838. Should these costs be financed through user fees, it may require user fees between 0.68% and 1.8% of the community’s MHI. Considering that several of the economic factors show a mid-range financial capability in this community, this analysis concludes that it is not likely the evaluated permit action will result in user fees above 2% of the community’s median household income and all options are affordable.

The Department considered all eight (8) of the criteria presented in subsection 644.145.3 when evaluating the affordability of the relevant actions. Taking into consideration these criteria, this analysis examined whether the above referenced permit modifications affects the ability of an individual customer or household to pay a utility bill without undue hardship or unreasonable sacrifice in the essential lifestyle or spending patterns of the individual or household. As a result of reviewing the above criteria, the Department hereby finds that the action described above may result in a low to medium burden with regard to the community’s overall financial capability and a mid-range financial impact for most individual customers/households.

This determination is based on readily available data and may over-estimate the financial impact on the community. When the community submits their facility plan as part of the construction permit process, the plan includes a discussion of community details, what the community can afford, existing obligations, future growth potential, an evaluation of options available to the community with cost information, and a discussion on no-discharge alternatives. The cost information provided through the facility plan process, which is developed by the community and their engineer, is more comprehensive of the community’s individual factors in relation to selected treatment technology and costing information.

References:

2. The number of connections was obtained from the City of Ewing’s Affordability Information Form.
3. This figure was obtained from the City of Ewing’s Affordability Information Form.
4. User Cost = Operation & Maintenance + Debt Retirement, as calculated by CapDet. (mechanical)
5. (41/(35,651/12))100 = 1.4 and (54/(35,651/12))100 = 1.8 (mechanical)
6. User Cost = Operation & Maintenance + Debt Retirement, as calculated by CapDet. (land application)
7. (20/(35,651/12))100 = 0.68 and (29/(35,651/12))100 = 0.98 (land application)
8. O&M costs per user per month: ((O&M/365days)/ gpd)*5,000 g
9. Debt retirement per user per month: (-PMT(IR, EL, CC))/EL/12 months/# of users
10. Unemployment data was obtained from Missouri Department of Economic Development (March 2014) – http://www.missourieconomy.org/pdfs/urel1403.pdf
These Standard Conditions incorporate permit conditions as required by 40 CFR 122.41 or other applicable state statutes or regulations. These minimum conditions apply unless superseded by requirements specified in the permit.

Part I – General Conditions

Section A – Sampling, Monitoring, and Recording

1. Sampling Requirements.
   a. Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity.
   b. All samples shall be taken at the outfall(s) or Missouri Department of Natural Resources (Department) approved sampling location(s), and unless specified, before the effluent joins or is diluted by any other body of water or substance.

2. Monitoring Requirements.
   a. Records of monitoring information shall include:
      i. The date, exact place, and time of sampling or measurements;
      ii. The individual(s) who performed the sampling or measurements;
      iii. The date(s) analyses were performed;
      iv. The individual(s) who performed the analyses;
      v. The analytical techniques or methods used; and
      vi. The results of such analyses.
   b. If the permittee monitors any pollutant more frequently than required by the permit at the location specified in the permit using test procedures approved under 40 CFR Part 136, or another method required for an industry-specific waste stream under 40 CFR subchapters N or O, the results of such monitoring shall be included in the calculation and reported to the Department with the discharge monitoring report data (DMR) submitted to the Department pursuant to Section B, paragraph 7.

3. Sample and Monitoring Calculations. Calculations for all sample and monitoring results which require averaging of measurements shall utilize an arithmetic mean unless otherwise specified in the permit.

4. Test Procedures. The analytical and sampling methods used shall conform to the reference methods listed in 10 CSR 20-7.015 unless alternates are approved by the Department. The facility shall use sufficiently sensitive analytical methods for detecting, identifying, and measuring the concentrations of pollutants. The facility shall ensure that the selected methods are able to quantify the presence of pollutants in a given discharge at concentrations that are low enough to determine compliance with Water Quality Standards in 10 CSR 20-7.031 or effluent limitations unless provisions in the permit allow for other alternatives. A method is “sufficiently sensitive” when: 1) the method minimum level is at or below the level of the applicable water quality criterion for the pollutant or, 2) the method minimum level is above the applicable water quality criterion, but the amount of pollutant in a facility’s discharge is high enough that the method detects and quantifies the level of pollutant in the discharge, or 3) the method minimum level is above the applicable water quality criterion, but the level of the applicable water quality criterion for the pollutant or, 2) the method minimum level is above the applicable water quality criterion, but the amount of pollutant in a facility’s discharge is high enough that the method detects and quantifies the level of pollutant in the discharge, or 3) the method has the lowest minimum level of the analytical methods approved under 10 CSR 20-7.015. These methods are also required for parameters that are listed as monitoring only, as the data collected may be used to determine if limitations need to be established. A permittee is responsible for working with their contractors to ensure that the analysis performed is sufficiently sensitive.

5. Record Retention. Except for records of monitoring information required by the permit related to the permittee’s sewage sludge use and disposal activities, which shall be retained for a period of at least five (5) years (or longer as required by 40 CFR part 503), the permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports required by the permit, and records of all data used to complete the application for the permit, for a period of at least three (3) years from the date of the sample, measurement, report or application. This period may be extended by request of the Department at any time.

6. Illegal Activities.
   a. The Federal Clean Water Act provides that any person who falsifies, tampers with, or knowingly renders inaccurate any monitoring device or method required to be maintained under the permit shall, upon conviction, be punished by a fine of not more than $10,000, or by imprisonment for not more than two (2) years, or both. If a conviction of a person is for a violation committed after a first conviction of such person under this paragraph, punishment is a fine of not more than $20,000 per day of violation, or by imprisonment of not more than four (4) years, or both.
   b. The Missouri Clean Water Law provides that any person or who falsifies, tampers with, or knowingly renders inaccurate any monitoring device or method required to be maintained pursuant to sections 644.006 to 644.141 shall, upon conviction, be punished by a fine of not more than $10,000, or by imprisonment for not more than six (6) months, or by both. Second and successive convictions for violation under this paragraph by any person shall be punished by a fine of not more than $50,000 per day of violation, or by imprisonment for not more than two (2) years, or both.

Section B – Reporting Requirements

1. Planned Changes.
   a. The permittee shall give notice to the Department as soon as possible of any planned physical alterations or additions to the permitted facility when:
      i. The alteration or addition to a permitted facility may meet one of the criteria for determining whether a facility is a new source in 40 CFR 122.29(b); or
      ii. The alteration or addition could significantly change the nature or increase the quantity of pollutants discharged. This notification applies to pollutants which are subject neither to effluent limitations in the permit, nor to notification requirements under 40 CFR 122.42;
      iii. The alteration or addition results in a significant change in the permittee's sludge use or disposal practices, and such alteration, addition, or change may justify the application of permit conditions that are different from or absent in the existing permit, including notification of additional use or disposal sites not reported during the permit application process or not reported pursuant to an approved land application plan;
      iv. Any facility expansions, production increases, or process modifications which will result in a new or substantially different discharge or sludge characteristics must be reported to the Department 60 days before the facility or process modification begins. Notification may be accomplished by application for a new permit. If the discharge does not violate effluent limitations specified in the permit, the facility is to submit a notice to the Department of the changed discharge at least 30 days before such changes. The Department may require a construction permit and/or permit modification as a result of the proposed changes at the facility.

   a. The permittee shall report any noncompliance which may endanger health or the environment. Relevant information shall be provided orally or via the current electronic method approved by the Department, within 24 hours from the time the permittee becomes aware of the circumstances, and shall be reported to the appropriate Regional Office during normal business hours or the Environmental Emergency Response hotline at 573-634-2436 outside of normal business hours. A written submission shall also be provided within five (5) business days of the time the permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the period of noncompliance, including exact dates and times, and if the noncompliance has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent reoccurrence of the noncompliance.

STANDARD CONDITIONS FOR NPDES PERMITS

ISSUED BY
THE MISSOURI DEPARTMENT OF NATURAL RESOURCES
MISSOURI CLEAN WATER COMMISSION
REVISED
AUGUST 1, 2014
The permittee shall submit notices as required under paragraph 2. b. of this section.

