

**STATE OF MISSOURI**  
**DEPARTMENT OF NATURAL RESOURCES**  
**MISSOURI CLEAN WATER COMMISSION**



**CONSTRUCTION PERMIT**

The Missouri Department of Natural Resources hereby issues a permit to:

PCRSD, Red Rock WWTP  
Red Rock Subdivision  
Platte City, MO 64079

for the construction of (described facilities):

See attached.

Permit Conditions:

See attached.

Construction of such proposed facilities shall be in accordance with the provisions of the Missouri Clean Water Law, Chapter 644, RSMo, and regulation promulgated thereunder, or this permit may be revoked by the Department of Natural Resources (Department).

As the Department does not examine structural features of design or the efficiency of mechanical equipment, the issuance of this permit does not include approval of these features.


A representative of the Department may inspect the work covered by this permit during construction. Issuance of a permit to operate by the Department will be contingent on the work substantially adhering to the approved plans and specifications.

This permit applies only to the construction of water pollution control components; it does not apply to other environmentally regulated areas.

December 17, 2018  
Effective Date

December 16, 2020  
Expiration Date

  
Edward B. Galbraith, Director, Division of Environmental Quality

  
Chris Wieberg, Director, Water Protection Program

## CONSTRUCTION PERMIT

### I. CONSTRUCTION DESCRIPTION

This is a **DEMONSTRATION** project and additional monitoring requirements are included in the operating permit in accordance with the Approval Process for Innovative Technology Factsheet. The facility is constructing an additional Advantex AX100 pod to go along with the existing 5 Advantex AX1000 pods, along with two moving bed bioreactors, settling basin, and an ultraviolet disinfection system. The design average flow remains 15,000 gallons per day.

This project will also include general site work appropriate to the scope and purpose of the project and all necessary appurtenances to make a complete and usable wastewater treatment facility.

### II. 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 the draft permit **ADDENDUM APPENDIX B – COST ANALYSIS FOR COMPLIANCE**.

### **III. CONSTRUCTION PERMIT CONDITIONS**

The permittee is authorized to construct subject to the following conditions:

1. This construction permit does not authorize discharge.
2. All construction shall be in accordance with the plans and specifications submitted by North Hills Engineering on June 7, 2018.
3. The Department must be contacted in writing prior to making any changes to the approved plans and specifications that would directly or indirectly have an impact on the capacity, flow, system layout, or reliability of the proposed wastewater treatment facilities or any design parameter that is addressed by 10 CSR 20-8, in accordance with 10 CSR 20-8.110(8).
4. State and federal law does not permit bypassing of raw wastewater, therefore steps must be taken to ensure that raw wastewater does not discharge during construction. If a sanitary sewer overflow or bypass occurs, report the appropriate information to the Department's Kansas City Regional Office per 10 CSR 20-7.015(9)(E)2.
5. The wastewater treatment facility shall be located at least fifty feet (50') from any dwelling or establishment.
6. The wastewater treatment facility shall be located above the twenty-five (25)-year flood level.
7. Wastewater treatment facility shall not be located within one hundred feet (100'), and preferably three hundred feet (300') of any water well or water supply structure.
8. In addition to the requirements for a construction permit, 10 CSR 20-6.200 requires land disturbance activities of 1 acre or more to obtain a Missouri state operating permit to discharge stormwater. The permit requires best management practices sufficient to control runoff and sedimentation to protect waters of the state. Land disturbance permits will only be obtained by means of the Department's ePermitting system available online at [dnr.mo.gov/env/wpp/epermit/help.htm](http://dnr.mo.gov/env/wpp/epermit/help.htm). See [dnr.mo.gov/env/wpp/stormwater/sw-land-disturb-permits.htm](http://dnr.mo.gov/env/wpp/stormwater/sw-land-disturb-permits.htm) for more information.
9. A United States (U.S.) Army Corps of Engineers (COE) permit (404) and a Water Quality Certification (401) issued by the Department or permit waiver may be required for the activities described in this permit. This permit is not valid until these requirements are satisfied. If construction activity will disturb any land below the ordinary high water mark of jurisdictional waters of the U.S. then a 404/401 will be required. Since the COE makes determinations on what is jurisdictional, you must contact the COE to determine permitting requirements. You may call the Department's Water Protection Program at 573-751-1300 for more information. See [dnr.mo.gov/env/wpp/401/](http://dnr.mo.gov/env/wpp/401/) for more information.

10. Upon completion of construction:

- A. Platte County Regional Sewer District will become the continuing authority for operation, maintenance, and modernization of these facilities;
- B. Submit an electronic copy of the as built of the project was not constructed in accordance with previously submitted plans and specifications; and
- C. Submit the enclosed form Statement of Work Completed to the Department in accordance with 10 CSR 20-6.010(5)(D) and request the operating permit modification be issued.

**IV. REVIEW SUMMARY**

**1. CONSTRUCTION PURPOSE**

The proposed construction is to meet final effluent limits for ammonia and *E. Coli* established in the May 1, 2015 permit renewal and revised December 1, 2017 with the time of travel study for ammonia.

**2. FACILITY DESCRIPTION**

The Red Rock WWTF is located in Red Rock Subdivision, Platte City, in Platte County, Missouri. The existing treatment plant is a STEP system with a recirculating media filter with sludge disposal completed by a contract hauler. The existing sludge storage provides approximately 348 days of storage at 3.0% solids. In 2017 the operating permit was modified to include a time of travel study for the ammonia limits, which modified the effective limits that the facility had to meet as part of the schedule of compliance.

In the table below is a summary of the last 5 years of discharge monitoring reports. Construction will add an additional filter bed, two MBBR units for ammonia treatment, and UV disinfection system. The facility discharges to Tributary to Clear Branch (8-20-13 MUDD V1.0 (C) (3960)). The facility has a design average flow of 15,000 gpd and serves a hydraulic population equivalent of approximately 150 people.

Parameter	Unit	Monthly Average Limit	Average from DMRs 2013-2018
Flow	MGD	*	0.009089
BOD5	mg/L	30	11.50
TSS	mg/L	30	9.78
Ammonia-summer	mg/L	*	13.8
Ammonia-winter	mg/L	*	11.12
pH	SU	6.5-9.0	7.13

\*monitoring only

### **3. COMPLIANCE PARAMETERS**

The final effluent limits the project is required to meet are established in the operating permit renewal issued on May 1, 2015 and modified December 1, 2017. The schedule of compliance expires on April 30, 2020 for final ammonia and *E. Coli* effluent limits. The table below is a summary of the monthly average effluent limits that become effective when construction is complete.

Parameter	Units	Monthly Average Effluent Limit
Flow	MGD	*
BOD	mg/L	30
TSS	mg/L	30
Ammonia-summer	mg/L	4.2
Ammonia-winter	mg/L	4.9
E. Coli	#/100mL	206
pH	SU	6.5-9.0

\*monitoring only

### **4. REVIEW of MAJOR TREATMENT DESIGN CRITERIA**

The current design guides, 10 CSR 20-8, do not contain design parameters for the innovative MBBR technology for ammonia removal. As a **DEMONSTRATION** project, the data gathered with the operating permit will be used to help develop design criteria for future projects.

