

Annual Report on Affordability Finding of Compliance to the Missouri Clean Water Law For Calendar Year 2015

Pursuant to Section 644.145.1 of the Revised Statutes of Missouri (RSMo) enacted in 2014, the Department of Natural Resources (Department) has conducted affordability findings, when issuing permits that incorporate a new requirement for discharges from publicly owned sewer systems or water or sewer treatment works, or when enforcing provisions of Chapter 644 or the Federal Water Pollution Control Act. This report presents the affordability findings conducted in the calendar year 2015.

Defined in Section 644.145.3(1) RSMo, affordability with respect to payment of a utility bill is “a measure of whether an individual customer or household with an income equal to or lower than the median household income for their community can pay the bill without undue hardship or unreasonable sacrifice in the essential lifestyle or spending patterns of the individual or household”, taking into consideration the criteria described in Section 644.145.4 RSMo (Appendix A).

The main body of the report presents the four categories of costs and impacts related affordability findings pursuant to Section 644.145.9 RSMo (Appendix A), with a comparison with the affordability findings made in the calendar year 2014. A description of the overall procedure for making the affordability findings in calendar year 2015 is provided in Appendix B. A summary of key data collected, derived and examined in making the affordability findings in calendar year 2015 is provided in Appendix C.

1. Affordability Findings

(1) The Numbers of Findings of Affordability

The total number of findings of affordability issued by the Department, with effective dates between January 1, 2015 and December 31, 2015, was seventy-seven, including seventy-seven findings categorized as affordable, zero finding categorized as not meeting the definition of affordable, and zero finding implemented as a federal mandate regardless of affordability.

(2) Average Increase in Sewer Rates

For the seventy-seven findings found to be affordable, compared with the respective sewer rates reported or surveyed, the average projected increase in sewer rates was \$6.45 in terms of 2013 dollar values, and 62.90%.

(3) Average Increase in Sewer Rates as Percentages of Median Household Income

For the seventy-seven found to be affordable, the average projected increase in sewer rates as a percentage of median house income (MHI) was 0.18%, where MHIs were referred to the MHIs of the municipalities (cities, villages, or towns) where the respective permit holders were located.

(4) A List of All the Permit Holders Receiving Affordability Findings

All the permits holders receiving findings are listed in Table 1 below. Data for the following indicators as well as other key information are provided in Appendix C:

- (a) Current and projected monthly residential sewer rates in dollars;
- (b) Projected monthly residential sewer rates as a percentage of median household income; and
- (c) Percentage of households at or below the state poverty rate.

Table 1 A List of all the permit holders receiving affordability findings in 2015

*	Permit No.	Facility Name**	Location (County)	Location (Municipality)
1	MO-0080730	Shady Lawn Rest Home	Andrew	Savannah
2	MO-0050601	Fairfax WWTF	Atchison	Fairfax
3	MO-0103021	Benton City WWTF	Audrain	Benton
4	MO-0021440	Monett WWTP	Barry	Monett
5	MO-0044172	Lamar WWTF	Barton	Lamar
6	MO-0125091	Amsterdam WWTF	Bates	Amsterdam
7	MO-0121550	Benton County SD #1, Blue Branch	Benton	Warsaw
8	MO-0099287	Gower WWTP	Buchanan	Gower
9	MO-0130052	Cowgill WWTF	Caldwell	Cowgill
10	MO-0099139	Hatton-McCredie Elementary School	Callaway	Kingdom
11	MO-0087114	New Bloomfield WWTP	Callaway	New Bloomfield
12	MO-0131091	Normac SD WWTP	Camden	Camdenton
13	MO-0122807	Cape Girardeau County RCSD, Essex Place Sewage Lagoon	Cape Girardeau	Jackson
14	MO-0094714	Mendon WWTF	Chariton	Mendon
15	MO-0133671	Elk Valley WWTF	Christian	Ozark
16	MO-0109002	Holt Wastewater Lagoon	Clay	Holt
17	MO-0113751	Trimble WWTF	Clinton	Trimble
18	MO-0129658	Wardsville Northwest WWTF	Cole	Wardsville
19	MO-0118010	Jameson WWTF	Daviess	Jameson
20	MO-0049662	King City Wastewater Lagoon	DeKalb	King
21	MO-0041106	Maysville WWTF	DeKalb	Maysville
22	MO-0096202	Union Star WWTF	DeKalb	Union Star
23	MO-0037087	Lonedell R-14 School District WWTF	Franklin	Lonedell
24	MO-0113549	Spring Bluff R-15 School District	Franklin	Sullivan
25	MO-0121312	Union East Sewage Treatment Plant	Franklin	Union
26	MO-0091375	Rosebud South WWTF	Gasconade	Rosebud
27	MO-0122467	Cainsville WWTF	Harrison	Cainsville
28	MO-0107042	Craig WWTF	Holt	Craig
29	MO-0043583	Mound City WWTF	Holt	Mound
30	MO-0090832	Oregon WWTP	Holt	Oregon
31	MO-0098094	Buckner WWTP	Jackson	Buckner
32	MO-0056162	Glaize Creek SD	Jefferson	Barnhart
33	MO-0133884	Cedar Hill Lakes WWTP	Jefferson	Cedar Hill
34	MO-0134490	Jefferson County PSD, Brookside Parc WWTF	Jefferson	Hillsboro
35	MO-0099473	Jefferson County PSD, Raintree Plantation WWTF	Jefferson	Hillsboro
36	MO-0106496	Centerview WWTF	Johnson	Centerview
37	MO-0031674	Conway WWTF	Laclede	Conway

