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September 17, 2012

Missouri Department of Natural Resources
Water Protection Forum,
Continuing Authority Language Stakeholders Group

To Whom It May Concern,

Ozarks Clean Water Company is a nonprofit sewer company organized under section 393.825, RSMo. I would like to comment on the DRAFT 10 CSR 20-6.010 Construction and Operating Permits that will be the topic of a stakeholders meeting on October 4, 2012. I will be unable to attend this meeting but will try to attend future meetings.

Under section **(3) Continuing Authorities (B)**, the 5 items that can be submitted as part of the permit application to utilize a lower preference continuing authority need to have the word "or" as part of this language in some fashion. There is plainly no need to submit all five items when any one of them is sufficient to allow for the use of the lower continuing authority.

Under section **(3) Continuing Authorities (B) 4**, a nonprofit (or for that matter "any person or group of persons") does not have "responsibility for.....all the property served by it." While I am not sure of the legal definition of "responsibility", I am fairly sure a nonprofit sewer company does not have responsibility for all the property served by the wastewater treatment facility and cannot be expected to have that responsibility.

I appreciate your consideration of these comments. Thank you.

Sincerely,



David Casaletto
President