2. c. The Department may waive the written report on a case-by-case basis for reports under paragraph 2. b. of this section if the oral report has been received within 24 hours.

3. **Anticipated Noncompliance.** The permittee shall give advance notice to the Department of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements. The notice shall be submitted to the Department 60 days prior to such changes or activity.

4. **Compliance Schedules.** Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of the permit shall be submitted no later than 14 days following each schedule date. The report shall provide an explanation for the instance of noncompliance and a proposed schedule or anticipated date, for achieving compliance with the compliance schedule requirement.

5. **Other Noncompliance.** The permittee shall report all instances of noncompliance not reported under paragraphs 2, 3, and 6 of this section, at the time monitoring reports are submitted. The reports shall contain the information listed in paragraph 2. a. of this section.

6. **Other Information.** Where the permittee becomes aware that it failed to submit any relevant facts in a permit application, or submitted incorrect information in a permit application or in any report to the Department, it shall promptly submit such facts or information.

7. **Discharge Monitoring Reports.**
   a. Monitoring results shall be reported at the intervals specified in the permit.
   b. Monitoring results must be reported to the Department via the current method approved by the Department, unless the permittee has been granted a waiver from using the method. If the permittee has been granted a waiver, the permittee must use forms provided by the Department.
   c. Monitoring results shall be reported to the Department no later than the 28th day of the month following the end of the reporting period.

**Section C – Bypass/Upset Requirements**

1. **Definitions.**
   a. **Bypass:** the intentional diversion of waste streams from any portion of a treatment facility, except in the case of blending.
   b. **Severe Property Damage:** substantial physical damage to property, damage to the treatment facilities which causes them to become inoperable, or substantial and permanent loss of natural resources which can reasonably be expected to occur in the absence of a bypass. Severe property damage does not mean economic loss caused by delays in production.
   c. **Upset:** an exceptional incident in which there is unintentional and temporary noncompliance with technology based permit effluent limitations because of factors beyond the reasonable control of the permittee. An upset does not include noncompliance to the extent caused by operational error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventive maintenance, or careless or improper operation.

2. **Bypass Requirements.**
   a. Bypass not exceeding limitations. The permittee may allow any bypass to occur which does not cause effluent limitations to be exceeded, but only if it also is for essential maintenance to assure efficient operation. These bypasses are not subject to the provisions of paragraphs 2. b. and 2. c. of this section.
   b. Notice.
      i. Anticipated bypass. If the permittee knows in advance of the need for a bypass, it shall submit prior notice, if possible at least 10 days before the date of the bypass.
      ii. Unanticipated bypass. The permittee shall submit notice of an unanticipated bypass as required in Section B – Reporting Requirements, paragraph 5 (24-hour notice).
   c. **Prohibition of bypass.**
      i. Bypass is prohibited, and the Department may take enforcement action against a permittee for bypass, unless:
         1. Bypass was unavoidable to prevent loss of life, personal injury, or severe property damage;
         2. There were no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment downtime. This condition is not satisfied if adequate back-up equipment should have been installed in the exercise of reasonable engineering judgment to prevent a bypass which occurred during normal periods of equipment downtime or preventive maintenance; and
         3. The permittee submitted notices as required under paragraph 2. b. of this section.
      ii. The Department may approve an anticipated bypass, after considering its adverse effects, if the Department determines that it will meet the three (3) conditions listed above in paragraph 2. c. i. of this section.

**Section D – Administrative Requirements**

1. **Duty to Comply.** The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Missouri Clean Water Law and Federal Clean Water Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or denial of a permit renewal application.
   a. The permittee shall comply with effluent standards or prohibitions established under section 307(a) of the Federal Clean Water Act for toxic pollutants and with standards for sewage sludge use or disposal established under section 405(d) of the CWA within the time provided in the regulations that establish these standards or prohibitions or standards for sewage sludge use or disposal, even if the permit has not yet been modified to incorporate the requirement.
   b. The Federal Clean Water Act provides that any person who violates section 301, 302, 306, 307, 308, 318 or 405 of the Act, or any permit condition or limitation implementing any such sections in a permit issued under section 402, or any requirement imposed in a pretreatment program approved under sections 402(a)(3) or 402(b)(8) of the Act, is subject to a civil penalty not to exceed $25,000 per day for each violation. The Federal Clean Water Act provides that any person who negligently violates sections 301, 302, 306, 307, 308, 318, or 405 of the Act, or any condition or limitation implementing any of such sections in a permit issued under section 402 of the Act, or any requirement
imposed in a pretreatment program approved under section 402(a)(3) or 402(b)(8) of the Act, is subject to criminal penalties of $2,500 to $25,000 per day of violation, or imprisonment of not more than one (1) year, or both. In the case of a second or subsequent conviction for a negligent violation, a person shall be subject to criminal penalties of not more than $50,000 per day of violation, or by imprisonment of not more than two (2) years, or both. Any person who knowingly violates such sections, or such conditions or limitations is subject to criminal penalties of $5,000 to $50,000 per day of violation, or imprisonment for not more than three (3) years, or both. In the case of a second or subsequent conviction for a knowing violation, a person shall be subject to criminal penalties of not more than $100,000 per day of violation, or imprisonment of not more than six (6) years, or both. Any person who knowingly violates section 301, 302, 303, 306, 307, 308, 318 or 405 of the Act, or any permit condition or limitation implementing any of such sections in a permit issued under section 402 of the Act, and who knows at that time that he thereby places another person in imminent danger of death or serious bodily injury, shall, upon conviction, be subject to a fine of not more than $250,000 or imprisonment of not more than 15 years, or both. In the case of a second or subsequent conviction for a knowing endangerment violation, a person shall be subject to a fine of not more than $500,000 or by imprisonment of not more than 30 years, or both. An organization, as defined in section 309(c)(3) of the CWA, shall, upon conviction of violating the imminent danger provision, be subject to a fine of not more than $1,000,000 and can be fined up to $2,000,000 for second or subsequent convictions.

c. Any person may be assessed an administrative penalty by the EPA Director for violating section 301, 302, 306, 307, 308, 318 or 405 of this Act, or any permit condition or limitation implementing any of such sections in a permit issued under section 402 of this Act. Administrative penalties for Class I violations are not to exceed $10,000 per violation, with the maximum amount of any Class I penalty assessed not to exceed $25,000. Penalties for Class II violations are not to exceed $10,000 per day for each day during which the violation continues, with the maximum amount of any Class II penalty not to exceed $125,000.

d. It is unlawful for any person to cause or permit any discharge of water contaminants from any water contaminant or point source located in Missouri in violation of sections 644.006 to 644.141 of the Missouri Clean Water Law, or any standard, rule or regulation promulgated by the commission. In the event the commission or the director determines that any provision of sections 644.006 to 644.141 of the Missouri Clean Water Law or standard, rules, limitations or regulations promulgated pursuant thereto, or permits issued by, or any final abatement order, other order, or determination made by the commission or the director, or any filing requirement pursuant to sections 644.006 to 644.141 of the Missouri Clean Water Law or any other provision which this state is required to enforce pursuant to any federal water pollution control act, is being, was, or is in imminent danger of being violated, the commission or director may cause to have instituted a civil action in any court of competent jurisdiction for the injunctive relief to prevent any such violation or further violation or for the assessment of a penalty not to exceed $10,000 per day for each day, or part thereof, the violation occurred and continues to occur, or both, as the court deems proper. Any person who willfully or negligently commits any violation in this paragraph shall, upon conviction, be punished by a fine of not less than $2,500 nor more than $25,000 per day of violation, or by imprisonment for not more than one year, or both. Second and successive convictions for violation of the same provision of this paragraph by any person shall be punished by a fine of not more than $50,000 per day of violation, or by imprisonment for not more than two (2) years, or both.