*	Permit No.	Facility Name**	Location (County)	Location (Municipality)
38	MO-0048097	Alma Sewage Treatment Lagoon	Lafayette	Alma
39	MO-0126101	Village of Fountain 'N Lakes WWTF	Lincoln	Moscow Mills
40	MO-0127698	Lincoln County PWSD #1, White Fences Subdivision	Lincoln	Winfield
41	MO-0051616	Browning WWTF	Linn	Browning
42	MO-0108227	Chillicothe WWTP	Livingston	Chillicothe
43	MO-0130869	Ludlow WWTF	Livingston	Ludlow
44	MO-0125679	Utica WWTF	Livingston	Utica
45	MO-0095214	Bevier WWTF	Macon	Bevier
46	MO-0023272	California South WWTP	Moniteau	California
47	MO-0096920	Madison WWTP	Monroe	Madison
48	MO-0055379	Monroe City WWTP	Monroe	Monroe
49	MO-0117013	Rhineland WWTF	Montgomery	Rhineland
50	MO-0119369	MDOC, Maryville Treatment Center	Nodaway	Maryville
51	MO-0130133	Pickering WWTF	Nodaway	Pickering
52	MO-0021458	Ravenwood WWTF	Nodaway	Ravenwood
53	MO-0022969	Skidmore WWTF	Nodaway	Skidmore
54	MO-0051144	Perryville Southeast WWTP	Perry	Perryville
55	MO-0108090	La Monte Northwest WWTF	Pettis	La Monte
56	MO-0033251	Dearborn WWTF	Platte	Dearborn
57	MO-0119393	Platte County RSD, Alan Acres WWTF	Platte	Kansas
58	MO-0122432	Platte County RSD, Red Rock WWTF	Platte	Platte
59	MO-0104019	Renick WWTF	Randolph	Renick
60	MO-0021822	Richmond North WWTP	Ray	Richmond
61	MO-0127940	Centerville WWTF	Reynolds	Centerville
62	MO-0022896	Ellington WWTF	Reynolds	Ellington
63	MO-0109053	Summersville WWTP	Shannon	Summersville
64	MO-0128252	St. Charles County PWSD #2, Sycamore Creek WWTF	St. Charles	New Melle
65	MO-0131300	Duckett Creek Sanitary District Wyndgate Subdivision WWTP	St. Charles	O'Fallon
66	MO-0058343	St. Charles Mississippi River WWTF	St. Charles	St. Charles
67	MO-0057801	St. Charles County PWSD #2, Castlegate MHP & Providence Point Subdivision	St. Charles	Wentzville
68	MO-0103756	Collins WWTF	St. Clair	Collins
69	MO-0043206	Dexter West WWTP	Stoddard	Dexter
70	MO-0129470	Box Canyon Watershed WWTF	Stone	Branson
71	MO-0113034	Forsyth WWTF	Taney	Forsyth
72	MO-0120472	Bronaugh WWTF	Vernon	Bronaugh
73	MO-0111279	St. Charles County PWSD #2, Dakota Boys Ranch WWTP	Warren	Dutzow
74	MO-0126896	Turning Point	Warren	Warrenton
75	MO-0128571	Caledonia WWTF	Washington	Caledonia
76	MO-0056227	MoDOT I-44 Conway Welcome Center WWTP	Webster	Conway
77	MO-0027600	Grant City West WWTF	Worth	Grant

