STATE OF MISSOURI

DEPARTMENT OF NATURAL RESOURCES

MISSOURI CLEAN WATER COMMISSION

MISSOURI STATE OPERATING PERMIT

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

Permit No.	MO-0040801
Owner:	City of Curryville
Address:	P.O. Box 160, Curryville, MO 63339
Continuing Authority:	Same as above
Address:	Same as above
Facility Name:	Curryville Wastewater Treatment Facility
Facility Address:	Southwest of Highway E and North Central Drive, Curryville, MO 63339
Legal Description:	SW ¼, SE ¼, NE ¼, Sec. 21, T53N, R4W, Pike County
Latitude/Longitude:	+3921113/-09120552
Receiving Stream:	Unnamed tributary to South Spencer Creek (U)
First Classified Stream and ID:	South Spencer Creek (C) (00098)
USGS Basin & Sub-watershed No.:	(07110007-030003)

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

FACILITY DESCRIPTION

Outfall #001 – POTW – SIC #4952 – **Certified Level D Operator Required**
Lift Station/Three-cell lagoon/sludge retained in lagoon.
Design population equivalent is 765.
Design flow is 76,500 gallons per day.
Actual flow is 11,000 gallons per day.
Design sludge production is 11.5 dry tons/year.

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

August 21, 2009
Effective Date

Mark N. Templeton, Director
Department of Natural Resources

August 20, 2014
Expiration Date

Irene Crawford
Regional Director, Northeast Regional Office

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

The permittee is authorized to discharge from outfall(s) with serial number(s) as specified in the application for this permit. The interim effluent limitations shall become effective upon issuance and remain in effect until August 31, 2012. Such discharges shall be controlled, limited and monitored by the permittee as specified below:

OUTFALL NUMBER AND EFFLUENT PARAMETER(S)	UNITS	INTERIM EFFLUENT LIMITATIONS			MONITORING REQUIREMENTS	
		DAILY MAXIMUM	WEEKLY AVERAGE	MONTHLY AVERAGE	MEASUREMENT FREQUENCY	SAMPLE TYPE
Outfall #001						
Flow	MGD	*		*	once/weekday**	24 hr. estimate
Biochemical Oxygen Demand$_5$***	mg/L		65	45	once/month	grab
Total Suspended Solids***	mg/L		120	80	once/month	grab
pH – Units	SU	****		****	once/month	grab
Ammonia as N	mg/L	*		*	once/month	grab
Temperature	°C	*		*	once/month	grab
Oil & Grease	mg/L	15		10	once/month	grab

MONITORING REPORTS SHALL BE SUBMITTED MONTHLY; THE FIRST REPORT IS DUE OCTOBER 28, 2009. THERE SHALL BE NO DISCHARGE OF FLOATING SOLIDS OR VISIBLE FOAM IN OTHER THAN TRACE AMOUNTS.

Whole Effluent Toxicity (WET) test	% Survival	See Special Conditions #10	once/every five (5) years	grab

MONITORING REPORTS SHALL BE SUBMITTED ONCE/FIVE (5) YEARS; THE FIRST REPORT IS DUE JANUARY 28, 2012.

B. STANDARD CONDITIONS

IN ADDITION TO SPECIFIED CONDITIONS STATED HEREIN, THIS PERMIT IS SUBJECT TO THE ATTACHED Parts I, II, & III STANDARD CONDITIONS DATED October 1, 1980 and August 15, 1994, AND HEREBY INCORPORATED AS THOUGH FULLY SET FORTH HEREIN.

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS (continued)

* Monitoring requirement only.
** Once each weekday means: Monday, Tuesday, Wednesday, Thursday, and Friday.
*** This facility is required to meet a removal efficiency of 65% or more.
**** pH is measured in pH units and is not to be averaged. The pH is to be maintained at or above 6.0 pH units.

C. INFLUENT MONITORING REQUIREMENTS

The facility is required to meet a removal efficiency of 65% or more. The monitoring requirements shall become effective upon issuance and remain in effect until expiration of the permit. To determine removal efficiencies, the influent wastewater shall be monitored by the permittee as specified below:

SAMPLING LOCATION AND PARAMETER(S)	UNITS	MONITORING REQUIREMENTS	
		MEASUREMENT FREQUENCY	SAMPLE TYPE
Influent			
Biochemical Oxygen Demand$_5$	mg/L	once/quarter*****	grab
Total Suspended Solids	mg/L	once/quarter*****	grab

MONITORING REPORTS SHALL BE SUBMITTED QUARTERLY; THE FIRST REPORT IS DUE JANUARY 28, 2010.

