



STATE OF MISSOURI  
Jeremiah W. (Jay) Nixon, Governor • Sara Parker Pauley, Director  
**DEPARTMENT OF NATURAL RESOURCES**

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[www.dnr.mo.gov](http://www.dnr.mo.gov)

April 8, 2013

Mr. Curt Mooney, Chairman of the Board  
Village of Sunrise Beach  
16537 N Hwy 5  
Sunrise Beach, MO 65079

RE: C295540-01 Sunrise Beach Wastewater Improvements Phase 1, Sunrise Beach  
Wastewater Treatment Facility (WWTF) MO-0137278, Construction Permit No.  
CP0001438

Dear Mr. Mooney:

The Missouri Department of Natural Resources' Water Protection Program has reviewed and approved the plans and specifications submitted by Schultz Surveying & Engineering, Inc. for the village of Sunrise Beach. Please find enclosed Construction Permit No. CP0001438 and one (1) set of approved plans and specifications.

This permit will terminate 24 months from the date of issuance. In accordance with 10 CSR 20-6.010(4)(G), the Department may grant an extension only one (1) time. If you believe that an extension is necessary, you must submit a request and a justification in writing for the extension at least 30 days prior to the permit expiration date.

Nothing in this permit removes any obligations to comply with county or other local ordinances or restrictions.

If you were adversely affected by this decision, you may appeal to have the matter heard by the Administrative Hearing Commission. To appeal, you must file a petition with the Administrative Hearing Commission within 30 days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed. If it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the Administrative Hearing Commission.

Mr. Curt Mooney, Chairman of the Board  
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If you have any questions concerning this matter, please contact Mrs. Emily Carpenter, of the Water Protection Program, at 573-751-6569 or Missouri Department of Natural Resources, Water Protection Program, P.O. Box 176, Jefferson City, MO 65102-0176.

Thank you for your efforts to help ensure clean water in Missouri.

Sincerely,

WATER PROTECTION PROGRAM



Byron F. Shaw, Jr., P.E.  
SRF Engineering Unit Chief

BFS:ecc

Enclosures

- c: Mr. Jared Wheaton, P.E., Schultz Surveying & Engineering, Inc.  
Southwest Regional Office  
Mr. Paul Dickerson, Water Protection Program, Compliance and Enforcement Section  
Mrs. Emily Carpenter, Water Protection Program, Financial Assistance Center  
Mr. Terry Nelson, Water Protection Program, Financial Assistance Center

C295540-01 Sunrise Beach WWTF, MO-0137278  
Sunrise Beach Wastewater Improvements Phase 1

Permit No. CP0001438

STATE OF MISSOURI  
DEPARTMENT OF NATURAL RESOURCES  
MISSOURI CLEAN WATER COMMISSION



## CONSTRUCTION PERMIT

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

Village of Sunrise Beach  
16537 N Hwy 5  
Sunrise Beach, MO 65079

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).

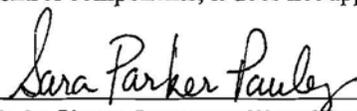
As the Department does not examine structural features of design or the efficiency of mechanical equipment, the issuance of this permit does not include approval of these features.

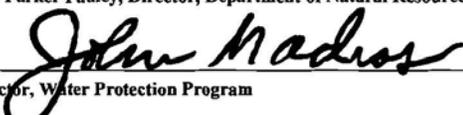
A representative of the Department may inspect the work covered by this permit during construction. Issuance of a permit to operate by the Department will be contingent on the work substantially adhering to the approved plans and specifications.

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

April 8, 2013  
Effective Date

April 7, 2015  
Expiration Date

  
Sara Parker Pauley, Director, Department of Natural Resources

  
Director, Water Protection Program

## **CONSTRUCTION PERMIT**

### **COLLECTION SYSTEM:**

The proposed wastewater collection system will consist of a low pressure sewer system, with grinder pumps at each connection, which will carry raw wastewater to the receiving wastewater treatment facility.

The collection system project consisting of the construction and installation of approximately 18,400 linear feet (lf) of four-inch (4") polyvinyl chloride (PVC) Standard Dimension Ratio (SDR)-21, 1,475 lf of three-inch (3") PVC SDR-21, and 655 lf of two-inch (2") PVC SDR-21 force mains with cleanouts and air release valves, and one (1) lamphole, and all necessary appurtenances to make a complete and usable wastewater collection system to serve an estimated population equivalent of 500 and an estimated design average flow of 50,000 gallons per day (gpd). The project will also include general site work appropriate to the scope and purpose of the project.