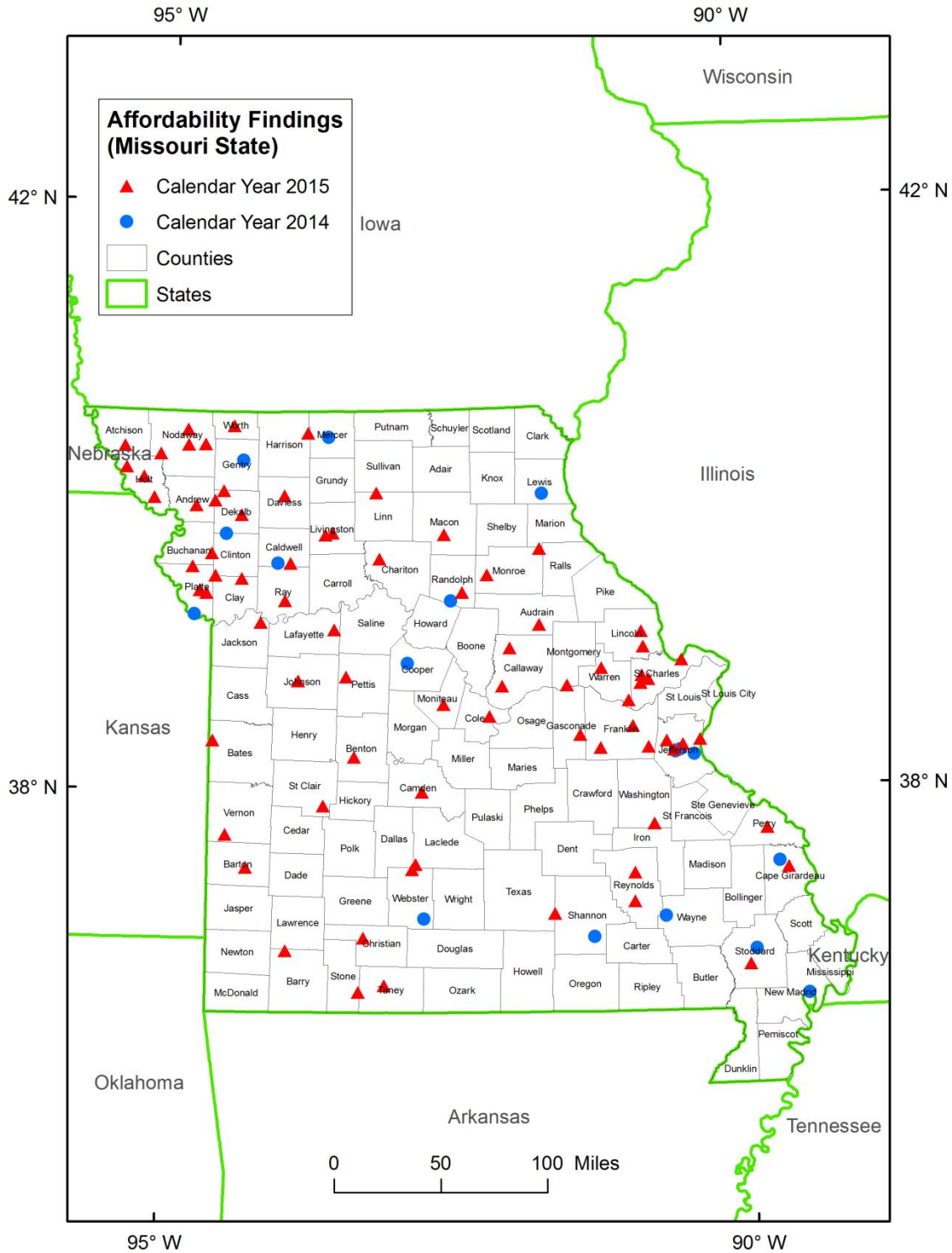
Notes

*: The table is arranged in ascending order of county names and then municipality names.

** : Abbreviations used in facility and or owner names, MDOC - Missouri Department of Corrections; MHP - Mobile Home Park; MoDOT - Missouri Department of Transportation; PSD - Public Sewer District; PWSD - Public Water Supply District; RCSD - Reorganized Common Sewer District; RSD - Regional Sewer District; SD - Sewer District; WWTF - Wastewater Treatment Facility; WWTP - Wastewater Treatment Plant

2. Comparison: 2015 vs 2014

The locations of the permit holders receiving affordability findings in 2015 and 2014 are illustrated in Map 1 below.



Map 1 Locations of permit holders receiving affordability findings in 2015 and 2014

3. Conclusion

Based on the information and data collected, derived and examined, all the affordability of findings issued by the Missouri Department of Natural Resources in calendar year 2015 met the criteria of affordable.

Appendix A: Subsections 644.145.4 and 644.145.9 of the Revised Statutes of Missouri

Revised Statutes of Missouri Chapter 644 Water Pollution

644.145.4. The department of natural resources shall adopt procedures by which it will make affordability findings that evaluate the affordability of permit requirements and enforcement actions described in subsection 1 of this section, and may begin implementing such procedures prior to promulgating implementing regulations. The commission shall have the authority to promulgate rules to implement this section pursuant to chapters 536 and 644, and shall promulgate such rules as soon as practicable. Affordability findings shall be based upon reasonably verifiable data and shall include an assessment of affordability with respect to persons or entities affected. The department shall offer the permittee an opportunity to review a draft affordability finding, and the permittee may suggest changes and provide additional supporting information, subject to subsection 6 of this section. The finding shall be based upon the following criteria:

- (1) A community's financial capability and ability to raise or secure necessary funding;
- (2) Affordability of pollution control options for the individuals or households at or below the median household income level of the community;
- (3) An evaluation of the overall costs and environmental benefits of the control technologies;
- (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;
- (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; 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;
- (6) An assessment of other community investments and operating costs relating to environmental improvements and public health protection;
- (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; and
- (8) An assessment of any other relevant local community economic condition.

644.145.9. The department shall file an annual report by the beginning of the fiscal year with the governor, the speaker of the house of representatives, the president pro tempore of the senate, and the chairs of the committees in both houses having primary jurisdiction over natural resource issues showing at least the following information on the findings of affordability completed in the previous calendar year:

(1) The total number of findings of affordability issued by the department, those categorized as affordable, those categorized as not meeting the definition of affordable, and those implemented as a federal mandate regardless of affordability;

(2) The average increase in sewer rates both in dollars and percentage for all findings found to be affordable;

(3) The average increase in sewer rates as a percentage of median house income in the communities for those findings determined to be affordable and a separate calculation of average increases in sewer rates for those found not to meet the definition of affordable;

(4) A list of all the permit holders receiving findings, and for each permittee the following data taken from the finding of affordability shall be listed:

(a) Current and projected monthly residential sewer rates in dollars;

(b) Projected monthly residential sewer rates as a percentage of median household income;

(c) Percentage of households at or below the state poverty rate.