2. Duty to Reapply.
   a. If the permittee wishes to continue an activity regulated by this permit after the expiration date of this permit, the permittee must apply for and obtain a new permit.
   b. A permittee with a currently effective site-specific permit shall submit an application for renewal at least 180 days before the expiration date of the existing permit, unless permission for a later date has been granted by the Department. (The Department shall not grant permission for applications to be submitted later than the expiration date of the existing permit.)
   c. A permittees with currently effective general permit shall submit an application for renewal at least 30 days before the existing permit expires, unless the permittee has been notified by the Department that an earlier application must be made. The Department may grant permission for a later submission date. (The Department shall not grant permission for applications to be submitted later than the expiration date of the existing permit.)

3. Need to Halt or Reduce Activity Not a Defense. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

4. Duty to Mitigate. The permittee shall take all reasonable steps to minimize or prevent any discharge or sludge use or disposal in violation of this permit which has a reasonable likelihood of adversely affecting human health or the environment.

5. Proper Operation and Maintenance. The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems which are installed by a permittee only when the operation is necessary to achieve compliance with the conditions of the permit.

6. Permit Actions.
   a. Subject to compliance with statutory requirements of the Law and Regulations and applicable Court Order, this permit may be modified, suspended, or revoked in whole or in part during its term for cause including, but not limited to, the following:
      i. Violations of any terms or conditions of this permit or the law;
      ii. Having obtained this permit by misrepresentation or failure to disclose fully any relevant facts;
      iii. A change in any circumstances or conditions that requires either a temporary or permanent reduction or elimination of the authorized discharge; or
      iv. Any reason set forth in the Law or Regulations.
   b. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition.

7. Permit Transfer.
   a. Subject to 10 CSR 20-6.010, an operating permit may be transferred upon submission to the Department of an application to transfer signed by the existing owner and the new owner, unless prohibited by the terms of the permit. Until such time the permit is officially transferred, the original permittee remains responsible for complying with the terms and conditions of the existing permit.
   b. The Department may require modification or revocation and reissuance of the permit to change the name of the permittee and incorporate such other requirements as may be necessary under the Missouri Clean Water Law or the Federal Clean Water Act.
   c. The Department, within 30 days of receipt of the application, shall notify the new permittee of its intent to revoke or reissue or transfer the permit.

8. Toxic Pollutants. The permittee shall comply with effluent standards or prohibitions established under section 307(a) of the Federal Clean Water Act for toxic pollutants and with standards for sewage sludge use or disposal established under section 405(d) of the Federal Clean Water Act within the time provided in the regulations that establish these standards or prohibitions or standards for sewage sludge use or disposal, even if the permit has not yet been modified to incorporate the requirement.

9. Property Rights. This permit does not convey any property rights of any sort, or any exclusive privilege.
10. **Duty to Provide Information.** The permittee shall furnish to the Department, within a reasonable time, any information which the Department may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit or to determine compliance with this permit. The permittee shall also furnish to the Department upon request, copies of records required to be kept by this permit.

11. **Inspection and Entry.** The permittee shall allow the Department, or an authorized representative (including an authorized contractor acting as a representative of the Department), upon presentation of credentials and other documents as may be required by law, to:
   a. Enter upon the permittee’s premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of the permit;
   b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
   c. Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and
   d. Sample or monitor at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by the Federal Clean Water Act or Missouri Clean Water Law, any substances or parameters at any location.

12. **Closure of Treatment Facilities.**
   a. Persons who cease operation or plan to cease operation of waste, wastewater, and sludge handling and treatment facilities shall close the facilities in accordance with a closure plan approved by the Department.
   b. Operating Permits under 10 CSR 20-6.010 or under 10 CSR 20-6.015 are required until all waste, wastewater, and sludges have been disposed of in accordance with the closure plan approved by the Department and any disturbed areas have been properly stabilized. Disturbed areas will be considered stabilized when perennial vegetation, pavement, or structures using permanent materials cover all areas that have been disturbed. Vegetative cover, if used, shall be at least 70% plant density over 100% of the disturbed area.

13. **Signatory Requirement.**
   a. All permit applications, reports required by the permit, or information requested by the Department shall be signed and certified. (See 40 CFR 122.22 and 10 CSR 20-6.010)
   b. The Federal Clean Water Act provides that any person who knowingly makes any false statement, representation, or certification in any record or other document submitted or required to be maintained under this permit, including monitoring reports or reports of compliance or non-compliance shall, upon conviction, be punished by a fine of not more than $10,000 per violation, or by imprisonment for not more than six (6) months per violation, or by both.
   c. The Missouri Clean Water Law provides that any person who knowingly makes any false statement, representation or certification in any application, record, report, plan, or other document filed or required to be maintained pursuant to sections 644.006 to 644.141 shall, upon conviction, be punished by a fine of not more than ten thousand dollars, or by imprisonment for not more than six months, or by both.

14. **Severability.** The provisions of the permit are severable, and if any provision of the permit, or the application of any provision of the permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of the permit, shall not be affected thereby.
PART II - SPECIAL CONDITIONS – PUBLICLY OWNED TREATMENT WORKS
SECTION A – INDUSTRIAL USERS

1. Definitions

Definitions as set forth in the Missouri Clean Water Laws and approved by the Missouri Clean Water Commission shall apply to terms used herein.

Significant Industrial User (SIU). Except as provided in the General Pretreatment Regulation 10 CSR 20-6.100, the term Significant Industrial User means:
1. All Industrial Users subject to Categorical Pretreatment Standards; and
2. Any other Industrial User that: discharges an average of 25,000 gallons per day or more of process wastewater to the Publicly-Owned Treatment Works (POTW) (excluding sanitary, noncontact cooling and boiler blowdown wastewater); contributes a process wastestream which makes up 5 percent or more of the average dry weather hydraulic or organic capacity of the POTW treatment plant; or is designated as such by the Control Authority on the basis that the Industrial User has a reasonable potential for adversely affecting the POTW’s or for violating any Pretreatment Standard or requirement.


2. Identification of Industrial Discharges

Pursuant to 40 CFR 122.44(j)(1), all POTWs shall identify, in terms of character and volume of pollutants, any Significant Industrial Users discharging to the POTW subject to Pretreatment Standards under section 307(b) of the CWA and 40 CFR 403.

3. Application Information

Applications for renewal or modification of this permit must contain the information about industrial discharges to the POTW pursuant to 40 CFR 122.21(j)(6)

4. Notice to the Department

Pursuant to 40 CFR 122.42(b), all POTWs must provide adequate notice of the following:
1. Any new introduction of pollutants into the POTW from an indirect discharger which would be subject to section 301 or 306 of CWA if it were directly discharging these pollutants; and
2. Any substantial change into the volume or character of pollutants being introduced into that POTW by a source introducing pollutants into the POTW at the time of issuance of the permit.

3. For purposes of this paragraph, adequate notice shall include information on:
   i. the quality and quantity of effluent introduced into the POTW, and
   ii. any anticipated impact of the change on the quantity or quality of effluent to be discharged from the POTW.

For POTWs without an approved pretreatment program, the notice of industrial discharges which was not included in the permit application shall be made as soon as practicable. For POTWs with an approved pretreatment program, notice is to be included in the annual pretreatment report required in the special conditions of this permit. Notice may be sent to:

Missouri Department of Natural Resources
Water Protection Program
Attn: Pretreatment Coordinator
P.O. Box 176
Jefferson City, MO 65102
PART III – BIOSOLIDS AND SLUDGE FROM DOMESTIC TREATMENT FACILITIES

SECTION A – GENERAL REQUIREMENTS

1. PART III Standard Conditions pertain to biosolids and sludge requirements under the Missouri Clean Water Law and regulations for domestic and municipal wastewater and also incorporates federal sludge disposal requirements under 40 CFR Part 503 for domestic wastewater. The Environmental Protection Agency (EPA) has principal authority for permitting and enforcement of the federal sludge regulations under 40 CFR Part 503 for domestic biosolids and sludge.

2. PART III Standard Conditions apply only to biosolids and sludge generated at domestic wastewater treatment facilities, including public owned treatment works (POTW) and privately owned facilities.