#### **Existing major components which will remain in use include the following:**

- The facility has an existing STEP system with a septic tank at each residence. Settled solids in the septic tank shall be removed by a contract hauler.
- The existing recirculation tank is 15,000 gallons per day.
- The existing recirculating media filter system is five Advantex AX100 pods, each with 100 square feet of media, with flow is broadcast across the top of each filter pod using rotary distributor heads. The design recirculation ratio is 4:1.

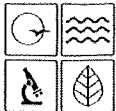
#### **Construction will cover the following items:**

- Recirculating Media filter-A sixth Advantex AX100 pod will be installed with 100 square feet of media, with flow broadcast across the top of each filter pod using rotary distributor heads.
  - From the sixth pod, it will flow to the existing 15,000 gpd recirculation tank where there is a design recirculation ratio is 4:1.
  - The drain rate from the filters to the recirculation tank is 50 gpm at peak hourly flow.

- Alkalinity chemical feed system with a 50-gallon tank with a metering pump with a turndown ratio of 100:1 to feed the existing RMF recirculation tank.
  - Two dosing pumps will be installed that have the capabilities to dose at 150 gallons per minute.
  - From the recirculation tank, flows are either recycled back or flow on to the new MBBR system.
- Moving Bed Biofilm Reactor (MBBR) – Installation of two MBBR tanks capable of treating a design average flow of 15,000 gpd and a peak flow of 43,200 gpd.
  - The MBBR is approximately 6 ft diameter and 10 ft deep with a sidewater depth of 7 ft for a volume of approximately 1480 gallons.
  - The hydraulic retention time at design flow is 2 hours.
  - The fill material will be Bio-pack “Kontakt 500” or approved equivalent with a total surface area of 152 ft<sup>2</sup> per cubic ft.
  - Aeration by means of two positive displacement type blowers each capable of supplying 24 scfm with 1.5 HP motors to the coarse bubble aeration diffusers.
  - Two submersible pumps with the capacity of 40 gpm at 26 ft of head.
- The effluent from the MBBR will flow by gravity to the disinfection system.
- Disinfection – Disinfection is the process of removal, deactivation, or killing or pathogenic microorganisms. An open channel, gravity flow, low pressure high intensity UV disinfection system capable of treating a peak flow of 57,600 gpd while delivering a minimum UV intensity of 30 mJ/cm<sup>2</sup> with an expected ultraviolet transmissivity of 50% or greater.
  - The single open channel UV system consists of one bank with 4 modules and 2 lamps per module, for a total of 8 UV lamps.
  - The disinfected effluent will flow by gravity through flow measurement equipment and to Outfall No. 001.
- Flow meter- A magnetic flowmeter will be installed between the UV disinfection system and the effluent discharge.
- Emergency Power – The project will install a new standby generator to provide operational power to the treatment facility in event of power failure.

## **5. OPERATING PERMIT**

Operating permit MO-0122432 will require a modification to reflect the construction activities. The modified Red Rock WWTF, MO-0122432, was successfully public noticed from October 5, 2018 to November 5, 2018 with no comments received. Submit the Statement of Work Completed to the Department in accordance with 10 CSR 20-6.010(5)(D) and request the operating permit modification be issued.



MISSOURI DEPARTMENT OF NATURAL RESOURCES  
WATER PROTECTION PROGRAM

**APPLICATION FOR CONSTRUCTION PERMIT –  
WASTEWATER FACILITY**

RECEIVED

JUN 07 2018

Water Protection Program

<b>FOR DEPARTMENT USE ONLY</b>	
APP NO.	CP NO.
FEE RECEIVED \$1000.00	CHECK NO. 21701
DATE RECEIVED 6-7-18	

**APPLICATION OVERVIEW**

The Application for Construction Permit – Wastewater Facility form is for construction pertaining to domestic wastewater treatment facilities, agrichemical facilities, and components thereof. This form has been developed in a modular format and consists of Part A and B. **All applicants must complete Part A.** Part B should be completed for applicants who currently land-apply wastewater or propose land application for wastewater treatment. **Please read the accompanying instructions before completing this form.** Submittal of an incomplete application may result in the application being returned.

**PART A – BASIC INFORMATION**

**1.0 APPLICATION INFORMATION** (Note – If any of the questions in this section are answered NO, this application may be considered incomplete and returned.)

- 1.1 Is this a Federal/State funded project? ☐ YES ☒ N/A Funding Agency: \_\_\_\_\_ Project #: \_\_\_\_\_
- 1.2 Is this an application for an agrichemical? ☐ YES (See instructions.) ☒ N/A
- 1.3 Has the Missouri Department of Natural Resources approved the proposed project's antidegradation review?  
☐ YES Date of Approval: n/a - not expanding flows.
- 1.4 Has the department approved the proposed project's facility plan\*?  
☒ YES Date of Approval: 04/26/2018 ☐ NO ☐ N/A (If Not Applicable, complete No. 1.5.)
- 1.5 [Complete only if answered Not Applicable on No. 1.4] Is a copy of the engineering report\* for wastewater treatment facilities with a design flow less than 22,500 gpd included with this application?  
☐ YES ☒ NO
- 1.6 Is a copy of the appropriate plans\* and specifications\* included with this application?  
☒ YES Denote which form is submitted: ☒ Hard copy ☐ Electronic copy (See instructions.) ☐ NO
- 1.7 Is a summary of design\* included with this application? ☒ YES ☐ NO
- 1.8 Is a general operating permit applicable?  
☐ YES Submit the appropriate operating permit application to the Regional Office at least 60 days prior to operation.  
☒ NO Enclose the appropriate operating permit application and fee submittal. Denote which form: ☒ B ☐ B2
- 1.9 Is the facility currently under enforcement with the department or the Environmental Protection Agency? ☐ YES ☒ NO
- 1.10 Is the appropriate fee included with this application? ☒ YES ☐ NO (See instructions for appropriate fee.)
- \* Must be affixed with a Missouri registered professional engineer's seal, signature and date.

**2.0 PROJECT INFORMATION**

**2.1 NAME OF PROJECT**

Platte Co. Regional Sewer District - Small WWTF Upgrade - 2018

**2.2 PROJECT DESCRIPTION**

Upgrade the Existing Red Rock WWTF. Add one RMF pod (to make 6 total), replace four dosing pumps, add back-up generator set for emergency power, add UV Disinfection and effluent flow-meter, add MBBR (moving bed biofilm reactor) located after (downstream) of the RMF system, to accomplish further treatment of ammonia. MBBR is being proposed as "demonstration technology".

**2.3 SLUDGE HANDLING, USE AND DISPOSAL DESCRIPTION**

No change to existing facility. Sludge is hauled in liquid form by a contract hauler, and disposed of at a large regional WWTF.

**2.4 DESIGN INFORMATION**


- A. Current population: 104; Design population: 150
- B. Actual Flow: 8,100 gpd; Design Average Flow: 15,000 gpd;  
Actual Peak Daily Flow: 15,000 gpd; Design Maximum Daily Flow: 15,000 gpd;  
Design Wet Weather Event: n/a - S.T.E.P.