Appendix B: Overall Procedure for Making Affordability Findings

The Department conducts an affordability finding, or a Cost Analysis for Compliance (CAFCom), as part of the renewal process for a National Pollutant Discharge and Elimination System (NPDES) permit, utilizing the following four primary tools and data sources:

(1) A Financial Questionnaire with a Community Supplemental Survey sent to permit holders categorized as a Publicly Owned Treatment Works (POTW) for collecting information on the sustainability and financial capability of a municipality; examples of information requested are the “current monthly residential sewer rates”, an primary socioeconomic indicator (Appendix C, Table A2), and “property tax collection rate in the municipality”, a secondary socioeconomic indicator;

(2) The PreScreening Tool developed by the Department for compiling and analyzing socioeconomic data available from national, regional and local databases, including statistics from the U.S. Census Bureau; an example of data being “monthly median household income” (Appendix C, Table A2) and “percentage of households at or below poverty” (Appendix C, Table A2);

(3) A CapdetWorks Model developed by Hydromantis Environmental Software Solutions, Inc. for estimating the capital costs and operating costs for different wastewater treatment technologies for compliance of upgrades so as to calculate the “projected monthly residential sewer rate” (Appendix C, Table A2);

(4) The Missouri Rural Population Sustainability Assessment Tool developed by the Environmental Finance Center at Wichita State University for assessing the potential of growth and sustainability of each rural community.

Once the draft NPDES permit is completed, the permit holder is given the opportunity to review and comment on the draft permit and the CAFCom during the courtesy 15 day preview and 30 day public notice period. This review and comment period offers permit holders an opportunity to provide additional information in regard to their community’s unique financial situations before the final NPDES permit is issued. During the 15 day preview, it is the Department’s practice to contact the permit holder via phone calls to ensure the permit holder has received and understood the draft permit and the CAFCom whenever the operating permit contains a Schedule of Compliance.

Appendix C: A Summary of Key Data Collected, Derived and Examined in Making Affordability Findings

Table A1

*	Permit		Facility		
	No.	Effective Date	Name**	Owner**	Location*** (Watershed)
1	MO-0080730	7/1/2015	Shady Lawn Rest Home	Andrew County Nursing Home District	10240013
2	MO-0050601	6/1/2015	Fairfax WWTF	City of Fairfax	10240005
3	MO-0103021	8/1/2015	Benton City WWTF	Village of Benton City	7110008
4	MO-0021440	5/1/2015	Monett WWTP	City of Monett	11070207
5	MO-0044172	9/1/2015	Lamar WWTF	City of Lamar	11070207
6	MO-0125091	9/1/2015	Amsterdam WWTF	City of Amsterdam	10290102
7	MO-0121550	6/1/2015	Benton County SD #1, Blue Branch	Benton County SD	10290109
8	MO-0099287	9/1/2015	Gower WWTP	City of Gower	10240012
9	MO-0130052	5/1/2015	Cowgill WWTF	City of Cowgill	10280101
10	MO-0099139	10/1/2015	Hatton-McCredie Elementary School	North Callaway R-I School District	10300102
11	MO-0087114	2/1/2015	New Bloomfield WWTP	City of New Bloomfield	10300102
12	MO-0131091	5/1/2015	Normac SD WWTP	Camden County SD	10290110
13	MO-0122807	5/1/2015	Cape Girardeau County RCSD, Essex Place Sewage Lagoon	Cape Girardeau County RCSD	7140107
14	MO-0094714	8/1/2015	Mendon WWTF	City of Mendon	10280103
15	MO-0133671	10/1/2015	Elk Valley WWTF	City of Ozark	11010002
16	MO-0109002	10/1/2015	Holt Wastewater Lagoon	City of Holt	10300101
17	MO-0113751	6/1/2015	Trimble WWTF	City of Trimble	10240012
18	MO-0129658	9/1/2015	Wardsville Northwest WWTF	Village of Wardsville	10300102
19	MO-0118010	8/1/2015	Jameson WWTF	Village of Jameson	10280101
20	MO-0049662	12/1/2015	King City Wastewater Lagoon	City of King City	10240012
21	MO-0041106	4/1/2015	Maysville WWTF	City of Maysville	10280101
22	MO-0096202	5/1/2015	Union Star WWTF	City of Union Star	10240012
23	MO-0037087	8/1/2015	Lonedell R-14 School District WWTF	Lonedell R-14 School District	7140102
24	MO-0113549	10/1/2015	Spring Bluff R-15 School District	Spring Bluff R-15 School District	7140103
25	MO-0121312	8/1/2015	Union East Sewage Treatment Plant	City of Union	7140103

Table A1 (Cont.)