C. INFLUENT MONITORING REQUIREMENTS (continued)

***** Sample once per quarter in the months of March, June, September, and December.

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

The permittee is authorized to discharge from outfall(s) with serial number(s) as specified in the application for this permit. The final effluent limitations shall become effective September 1, 2012, and remain in effect until expiration of the permit. Such discharges shall be controlled, limited and monitored by the permittee as specified below:

OUTFALL NUMBER AND EFFLUENT PARAMETER(S)	UNITS	FINAL EFFLUENT LIMITATIONS			MONITORING REQUIREMENTS	
		DAILY MAXIMUM	WEEKLY AVERAGE	MONTHLY AVERAGE	MEASUREMENT FREQUENCY	SAMPLE TYPE
Outfall #001						
Flow	MGD	*		*	once/weekday**	24 hr. estimate
Biochemical Oxygen Demand$_5$***	mg/L		65	45	once/month	grab
Total Suspended Solids***	mg/L		120	80	once/month	grab
pH – Units	SU	****		****	once/month	grab
Ammonia as N	mg/L				once/month	grab
(May 1 – Oct 31)		4.5		1.4		
(Nov 1 – April 30)		7.5		2.9		
Temperature	°C	*		*	once/month	grab
Oil & Grease	mg/L	15		10	once/month	grab

MONITORING REPORTS SHALL BE SUBMITTED MONTHLY; THE FIRST REPORT IS DUE OCTOBER 28 2012. THERE SHALL BE NO DISCHARGE OF FLOATING SOLIDS OR VISIBLE FOAM IN OTHER THAN TRACE AMOUNTS.

Whole Effluent Toxicity (WET) test	% Survival	See Special Conditions #10	once/every five (5) years grab

MONITORING REPORTS SHALL BE SUBMITTED ONCE/FIVE (5) YEARS; THE FIRST REPORT IS DUE JANUARY 28, 2012.

B. STANDARD CONDITIONS

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A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS (continued)

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The facility is required to meet a removal efficiency of 65% or more. The monitoring requirements shall become effective upon issuance and remain in effect until expiration of the permit. To determine removal efficiencies, the influent wastewater shall be monitored by the permittee as specified below:

SAMPLING LOCATION AND PARAMETER(S)	UNITS	MONITORING REQUIREMENTS	
		MEASUREMENT FREQUENCY	SAMPLE TYPE
Influent			
Biochemical Oxygen Demand$_5$	mg/L	once/quarter*****	grab
Total Suspended Solids	mg/L	once/quarter*****	grab

MONITORING REPORTS SHALL BE SUBMITTED QUARTERLY; THE FIRST REPORT IS DUE JANUARY 28, 2010.

C. INFLUENT MONITORING REQUIREMENTS (continued)

***** Sample once per quarter in the months of March, June, September, and December.

D. SPECIAL CONDITIONS

1. This permit may be reopened and modified, or alternatively revoked and reissued, to:
   (a) Comply with any applicable effluent standard or limitation issued or approved under Sections 301(b)(2)(C) and (D), 304(b)(2), and 307(a) (2) of the Clean Water Act, if the effluent standard or limitation so issued or approved:
      (1) contains different conditions or is otherwise more stringent than any effluent limitation in the permit; or
      (2) controls any pollutant not limited in the permit.
   (b) Incorporate new or modified effluent limitations or other conditions, if the result of a waste load allocation study, toxicity test or other information indicates changes are necessary to assure compliance with Missouri's Water Quality Standards.
   (c) Incorporate new or modified effluent limitations or other conditions if, as the result of a watershed analysis, a Total Maximum Daily Load (TMDL) limitation is developed for the receiving waters which are currently included in Missouri's list of waters of the state not fully achieving the state's water quality standards, also called the 303(d) list.

   The permit as modified or reissued under this paragraph shall also contain any other requirements of the Clean Water Act then applicable.

2. All outfalls must be clearly marked in the field.

3. Permittee will cease discharge by connection to a facility with an area-wide management plan per [10 CSR 20-6.010(3)(B)1 or 2] within 90 days of notice of its availability. The permittee shall obtain department approval for closure or alternate use of the facility.