**2.5 ADDITIONAL INFORMATION**

- A. Is a topographic map attached? ☒ YES ☐ NO
- B. Is a process flow diagram attached? ☒ YES ☐ NO

**2.6 ESTIMATED PROJECT CONSTRUCTION COST**

\$ 330,000.00

<b>3.0 WASTEWATER TREATMENT FACILITY</b>				
NAME PCRSd, Red Rock Wastewater Treatment Facility		TELEPHONE NUMBER WITH AREA CODE (816) 858-2052		EMAIL ADDRESS dkoch@pcrsd.com
ADDRESS (PHYSICAL) Red Rock Subdivision	CITY Platte City	STATE MO	ZIP CODE 64079	COUNTY Platte
Wastewater Treatment Facility: Mo- 0122432 (Outfall        Of        )				
3.1 Legal Description:        ¼, NE        ¼, SE        ¼, Sec. 33        , T 53N        , R 34W (Use additional pages if construction of more than one outfall is proposed.)				
3.2 UTM Coordinates Easting (X): 352273        Northing (Y): 4358295 For Universal Transverse Mercator (UTM), Zone 15 North referenced to North American Datum 1983 (NAD83)				
3.3 Name of receiving streams: Tributary to Clear Branch, 8-20-13 MUDD V1.0 (C) (3960)				
<b>4.0 PROJECT OWNER</b>				
NAME Platte County Regional Sewer District		TELEPHONE NUMBER WITH AREA CODE (816) 858-2052		EMAIL ADDRESS dkoch@pcrsd.com
ADDRESS 11724 NW Plaza Circle, Suite 800	CITY Kansas City	STATE MO	ZIP CODE 64153	
<b>5.0 CONTINUING AUTHORITY:</b> Permanent organization that will serve as the continuing authority for the operation, maintenance and modernization of the wastewater collection system.				
NAME Platte County Regional Sewer District		TELEPHONE NUMBER WITH AREA CODE (816) 858-2052		EMAIL ADDRESS dkoch@pcrsd.com
ADDRESS 11724 NW Plaza Circle, Suite 800	CITY Kansas City	STATE MO	ZIP CODE 64153	
5.1 A letter from the continuing authority, if different than the owner, is included with this application. <input type="checkbox"/> YES <input type="checkbox"/> NO <input checked="" type="checkbox"/> N/A				
5.2 COMPLETE THE FOLLOWING IF THE CONTINUING AUTHORITY IS A MISSOURI PUBLIC SERVICE COMMISSION REGULATED ENTITY.				
A. Is a copy of the certificate of convenience and necessity included with this application? <input type="checkbox"/> YES <input type="checkbox"/> NO				
5.3 COMPLETE THE FOLLOWING IF THE CONTINUING AUTHORITY IS A PROPERTY OWNERS ASSOCIATION.				
A. Is a copy of the as-filed restrictions and covenants included with this application? <input type="checkbox"/> YES <input type="checkbox"/> NO				
B. Is a copy of the as-filed warranty deed, quitclaim deed or other legal instrument which transfers ownership of the land for the wastewater treatment facility to the association included with this application? <input type="checkbox"/> YES <input type="checkbox"/> NO				
C. Is a copy of the as-filed legal instrument (typically the plat) that provides the association with valid easements for all sewers included with this application? <input type="checkbox"/> YES <input type="checkbox"/> NO				
D. Is a copy of the Missouri Secretary of State's nonprofit corporation certificate included with this application? <input type="checkbox"/> YES <input type="checkbox"/> NO				
<b>6.0 ENGINEER</b>				
ENGINEER NAME / COMPANY NAME Jay E. Norco, P.E. / North Hills Engineering, Inc.		TELEPHONE NUMBER WITH AREA CODE (816) 935-2777		EMAIL ADDRESS northhillseng@gmail.com
ADDRESS 1825 Sunrise Dr.	CITY Smithville	STATE MO	ZIP CODE 64089	
<b>7.0 PROJECT OWNER:</b> I hereby certify that I am familiar with the information contained in this application and 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 Missouri Clean Water Law. I also understand the issuance of the construction permit does not guarantee the proposed wastewater treatment will meet the required effluent limitations of the issued Missouri State Operating Permit for this facility.				
PROJECT OWNER SIGNATURE 				
PRINTED NAME Dan Koch			DATE 5/30/18	
TITLE OR CORPORATE POSITION Executive Director		TELEPHONE NUMBER WITH AREA CODE (816) 858-2052		EMAIL ADDRESS dkoch@pcrsd.com
Mail completed copy to:        MISSOURI DEPARTMENT OF NATURAL RESOURCES WATER PROTECTION PROGRAM P.O. BOX 176 JEFFERSON CITY, MO 65102-0176				
<b>END OF PART A.</b>				
<b>REFER TO THE APPLICATION OVERVIEW TO DETERMINE WHETHER PART B NEEDS TO BE COMPLETE.</b>				



## APPENDIX F1

### SUMMARY OF DESIGN

#### RED ROCK WWTF UPGRADE DESIGN CRITERIA AND CALCULATIONS

JEN  
12/6/2017  
REV 4-23-18

##### Purpose:

These calculations are prepared to address the upgrade of the existing Red Rock WWTF.  
The existing recirculating media filter (RMF) is not capable of meeting the proposed ammonia limits in the draft NPDES permit.  
This report will set for the design criteria, and the basis of design for several options, some of which use the existing RMF.  
**Note that the rated design flow of the facility (15,000 gallons per day) is NOT being increased and will be maintained.**

##### Existing Flows:

Number of existing homes connected: 47 units (SFR)  
Metered Historical Water use of :  
Avg. water usage = 4,629 gal/mo = 154.3 gpd/unit.  
Note that this equates to an per-capita flow: 154.3 gpd/unit / 2.5 cap = 62 gal/cap-d  
(Based on water use billing records, winter averaging neglects consumptive use - See Appendix F1)  
(This average value considers only homes that are occupied - vacant homes are not used.)  
Note: This errs on the conservative side, because vacant homes are a statistical reality.  
Note: Across entire PCRSD service base, average monthly water usage is about 4,500 gal/mo, based on water meter readings.

Estimate actual ADF (not used in calcs) 4,629 gal/mo-unit x 47 units = 7,252 gpd avg.  
Note: This rate equates to: = 5.04 gpm

Note that these flows above are presented for information only. See below, that more conservative, higher flow values will be used for design.  
Note that the design flow of the existing facility is much higher than the existing connected flows.

##### Design Flows:

Use a higher-than-historical unit flow factor, and apply peak factor to be conservative.  
The current design population of 150 will be retained.

Derive number of units: 60 units SFR, compared to existing units this is: 28% growth.  
Design population : 60 lots x 2.5 cap/lot = 150 capita  
Compare existing design popl.: 150 design PE / 128% = 118 capita  
Design avg flow per lot = 2.5 cap/lot x 80 gal/cap-d = 200 gpd/lot  
(Note this is higher than the 62.4 gal/cap-d documented by water use records.)  
Average flow (ADF) 60 units x 200 gpd/lot = 12,000 gpd  
= 500 gal/hr = 8.3 gpm

Peak Daily Flow = 15000 gpd, same as current Operating Permit.  
(This corresponds to the permitted design flow of the WWTF, 15,000 gpd.)