*	Permit		Facility		
	No.	Effective Date	Name**	Owner**	Location*** (Watershed)
26	MO-0091375	9/1/2015	Rosebud South WWTF	City of Rosebud	7140103
27	MO-0122467	5/1/2015	Cainsville WWTF	City of Cainsville	10280102
28	MO-0107042	4/1/2015	Craig WWTF	City of Craig	10240005
29	MO-0043583	9/1/2015	Mound City WWTF	City of Mound City	10240005
30	MO-0090832	3/1/2015	Oregon WWTP	City of Oregon	10240005
31	MO-0098094	2/1/2015	Buckner WWTP	City of Buckner	10300101
32	MO-0056162	10/1/2015	Glaize Creek SD	Glaize Creek SD	7140101
33	MO-0133884	9/1/2015	Cedar Hill Lakes WWTP	Village of Cedar Hill Lakes	7140104
34	MO-0134490	9/1/2015	Jefferson County PSD, Brookside Parc WWTF	Jefferson County PSD	7140101
35	MO-0099473	11/1/2015	Jefferson County PSD, Raintree Plantation WWTF	Jefferson County PSD	7140104
36	MO-0106496	2/1/2015	Centerview WWTF	City of Centerview	10300104
37	MO-0031674	7/1/2015	Conway WWTF	City of Conway	10290110
38	MO-0048097	11/1/2015	Alma Sewage Treatment Lagoon	City of Alma	10300104
39	MO-0126101	6/1/2015	Village of Fountain 'N Lakes WWTF	Village of Fountain 'N Lakes	7110004
40	MO-0127698	7/1/2015	Lincoln County PWSD #1, White Fences Subdivision	Lincoln County PWSD #1	7110004
41	MO-0051616	4/1/2015	Browning WWTF	City of Browning	10280103
42	MO-0108227	6/1/2015	Chillicothe WWTP	City of Chillicothe	10280101
43	MO-0130869	5/1/2015	Ludlow WWTF	Village of Ludlow	10280101
44	MO-0125679	4/1/2015	Utica WWTF	Village of Utica	10280101
45	MO-0095214	10/27/2015	Bevier WWTF	City of Bevier	10280203
46	MO-0023272	4/1/2015	California South WWTP	City of California	10300102
47	MO-0096920	10/1/2015	Madison WWTP	City of Madison	7110006
48	MO-0055379	3/1/2015	Monroe City WWTP	City of Monroe City	7110004
49	MO-0117013	3/1/2015	Rhineland WWTF	Village of Rhineland	10300200
50	MO-0119369	9/1/2015	MDOC, Maryville Treatment Center	MDOC	10240013
51	MO-0130133	9/1/2015	Pickering WWTF	City of Pickering	10240013
52	MO-0021458	7/1/2015	Ravenwood WWTF	City of Ravenwood	10240012
53	MO-0022969	3/1/2015	Skidmore WWTF	City of Skidmore	10240010
54	MO-0051144	8/1/2015	Perryville Southeast WWTP	City of Perryville	7140105
55	MO-0108090	6/1/2015	La Monte Northwest WWTF	City of La Monte	10300104

Table A1 (Cont.)

*	Permit		Facility		
	No.	Effective Date	Name**	Owner**	Location*** (Watershed)
56	MO-0033251	3/1/2015	Dearborn WWTF	City of Dearborn	10240011
57	MO-0119393	5/1/2015	Platte County RSD, Alan Acres WWTF	Platte County RSD	10240012
58	MO-0122432	5/1/2015	Platte County RSD, Red Rock WWTF	Platte County RSD	10240012
59	MO-0104019	12/1/2015	Renick WWTF	Village of Renick	7110006
60	MO-0021822	5/1/2015	Richmond North WWTP	City of Richmond	10300101
61	MO-0127940	10/1/2015	Centerville WWTF	City of Centerville	11010007
62	MO-0022896	9/1/2015	Ellington WWTF	City of Ellington	11010007
63	MO-0109053	2/1/2015	Summersville WWTP	City of Summersville	11010008
64	MO-0128252	8/1/2015	St. Charles County PWSD #2, Sycamore Creek WWTF	St. Charles County PWSD #2	7110009
65	MO-0131300	8/1/2015	Duckett Creek Sanitary District Wyndgate Subdivision WWTP	Duckett Creek Sanitary District	7110009
66	MO-0058343	8/1/2015	St. Charles Mississippi River WWTF	City of St. Charles	7110009
67	MO-0057801	9/1/2015	St. Charles County PWSD #2, Castlegate MHP & Providence Point Subdivision	St. Charles County PWSD #2	7110009
68	MO-0103756	6/1/2015	Collins WWTF	City of Collins	10290106
69	MO-0043206	5/1/2015	Dexter West WWTP	City of Dexter	8020203
70	MO-0129470	11/16/2015	Box Canyon Watershed WWTF	Stone County PSD #1	11010001
71	MO-0113034	9/1/2015	Forsyth WWTF	City of Forsyth	11010003
72	MO-0120472	9/1/2015	Bronaugh WWTF	City of Bronaugh	10290104
73	MO-0111279	10/1/2015	St. Charles County PWSD #2, Dakota Boys Ranch WWTP	St. Charles County PWSD #2	10300200
74	MO-0126896	8/1/2015	Turning Point	Warren County Council Against Domestic Violence	10300200
75	MO-0128571	3/1/2015	Caledonia WWTF	Village of Caledonia	7140104
76	MO-0056227	5/1/2015	MoDOT I-44 Conway Welcome Center WWTP	MoDOT	10290110
77	MO-0027600	6/1/2015	Grant City West WWTF	City of Grant City	10280101

Notes

*: This order of this table corresponds to the order of Table 1 in the main text.