4. Changes in Discharges of Toxic Substances

   The permittee shall notify the Director as soon as it knows or has reason to believe:
   (a) That any activity has occurred or will occur which would result in the discharge of any toxic pollutant which is not limited in the permit, if that discharge will exceed the highest of the following "notification levels:"
      (1) One hundred micrograms per liter (100 µg/L);
      (2) Two hundred micrograms per liter (200 µg/L) for acrolein and acrylonitrile; five hundred micrograms per liter (500 µg/L) for 2,5 dinitrophenol and for 2-methyl-4, 6-dinitrophenol; and one milligram per liter (1 mg/L) for antimony;
      (3) Five (5) times the maximum concentration value reported for the pollutant in the permit application;
      (4) The level established in Part A of the permit by the Director.
   (b) That they have begun or expect to begin to use or manufacture as an intermediate or final product or byproduct any toxic pollutant, which was not reported in the permit application.

5. Report as no-discharge when a discharge does not occur during the report period.

6. Water Quality Standards
   (a) Discharges to waters of the state shall not cause a violation of water quality standards rule under 10 CSR 20-7.031, including both specific and general criteria.
   (b) General Criteria. The following general water quality criteria shall be applicable to all waters of the state at all times including mixing zones. No water contaminant, by itself or in combination with other substances, shall prevent the waters of the state from meeting the following conditions:
      (1) Waters shall be free from substances in sufficient amounts to cause the formation of putrescent, unsightly or harmful bottom deposits or prevent full maintenance of beneficial uses;
      (2) Waters shall be free from oil, scum and floating debris in sufficient amounts to be unsightly or prevent full maintenance of beneficial uses;
      (3) Waters shall be free from substances in sufficient amounts to cause unsightly color or turbidity, offensive odor or prevent full maintenance of beneficial uses;
      (4) Waters shall be free from substances or conditions in sufficient amounts to result in toxicity to human, animal or aquatic life;
      (5) There shall be no significant human health hazard from incidental contact with the water;
      (6) There shall be no acute toxicity to livestock or wildlife watering;
      (7) Waters shall be free from physical, chemical or hydrologic changes that would impair the natural biological community;
      (8) Waters shall be free from used tires, car bodies, appliances, demolition debris, used vehicles or equipment and solid waste as defined in Missouri's Solid Waste Law, section 260.200, RSMo, except as the use of such materials is specifically permitted pursuant to section 260.200-260.247.

D. SPECIAL CONDITIONS (continued)

7. Sludge and Biosolids Use For Domestic Wastewater Treatment Facilities
   (a) Permittee shall comply with the pollutant limitations, monitoring, reporting, and other requirements in accordance with the attached permit Standard Conditions.
   (b) If sludge is not removed by a contract hauler, permittee is authorized to land apply biosolids. Permit Standard Conditions, Part III shall apply to the land application of biosolids. Permittee shall notify the department at least 180 days prior to the planned removal of biosolids. The department may require submittal of a biosolids management plan for department review and approval as determined appropriate on a case-by-case basis.

8. The permittee shall comply with any applicable requirements listed in 10 CSR 20-8 and 10 CSR 20-9, unless the facility has received written notification that the Department has approved a modification to the requirements. The monitoring frequencies contained in this permit shall not be construed by the permittee as a modification of the monitoring frequencies listed in 10 CSR 20-9. If a modification of the monitoring frequencies listed in 10 CSR 20-9 is needed, the permittee shall submit a written request to the department for review and, if deemed necessary, approval.

9. The permittee shall develop and implement a program for maintenance and repair of the collection system. The recommended guidance is the US EPA's Guide for Evaluating Capacity, Management, Operation, and Maintenance (CMOM) Programs at Sanitary Sewer Collection Systems (Document number EPA 305-B-05-002). The permittee shall submit a report semi-annually in April and October with the Discharge and Monitoring reports which address measures taken to locate and eliminate sources of infiltration and inflow into the collection system serving the facility.