3. Biosolids and Sludge Use and Disposal Practices:
   a. The permittee is authorized to operate the biosolids and sludge generating, treatment, storage, use, and disposal facilities listed in the facility description of this permit.
   b. The permittee shall not exceed the design sludge/biosolids volume listed in the facility description and shall not use biosolids or sludge disposal methods that are not listed in the facility description, without prior approval of the permitting authority.
   c. For facilities operating under general operating permits that incorporate Standard Conditions PART III, the facility is authorized to operate the biosolids and sludge generating, treatment, storage, use and disposal facilities identified in the original operating permit application, subsequent renewal applications or subsequent written approval by the department.

4. Biosolids or Sludge Received from other Facilities:
   a. Permittees may accept domestic wastewater biosolids or sludge from other facilities as long as the permittee’s design sludge capacity is not exceeded and the treatment facility performance is not impaired.
   b. The permittee shall obtain a signed statement from the biosolids or sludge generator or hauler that certifies the type and source of the sludge.

5. Nothing in this permit precludes the initiation of legal action under local laws, except to the extent local laws are preempted by state law.

6. This permit does not preclude the enforcement of other applicable environmental regulations such as odor emissions under the Missouri Air Pollution Control Law and regulations.

7. This permit may (after due process) be modified, or alternatively revoked and reissued, to comply with any applicable biosolids or sludge disposal standard or limitation issued or approved under Section 405(d) of the Clean Water Act or under Chapter 644 RSMo.

8. In addition to Standard Conditions PART III, the Department may include biosolids and sludge limitations in the special conditions portion or other sections of a site specific permit.

9. Exceptions to Standard Conditions PART III may be authorized on a case-by-case basis by the Department, as follows:
   b. Exceptions cannot be granted where prohibited by the federal sludge regulations under 40 CFR Part 503.
SECTION B – DEFINITIONS

1. Best Management Practices are practices to prevent or reduce the pollution of waters of the state and include agronomic loading rates (nitrogen based), soil conservation practices, spill prevention and maintenance procedures and other site restrictions.
2. Biosolids means organic fertilizer or soil amendment produced by the treatment of domestic wastewater sludge.
3. Biosolids land application facility is a facility where biosolids are spread onto the land at agronomic rates for production of food, feed or fiber. The facility includes any structures necessary to store the biosolids until soil, weather, and crop conditions are favorable for land application.
4. Class A biosolids means a material that has met the Class A pathogen reduction requirements or equivalent treatment by a Process to Further Reduce Pathogens (PFRP) in accordance with 40 CFR Part 503.
5. Class B biosolids means a material that has met the Class B pathogen reduction requirements or equivalent treatment by a Process to Significantly Reduce Pathogens (PSRP) in accordance with 40 CFR Part 503.
6. Domestic wastewater means wastewater originating from the sanitary conveniences of residences, commercial buildings, factories and institutions; or co-mingled sanitary and industrial wastewater processed by a (POTW) or a privately owned facility.
7. Feed crops are crops produced primarily for consumption by animals.
8. Fiber crops are crops such as flax and cotton.
9. Food crops are crops consumed by humans which include, but is not limited to, fruits, vegetables and tobacco.
10. Industrial wastewater means any wastewater, also known as process wastewater, not defined as domestic wastewater. Per 40 CFR Part 122.2, process wastewater means any water which, during manufacturing or processing, comes into direct contact with or results from the production or use of any raw material, intermediate product, finished product, byproduct, or waste product. Land application of industrial wastewater, residuals or sludge is not authorized by Standard Conditions PART III.
11. Mechanical treatment plants are wastewater treatment facilities that use mechanical devices to treat wastewater, including, sand filters, extended aeration, activated sludge, contact stabilization, trickling filters, rotating biological contact systems, and other similar facilities. It does not include wastewater treatment lagoons or constructed wetlands for wastewater treatment.
12. Plant Available Nitrogen (PAN) is nitrogen that will be available to plants during the growing seasons after biosolids application.
13. Public contact site is land with a high potential for contact by the public. This includes, but is not limited to, public parks, ball fields, cemeteries, plant nurseries, turf farms, and golf courses.
14. Sludge is the solid, semisolid, or liquid residue removed during the treatment of wastewater. Sludge includes septage removed from septic tanks or equivalent facilities. Sludge does not include carbon coal byproducts (CCBs), sewage sludge incinerator ash, or grit/screenings generated during preliminary treatment of domestic sewage.
15. Sludge lagoon is part of a mechanical wastewater treatment facility. A sludge lagoon is an earthen or concrete lined basin that receives sludge that has been removed from a wastewater treatment facility. It does not include a wastewater treatment lagoon or sludge treatment units that are not a part of a mechanical wastewater treatment facility.
16. Septage is the sludge pumped from residential septic tanks, cesspools, portable toilets, Type III marine sanitation devices, or similar treatment works such as sludge holding structures from residential wastewater treatment facilities with design populations of less than 150 people. Septage does not include grease removed from grease traps at a restaurant or material removed from septic tanks and other similar treatment works that have received industrial wastewater. The standard for biosolids from septage is different from other sludges. See Section H for more information.

SECTION C – MECHANICAL WASTEWATER TREATMENT FACILITIES

1. Biosolids or sludge shall be routinely removed from wastewater treatment facilities and handled according to the permit facility description and the requirements of Standard Conditions PART III or in accordance with Section A.3.c., above.
2. The permittee shall operate storage and treatment facilities, as defined by Section 644.016(23), RS Mo, so that there is no biosolids or sludge discharged to waters of the state. Agricultural storm water discharges are exempt under the provisions of Section 644.059, RS Mo.
3. Mechanical treatment plants shall have separate biosolids or sludge storage compartments in accordance with 10 CSR 20, Chapter 8. Failure to remove biosolids or sludge from these storage compartments on the required design schedule is a violation of this permit.

SECTION D – BIOSOLIDS OR SLUDGE DISPOSED AT OTHER TREATMENT FACILITY OR BY CONTRACT HAULER

1. Permitees that use contract haulers, under the authority of their operating permit, to dispose of biosolids or sludge, are responsible for compliance with all the terms of this permit. Contract haulers that assume the responsibility of the final disposal of biosolids or sludge, including biosolids land application, must obtain a Missouri State Operating Permit unless the hauler transports the biosolids or sludge to another permitted treatment facility.
2. Testing of biosolids or sludge, other than total solids content, is not required if biosolids or sludge are hauled to a permitted wastewater treatment facility, unless it is required by the accepting facility.
SECTION E – INCINERATION OF SLUDGE

1. Please be aware that sludge incineration facilities may be subject to the requirements of 40 CFR Part 503 Subpart E, Missouri Air Conservation Commission regulations under 10 CSR 10, and solid waste management regulations under 10 CSR 80, as applicable.

2. Permittee may be authorized under the facility description of this permit to store incineration ash in lagoons or ash ponds. This permit does not authorize the disposal of incineration ash. Incineration ash shall be disposed in accordance with 10 CSR 80; or, if the ash is determined to be hazardous, with 10 CSR 25.

3. In addition to normal sludge monitoring, incineration facilities shall report the following as part of the annual report, mass of sludge incinerated and mass of ash generated. Permittee shall also provide the name of the ash disposal facility and permit number if applicable.

SECTION F – SURFACE DISPOSAL SITES AND BIOSOLIDS AND SLUDGE LAGOONS

1. Please be aware that surface disposal sites of biosolids or sludge from wastewater treatment facilities may be subject to other laws including the requirements in 40 CFR Part 503 Subpart C, Missouri Air Conservation Commission regulations under 10 CSR 10, and solid waste management regulations under 10 CSR 80, as applicable.

2. Biosolids or sludge storage lagoons are temporary facilities and are not required to obtain a permit as a solid waste management facility under 10 CSR 80. In order to maintain biosolids or sludge storage lagoons as storage facilities, accumulated biosolids or sludge must be removed routinely, but not less than once every two years unless an alternate schedule is approved in the permit. The amount of biosolids or sludge removed will be dependent on biosolids or sludge generation and accumulation in the facility. Enough biosolids or sludge must be removed to maintain adequate storage capacity in the facility.
   a. In order to avoid damage to the lagoon seal during cleaning, the permittee may leave a layer of biosolids or sludge on the bottom of the lagoon, upon prior approval of the Department;
   b. Permittee shall close the lagoon in accordance with Section I.