** : Abbreviations used in facility and or owner names, MDOC - Missouri Department of Corrections; MHP - Mobile Home Park; MoDOT - Missouri Department of Transportation; PSD - Public Sewer District; PWSD - Public Water Supply District; RCSD - Reorganized Common Sewer District; RSD - Regional Sewer District; SD - Sewer District; WWTF - Wastewater Treatment Facility; WWTP - Wastewater Treatment Plant.

***: United States Geological Survey (USGS) 8-Digit Hydrological Unit Code.

Table A2

RSMo 644.145.9 Criteria							
(4) (a)	(4) (a)	(4) (b)	(2)	(2)	(3)	(4) (c)	(1)
↓	↓	↓	↓	↓	↓	↓	↓
							Federal Mandate
							0
							Not Affordable
							0
							Affordable
			Average	Average	Average		
			\$6.45	62.90%	0.18%		

*	Permit No.	Facility Name	Primary Socioeconomic Indicators** (MHI: Median Household Income)						Households At Or Below Poverty	Affordability ***
			Current Monthly Residential Sewer Rate	Projected Monthly Residential Sewer Rate		Increase of Monthly Residential Sewer Rate				
			\$	\$	% of Monthly MHI	\$	%	% of Monthly MHI		
1	MO-0080730	Shady Lawn Rest Home	NA	//	//	//	//	//	8.1%	Yes
2	MO-0050601	Fairfax WWTF	\$20.25	\$42.10	1.07%	\$21.85	107.90%	0.55%	8.1%	Yes
3	MO-0103021	Benton City WWTF	\$14.70	\$34.20	1.14%	\$19.50	132.65%	0.65%	8.6%	Yes
4	MO-0021440	Monett WWTP	\$23.35	\$23.50	0.66%	\$0.15	0.65%	0.00%	20.0%	Yes
5	MO-0044172	Lamar WWTF	NA	/	/	\$0.04	/	0.00%	24.6%	Yes
6	MO-0125091	Amsterdam WWTF	\$50.00	\$30.35	1.27%	/////	/////	/////	14.3%	Yes
7	MO-0121550	Benton County SD #1, Blue Branch	NA	/	/	\$0.09	/	0.00%	27.7%	Yes
8	MO-0099287	Gower WWTP	\$29.40	\$33.42	0.85%	\$4.02	13.67%	0.10%	10.5%	Yes
9	MO-0130052	Cowgill WWTF	NA	\$36.57	1.41%	/	/	/	26.5%	Yes
10	MO-0099139	Hatton-McCredie Elementary School	//	//	//	\$0.02	//	0.00%	11.7%	Yes

Table A2 (Cont.)

*	Permit No.	Facility Name	Primary Socioeconomic Indicators** (MHI: Median Household Income)						Households At Or Below Poverty	Affordability ****
			Current Monthly Residential Sewer Rate	Projected Monthly Residential Sewer Rate		Increase of Monthly Residential Sewer Rate				
			\$	\$	% of Monthly MHI	\$	%	% of Monthly MHI		
11	MO-0087114	New Bloomfield WWTP	NA	/	/	\$0.33	/	0.01%	28.1%	Yes
12	MO-0131091	Normac SD WWTP	NA	/	/	\$0.23	/	0.01%	23.2%	Yes
13	MO-0122807	Cape Girardeau County RCSD, Essex Place Sewage Lagoon	\$35.00	////	////	////	////	////	6.2%	Yes
14	MO-0094714	Mendon WWTF	\$17.50	\$38.90	1.44%	\$21.40	122.29%	0.79%	14.6%	Yes
15	MO-0133671	Elk Valley WWTF	NA	/	/	\$0.42	/	0.01%	14.2%	Yes
16	MO-0109002	Holt Wastewater Lagoon	NA	\$33.47	0.85%	/	/	/	9.9%	Yes
17	MO-0113751	Trimble WWTF	\$40.00	\$43.69	1.21%	\$3.69	9.22%	0.10%	10.2%	Yes
18	MO-0129658	Wardsville Northwest WWTF	NA	/	/	\$0.74	/	0.02%	3.0%	Yes
19	MO-0118010	Jameson WWTF	\$49.00	\$46.20	1.79%	////	////	////	6.0%	Yes
20	MO-0049662	King City Wastewater Lagoon	\$22.07	\$34.83	0.98%	\$12.76	57.82%	0.36%	29.4%	Yes
21	MO-0041106	Maysville WWTF	\$21.00	\$24.41	0.62%	\$3.41	16.24%	0.09%	7.9%	Yes
22	MO-0096202	Union Star WWTF	\$33.50	\$45.40	1.15%	\$11.90	35.52%	0.30%	6.0%	Yes
23	MO-0037087	Lonedell R-14 School District WWTF	//	//	//	\$0.55	//	0.01%	12.9%	Yes
24	MO-0113549	Spring Bluff R-15 School District	//	//	//	\$0.03	//	0.00%	12.9%	Yes
25	MO-0121312	Union East Sewage Treatment Plant	NA	/	/	\$0.11	/	0.00%	9.1%	Yes
26	MO-0091375	Rosebud South WWTF	\$20.50	\$21.76	0.69%	\$1.26	6.15%	0.04%	19.3%	Yes
27	MO-0122467	Cainsville WWTF	\$25.00	\$30.64	1.74%	\$5.64	22.56%	0.32%	29.6%	Yes
28	MO-0107042	Craig WWTF	\$16.50	\$49.06	1.50%	\$32.56	197.33%	1.00%	13.1%	Yes
29	MO-0043583	Mound City WWTF	\$24.60	\$27.48	0.70%	\$2.88	11.71%	0.07%	11.1%	Yes
30	MO-0090832	Oregon WWTP	\$21.50	\$21.62	0.55%	\$0.12	0.54%	0.00%	10.7%	Yes