10. Acute Whole Effluent Toxicity (WET) tests shall be conducted as follows:

SUMMARY OF WET TESTING FOR THIS PERMIT				
OUTFALL	A.E.C. %	FREQUENCY	SAMPLE TYPE	MONTH
#001	100 %	Once/five years	Grab	Any, 2011

   (a) Test Schedule and Follow-Up Requirements
      (1) Perform a MULTIPLE-dilution acute WET test in the months and at the frequency specified above. For tests which are successfully passed, submit test results using the Department's WET test report form #MO-780-1899 along with complete copies of the test reports as received from the laboratory, including copies of chain-of-custody forms within 30 calendar days of availability to the WATER PROTECTION PROGRAM, P.O. Box 176, Jefferson City, MO 65102. If the effluent passes the test, do not repeat the test until the next test period.
         (a) For discharges of stormwater, samples shall be collected within three hours from when discharge first occurs.
         (b) Samples submitted for analysis of stormwater discharges shall be collected as a grab.
         (c) For discharges of non-stormwater, samples shall be collected only when precipitation has not occurred for a period of forty-eight hours prior to sample collection. In no event shall sample collection occur simultaneously with the occurrence of precipitation excepting for stormwater samples.
         (d) A twenty-four hour composite sample shall be submitted for analysis of non-stormwater discharges.
         (e) Upstream receiving water samples, where required, shall be collected upstream from any influence of the effluent where downstream flow is clearly evident.
         (f) Samples submitted for analysis of upstream receiving water may be collected as either a grab or twenty-four-hour composite as appropriate to the nature of the discharge.
         (g) Chemical and physical analysis of the upstream control and effluent sample shall occur immediately upon being received by the laboratory, prior to any manipulation of the effluent sample beyond preservation methods consistent with federal guidelines for WET testing that are required to stabilize the sample during shipping.
         (h) Any and all chemical or physical analysis of the effluent sample performed in conjunction with the WET test shall be performed at the 100% Effluent concentration in addition to analyses performed upon any other effluent concentration.
         (i) All chemical analyses included in the Missouri Department of Natural Resources WET test report form #MO-780-1899 shall be performed and results shall be recorded in the appropriate field of the report form.
         (j) Where flow-weighted composite sample is required for analysis, the samples shall be composited at the laboratory where the test is to be performed.
         (k) Where in stream testing is required downstream from the discharge, sample collection shall occur immediately below the established Zone of Initial Dilution in conjunction with or immediately following a release or discharge.

D. SPECIAL CONDITIONS (continued)

(l) Samples submitted for analysis of downstream receiving water may be collected as either a grab or twenty-four-hour composite as appropriate to the nature of the discharge.
(m) All instream samples, including downstream samples, shall be tested for toxicity at the 100% concentration in addition to any other assigned AEC for in-stream samples.

(2) All failing test results along with complete copies of the test reports as received from the laboratory, INCLUDING THOSE TESTS CONDUCTED UNDER CONDITION (3) BELOW, shall be reported to the WATER PROTECTION PROGRAM, P.O. Box 176, Jefferson City, MO 65102 within 14 calendar days of the availability of the results.
(3) If the effluent fails the test, a multiple dilution test shall be performed for BOTH test species within 30 calendar days and biweekly thereafter (for storm water, tests shall be performed on the next and subsequent storm water discharges as they occur, but not less than 7 days apart) until one of the following conditions are met:
(a) THREE CONSECUTIVE MULTIPLE-DILUTION TESTS PASS. No further tests need to be performed until next regularly scheduled test period.
(b) A TOTAL OF THREE MULTIPLE-DILUTION TESTS FAIL.
(4) Failure of at least two multiple-dilution tests during any period of accelerated monitoring violates the permit narrative requirement for aquatic life protection.
(5) The permittee shall submit a summary of all test results for the test series along with complete copies of the test reports as received from the laboratory to the WATER PROTECTION PROGRAM, P.O. Box 176, Jefferson City, MO 65102 within 14 calendar days of the third failed test.
(6) Additionally, the following shall apply upon failure of the third MULTIPLE DILUTION test: A toxicity identification evaluation (TIE) or toxicity reduction evaluation (TRE) is automatically triggered. The permittee shall contact THE WATER PROTECTION PROGRAM within 14 calendar days from availability of the test results to ascertain as to whether a TIE or TRE is appropriate. The permittee shall submit a plan for conducting a TIE or TRE to the WATER PROTECTION PROGRAM within 60 calendar days of the date of DNR's direction to perform either a TIE or TRE. This plan must be approved by DNR before the TIE or TRE is begun. A schedule for completing the TIE or TRE shall be established in the plan approval.
(7) Upon DNR's approval, the TIE/TRE schedule may be modified if toxicity is intermittent during the TIE/TRE investigations. A revised WET test schedule may be established by DNR for this period.
(8) If a previously completed TIE has clearly identified the cause of toxicity, additional TIEs will not be required as long as effluent characteristics remain essentially unchanged and the permittee is proceeding according to a DNR approved schedule to complete a TRE and reduce toxicity. Regularly scheduled WET testing as required in the permit, without the follow-up requirements, will be required during this period.
(9) When WET test sampling is required to run over one DMR period, each DMR report shall contain a copy of the Department's WET test report form that was generated during the reporting period.
(10) Submit a concise summary in tabular format of all WET test results with the annual report.