SECTION G – LAND APPLICATION OF BIOSOLIDS

1. The permittee shall not land apply biosolids unless land application is authorized in the facility description, the special conditions of the issued NPDES permit, or in accordance with Section A.3.c., above.

2. This permit only authorizes “Class A” or “Class B” biosolids derived from domestic wastewater to be land applied onto grass land, crop land, timber, or other similar agricultural or silviculture lands at rates suitable for beneficial use as organic fertilizer and soil conditioner.

3. Class A Biosolids Requirements: Biosolids shall meet Class A requirements for application to public contact sites, residential lawns, home gardens or sold and/or given away in a bag or other container.

4. Class B biosolids that are land applied to agricultural and public contact sites shall comply with the following restrictions:
   a. Food crops that touch the biosolids/soil mixture and are totally above the land surface shall not be harvested for 14 months after application of biosolids.
   b. Food crops below the surface of the land shall not be harvested for 20 months after application of biosolids when the biosolids remain on the land surface for four months or longer prior to incorporation into the soil.
   c. Food crops below the surface of the land shall not be harvested for 38 months after application of biosolids when the biosolids remain on the land surface for less than four months prior to incorporation into the soil.
   d. Animal grazing shall not be allowed for 30 days after application of biosolids.
   e. Food crops, feed crops, and fiber crops shall not be harvested for 30 days after application of biosolids.
   f. Turf shall not be harvested for one year after application of biosolids if used for lawns or high public contact sites in close proximity to populated areas such as city parks or golf courses.
   g. After Class B biosolids have been land applied to public contact sites with high potential for public exposure, as defined in 40 CFR § 503.31, such as city parks or golf courses, access must be restricted for 12 months.
   h. After Class B biosolids have been land applied public contact sites with low potential for public exposure as defined in 40 CFR § 503.31, such as a rural land application or reclamation sites, access must be restricted for 30 days.

5. Pollutant limits
   a. Biosolids shall be monitored to determine the quality for regulated pollutants listed in Table 1, below. Limits for any pollutants not listed below may be established in the permit.
   b. The number of samples taken is directly related to the amount of biosolids or sludge produced by the facility (See Section J, below). Samples should be taken only during land application periods. When necessary, it is permissible to mix biosolids with lower concentrations of biosolids as well as other suitable Department approved material to achieve pollutant concentration below those identified in Table 1, below.
   c. Table 1 gives the ceiling concentration for biosolids. Biosolids which exceed the concentrations in Table 1 may not be land applied.
TABLE 1

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Milligrams per kilogram dry weight</th>
</tr>
</thead>
<tbody>
<tr>
<td>Arsenic</td>
<td>75</td>
</tr>
<tr>
<td>Cadmium</td>
<td>85</td>
</tr>
<tr>
<td>Copper</td>
<td>4,300</td>
</tr>
<tr>
<td>Lead</td>
<td>840</td>
</tr>
<tr>
<td>Mercury</td>
<td>57</td>
</tr>
<tr>
<td>Molybdenum</td>
<td>75</td>
</tr>
<tr>
<td>Nickel</td>
<td>420</td>
</tr>
<tr>
<td>Selenium</td>
<td>100</td>
</tr>
<tr>
<td>Zinc</td>
<td>7,500</td>
</tr>
</tbody>
</table>

d. Table 2 below gives the low metal concentration for biosolids. Because of its higher quality, biosolids with pollutant concentrations below those listed in Table 2 can safely be applied to agricultural land, forest, public contact sites, lawns, home gardens or be given away without further analysis. Biosolids containing metals in concentrations above the low metals concentrations but below the ceiling concentration limits may be land applied but shall not exceed the annual loading rates in Table 3 and the cumulative loading rates in Table 4. The permittee is required to track pollutant loading onto application sites for parameters that have exceeded the low metal concentration limits.

TABLE 2

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Milligrams per kilogram dry weight</th>
</tr>
</thead>
<tbody>
<tr>
<td>Arsenic</td>
<td>41</td>
</tr>
<tr>
<td>Cadmium</td>
<td>39</td>
</tr>
<tr>
<td>Copper</td>
<td>1,500</td>
</tr>
<tr>
<td>Lead</td>
<td>300</td>
</tr>
<tr>
<td>Mercury</td>
<td>17</td>
</tr>
<tr>
<td>Nickel</td>
<td>420</td>
</tr>
<tr>
<td>Selenium</td>
<td>100</td>
</tr>
<tr>
<td>Zinc</td>
<td>2,800</td>
</tr>
</tbody>
</table>

e. Annual pollutant loading rate.

TABLE 3

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Kg/ha (lbs./ac) per year</th>
</tr>
</thead>
<tbody>
<tr>
<td>Arsenic</td>
<td>2.0 (1.79)</td>
</tr>
<tr>
<td>Cadmium</td>
<td>1.9 (1.70)</td>
</tr>
<tr>
<td>Copper</td>
<td>75 (66.94)</td>
</tr>
<tr>
<td>Lead</td>
<td>15 (13.39)</td>
</tr>
<tr>
<td>Mercury</td>
<td>0.85 (0.76)</td>
</tr>
<tr>
<td>Nickel</td>
<td>21 (18.74)</td>
</tr>
<tr>
<td>Selenium</td>
<td>5.0 (4.46)</td>
</tr>
<tr>
<td>Zinc</td>
<td>140 (124.96)</td>
</tr>
</tbody>
</table>
f. Cumulative pollutant loading rates.

TABLE 4

<table>
<thead>
<tr>
<th>Pollutant</th>
<th>Kg/ha (lbs./ac)</th>
</tr>
</thead>
<tbody>
<tr>
<td>Arsenic</td>
<td>41 (37)</td>
</tr>
<tr>
<td>Cadmium</td>
<td>39 (35)</td>
</tr>
<tr>
<td>Copper</td>
<td>1500 (1339)</td>
</tr>
<tr>
<td>Lead</td>
<td>300 (268)</td>
</tr>
<tr>
<td>Mercury</td>
<td>17 (15)</td>
</tr>
<tr>
<td>Nickel</td>
<td>420 (375)</td>
</tr>
<tr>
<td>Selenium</td>
<td>100 (89)</td>
</tr>
<tr>
<td>Zinc</td>
<td>2800 (2499)</td>
</tr>
</tbody>
</table>

6. Best Management Practices. The permittee shall use the following best management practices during land application activities to prevent the discharge of biosolids to waters of the state.
   a. Biosolids shall not be applied to the land if it is likely to adversely affect a threatened or endangered species listed under § 4 of the Endangered Species Act or its designated critical habitat.
   b. Apply biosolids only at the agronomic rate of nitrogen needed (see 5.c. of this section).
   c. The applicator must document the Plant Available Nitrogen (PAN) loadings, available nitrogen in the soil, and crop
nitrogen removal when either of the following occurs: 1) When biosolids are greater than 50,000 mg/kg TN; or 2) When biosolids are land applied at an application rate greater than two dry tons per acre per year.

i. PAN can be determined as follows:

\[(\text{Nitrate} + \text{nitrite nitrogen}) + (\text{organic nitrogen} \times 0.2) + (\text{ammonia nitrogen} \times \text{volatilization factor})\]  

Volatilization factor is 0.7 for surface application and 1 for subsurface application. Alternative volatilization factors and mineralization rates can be utilized on a case-by-case basis.

ii. Crop nutrient production/removal to be based on crop specific nitrogen needs and realistic yield goals. **NOTE:** There are a number of reference documents on the Missouri Department of Natural Resources website that are informative to implement best management practices in the proper management of biosolids, including crop specific nitrogen needs, realistic yields on a county by county basis and other supporting references.

iii. Biosolids that are applied at agronomic rates shall not cause the annual pollutant loading rates identified in Table 3 to be exceeded.