Estimated peak hourly (PHF): 15,000 gpd = 10.4 gpm x 4.0 PF = 42 gpm  
Note: Peak hourly flows are attenuated by the recirc tank - does not directly affect downstream hydraulics.

Estimated range of flows for proposed effluent flowmeter: 4 gpm to 50 gpm  
(Effluent flows will have inflow peaks attenuated by tank volume.)

Notes:  
1 This subdivision contains newer homes on a pressurized system. Wet weather flow (I/I) is a non-factor.  
2 The design flow of facility, (15,000 gpd monthly average flow) will be maintained.  
3 The existing collection system is STEP, and peaks are dampened by septic/dosing tank volume.  
The existing OSI effluent pumps run about 9 gpm.

##### Existing System Info:

Type of Collection System: STEP  
Septic Tank Vol. (each SFR unit) : 1,000 gal  
Septic Tank Vol / ADF (each unit): 500%  
RecircTank Existing:  
Type: HDPE horiz cylinder  
Total Vol: 15,000 gal  
Work Vol: 12,000 gal  
HRT at ADF: 1.00 days  
Work vol % of ADF: 100%  
Filter Beds Exist:  
Model: Orenco AX-100, single stage system, 5 pods.  
Media: Vertical porous cloth sheets, arranged in racks.  
Bed area: 100 sf / pod  
Media Depth: 2.5 feet approx.

##### Design Wastewater Char's

Based on sampling and testing performed from 2014 to 2014 - See Appendix F2: Red Rock WWTF Sampling Data.  
BOD5 150 mg/L  
TSS 80 mg/L

TKN 73 mg/L (Kjeldahl N is the sum of organically bound nitrogen and ammonia-ammonium N.)  
 NH3 65 mg/L

Other supplemental influent data:

FOG 14 mg/L  
 Alkalinity 479 mg/L as CaCO3

#### Design Wastewater Loads

Based on average sampled characteristic, and rounded to whole numbers.

BOD5	150 mg/L	x	0.0120 mgd	x	8.34 lb/mgal	=	15.0 lb/day
TSS	80 mg/L	x	0.0120 mgd	x	8.34 lb/mgal	=	8.0 lb/day
TKN	73 mg/L	x	0.0120 mgd	x	8.34 lb/mgal	=	7.3 lb/day

Alkalinity: Measured alkalinity averages : 479 mg/L as CaCO3.  
 Assuming some denitrification recovery (which can be up to 3.5 ppm of 7.14 ppm for complete denite),  
 The system should have enough alkalinity for complete nitrification.  
 Provisions will be made for future addition of alkalinity feed system, using granular feeder.  
 Net alk demand = (assuming partial denite)  
 65 ppm NH3 oxidized x 5 ppm alk demand/ppm NH3 oxid = 325 ppm  
 Thus remaining alk = 154 mg/L as CaCO3

#### Alkalinity Feed System:

Needed for supplementing alkalinity.

Assume partial supplementation:  
 50 mg/L x 0.0120 mgd x 8.34 lb/mgal = 5.0 lb/d as CaCO3

Use sodium bicarbonate (NaHCO3) to adjust pH:

Standard dose:  $\frac{1.5 \text{ lb bicarb}}{10000 \text{ gal}} \text{ per } (10 \text{ ppm alk incr}) \times 50 \text{ ppm alk} \times 12,000 \text{ gpd} = 9 \text{ lb/d}$

(Note same alkalinity adjustment using Na2CO3 would take about 0.9 lbs per 10kgal per 10 ppm alk., at a slightly reduced cost.)  
 But we proposed using Bi-Carb for safety and ease of use.

Estimated cost = \$ 13.00 / 50 lbs = \$ 0.26 / lb x 9 lb/d = \$ 2.34 / day

Solubility of Bicarb= 8.00 lbs per 100 lbs water, or 8.00% solution, S.G. = 1.05  
 Density of solution= 65.52 lb/gal

Metering pump average feed rate = 9 lb/d / 8.00% = 112.5 lb/d = 1.72 gpd  
 Metering pump range of pump rates = 1.72 gpd x 20% = 0.34 gpd = 0.01 gal/hr  
 1.72 gpd x 300% = 5.15 gpd = 0.21 gal/hr

Thus, the minimum size mixing / solution tank for feeding solution is: 1.72 gpd x 20 days = 34.34 gal

Use a minimum feed tank of : 50 gallons

#### Option 1A: Expand Existing RMF System (Add 1 pod), and Construct MBBR as Second Stage (RECOMMENDED OPTION):

The existing system has 5 AX-100 pods, as a single stage.  
 Expand the first stage to six (6) AX-100 pods. (Add one pod and upsize one filter vault.)  
 Add a second vent fan to improve venting of the pods.

This would be a single-stage system designed to produce an effluent 10/10/3 (BOD/TSS/NH3).  
 The existing recirc tank and dosing pumps & controls are re-used.

Proposed 1st stage has: 6 Advantex modules x 100 sf/pod = 600 sf surface  
 (add one module to 5 existing)

Proposed HLR = 12,000 gpd / 600 sf = 20.0 gpd/sf (at avg flow and loadings)

Proposed BOD Loading = 15.0 lb/d / 600 sf = 0.025 lb/sf-d  
 Proposed TKN Loading = 7.3 lb/d / 600 sf = 0.012 lb/sf-d

Adequate performance for BOD removal at the above loadings is documented by existing installations, and by this installation.  
 Note: Typical Orenco loadings for AX100 system with nitrification are HLR=25 gpd/sf, BOD 0.30 lb/sf-d

Note: Alkalinity supplementation will be made to the existing recirculation tank.

Dosing Hydraulics:

Assume recirculation ratio = 4 : 1  
 ADF = 12,000 gpd, Total daily dose flow = 60,000 gpd, = 41.7 gpm = 2,500 gal/hr  
 PDF = 15,000 gpd, Total daily dose flow = 75,000 gpd, = 52.1 gpm = 3,125 gal/hr

For Normal Dosing Cycle:

Assume Normal Total Dose Cycle = 4.5 min      Dosing rate = 150 gpm  
 Thus number of dosing events per day = 320  
 Run time per dose event:  
 ADF: 60,000 gpd / 320 evnt = 187.50 gal/dose, / 150 gpm = 1.25 min  
  
 Peak effluent rate = 20% of the peak delivery (dosing rate) x 150 gpm = 30.0 gpm  
 (Compare the peak run time as a percentage of the total cycle time: 28%  
 This is because the dose volume takes time to work through the pods, across the media sheets.

For High Rate Dosing Cycle:

Assume Normal Total Dose Cycle = 3.5 min      Dosing rate = 150 gpm  
 Thus number of dosing events per day = 411.4  
 Run time per dose event:  
 ADF: 60,000 gpd / 411.4 evnt = 145.83 gal/dose, / 150 gpm = 0.97 min  
 PDF: 75,000 gpd / 411.4 evnt = 182.29 gal/dose, / 150 gpm = 1.22 min  
  
 Peak effluent rate = 20% of the peak delivery (dosing rate) x 150 gpm = 30.0 gpm  
 (Compare the peak run time as a percentage of the total cycle time: 35%  
 This is because the dose volume takes time to work through the pods, across the media sheets.