(b) PASS/FAIL procedure and effluent limitations:
(1) To pass a multiple-dilution test:
(a) For facilities with a computed percent effluent at the edge of the zone of initial dilution, Allowable Effluent Concentration (AEC) OF 30% OR LESS, the AEC must be less than three-tenths (0.3) of the LC_{50} concentration for the most sensitive of the test organisms; **OR**,
(b) For facilities with an AEC greater than 30%, the LC50 concentration must be greater than 100%; **AND**,
(c) All effluent concentrations equal to or less than the AEC must be nontoxic. Mortality observed in all effluent concentrations equal to or less than the AEC shall not be significantly different (at the 95% confidence level; $p = 0.05$) than that observed in the upstream receiving-water control sample. Where upstream receiving water is not available mortality observed in the AEC test concentration shall not be significantly different (at the 95% confidence level; $p = 0.05$) than that observed in the laboratory control. The appropriate statistical tests of significance shall be consistent with the most current edition of METHODS FOR MEASURING THE ACUTE TOXICITY OF EFFLUENTS AND RECEIVING WATERS TO FRESHWATER AND MARINE ORGANISMS or other federal guidelines as appropriate or required. Failure of one multiple-dilution test may be considered an effluent limit violation.

D. SPECIAL CONDITIONS (continued)

(c) Test Conditions
(1) Test Type: Acute Static non-renewal
(2) All tests, including repeat tests for previous failures, shall include both test species listed below.
(3) Test species: Ceriodaphnia dubia and Pimephales promelas (fathead minnow). Organisms used in WET testing shall come from cultures reared for the purpose of conducting toxicity tests and cultured in a manner consistent with the most current USEPA guidelines. All test animals shall be cultured as described in the most current edition of Methods for Measuring the Acute Toxicity of Effluents and Receiving Waters to Freshwater and Marine Organisms.
(4) Test period: 48 hours at the "Acceptable Effluent Concentration" (AEC) specified above.
(5) Upstream receiving stream water shall be used as dilution water. If upstream water is unavailable or if mortality in the upstream water exceeds 10%, "reconstituted" water will be used as dilution water. Procedures for generating reconstituted water will be supplied by the MDNR upon request.
(6) Multiple-dilution tests will be run with:
(a) 100%, 50%, 25%, 12.5%, and 6.25% effluent, unless the AEC is less than 25% effluent, in which case dilutions will be 4 times the AEC, two times the AEC, AEC, 1/2 AEC and 1/4 AEC;
(b) 100% receiving-stream water (if available), collected upstream of the outfall at a point beyond any influence of the effluent; and
(c) reconstituted water.
(7) If reconstituted-water control mortality for a test species exceeds 10%, the entire test will be rerun.
(8) If upstream control mortality exceeds 10%, the entire test will be rerun using reconstituted water as the dilutant.

SUMMARY OF TEST METHODOLOGY FOR ACUTE WHOLE-EFFLUENT TOXICITY TESTS

Whole-effluent-toxicity test required in NPDES permits shall use the following test conditions when performing single or multiple dilution methods. Any future changes in methodology will be supplied to the permittee by the Missouri Department of Natural Resources (MDNR). Unless more stringent methods are specified by the DNR, the procedures shall be consistent with the most current edition of Methods for Measuring the Acute Toxicity of Effluents and Receiving Waters to Freshwater and Marine Organisms,

Test conditions for Ceriodaphnia dubia:

Test duration:	48 h
Temperature:	25 ± 1°C Temperatures shall not deviate by more than 3°C during the test.
Light Quality:	Ambient laboratory illumination
Photoperiod:	16 h light, 8 h dark
Size of test vessel:	30 mL (minimum)
Volume of test solution:	15 mL (minimum)
Age of test organisms:	<24 h old
No. of animals/test vessel:	5
No. of replicates/concentration:	4
No. of organisms/concentration:	20 (minimum)
Feeding regime:	None (feed prior to test)
Aeration:	None
Dilution water:	Upstream receiving water; if no upstream flow, synthetic water modified to reflect effluent hardness.
Endpoint:	Pass/Fail (Statistically significant Mortality when compared to upstream receiving water control or synthetic control if upstream water was not available at $p \leq 0.05$)
Test acceptability criterion:	90% or greater survival in controls

Test conditions for Pimephales promelas:

Test duration:	48 h
Temperature:	25 ± 1°C Temperatures shall not deviate by more than 3°C during the test.
Light Quality:	Ambient laboratory illumination
Photoperiod:	16 h light/ 8 h dark
Size of test vessel:	250 mL (minimum)
Volume of test solution:	200 mL (minimum)
Age of test organisms:	1-14 days (all same age)
No. of animals/test vessel:	10
No. of replicates/concentration:	4 (minimum) single dilution method 2 (minimum) multiple dilution method
No. of organisms/concentration:	40 (minimum) single dilution method 20 (minimum) multiple dilution method
Feeding regime:	None (feed prior to test)
Aeration:	None, unless DO concentration falls below 4.0 mg/L; rate should not exceed 100 bubbles/min.
Dilution water:	Upstream receiving water; if no upstream flow, synthetic water modified to reflect effluent hardness.
Endpoint:	Pass/Fail (Statistically significant Mortality when compared to upstream receiving water control or synthetic control if upstream water was not available at $p \leq 0.05$)
Test Acceptability criterion:	90% or greater survival in controls

E. SCHEDULE OF COMPLIANCE

AMMONIA AS N

The final daily maximum and monthly average Ammonia as N limits shall become effective three (3) years after the issue date of the permit. The Effluent Regulation, 10 CSR 20-7.031(10) allows the permittee up to three (3) years from the issuance date of this permit to comply with new or revised National Pollutant Discharge Elimination System (NPDES) or Missouri operating permit limitations based on criteria in the Clean Water Commission Regulations. It states that such compliance "shall be achieved with all deliberate speed and no later than three (3) years from the date of issuance of the permit." Therefore modification to the facilities must be made if required to meet the final effluent limits of this permit.

1. If modifications to the facility are required to meet the final effluent limits of this permit, the City of Curryville shall submit engineering plans, engineering specifications, and a construction permit application by **August 21, 2010**, for changes to the Curryville Wastewater Treatment Facility so the discharge from the facility will meet the final effluent limits for Ammonia as N.

2. If completion of construction will be more than 1 year, the City of Curryville shall submit interim progress reports every 12 months from **August 21, 2009**.

3. If the City of Curryville determines that modifications to the facility are not needed to meet the final effluent limits of this permit, the City of Curryville shall submit a letter to the department by August 21, 2010 stating that modifications are not needed for the Curryville Wastewater Treatment Facility to meet the final effluent limitations of this permit.

4. The Curryville Wastewater Treatment Facility will meet final effluent limits by **August 21, 2012**.

F. ADDITIONAL CONDITIONS

1. Permit Transfer -This permit may be transferred to a new owner by submitting an "Application for Transfer of Operating Permit" signed by the seller and buyer of the facility, along with the appropriate modification fee.

2. Permit Renewal Requirements -Unless this permit is terminated, the permittee shall submit an application for the renewal of this permit no later than six (6) months prior to the permit's expiration date. Failure to apply for renewal may result in termination of this permit and enforcement action to compel compliance with this condition and the Missouri Clean Water Law.

3. Termination -In order to terminate this permit, the permittee shall notify the department by submitting Form J, included with the State Operating Permit. The permittee shall complete Form J and mail it to the department at the address noted in the cover letter of this permit. Proper closure of any storage structure is required prior to permit termination. A closure plan shall be submitted to the department and approved prior to initiating closure activities.

4. Duty Of Compliance - The permittee shall comply with all conditions of this permit. Any noncompliance with this permit constitutes a violation of Chapter 644, Missouri Clean Water Law, and 10 CSR 20-6. Noncompliance may result in enforcement action, termination of this authorization, or denial of the permittee's request for renewal.