The collection system project also consists of the installation of 34 simplex grinder pump units with each pump capable of operating at ten (10) gallons per minute (gpm) at 115 feet of total dynamic head (TDH), and three (3) duplex grinder pump stations, grinder pump station No. 1 has two (2) pumps with each capable of operating at 80 gpm at 84 feet TDH, grinder pump station No. 2 has two (2) pumps with each capable of operating at 50 gpm at 163 feet TDH, grinder pump station No. 3 has two (2) pumps with each capable of operating at 80 gpm at 126 feet TDH, and two (2) portable generators, and all necessary appurtenances to make a complete grinder pump system.

### **WASTEWATER TREATMENT FACILITY:**

The proposed wastewater treatment facility will consist of flow equalization, an extended aeration mechanical package plant, tertiary filtration, chemical addition for phosphorus removal, and ultraviolet disinfection. This facility shall meet the water quality standards for the Lake of the Ozarks after construction.

The wastewater treatment facility project will consist of the construction and installation of the Sunrise Beach WWTF, which will have a design average flow of 50,000 gpd and includes the following components:

- Construction of a headworks structure to include a bar screen, grit removal, influent flow meter, and flow proportioning.

- Construction of a 10,000 gallon flow equalization tank complete with mixing provided by a blower capable of supplying 75 cubic feet per minute (cfm) of air, and two (2) pumps with each capable of operating at 38 gpm at 15 feet TDH.
- Construction of two (2) pre-anoxic chambers with each tank having a volume of 2,095 gallons.
- Construction of two (2) aeration tanks with a 37,500 gallon volume in each tank complete with air diffusers and three blowers capable of supplying 275 cfm of air each.
- Construction of two (2) post anoxic chambers with each tank having a volume of 2,095 gallons.
- Construction of two (2) clarifiers with a 4,167 gallon volume in each clarifier and two (2) four-inch (4") sludge airlift pumps.
- Construction of a tertiary filter with a filter area of 20.8 square feet and two (2) positive displacement blowers supplying 30 cfm of air.
- Installation of chemical phosphorus removal by means of the chemicals alum and ferrous sulfate.
- Construction of a clearwell chamber with a 3,270 gallon volume and two (2) backwash pumps capable of operating at 312 gpm at 15 feet TDH.
- Construction of an ultraviolet light disinfection system consisting of two (2) banks and capable of treating a peak flow of 175 gpm.
- Installation of a parshall flume with an ultrasonic flow meter.
- Construction of a mudwell chamber with a 3,509 gallon volume and duplex pumps capable of operating at 50 gpm at 15 feet TDH each.
- Construction of two (2) sludge holding tanks with each tank having a volume of 4,000 gallons.
- Installation of a standby generator with an automatic transfer switch.

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

#### **FINDING OF AFFORDABILITY:**

Pursuant to Section 644.145, RSMo, the Department is required to determine whether a permit or decision is affordable and make a finding of affordability for each permit or decision.

An Affordability Determination and Finding was performed in accordance with RSMO §644.145 and is enclosed with this construction permit. The Department finds the project is affordable with a high economic burden to the community.

#### **PERMIT CONDITIONS:**

1. All construction shall be in accordance with the plans and specifications submitted by Schultz Surveying & Engineering, Inc. on April 3, 2013 and approved by the Department on April 8, 2013.

2. Regulation 10 CSR 20-4.040(19)(B)1 requires that projects be publicly advertised, allowing sufficient time for bids to be prepared and submitted. Projects should be advertised at least 30 days prior to bid opening.
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. As per 10 CSR 20-4.040, all changes in contract price or time within the approved scope of work must be by change order in accordance with Section 20 of this rule.
5. 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 Southwest Regional Office per 10 CSR 20-7.015(9)(E)2.
6. Protection of drinking water supplies shall be in accordance with 10 CSR 20-8.120(10). "There shall be no physical connections between a public or private potable water supply system and a sewer, or appurtenance thereto which would permit the passage of any wastewater or polluted water into the potable supply. No water pipe shall pass through or come in contact with any part of a sewer manhole."
  - A. Sewers in relation to water works structures shall meet the requirements of 10 CSR 23-3.010 with respect to minimum distances from public water supply wells or other water supply sources and structures.
  - B. Sewer mains shall be laid at least ten (10) feet horizontally from any existing or proposed water main. The distances shall be measured edge-to-edge. In cases where it is not practical to maintain a ten (10) foot separation, the Department may allow a deviation on a case-by-case basis, if supported by data from the design engineer. Such a deviation may allow installation of the sewer closer to a water main, provided that the water main is in a separate trench or on an undisturbed earth shelf located on either side of the sewer and at an elevation so the bottom of the water main is at least 18 inches above the top of the sewer. If it is impossible to obtain proper horizontal and vertical separation as described above for sewers, the sewer must be constructed of slip-on or mechanical joint pipe or continuously encased and be pressure tested to 150 pounds per square inch to assure water tightness.
  - C. Manholes should be located at least ten (10) feet horizontally from any existing or proposed water main.