( SEE SUPPLEMENTAL MBBR CALCULATIONS, PRESENTED AFTER THESE CALCULATIONS)

## APPENDIX F1 - SUPPLEMENTAL

JEN  
4/23/2018

### SUMMARY OF DESIGN - NITRIFICATION MBBR

#### RED ROCK WWTF UPGRADE DESIGN CRITERIA AND CALCULATIONS

##### Purpose:

Summarize the sizing and design of the MBBR to be used to polish ammonia nitrogen. The existing recirculating media filter (RMF) system by itself is not consistent at ammonia removal. However, the existing RMF is very effective at removing carbonaceous BOD, achieving a consistent effluent BOD avg = 10.5 mg/L. **Note that the rated design flow of the facility (15,000 gallons per day) is NOT being increased and will be maintained.**

##### MBBR SYSTEM CALCULATIONS

Influent stream to MBBR from RMF system:

ADF = 12,000 gpd  
PDF = 15,000 gpd  
BOD5 = 12 mg/L  
TSS = 10 mg/L  
TKN = 10 mg/L as N (can assume all is NH4+ - N, same equiv wt. as NH3-N)  
(Note this larger flow is being used to size the MBBR system.)

Note: Studies have shown that as long as BOD5 loading is low (< 2 g/M<sup>2</sup>-day), then nitrifiers will predominate.

Supplemental: Conversion of media surface area loading rate:

$$\begin{aligned} 1.0 \text{ gram} / \text{m}^2 \text{ -day} &= 0.00229568 \text{ lb} / 10.7639 \text{ sf-day} \\ &= 0.00021328 \text{ lb} / \text{sf-d} \\ &= 0.2133 \text{ lb} / 1,000 \text{ sf-d} \end{aligned}$$

Calculate minimum surface area of media required:

Base on the surface area removal rate (SARR) =

$$\begin{aligned} &0.20 \text{ gram NH}_4\text{-N} / \text{m}^2 \text{ of media -day} \\ &\text{equates to: } 0.043 \text{ lb NH}_4\text{-N} / 1,000 \text{ sf-d} \end{aligned}$$

Notes:

This removal rate accounts for D-O<sub>2</sub> = 3 ppm, winter conditions, max organic load. Research and operating facilities have shown that once BOD is reduced a realistic SARR = 0.5 g NH<sub>4</sub>-N / m<sup>2</sup>-d

$$\begin{aligned} \text{Use MBBR media with surface area} &= 131 \text{ sf/cf} (= 605.6 \text{ m}^2/\text{m}^3) \\ \text{Daily load of ammonia-N} &= 10 \text{ mg/L as N} \times 15,000 \text{ gpd peak daily} = 3000 \text{ gallons} \\ \text{Minimum surface areas of media} &= 1000 \text{ sf} / 0.043 \text{ lb NH}_4 / 1,000 \text{ sf-d} = 29,328 \text{ sf} \\ \text{Minimum bulk volume of media} &= 29,328.16 \text{ sf media} / 131 \text{ sf/cf} = 223.9 \text{ cf} = 8.29 \text{ CY} \end{aligned}$$

$$\begin{aligned} \text{Design volume of MBBR tank} &= \left( \frac{0.20 \text{ Q}}{4.8 \text{ hrs HRT}} \right) \times 15,000 \text{ gpd peak daily} = 3000 \text{ gallons} \\ \text{Resultant fill factor of media} &= \frac{223.9 \text{ CF}}{401.0 \text{ CF}} = 56\% \end{aligned}$$

(For small, high surface area media, a common fill rate is 30% - 70%).

Check BOD surface loading (to make sure it is low enough):

$$\begin{aligned} \text{Design BOD loading} &= 12 \text{ mg/L} \times 8.34 \text{ conv} \times 0.02 \text{ MGD} = 1.5012 \text{ lb/day} \\ \text{Surface area loading} &= \frac{1.5012 \text{ lb/day}}{29,328 \text{ sf media}} = 0.0511863 \text{ lb} / 1,000 \text{ sf-day} \\ &= 0.240 \text{ gram} / \text{m}^2 \text{ -day of BOD5} \end{aligned}$$

Design as two reactors in series: 1st will likely be oxygen limited, and 2nd will be reaction rate limited. In summer conditions it is likely that only one tank will be required.

For MBBR tanks, use vertical manhole sections:

2 manhole tanks in series:

Volume each = 200.5 cf  
 Size each = 6.0 foot dia x 7.1 feet fluid depth. + 2.5 ft freebrd = 9.6 feet  
 Height of media per tank = 223.9 cf media / 401.0 tank V x 7.1 ft depth = 4.0 feet

#### Air Rate Total, for Both Tanks:

MBBR is mixing limited, so use rate of: 50 CFM/1000 CF x 401.0 cf = 20.1 scfm  
 (See supplemental calcs below, peak process air rate = 16 scfm)  
 Note: Although this air rate seems excessive (twice the rate of activated sludge), research has found that a higher D.O. drives the ammonia consumption in low loadings, improving transfer through the biofilm.

#### Design pressure of blowers:

Static: 7.1 feet - 0.3333 ft off floor = 6.8 feet = 2.929 psig  
 Pipe losses: 0.3 psig  
 Orifice Loss: 0.2 psig  
 = 3.4 psig  
 = 94.9 in H<sub>2</sub>O

#### Correction to site conditions: SCFM to ACFM

Site Barometric pressure:  $P_b = 14.2$  psia  
 Inlet losses (filter, silencer),  $L_i = 0.2$  psi  
 Suction pressure =  $P_b - L_i = 14.0$  psi  
 Suction temperature (summer)  $T_a = 100$  deg. F  
 Site vapor pressure  $V_{pa} = 0.9503$  psia for 100 F  
 Relative humidity  $R_{ha} = 0.85$   
 Discharge pressure  $P_d = 3.43$  psi + 14.2 = 17.63 psia

$$ACFM_{corr} = \left( \frac{14.7}{14.2} - \left( \frac{0.36}{0.85} \times \frac{0.3391}{0.9503} \right) \right) \times \frac{560}{528} \times \frac{14.2}{14.0}$$

$$= 1.1710$$

#### Actual air at PEAK:

$$\text{Use ACFM} = 20.1 \text{ scfm} \times 1.171 \text{ inlet correction} = 23.48 \text{ acfm}$$

#### Blower approximate horsepower:

W lb/sec = flow of air = 23 scfm peak 0.075 lb/cf at STP = 1.761 lb/min = 0.029349 lb/sec  
 R 53.3 ft-lb/ (lb air) - deg R Engineering gas constant  
 T1 560 deg R = absolute inlet temperature = 100 deg F maximum + 460 deg F = 560 deg R  
 P1 14.0 psia Absolute inlet atmospheric pressure  
 P2 17.6 psia Absolute outlet pressure = 14.2 psi + 3.43 psi = 17.63 psi  
 n 0.283 Constant for air.  
 e 0.50 Assumed mechanical efficiency for blower

$$Hp = \frac{0.029349 \text{ lb/sec} \times 53.3 \text{ ft-lb/ (lb air)} - \text{deg R} \times \frac{560 \text{ deg R} \times ((\frac{17.6 \text{ psi}}{14.0 \text{ psi}})^{\frac{1}{0.283}} - 1)}{0.5 \text{ eff} \times 0.283}}{550 \text{ ft-lb/s-hp} \times 0.5 \text{ eff} \times 0.283}$$

$$= 0.8 \text{ hp}$$

Use min blower motor size = 1.5 Hp

#### Estimate air header pipe size:

Discharge pipe size:

Dia. in.	A, sf	Flow, cfm	Avg air flow	
			Vel, ft/min	Target velocity range
1	0.005	20	3676	1200-1800
1.5	0.012	20	1634	1200-1800 Use 1.5-inch discharge piping
2	0.022	20	919	1200-1800
2.5	0.034	20	588	1200-1800
3	0.049	20	408	1200-1800

#### SETTLING TANK:

Provide a third tank for settling of effluent solids, and for possible future recycling of nitrified effluent to first stage RMF system.