   This permit authorizes only the activities described in this permit. Compliance with this permit may not be considered a shield from compliance with any local ordinance, State Regulation or State Law.

Missouri Department of Natural Resources
Statement of Basis
Curryville Wastewater Treatment Facility
MO-0040801

A Statement of Basis (Statement) gives pertinent information regarding the applicable regulations and rational for the development of the NPDES Missouri State Operating Permit (operating permit). This Statement includes Wasteload Allocations, Water Quality Based Effluent Limitations, and Reasonable Potential Analysis calculations as well as any other calculations that effect the effluent limitations of this operating permit. This Statement does not pertain to operating permits that include sewage sludge land application plans and variance procedures, and does not include the public comment process for this operating permit.

A Statement is not an enforceable part of an operating permit.

Part I – Facility Information

Facility Type: POTW
Facility SIC Code(s): #4952
Facility Description: The facility has a lift station at the head works followed by a three-cell lagoon; sludge is retained in the lagoon.

OUTFALL(S) TABLE:

OUTFALL	DESIGN FLOW (CFS)	TREATMENT LEVEL	EFFLUENT TYPE	DISTANCE TO CLASSIFIED SEGMENT (MI)
#001	0.118	equivalent to secondary	domestic wastewater	~ 6.2

Receiving Water Body's Water Quality & Facility Performance History:
The last Stream Survey conducted at the facility on August 4, 1983 found no discharge from the facility to impact the receiving stream; no Low Flow Studies have been conducted at this facility.
The facility has not violated any permitted effluent limitations according to submitted discharge monitoring reports.

Comments:
The facility was not in compliance when it was last inspected on September 22, 2008. Compliance issues included failure to mark the outfall; failure to apply for renewal of the permit at least 180 days prior to its expiration; failure to provide warning signs on all sides of the perimeter fence; failure to provide adequate fencing; and failure to collect an influent sample to ensure a removal efficiency of 65%. The City was sent a return to compliance letter on December 1, 2008.

Part II A – Operator Certification Requirements

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

- Owned or operated by or for:
  - Municipalities ☒
  - Public Sewer District: ☐
  - County ☐
  - Public Water Supply Districts: ☐
  - Private sewer company regulated by the Public Service Commission: ☐
  - State or Federal agencies:

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

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

Operator's Name: Ricky L. Gordon
Certification Number: 2767
Certification Level: A

Part II B – Operational Monitoring

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

Part III – Receiving Stream Information

APPLICABLE DESIGNATIONS OF WATERS OF THE STATE:

As per Missouri's Effluent Regulations [10 CSR 20-7.015], the waters of the state are divided into the below listed seven (7) categories. Each category lists effluent limitations for specific parameters, which are presented in each outfall's Effluent Limitation Table and further discussed in the Derivation & Discussion of Limits section.

Missouri or Mississippi River [10 CSR 20-7.015(2)]: ☐
Lake or Reservoir [10 CSR 20-7.015(3)]: ☐
Losing [10 CSR 20-7.015(4)]: ☐
Metropolitan No-Discharge [10 CSR 20-7.015(5)]: ☐
Special Stream [10 CSR 20-7.015(6)]: ☐
Subsurface Water [10 CSR 20-7.015(7)]: ☐
All Other Waters [10 CSR 20-7.015(8)]: ☒

10 CSR 20-7.031 Missouri Water Quality Standards, the department defines the Clean Water Commission water quality objectives in terms of "water uses to be maintained and the criteria to protect those uses." The receiving stream and/or 1st classified receiving stream's beneficial water uses to be maintained, are located in the Receiving Stream Table located below in accordance with [10 CSR 20-7.031(3)].

RECEIVING STREAM(S) TABLE:

WATERBODY NAME	CLASS	WBID	DESIGNATED USES*	8-DIGIT HUC	EDU**
Unnamed tributary to South Spencer Creek	U	N/A	General Criteria	07110007	Central Plains / Cuivre / Salt
South Spencer Creek	C	00098	LWW, AQL, WBC-B***		

* - Irrigation (IRR), Livestock & Wildlife Watering (LWW), Protection of Warm Water Aquatic Life and Human Health-Fish Consumption (AQL), Cool Water Fishery(CLF), Cold Water Fishery (CDF), Whole Body Contact Recreation (WBC), Secondary Contact Recreation (SCR), Drinking Water Supply (DWS), Industrial (IND), Groundwater (GRW).
** - Ecological Drainage Unit.
*** - UAA has not been conducted.
N/A – Not applicable.