d. Buffer zones are as follows:

i. 300 feet of a water supply well, sinkhole, water supply reservoir or water supply intake in a stream;

ii. 300 feet of a losing stream, no discharge stream, stream stretches designated for whole body contact recreation, wild and scenic rivers, Ozark National Scenic Riverways or outstanding state resource waters as listed in the Water Quality Standards, 10 CSR 20-7.031;

iii. 150 feet of dwellings or public use areas;

iv. 100 feet (35 feet if biosolids application is down-gradient or the buffer zone is entirely vegetated) of lake, pond, wetlands or gaining streams (perennial or intermittent);

v. 50 feet of a property line. Buffer distances from property lines may be waived with written permission from neighboring property owner.

vi. For the application of dry, cake or liquid biosolids that are subsurface injected, buffer zones identified in 5.d.i. through 5.d.iii above, may be reduced to 100 feet. The buffer zone may be reduced to 35 feet if the buffer zone is permanently vegetated. Subsurface injection does not include methods or technology reflective of combination surface/shallow soil incorporation.

e. Slope limitation for application sites are as follows:

i. For slopes less than or equal to 6 percent, no rate limitation;

ii. Applied to a slope 7 to 12 percent, the applicator may apply biosolids when soil conservation practices are used to meet the minimum erosion levels;

iii. Slopes > 12 percent, apply biosolids only when grass is vegetated and maintained with at least 80 percent ground cover at a rate of two dry tons per acre per year or less.

iv. Dry, cake or liquid biosolids that are subsurface injected, may be applied on slopes not to exceed 20 percent. Subsurface injection does not include the use of methods or technology reflective of combination surface/shallow soil incorporation.

f. No biosolids may be land applied in an area that it is reasonably certain that pollutants will be transported into waters of the state.

g. Biosolids may be land applied to sites with soil that are snow covered, frozen, or saturated with liquid when site restrictions or other controls are provided to prevent pollutants from being discharged to waters of the state during snowmelt or stormwater runoff. During inclement weather or unfavorable soil conditions use the following management practices:

i. A maximum field slope of 6% and a minimum 300 feet grass buffer between the application site and waters of the state. A 35 feet grass buffer may be utilized for the application of dry, cake or liquid biosolids that are subsurface injected. Subsurface injection does not include the use of methods or technology reflective of combination surface/shallow soil incorporation;

ii. A maximum field slope of 2% and 100 feet grass buffer between the application site and waters of the state. A 35 feet grass buffer may be used for the application of dry, cake or liquid biosolids that are subsurface injected. Subsurface injection does not include the use of methods or technology reflective of combination surface/shallow soil incorporation;

iii. Other best management practices approved by the Department.
SECTION I– CLOSURE REQUIREMENTS

1. Haulers that land apply septage must obtain a state permit. An operating permit is not required for septage haulers who transport septage to another permitted treatment facility for disposal.

2. Do not apply more than 30,000 gallons of septage per acre per year or the volume otherwise stipulated in the operating permit.

3. Septic tanks are designed to retain sludge for one to three years which will allow for a larger reduction in pathogens and vectors, as compared to mechanical treatment facilities.

4. Septage must comply with Class B biosolids regarding pathogen and vector attraction reduction requirements before it may be applied to crops, pastures or timberland. To meet required pathogen and vector reduction requirements, mix 50 pounds of hydrated lime for every 1,000 gallons of septage and maintain a septage pH of at least 12 pH standard units for 30 minutes or more prior to application.

5. Lime is to be added to the pump truck and not directly to the septic tanks, as lime would harm the beneficial bacteria of the septic tank.

6. As residential septage contains relatively low levels of metals, the testing of metals in septage is not required.

SECTION H – SEPTAGE

1. Haulers that land apply septage must obtain a state permit. An operating permit is not required for septage haulers who transport septage to another permitted treatment facility for disposal.

2. Do not apply more than 30,000 gallons of septage per acre per year or the volume otherwise stipulated in the operating permit.

3. Septic tanks are designed to retain sludge for one to three years which will allow for a larger reduction in pathogens and vectors, as compared to mechanical treatment facilities.

4. Septage must comply with Class B biosolids regarding pathogen and vector attraction reduction requirements before it may be applied to crops, pastures or timberland. To meet required pathogen and vector reduction requirements, mix 50 pounds of hydrated lime for every 1,000 gallons of septage and maintain a septage pH of at least 12 pH standard units for 30 minutes or more prior to application.

5. Lime is to be added to the pump truck and not directly to the septic tanks, as lime would harm the beneficial bacteria of the septic tank.

6. As residential septage contains relatively low levels of metals, the testing of metals in septage is not required.
SECTION J – MONITORING FREQUENCY

1. At a minimum, biosolids or sludge shall be tested for volume and percent total solids on a frequency that will accurately represent sludge quantities produced and disposed. Please see the table below.

<table>
<thead>
<tr>
<th>Table 5</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Biosolids or Sludge produced and disposed (Dry Tons per Year)</strong></td>
</tr>
<tr>
<td>Metals, Pathogens and Vectors, Total Phosphorus, Total Potassium</td>
</tr>
<tr>
<td>319 or less</td>
</tr>
<tr>
<td>320 to 1650</td>
</tr>
<tr>
<td>1651 to 1650</td>
</tr>
<tr>
<td>16,501+</td>
</tr>
</tbody>
</table>

<sup>1</sup>Calculate plant available nitrogen (PAN) when either of the following occurs: 1) when biosolids are greater than 50,000 mg/kg TN; or 2) when biosolids are land applied at an application rate greater than two dry tons per acre per year.

<sup>2</sup>Priority pollutants (40 CFR 122.21, Appendix D, Tables II and III) are required only for permit holders that must have a pre-treatment program. Monitoring requirements may be modified and incorporated into the operating permit by the Department on a case-by-case basis.

Note 1: Total solids: A grab sample of sludge shall be tested one per day during land application periods for percent total solids. This data shall be used to calculate the dry tons of sludge applied per acre.

Note 2: Table 5 is not applicable for incineration and permit holders that landfill their sludge.

2. Permittees that operate wastewater treatment lagoons, peak flow equalization basins, combined sewer over flow basins or biosolids or sludge lagoons that are cleaned out once a year or less, may choose to sample only when the biosolids or sludge is removed or the lagoon is closed. Test one composite sample for each 319 dry tons of biosolids or sludge removed from the lagoon during the reporting year or during lagoon closure. Composite sample must represent various areas at one-foot depth.

3. Additional testing may be required in the special conditions or other sections of the permit.

4. Biosolids and sludge monitoring shall be conducted in accordance with federal regulation 40 CFR § 503.8, Sampling and analysis.

SECTION K – RECORD KEEPING AND REPORTING REQUIREMENTS

1. The permittee shall maintain records on file at the facility for at least five years for the items listed in Standard Conditions PART III and any additional items in the Special Conditions section of this permit. This shall include dates when the biosolids or sludge facility is checked for proper operation, records of maintenance and repairs and other relevant information.

2. Reporting period
   a. By February 19<sup>th</sup> of each year, applicable facilities shall submit an annual report for the previous calendar year period for all mechanical wastewater treatment facilities, sludge lagoons, and biosolids or sludge disposal facilities.
   b. Permittees with wastewater treatment lagoons shall submit the above annual report only when biosolids or sludge are removed from the lagoon during the report period or when the lagoon is closed.

3. Report Form. The annual report shall be prepared on report forms provided by the Department or equivalent forms approved by the Department.