- D. Sewers crossing water mains shall be laid to provide a minimum vertical distance of 18 inches between the outside of the water main and the outside of the sewer. This shall be the case where the water main is either above or below the sewer. The crossing shall be arranged so that the sewer joints will be equidistant and as far as possible from the water main joints. Where a water main crosses under a sewer, adequate structural support shall be provided for the sewer to maintain line and grade. When it is impossible to obtain proper vertical separation as stipulated above, one (1) of the following methods must be specified:
- 1) The sewer shall be designed and constructed equal to the water pipe and shall be pressure tested to assure water tightness prior to backfilling; or
  - 2) Either the water main or sewer line may be continuously encased or enclosed in a watertight carrier pipe which extends ten (10) feet on both sides of the crossing, measured perpendicular to the water main. The carrier pipe shall be of materials approved by the Department for use in water main construction.
7. In addition to the requirements for a construction permit, 10 CSR 20-6.200 requires land disturbance activities of one (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. Starting September 1, 2012, land disturbance permits will only be obtained by means of the Department's ePermitting system available online at [www.dnr.mo.gov/env/wpp/epermit/help.htm](http://www.dnr.mo.gov/env/wpp/epermit/help.htm). See [www.dnr.mo.gov/env/wpp/stormwater/sw-land-disturb-permits.htm](http://www.dnr.mo.gov/env/wpp/stormwater/sw-land-disturb-permits.htm) for more information.
8. 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 [www.dnr.mo.gov/env/wpp/401/](http://www.dnr.mo.gov/env/wpp/401/) for more information.
9. A full closure plan shall be submitted to the Department's Southwest Regional Office for review and approval of any permitted wastewater treatment system being replaced. In accordance with 10 CSR 20-6.010(12), the closure plan must meet the requirements outlined in Standard Conditions Part III, Section I, of the Missouri State Operating Permit No. MO-0134996, Buccaneer Bay WWTF. Closure shall not commence until the submitted closure plan is approved by the Department. Form J – Request for Termination of a State Operating Permit, shall be submitted to the Department's

Southwest Regional Office for termination of any existing Missouri State Operating Permit, once closure is completed in accordance with the approved closure plan.

10. Upon completion of construction, the village of Sunrise Beach will become the continuing authority for operation, maintenance, and modernization of these facilities.
11. In accordance with 10 CSR 20-6.010(5)(D), submit the enclosed form Statement of Work Completed to the Department following completion of construction. Submit an electronic copy of the as built with this form.

**Missouri Department of Natural Resources  
Water Protection Program  
Affordability Determination and Finding  
(In accordance with RSMo 644.145)**

**Sunrise Beach WWTF  
Village of Sunrise Beach  
For the purpose of construction of a new WWTF  
Operating Permit MO-0137278**

Section 644.145 RSMo requires the Missouri Department of Natural Resources 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 or publicly-owned treatment works.”

**Facility Description:**

The proposed Sunrise Beach Wastewater Treatment Facility (WWTF) will be located near the intersection of Highway 5 and Kula Bay Drive, Sunrise Beach, Missouri in Camden County. The proposed treatment facility shall consist of flow equalization, extended aeration mechanical package plant, ultraviolet disinfection, and sludge disposal by contract hauler. The proposed design average flow is 50,000 gallons per day (gpd) and a peak wet weather flow of 124,000 gpd.