Note: Due to very long SRT and low organic load, anticipated sludge production should be very low.

Most second stage Nitrification reactors do not use or require any clarification tanks.

Tank dia = 6.0 feet  
 Overflow rate at peak daily flow: 15,000 gpd / 28.27 sf = 530.52 gpd/SF OK

#### DESIGN PROVISIONS:

Design process piping so that 2nd stage can be bypassed and dewatered in summer months, to allow maintenance, sludge removal, or use only 1 stage.

Use sieves for transfer and effluent draw-off, with max 3/8" openings.

Provide portable electric submersible dewatering pump, to be inserted (say monthly) to remove accumulated sloughed biofilm.

Aeration to be coarse bubble diffused air, using retrievable stainless steel grid mounted on the floor.

Long air hose will be provided to connect to diffuser grid when inserting into tank with media in place - to fluidize as grid is lowered.

Provide blowers with AFD's to allow adjustment of air rate for seasonal variations in D.O2, and to periodically increase turbulence for sloughing.

#### SUPPLEMENTAL: COMPARE PROCESS AIR RATE REQUIRED:

Mass rate based on process demands.:

Neglect oxygen credit for cells in waste sludge.

In estimating oxygen for nitrif: Assume that nitrogen demand exerted =

To estimate denitrification credit:

$$\begin{aligned} \text{Full credit} &= (10.00 \text{ mg/L-N nitrate formed} - 5.00 \text{ mg/L O}_2 \text{ full credit}) \times 0.0 \text{ mg/L NO}_3\text{-N} \times 8.34 \text{ conv} \times 0.015 \text{ mgd} = 0.0 \text{ mgd} \\ \text{Credit used} &= 0.0 \text{ mg/L NO}_3\text{-N} \times 8.34 \text{ conv} \times 0.015 \text{ mgd} = 0.0 \text{ mgd} \end{aligned}$$

Design Average Conditions

Oxygen consumption ratio for carbonaceous O2 demand =

O2 for BOD: 1.5012 ppd BOD5 applied /

O2 for Nitrogen: 1.251 ppd ammonia demand exerted x

O2 credit taken for denitrification: 0.0 ppd nitrate-N formed x

Total oxygen required:

$$\begin{aligned} &1.10 \text{ lb O}_2/\text{lb BOD}_5 \text{ removed. (Common value 1.2 for endogenous respiration at long SRT.)} \\ &1.10 \text{ lbs O}_2/\text{lbs BOD}_5 = 1.32 \text{ ppd} \\ &4.57 \text{ lbs O}_2/\text{lbsTKN} = 5.72 \text{ ppd} \\ &-2.86 \text{ lbs O}_2/\text{lbsNO}_3\text{-N} = -7.04 \text{ ppd} \end{aligned}$$

Peak Oxygen Demand Conditions

Assume that the peaking factor for peak hourly BOD and Nitrogen =

$$1.20 \text{ ( peaking factor)} \times 7.04 \text{ ppd} = 8.45 \text{ ppd}$$

Estimate AOTR/SOTR (Wastewater transfer efficiency)

Assume:

Submergence =

B = 0.95

A = 0.75

T = 15.00 deg C

Pa = 14.2 psia

d = 6.76 ft

Pd = 17.1 psia

Ot = 19 percent

C = 4.0 mg/L

Cs20 = 9.07 mg/L

F = 0.95

Csth = (calc) mg/L

Csth = 10.1 mg/L

7.1 foot depth - 0.333 foot diffusers off floor = 6.76 feet subm

Salinity-surface tension correction factor (beta)

Oxygen transfer correction factor, ratio of KLa for wastewater to cleanwater (alpha)

(typical value = 0.6 for fine bubble aeration, 0.75 for coarse bubble aeration)

Operating temperature (avg winter)

atmospheric pressure at jobsite = 734.15 mm Hg

depth of air release = 2.93 psig

Pressure at depth of air release = 14.2 psi atm + 2.93 psig = 17.1 psia

Oxygen concentration of gas leaving tank

Dissolved oxygen level in reactor

DO concentration at saturation in clean water at 20 deg C and 1.0 atm.

Fouling factor( Typ. 0.9 - 0.95 for diffusers)

Average DO saturation conc. In clean water in aeration tank at temperature T and jobsite altitude.

Oxygen saturation concentration in clean water in temperature T and jobsite altitude.

$$\begin{aligned} C_{sth} &= 10.1 \text{ mg/L} \times 0.5 \times (17.1 \text{ psia} / 14.2 \text{ psia}) + (19 \text{ percent} / 21 \text{ percent}) = 10.66 \text{ mg/L} \\ \text{AOTR/SOTR} &= (0.95 \text{ (Beta)} \times 10.66 \text{ mg/L}) - (1.024 \wedge (4.0 \text{ mg/L} / 9.07 \text{ mg/L}) \times 20 \text{ C})) \times 0.75 \text{ A} \times 0.95 = 0.428 \end{aligned}$$

Volumetric rate based on process demands, considering transfer efficiency:

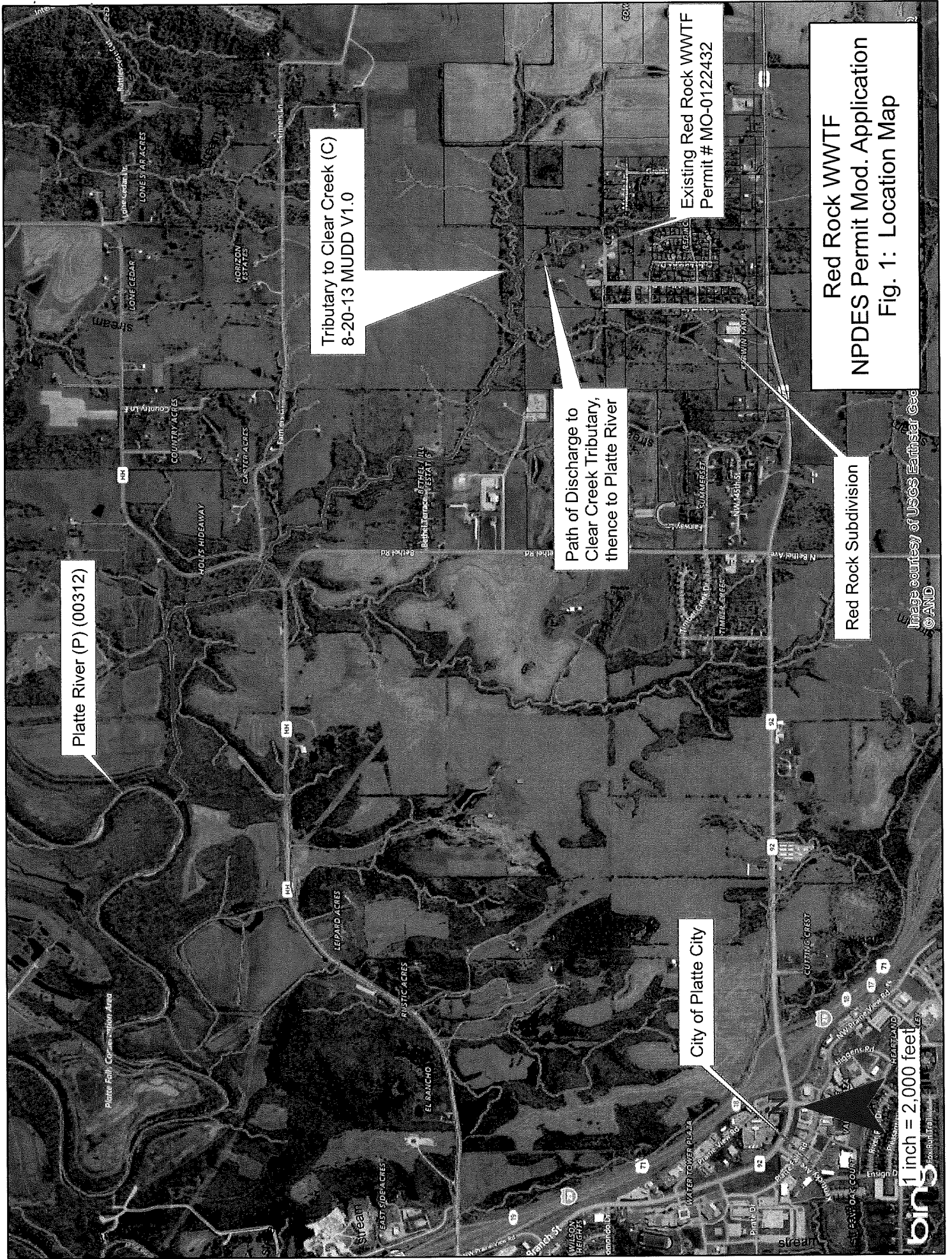
Theoretical air required =  $\frac{7.04 \text{ ppd O}_2 / (0.075 \text{ pcf air} \times 0.232 \text{ frac O}_2)}{0.75\% \text{ per ft} \times 42.8\% \text{ of clean water efficiency (as calc'd above)}}$  = 404 scf/day = 0.281 scfm O<sub>2</sub> per basin

Wastewater transfer efficiency =  $\frac{0.75\% \text{ per ft} \times 42.8\% \text{ of clean water efficiency (as calc'd above)}}{0.075 \text{ pcf air} \times 0.232 \text{ frac O}_2}$  = 5.1% applies to coarse bubble diffusers

Design average airflow =  $\frac{0.2809 \text{ scfm}}{13 \text{ scfm avg} \times 0.75\% \text{ min air} = 1.20 \text{ factor} = 13 \text{ scfm SOTE} \times 43\% \text{ transfer} = 13 \text{ scfm Avg for system}}$

Peak airflow (with safety factor added above) = 16 scfm PEAK for system

Minimum airflow for blower = 10 scfm



Platte River (P) (00312)

Tributary to Clear Creek (C)  
8-20-13 MUDD V1.0

Path of Discharge to  
Clear Creek Tributary,  
thence to Platte River

Existing Red Rock WWTF  
Permit # MO-0122432

Red Rock WWTF  
NPDES Permit Mod. Application  
Fig. 1: Location Map

Red Rock Subdivision

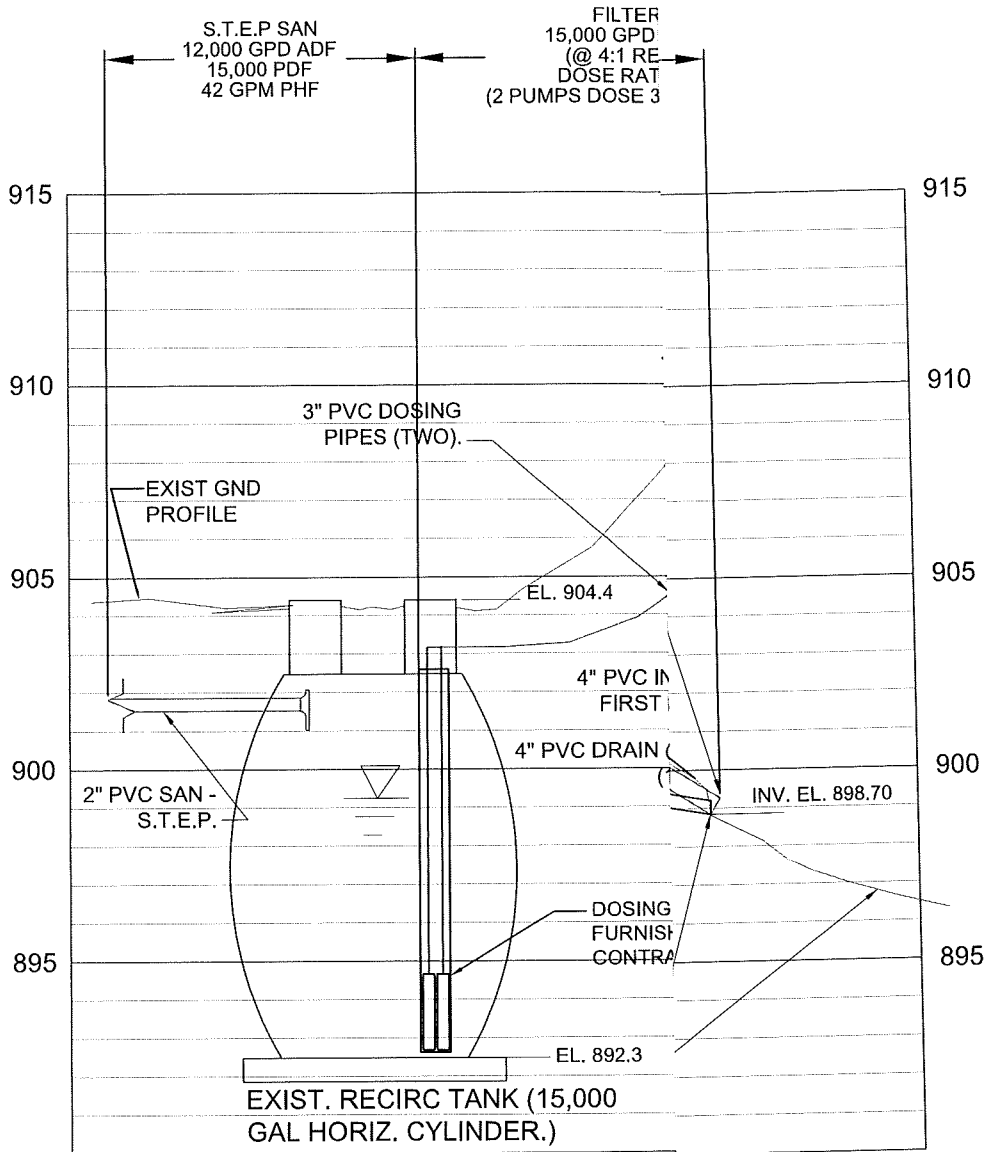
City of Platte City

1 inch = 2,000 feet  
bing

Image courtesy of USGS Earthstar Geo  
© AND



DESIGN FLOW RATES:  
 ADF = AVERAGE DAILY FLOW  
 PDF = PEAK DAILY FLOW  
 PHF = PEAK HOURLY FLOW



**FLOW**

**SCALE:**  
**SCALE:**

Revisions

Description

Date

No.