4. Reports shall be submitted as follows:
   Major facilities, which are those serving 10,000 persons or more or with a design flow equal to or greater than 1 million gallons per day or that are required to have an approved pretreatment program, shall report to both the Department and EPA if the facility land applied, disposed of biosolids by surface disposal, or operated a sewage sludge incinerator. All other facilities shall maintain their biosolids or sludge records and keep them available to Department personnel upon request. State reports shall be submitted to the address listed as follows:
   DNR regional or other applicable office listed in the permit (see cover letter of permit)
   ATTN: Sludge Coordinator
Annual report contents. The annual report shall include the following:

a. Biosolids and sludge testing performed. If testing was conducted at a greater frequency than what is required by the permit, all test results must be included in the report.

b. Biosolids or sludge quantity shall be reported as dry tons for the quantity produced and/or disposed.

c. Gallons and % solids data used to calculate the dry ton amounts.

d. Description of any unusual operating conditions.

e. Final disposal method, dates, and location, and person responsible for hauling and disposal.
   i. This must include the name and address for the hauler and sludge facility. If hauled to a municipal wastewater treatment facility, sanitary landfill, or other approved treatment facility, give the name of that facility.
   ii. Include a description of the type of hauling equipment used and the capacity in tons, gallons, or cubic feet.

f. Contract Hauler Activities:
   If using a contract hauler, provide a copy of a signed contract from the contractor. Permittee shall require the contractor to supply information required under this permit for which the contractor is responsible. The permittee shall submit a signed statement from the contractor that he has complied with the standards contained in this permit, unless the contract hauler has a separate biosolids or sludge use permit.

g. Land Application Sites:
   i. Report the location of each application site, the annual and cumulative dry tons/acre for each site, and the landowners name and address. The location for each spreading site shall be given as a legal description for nearest ¼, ¼, Section, Township, Range, and county, or UTM coordinates. The facility shall report PAN when either of the following occurs: 1) When biosolids are greater than 50,000 mg/kg TN; or 2) when biosolids are land applied at an application rate greater than two dry tons per acre per year.
   ii. If the “Low Metals” criteria are exceeded, report the annual and cumulative pollutant loading rates in pounds per acre for each applicable pollutant, and report the percent of cumulative pollutant loading which has been reached at each site.
   iii. Report the method used for compliance with pathogen and vector attraction requirements.
   iv. Report soil test results for pH and phosphorus. If no soil was tested during the year, report the last date when tested and the results.
MISSOURI DEPARTMENT OF NATURAL RESOURCES  
WATER PROTECTION PROGRAM  
FORM B: APPLICATION FOR OPERATING PERMIT FOR FACILITIES THAT RECEIVE PRIMARILY DOMESTIC WASTE AND HAVE A DESIGN FLOW LESS THAN OR EQUAL TO 100,000 GALLONS PER DAY

READ THE ACCOMPANYING INSTRUCTIONS BEFORE COMPLETING THIS FORM

1. THIS APPLICATION IS FOR:
   - An operating permit for a new or unpermitted facility: Construction Permit #
   - A new site-specific operating permit formerly general permit MOG
   - A site-specific operating permit renewal: Permit #MO-
   - A site-specific operating permit modification: Permit #MO-
   - General permit (MOG — Non POTWs discharging < 50,000 GPD or MOG823 — Land Application of Domestic Wastewater): Permit #MO-

1.1 Is the appropriate fee included with the application (see instructions for appropriate fee)?  
   - YES  
   - NO

2. FACILITY
   - NAME: Ewing Wastewater Treatment Facility
   - ADDRESS (PHYSICAL): Terminus of Lakeview Drive
   - CITY: Ewing
   - STATE: MO  
   - ZIP CODE: 63440
   - TELEPHONE NUMBER WITH AREA CODE: (660) 494-3447

2.1 Legal description:  
2.2 UTM Coordinates Easting (E): 609849  
    Northing (N): 4430851
    For Universal Transverse Mercator (UTM), Zone 15 North referenced to North American Datum 1983 (NAD83)

2.3 Name of receiving stream: Tributary to Middle Fabius River

2.4 Number of outfalls: 1  
   - Wastewater outfalls: 1  
   - Stormwater outfalls:  
   - Instream monitoring sites: 0

3. OWNER
   - NAME: City of Ewing
   - ADDRESS: 102 S. Gilead
   - CITY: Ewing
   - STATE: MO  
   - ZIP CODE: 63440
   - EMAIL ADDRESS: ewingcty@marktwain.net
   - TELEPHONE NUMBER WITH AREA CODE: (660) 494-3447

3.1 Request review of draft permit prior to public notice?  
   - YES  
   - NO

3.2 Are you a publicly owned treatment works?  
   - YES  
   - NO
   - If yes, is the Financial Questionnaire attached?  
   - YES  
   - NO

3.3 Are you a privately owned treatment works?  
   - YES  
   - NO

3.4 Are you a privately owned treatment facility regulated by the Public Service Commission?  
   - YES  
   - NO

4. CONTINUING AUTHORITY: Permanent organization that will serve as the continuing authority for the operation, maintenance and modernization of the facility
   - NAME: City of Ewing
   - ADDRESS: 102 S. Gilead
   - CITY: Ewing
   - STATE: MO  
   - ZIP CODE: 63440
   - EMAIL ADDRESS: ewingcty@marktwain.net
   - TELEPHONE NUMBER WITH AREA CODE: (660) 494-3447

If the continuing authority is different than the owner, include a copy of the contract agreement between the two parties and a description of the responsibilities of both parties within the agreement.

5. OPERATOR
   - NAME: Doug Lewis
   - TITLE: Operator
   - ADDRESS: 102 S. Gilead
   - CITY: Ewing
   - STATE: MO  
   - ZIP CODE: 63440
   - EMAIL ADDRESS: ewingcty@marktwain.net
   - TELEPHONE NUMBER WITH AREA CODE: (673) 494-3447

6. FACILITY CONTACT
   - NAME: Dean Waggy
   - TITLE: Mayor
   - ADDRESS: 102 S. Gilead
   - CITY: Ewing
   - STATE: MO  
   - ZIP CODE: 63440
   - EMAIL ADDRESS: ewingcty@marktwain.net
   - TELEPHONE NUMBER WITH AREA CODE: (673) 494-3447
7. DESCRIPTION OF FACILITY

7.1 Process Flow Diagram or Schematic: Provide a diagram showing the processes of the treatment plant. Show all of the treatment units, including disinfection (e.g. – chlorination and dechlorination), influents, and outfalls. Specify where samples are taken. Indicate any treatment process changes in the routing of wastewater during dry weather and peak wet weather. Include a brief narrative description of the diagram. Attach sheets as necessary.

7.2 Attach an aerial photograph or USGS topographic map showing the location of the facility and outfall.
8. ADDITIONAL FACILITY INFORMATION

8.1 Facility SIC code: 4962  Discharge SIC code: 4962

8.2 Number of people presently connected or population equivalent (P.E.) 456  Design P.E. 600

8.3 Connections to the facility:
Number of units presently connected:
Homes 133  Trailers 71  Apartments  ____  Other (including industrial)  ____
Number of commercial establishments: 6  ____

8.4 Design flow: 60000  Actual flow: 58000

8.5 Will discharge be continuous through the year?  □ Yes  □ No
Discharge will occur during the following months: 0
How many days of the week will discharge occur? 0

8.6 Is industrial wastewater discharged to the facility?  □ Yes  □ No
If yes, attach a list of the industries that discharge to your facility

8.7 Does the facility accept or process leachate from landfills?  □ Yes  □ No

8.8 Is wastewater land applied?  □ Yes  □ No
If yes, is Form I attached?  □ Yes  □ No

8.9 Does the facility discharge to a losing stream or sinkhole?  □ Yes  □ No

8.10 Has a wasteload allocation study been completed for this facility?  □ Yes  □ No

9. LABORATORY CONTROL INFORMATION

LABORATORY WORK CONDUCTED BY PLANT PERSONNEL

Lab work conducted outside of plant.  □ Yes  □ No
Push-button or visual methods for simple tests such as pH, settleable solids.  □ Yes  □ No
Additional procedures such as dissolved oxygen, chemical oxygen demand, biological oxygen demand, filtrations, solids, volatile content.  □ Yes  □ No
More advanced determinations such as BOD seeding procedures, fecal coliform, nutrients, total oils, phenols, etc.  □ Yes  □ No
Highly sophisticated instrumentation, such as atomic absorption and gas chromatograph.  □ Yes  □ No

10. COLLECTION SYSTEM

10.1 Length of pipe in the sewer collection system?  ___ Feet, or 6 ___ Miles (either unit is appropriate)

10.2 Does significant infiltration occur in the collection system?  □ Yes  □ No
   If yes, briefly explain any steps underway or planned to minimize inflow and infiltration:

11. BYPASSING

Does any bypassing occur in the collection system or at the treatment facility?  □ Yes  □ No
If yes, explain:
12. SLUDGE HANDLING, USE AND DISPOSAL

12.1 Is the sludge a hazardous waste as defined by 10 CSR 257? ☑ Yes ☐ No

12.2 Sludge production, including sludge received from others: 9 ______ Design dry tons/year 8.7 ______ Actual dry tons/year

12.3 Capacity of sludge holding structures:
- Sludge storage provided: ______ cubic feet; ______ days of storage; ______ average percent solids of sludge;
- ☐ No sludge storage is provided. ☑ Sludge is stored in lagoon.