Table A2 (Cont.)

*	Permit No.	Facility Name	Primary Socioeconomic Indicators** (MHI: Median Household Income)						Households At Or Below Poverty	Affordability ***
			Current Monthly Residential Sewer Rate	Projected Monthly Residential Sewer Rate		Increase of Monthly Residential Sewer Rate				
			\$	\$	% of Monthly MHI	\$	%	% of Monthly MHI		
31	MO-0098094	Buckner WWTP	NA	/	/	\$0.03	/	0.00%	11.3%	Yes
32	MO-0056162	Glaize Creek SD	NA	/	/	\$0.18	/	0.00%	10.5%	Yes
33	MO-0133884	Cedar Hill Lakes WWTP	\$23.54	\$23.58	0.60%	\$0.04	0.16%	0.00%	9.2%	Yes
34	MO-0134490	Jefferson County PSD, Brookside Parc WWTF	\$35.58	////	////	////	////	////	9.8%	Yes
35	MO-0099473	Jefferson County PSD, Raintree Plantation WWTF	\$59.00	\$59.05	1.51%	\$0.05	0.08%	0.00%	9.8%	Yes
36	MO-0106496	Centerview WWTF	\$26.49	\$37.67	1.40%	\$11.18	42.20%	0.42%	14.5%	Yes
37	MO-0031674	Conway WWTF	\$13.92	\$8.29	0.58%	////	////	////	22.2%	Yes
38	MO-0048097	Alma Sewage Treatment Lagoon	\$10.20	\$48.75	1.32%	\$38.55	377.94%	1.04%	5.5%	Yes
39	MO-0126101	Village of Fountain 'N Lakes WWTF	\$55.00	\$65.49	1.66%	\$10.49	19.07%	0.27%	7.3%	Yes
40	MO-0127698	Lincoln County PWSD #1, White Fences Subdivision	\$56.98	////	////	////	////	////	27.5%	Yes
41	MO-0051616	Browning WWTF	NA	/	/	\$1.01	/	0.07%	40.9%	Yes
42	MO-0108227	Chillicothe WWTP	\$24.25	\$24.43	0.78%	\$0.18	0.74%	0.01%	22.6%	Yes
43	MO-0130869	Ludlow WWTF	NA	\$31.14	1.33%	/	/	/	41.0%	Yes
44	MO-0125679	Utica WWTF	\$32.00	\$22.79	0.87%	////	////	////	19.9%	Yes
45	MO-0095214	Bevier WWTF	\$34.38	\$34.38	1.02%	\$0.00	0.00%	0.00%	10.6%	Yes
46	MO-0023272	California South WWTP	NA	/	/	\$0.18	/	0.01%	15.8%	Yes
47	MO-0096920	Madison WWTP	\$21.00	\$29.88	1.13%	\$8.88	42.29%	0.34%	11.9%	Yes
48	MO-0055379	Monroe City WWTP	NA	/	/	\$0.06	/	0.00%	16.3%	Yes
49	MO-0117013	Rhineland WWTF	NA	\$40.54	1.31%	/	/	/	35.7%	Yes
50	MO-0119369	MDOC, Maryville Treatment Center	NA	///	///	///	///	///	14.0%	Yes

Table A2 (Cont.)