Jay E. Norco E-29748

ENGINEERING  
 REPORT DWG.

CL#2012038740

PLATTE CO. REGIONAL SEWER DISTRICT  
 11724 NW PLAZA CRC., SUITE 800, KCMO 64153

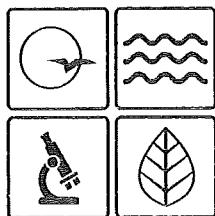
RED ROCK WWTF  
 HYDRAULIC PROFILE / DIAGRAM

Design:  
 JEN

Drawn:  
 JEN

Date: 5-01-18

Sheet: 1 OF 1



Missouri Department of

dnr.mo.gov

**NATURAL RESOURCES**

Eric R. Greitens, Governor

Carol S. Comer, Director

APR 26 2018

Mr. Don Koch, Executive Director  
Platte County Regional Sewer District  
11724 NW Plaza Circle, Suite 800  
Kansas City, MO 64153

RE: Red Rock WWTF Upgrade – Red Rock Wastewater Treatment Facility, MO-0122432,  
Platte County, Amended Facility Plan Approval

Dear Mr Koch:

The Missouri Department of Natural Resources' Water Protection Program has reviewed the amended facility plan regarding the Red Rock WWTF Upgrade submitted by North Hills Engineering, Inc. on behalf of the Platte County Regional Sewer District on April 23, 2018.

This amended engineering report recommends Alternative No. 1A. This alternative adds one pod to the existing treatment system, four 75 gpm pumps to replace the existing three, a new recirculation splitter valve with a fixed 4:1 ratio, two stage moving bed biofilm reactor (MBBR) as a second stage, an ultraviolet disinfection system, and magnetic flowmeter would also be added to the system. The proposed project is intended to achieve 3 mg/L of NH<sub>3</sub>. No additional flow is anticipated at this subdivision and was, therefore, not addressed in evaluating alternatives.

The current design guides, 10 CSR 20-8 do not contain design parameters for this configuration of technology or for moving bed bioreactors and therefore this is considered a demonstration project. As this is a demonstration project, for the first year of operation following construction, additional monitoring will be required before and after the MBBR. A final engineering evaluation report will be a condition of the operating permit also. The data gathered with the operating permit will be used to help develop design criteria for future projects.

The amended facility plan proposed six alternatives to meet effluent limits both for nitrogen ammonia and *e coli*.

Alternative No. 1A is to expand the RMF system and add a MBBR and is a viable proposal to meet water quality standards. It is the least-cost option and is expected to provide a more consistent level of treatment than the existing system.

Alternative No. 1B is to expand the RMF system with the addition of two Advantex pods.



Recycled paper

Alternative No. 2 is to construct a two-stage, integrated fixed-film activated sludge system. Though feasible, the recommended alternative is more cost-effective in meeting water quality standards.

Alternative No. 3 is to construct an activated sludge system. Though feasible, the recommended alternative is more cost-effective in meeting water quality standards.

Alternative No. 4 is to pump to a regional wastewater treatment facility. This alternative is not feasible due to the long distance involved, high friction losses, and the need for an electrical upgrade with the increased pump sizes and generator being needed.

Alternative No. 5 is to combine with another wastewater treatment facility. The nearby plant was recently constructed and this community neither has the need or desire to combine therefore this alternative is not feasible.

Alternative No. 6 is to construct a drip irrigation system. Limits are not applicable and disinfection is not needed for this alternative, however the costs of implementing this alternative far exceeded the costs of the recommended alternative.

Any changes to the scope of work as shown in this facility plan will require submittal of a complete facility plan as outlined in the Facility Plan Guidance for Wastewater Treatment Facilities, Fact Sheet--PUB2416.

The Department recommends you continue to consider land application as an alternative. The treatment method would benefit both the land owner and the city as the irrigation would provide some nutrients to the fields and could be a cost effective solution for the city. The city would be exempt from the upcoming U.S. Environmental Protection Agency (EPA) ammonia limits as well as any other lower limits that may be adopted in the future. Land application would also remove the facility's disinfection requirements provided that the facility was not applying on public land.

The Department's review of engineer's cost estimate associated with this project is not rigorous. It serves only as a basis for project scope and general comparison of alternatives. Since the estimate is preliminary, costs to help the owner or community decide which option to pursue, the Department does not independently verify costs nor does it determine whether selected alternatives represent financially prudent decisions. It is important to understand that it is the community's or owner's responsibility to make sure that all planned expenditures are reasonable. For comparison purposes the Department recommends using a 20-year present worth analysis to provide a reasonable basis for lifetime cost comparisons.

Mr. Don Koch, Executive Director  
Platte County Regional Sewer District  
Page Three

Please proceed with securing financial support for the proposed project. This determination is valid for projects that are not utilizing funding from Department of Natural Resources. Projects seeking funding through the Department must be reviewed and approved by the Financial Assistance Center, due to additional conditions in 10 CSR 20-4, "Grants and Loans".

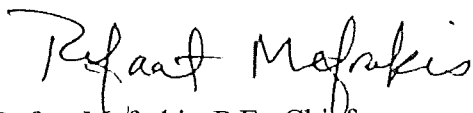
Following the Department's public notice of draft Missouri State Operating Permit, the Department will review any public notice comments received. Significant comments have the potential to require a facility plan amendment submittal for Department approval and an additional public notice.

After receipt of this letter, please submit one set of the construction plans and specifications, one copy of the summary of design, and, if possible, one electronic version of each, along with a construction permit application Application for Construction Permit - Wastewater Treatment Facility, Form--MO 780-2189 and an application fee of \$1,000 for < 500,000 gpd and Form B - Application for Operating Permit for Domestic Wastewater ( $\leq$  100,000 gallons per day), Form--MO 780-1512 and an application fee of \$200.

For questions related to technical issues such as the preliminary engineering report, construction permit, or plans and specifications, please contact Ms. Diane Reinhardt, review engineer, by phone at 573-751-6568 or by mail at Department of Natural Resources, P.O. Box 176, Jefferson City MO 65102. Thank you.

Sincerely,

WATER PROTECTION PROGRAM



Refaat Mefrakis, P.E., Chief  
Engineering Section

RM:drm

c: Mr. Jay Norco, North Hills Engineering, Inc.  
Kansas City Regional Office