12.4 Type of Storage: ☑ Holding tank ☐ Building ☐ Basin ☑ Lagoon ☐ Concrete Pad ☐ Other (Describe) ______

12.5 Sludge Treatment:
- ☐ Anaerobic Digestor
- ☐ Storage Tank
- ☑ Lagoon
- ☐ Aerobic Digestor
- ☐ Composting
- ☐ Air or Heat Drying
- ☐ Other (Attach description) ______

12.6 Sludge Use or Disposal:
- ☐ Land Application
- ☐ Surface Disposal (Sludge Disposal Lagoon, Sludge held for more than two years)
- ☑ Contract Hauler
- ☐ Hauled to Another treatment facility
- ☑ Inclination
- ☑ Sludge Retained in Wastewater treatment lagoon
- ☐ Solid waste landfill

12.7 Person responsible for hauling sludge to disposal facility:
- ☐ By applicant
- ☑ By others (complete below)

NAME: ________________________________ EMAIL ADDRESS: ________________________________

ADDRESS: _____________________________ CITY: _____________________________ STATE: __________ ZIP CODE: __________

CONTACT PERSON: ___________________________ TELEPHONE NUMBER WITH AREA CODE: __________ PERMIT NO.: __________

12.8 Sludge use or disposal facility
- ☐ By applicant
- ☑ By others (Complete below)

NAME: ________________________________ EMAIL ADDRESS: ________________________________

ADDRESS: _____________________________ CITY: _____________________________ STATE: __________ ZIP CODE: __________

CONTACT PERSON: ___________________________ TELEPHONE NUMBER WITH AREA CODE: __________ PERMIT NO.: __________

12.9 Does the sludge or biosolids disposal comply with federal sludge regulations under 40 CFR 503?
- ☑ Yes
- ☐ No (Explain)

13. ELECTRONIC DISCHARGE MONITORING REPORT (eDMR) SUBMISSION SYSTEM
Per 40 CFR Part 127 National Pollutant Discharge Elimination System (NPDES) Electronic Reporting Rule, reporting of effluent limits and monitoring shall be submitted by the permittee via an electronic system to ensure timely, complete, accurate, and nationally consistent set of data. One of the following must be checked in order for this application to be considered complete. Please visit http://dnr.mo.gov/env/wpp/edmr.htm to access the Facility Participation Package.

☐ - You have completed and submitted with this permit application the required documentation to participate in the eDMR system.
☐ - You have previously submitted the required documentation to participate in the eDMR system and/or you are currently using the eDMR system.
☐ - You have submitted a written request for a waiver from electronic reporting. See instructions for further information regarding waivers.

14. CERTIFICATION
I certify that I am familiar with the information contained in the application, that to the best of my knowledge and belief such information is true, complete and accurate, and if granted this permit, I agree to abide by the Missouri Clean Water Law and all rules, regulations, orders and decisions, subject to any legitimate appeal available to applicant under the Missouri Clean Water Law.

NAME: ________________________________ OFFICIAL TITLE: _____________________________ TELEPHONE NUMBER WITH AREA CODE: (______) ____-_______

Dean Wagy Mayor (573) 494-3497

SIGNATURE: ___________________________ DATE SIGNED: 9-11-17
## Water Protection Program

### Form I - Permit Application for Operation of Wastewater Irrigation Systems

**INSTRUCTIONS:** The following forms must be submitted with Form I: FORM B or B2 for domestic wastewater, and FORM A for industrial wastewater.

### 1. Facility Information

1. **Facility Name:** Ewing Wastewater Treatment Facility
2. **Permit Number:** MO-010467

#### 1.3 Type of wastewater to be irrigated:
- [ ] Domestic
- [ ] Municipal
- [ ] State/National Park
- [ ] Seasonal business
- [ ] Municipal with Pretreatment Program or Significant Industrial Users
- [ ] Other (explain) __________

**SIC Codes (list all that apply, in order of importance):** 4962

#### 1.4 Months when the business or enterprise will operate or generate wastewater:
- [ ] 12 months per year
- [ ] Part of year (list Months): __________

#### 1.5 This system is designed for:
- [ ] No-discharge
- [ ] Partial Irrigation when feasible and discharge rest of time.
- [ ] Irrigation during recreation season (April – October) and discharge during November – March.
- [ ] Other (explain) __________

#### 1.6 List the Facility outfalls which will be applicable to the irrigation system.

**Outfall Numbers:** 001

### 2. Storage Basins

1. **Number of storage basins:** 4
2. **Type of basin:**
   - [ ] Steel
   - [ ] Concrete
   - [ ] Fiberglass
   - [ ] Earthen
   - [ ] Earthen with membrane liner

### 3. Land Application System

#### 3.1 Number of irrigation sites 1 __________

| Location: | __________ | __________ | SE | __________ | Sec | T | R | __________ | __________ | County | __________ | Acres |
|-----------|------------|------------|----|------------|-----|---|---|------------|------------|--------|------------|
| Location: | __________ | __________ | __________ | __________ | Sec | T | R | __________ | __________ | County | __________ | Acres |

**Attach pages as needed.**

#### 3.2 Attach a site map showing topography, storage basins, irrigation sites, property boundary, streams, wells, roads, dwellings, and other pertinent features.

#### 3.3 Type of vegetation:
- [ ] Grass hay
- [ ] Pasture
- [ ] Timber
- [ ] Row crops
- [ ] Other (describe) __________

#### 3.4 Wastewater flow (dry weather) gallons/day:
- Average annual: 58000
- Seasonal __________
- Off-season __________

**Months of seasonal flow:** __________
3. LAND APPLICATION SYSTEM (continued)

3.5 Land Application rate per acre (design flow including 1 in 10 year stormwater flows):

- Design: 40 inches/year 0.5 inches/hour 1 inches/day 3 inches/week
- Actual: 38.7 inches/year 0.5 inches/hour 1 inches/day 3 inches/week

Total Irrigation per year (gallons): 21.9 MG Design 21.17 MG Actual

Actual months used for Irrigation (check all that apply):
☐ Jan ☐ Feb ☑ Mar ☑ Apr ☑ May ☑ Jun ☑ Jul ☑ Aug ☑ Sep ☑ Oct ☑ Nov ☐ Dec

3.6 Land Application Rate is based on:
☐ Nutrient Management Plan (N&P)
☑ Hydraulic Loading
☐ Other (describe)

3.7 Equipment type: ☑ Sprinklers ☐ Gated pipe ☐ Center pivot ☐ Traveling gun ☐ Other (describe)

Equipment Flow Capacity: 21,600 Gallons per hour 1014 Total hours of operation per year

3.8 Public Use Areas. Public access shall not be allowed to public use area irrigation sites when application is occurring. Method of Public Access Restriction:
☑ Site is Fenced ☐ Wastewater disinfection prior to Irrigation ☑ Site is not for public use
☐ Other (describe)

3.9 Separation distance (in feet) from the outside edge of the wetted irrigation area to nearby down gradient features:
300. Permanent flowing stream N/A Losing Stream N/A Intermittent (wet weather) stream ___ Lake or pond
50. Property boundary 150. Dwellings N/A Water supply well ___ Other (describe)

3.10 The facility must develop and retain an Operation and Maintenance (O&M) Plan for the irrigation system.

Date of O&M Plan: 04/01/2017

4. CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information including the possibility of fine or imprisonment.

OWNER OR AUTHORIZED REPRESENTATIVE
Dean Wagy

EMAIL ADDRESS
cwiningty@marktwain.net

SIGNATURE
Dean Wagy

DATE SIGNED 9-11-17

760-666 (06/14)