Receiving Stream: Unnamed Tributary to Lake of the Ozarks (U)  
First Classified Stream and ID: Lake of the Ozarks (L2) (07205) 303(d) list  
USGS Basin & Sub-watershed No.: (102901090207)

Residential Connections:	<u>39</u>
Commercial Connections:	<u>37</u>
Total Connections <sup>1</sup> :	<u>76</u>

**New Permit Requirements or Requirements Now Being Enforced:**

The village of Sunrise Beach is an unsewered community. The village desires to construct a centralized collection system and treatment facility in anticipation of economic growth for the community. The Department received a construction permit application request on December 6, 2012 for the proposed construction of a collection system and new wastewater treatment facility. The village plans on phasing the construction of the wastewater system in order to provide service to the entire community.

**Range of Anticipated Costs Associated with Complying with Requirements:**

According to the village of Sunrise Beach’s Facility Plan the estimated cost of constructing the treatment facility is \$652,500 (Page 22 of the facility plan). The total project cost of phase 1 including the collection system is estimated to be \$2,548,300 (Page 23 of the facility plan).

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<sup>1</sup> The number of connections was obtained from the Facility Plan for the Village of Sunrise Beach received on August 7, 2012 and approved on January 16, 2013.

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

The village of Sunrise Beach is on the 2013 Intended Use Plan under the fundable projects list. The village has passed a \$8,000,000 bond issue on April 7, 2009. The village of Sunrise Beach anticipates receiving a \$2,292,800 loan from the Department's State Revolving Fund (SRF) (Page 24 of the facility plan).

Proposed User Rates (monthly 3,000 gpd usage): \$46.12

Municipal Bond Rating (if applicable): N/A

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

Current outstanding debt: Unknown

Other indicators:

Since the village of Sunrise Beach has passed a \$8,000,000 bond issue, they are capable of completing the construction of the treatment facility and phase 1 of the collection system contingent on receiving SRF financing.

**(2) Affordability of pollution control options for the individuals or households of the community:**

Current annual operating costs (exclude depreciation):	\$0
Current user rate:	<u>\$0</u>
Estimated capital cost of pollution control options:	<u>\$2,548,300</u>
Annual Cost of Additional (Operating Costs & Debt Service):	<u>\$218,500</u>
Estimated Resulting User Rate and/or Cost per Household:	<b>\$Error! Reference source not found. Error! Reference source not found.</b>
Median Household Income	<u>\$28,730</u>
Rate and/or Cost per Household as a Percent of Median Household Income: <i>(Rate/MHI = (553.44/28,730)*100 = 1.93%)</i>	<u>1.93%</u>

Check Appropriate Box	Financial Impact	Residential Indicator (Usage Rate as a percent of MHI = annual cost/MHI)
	Low	Less than 1% MHI
X	Medium	Between 1% and 2% MHI
	High	Greater than 2% MHI

The residential indicator was determined to have a medium financial impact based on the proposed user rate, which is approximately 1.93 percent of the median household income.

**(3) An evaluation of the overall costs and environmental benefits of the control technologies:**

The village of Sunrise Beach evaluated multiple alternatives for the proposed treatment facility. The Antidegradation Report and Facility Plan completed for the village provides detailed discussions of the alternatives evaluated. Alternatives ranged from regionalization with the Gravois Arms Sewer District, land application, and new discharging wastewater treatment facilities. The construction of an extended aeration mechanical package plant was determined to be the most cost effective and practical option. The village elected to phase the development of the treatment facility and collection system to serve the entire community.

An extended aeration treatment facility is a proven technology in the state that achieves a high quality of effluent. The facility will treat an organic load of 170 pounds of Bio-chemical Oxygen Demand (BOD<sub>5</sub>) per day. The proposed facility is designed to meet average monthly limits of 20 milligrams per liter (mg/L) BOD<sub>5</sub> and 20 mg/L Total Suspended Solids (TSS).

The receiving stream is an Unnamed Tributary to the Lake of the Ozarks. The permit limits were derived to protect the beneficial uses of the Lake of the Ozarks. The beneficial uses of the Lake of the Ozarks are whole body contact recreation, secondary contact recreation, livestock and wildlife watering, and protection of warm water aquatic life and human health fish consumption.

**(4) 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; and*
- (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.*

Potentially Distressed Populations	
Unemployment for Village of Sunrise Beach <sup>2</sup>	8.2%
Median Household Income (MHI) in Village of Sunrise Beach <sup>3</sup>	\$28,730
Percent Change in MHI (1990-2010)	+29.9%
Percent Population Growth/Decline (1990-2010) <sup>4</sup>	+138.1%
Change in Median Age in Years (1990-2010)	+8.1 years
Percent of Households in Poverty <sup>5</sup>	14.3%
Percent of Households Relying on Food Stamps	11.6%

Opportunity for cost savings or cost avoidance:

The village of Sunrise Beach has applied for a SRF loan. The village will realize savings in interest comparing a SRF loan to a private loan.