*	Permit No.	Facility Name	Primary Socioeconomic Indicators** (MHI: Median Household Income)						Households At Or Below Poverty	Affordability ***
			Current Monthly Residential Sewer Rate	Projected Monthly Residential Sewer Rate		Increase of Monthly Residential Sewer Rate				
			\$	\$	% of Monthly MHI	\$	%	% of Monthly MHI		
51	MO-0130133	Pickering WWTF	\$49.00	\$43.73	1.24%	/////	/////	/////	28.5%	Yes
52	MO-0021458	Ravenwood WWTF	\$25.10	\$41.55	1.36%	\$16.45	65.54%	0.54%	15.6%	Yes
53	MO-0022969	Skidmore WWTF	\$33.25	\$40.43	1.12%	\$7.18	21.59%	0.20%	7.6%	Yes
54	MO-0051144	Perryville Southeast WWTP	NA	/	/	\$0.07	/	0.00%	17.9%	Yes
55	MO-0108090	La Monte Northwest WWTF	\$18.75	\$14.50	0.54%	/////	/////	/////	11.0%	Yes
56	MO-0033251	Dearborn WWTF	\$26.82	\$25.96	0.76%	/////	/////	/////	4.2%	Yes
57	MO-0119393	Platte County RSD, Alan Acres WWTF	\$44.97	////	////	////	////	////	7.3%	Yes
58	MO-0122432	Platte County RSD, Red Rock WWTF	\$44.97	////	////	////	////	////	7.3%	Yes
59	MO-0104019	Renick WWTF	\$26.14	\$41.23	1.05%	\$15.09	57.73%	0.38%	7.4%	Yes
60	MO-0021822	Richmond North WWTP	NA	/	/	\$0.02	/	0.00%	14.7%	Yes
61	MO-0127940	Centerville WWTF	\$32.00	\$32.31	1.75%	\$0.31	0.96%	0.02%	30.9%	Yes
62	MO-0022896	Ellington WWTF	\$11.40	\$62.19	1.93%	\$50.79	445.53%	1.58%	14.4%	Yes
63	MO-0109053	Summersville WWTP	NA	/	/	\$0.25	/	0.01%	13.8%	Yes
64	MO-0128252	St. Charles County PWSD #2, Sycamore Creek WWTF	\$27.11	\$27.27	0.69%	\$0.16	0.59%	0.00%	4.3%	Yes
65	MO-0131300	Duckett Creek Sanitary District Wyndgate Subdivision WWTP	NA	/	/	\$0.09	/	0.00%	3.3%	Yes
66	MO-0058343	St. Charles Mississippi River WWTF	NA	/	/	\$0.00	/	0.00%	10.4%	Yes
67	MO-0057801	St. Charles County PWSD #2, Castlegate MHP & Providence Point Subdivision	\$27.11	\$27.17	0.69%	\$0.06	0.23%	0.00%	3.8%	Yes
68	MO-0103756	Collins WWTF	\$31.27	\$11.90	0.52%	/////	/////	/////	39.4%	Yes
69	MO-0043206	Dexter West WWTP	\$12.25	\$36.31	1.37%	\$24.06	196.41%	0.91%	15.0%	Yes
70	MO-0129470	Box Canyon Watershed WWTF	\$45.00	\$50.00	1.27%	\$5.00	11.11%	0.13%	25.4%	Yes

Table A2 (Cont.)

*	Permit No.	Facility Name	Primary Socioeconomic Indicators** (MHI: Median Household Income)						Households At Or Below Poverty	Affordability ***
			Current Monthly Residential Sewer Rate	Projected Monthly Residential Sewer Rate		Increase of Monthly Residential Sewer Rate				
			\$	\$	% of Monthly MHI	\$	%	% of Monthly MHI		
71	MO-0113034	Forsyth WWTF	NA	/	/	\$0.03	/	0.00%	12.3%	Yes
72	MO-0120472	Bronaugh WWTF	\$49.00	\$13.78	1.64%	/////	/////	/////	16.7%	Yes
73	MO-0111279	St. Charles County PWS #2, Dakota Boys Ranch WWTP	\$27.11	\$27.91	0.71%	\$0.80	2.95%	0.02%	5.2%	Yes
74	MO-0126896	Turning Point	NA	////	////	////	////	////	14.9%	Yes
75	MO-0128571	Caledonia WWTF	\$49.26	\$16.41	1.47%	/////	/////	/////	49.1%	Yes
76	MO-0056227	MoDOT I-44 Conway Welcome Center WWTP	///	///	///	///	///	///	22.2%	Yes
77	MO-0027600	Grant City West WWTF	\$23.65	\$36.94	1.39%	\$13.29	56.19%	0.50%	26.9%	Yes

Notes

*: The order of this table corresponds to the order of Table 1 in the main text.

** : In calculating "projected monthly residential sewer rate as % of monthly MHI", if the "projected monthly residential sewer rate" is lower than the "current monthly residential sewer rate", the "current monthly residential sewer rate" is used; in calculating both "projected monthly residential sewer rate as % of monthly MHI" and the "increase of monthly residential sewer rate as % of monthly MHI", if municipality monthly MHI is higher than the Missouri monthly MHI, Missouri monthly MHI is used; NA - data not available as the permittees did not provide their current user rates, although the Department had made attempts to obtain the information; / - generally not applicable for the analysis due to data not available for the "current monthly residential of sewer rate"; // - not applicable as schools, churches, domestic abuse centers, and nursing homes do not finance the upgrade, operation, or maintenance of their wastewater treatment facilities based on residential sewer rates; /// - not applicable as state-owned systems do not finance the upgrade, operation, or maintenance of their wastewater treatment facilities based on residential sewer rates; //// - not applicable as different sewer districts user specific rate structures and they are generally considered as sufficient to comply with the permits; ///// - not applicable as this column only presents results of those permits that would induce increase of monthly residential sewer rate.

***: Yes - affordable, No - not affordable, Mandate - federal mandate regardless of affordability.