Opportunity for changes to implementation/compliance schedule:

None Noted

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

The village of Sunrise Beach owns and operates a public drinking water system for the community. Annual operation and maintenance budgets must be maintained for the drinking water system as well.

**(6) 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:**

<sup>2</sup> Unemployment data was obtained from American Fact Finder at [http://factfinder2.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS\\_10\\_5YR\\_S1901&prodType=table](http://factfinder2.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_10_5YR_S1901&prodType=table)

<sup>3</sup> Median Household Income is provided by the American Fact Finder – INCOME IN THE PAST 12 MONTHS (IN 2010 INFLATION ADJUSTED DOLLARS) – 2006 – 2010 American Community Survey 5-Year Estimates, which can be found online at:

[http://factfinder2.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS\\_10\\_5YR\\_S1901&prodType=table](http://factfinder2.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_10_5YR_S1901&prodType=table)

<sup>4</sup> Population trend data was obtained from online at [http://mcdc1.missouri.edu/cgi-bin/profiler/profiler.py?profile\\_id=SF1\\_2010&geoids=16000US2912988](http://mcdc1.missouri.edu/cgi-bin/profiler/profiler.py?profile_id=SF1_2010&geoids=16000US2912988)

<sup>5</sup> Poverty data is provided by the American Fact Finder – POVERTY STATUS IN THE PAST 12 MONTHS – 2006-2010 American Community Survey 5-Year Estimates, which can be found online at [http://factfinder2.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS\\_10\\_5YR\\_DP03&prodType=table](http://factfinder2.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_10_5YR_DP03&prodType=table)

**Socioeconomic, Debt and Financial Indicators**

Indicators	Strong (3 points)	Mid-Range (2 points)	Weak (1 point)	Score
Bond rating indicator	Above BBB or Baa	BBB or Baa	Below BBB or Baa	N/A
Overall net debt as a % of full market property value	Below 2%	2% - 5%	Above 5%	N/A
Unemployment Rate	>1% below Missouri average	± 1% of Missouri average	>1% above Missouri average	1
Median household income	More than 25% above Missouri MHI	± 25% of Missouri MHI	More than 25% below Missouri average	1
Property tax revenues as a % of full market property value	Below 2%	2% - 4%	Above 4%	N/A
Property tax collection rate	Above 98%	94% - 98%	Below 94%	N/A

Secondary Indicators Average Score: 1  
 Residential Indicator (from Criteria #2 above): 1.93% medium impact

**Financial Capability Matrix:**

Financial Capability Indicators Score from above ↓	Residential Indicator (User rate as a % of MHI)		
	Low (Below 1%)	Mid-Range (Between 1.0% and 2.0%)	High (Above 2.0%)
Weak (below 1.5)	Medium Burden	High Burden	High Burden
Mid-Range (1.5 – 2.5)	Low Burden	Medium Burden	High Burden
Strong (above 2.5)	Low Burden	Low Burden	Medium Burden

Estimated Financial Burden: high burden

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

The village of Sunrise Beach’s population grew 138.1 percent from 1990-2010. In terms of economic strength, Camden County is on lower than average when compared to other counties in the State. The per capita income is 13.2 percent lower than the State’s average.<sup>6</sup>

<sup>6</sup> County per capita income was obtained online at <http://www.missourieconomy.org/indicators/wages/pci10county.stm>.

In terms of retail Sales, Camden County gains retail customers from surrounding counties and the County residents spend more than the state average on retail goods and services. The buying power index of Camden County residents is above average compared to the rest of the regional economy.<sup>7</sup>

### **Conclusion and Finding**

The village of Sunrise Beach requested a construction permit for the construction of a centralized collection system and new wastewater treatment facility for the village. The Department finds that these improvements will improve the water quality of the Lake of the Ozarks by elimination of failing on-site systems and improve the public health of the community.

The Department considered all seven (7) 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 will result in a high burden with regard to the community's overall financial capability and a medium financial impact for most individual customers/households.

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<sup>7</sup> Retail trade analysis was obtained online at [http://www.missourieconomy.org/pdfs/central\\_wia\\_retail\\_trade\\_analysis.pdf](http://www.missourieconomy.org/pdfs/central_wia_retail_trade_analysis.pdf).