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

ANTI-BACKSLIDING:

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

☒ - All limits in this statement are at least as protective as those previously established; therefore, backsliding does not apply.

AREA-WIDE WASTE TREATMENT MANAGEMENT & CONTINUING AUTHORITY:

As per [10 CSR 20-6.010(8)(A)10.], when a Continuing Authority under paragraph 10 CSR 20-6.010(3)(B)1. or 2. is expected to be available for connection within the next five (5) years, any operating permit issued to a permittee under this paragraph, located within the service area of the paragraph (3)(B)1. or 2. facility, shall contain the following special condition… This language is contained in Special Condition #3 of this operating permit.

COMPLIANCE AND ENFORCEMENT:

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

Not Applicable ☒ - The permittee/facility is not currently under Water Protection Program enforcement action.

REASONABLE POTENTIAL ANALYSIS (RPA):

Federal regulation [40 CFR Part 122.44(d)(1)(i)] requires effluent limitations for all pollutants that are or may be discharged at a level that will cause or have the reasonable potential to cause or contribute to an in-stream excursion above narrative or numeric water quality standard.

In accordance with [40 CFR Part 122.44(d)(iii)] if the permit writer determines that any give pollutant has the reasonable potential to cause, or contribute to an in-stream excursion above the WQS, the permit must contain effluent limits for that pollutant.

Applicable ☒ - A RPA was conducted on appropriate parameters. Please see **APPENDIX B – RPA RESULTS.**

REMOVAL EFFICIENCY:
Removal efficiency is a method by which the Federal Regulations define Secondary Treatment and Equivalent to Secondary Treatment, which applies to Biochemical Oxygen Demand 5-day (BOD_5) and Total Suspended Solids (TSS) for Publicly Owned Treatment Works (POTWs)/municipals. Please see the United States Environmental Protection Agency's (EPA) website for interpretation of percent removal requirements for National Pollutant Discharge Elimination System Permit Application Requirements for Publicly Owned Treatment Works and Other Treatment Works Treating Domestic Sewage at www.epa.gov/fedrgstr/EPA-WATER/1999/August/Day-04/w18866.htm

Applicable ☒ - Equivalent to Secondary Treatment is 65% removal [40 CFR Part 105(a)(3) & (b)(3)].

SANITARY SEWER OVERFLOWS (SSOS), BYPASSES, INFLOW & INFILTRATION (I&I) – PREVENTION/REDUCTION:
Sanitary Sewer Systems (SSSs) are municipal wastewater collection system that convey domestic, commercial, and industrial wastewater, and limited amounts of infiltrated groundwater and storm water (i.e. I&I), to a POTW. SSSs are not designed to collect large amounts of storm water runoff from precipitation events.

Untreated or partially treated discharges from SSSs are commonly referred to as SSOs. SSOs have a variety of causes including blockages, line breaks, sewer defects that allow excess storm water and ground water to overload the system, lapses in sewer system operation and maintenance, inadequate sewer design and construction, power failures, and vandalism. A SSOs is defined as an untreated or partially treated sewage release from a SSS. SSOs can occur at any point in an SSS, during dry weather or wet weather. SSOs include overflows that reach waters of the state. SSOs also include overflows out of manholes and onto city streets, sidewalks, and other terrestrial locations. SSSs can back up into buildings, including private residences. When sewage backups are caused by problems in the publicly-owned portion of an SSS, they are considered SSOs.

Applicable ☒ - The permittee is required to develop or implement a program for maintenance and repair of the collection system and shall be required in this operating permit by either means of a Special Condition or Schedule of Compliance. In addition, the department considers the development of this program as an implementation of this condition.

At this time, the department recommends the US EPA's Guide for Evaluating Capacity, Management, Operation and Maintenance (CMOM) Programs At Sanitary Sewer Collection Systems (Document # EPA 305-B-05-002). The CMOM identifies some of the criteria used by the EPA to evaluate a collection system's management, operation, and maintenance and was intended for use by the EPA, state, regulated community, and/or third party entities. The CMOM is applicable to small, medium, and large systems; both public and privately owned; and both regional and satellite collection systems. The CMOM does not substitute for the Clean Water Act, the Missouri Clean Water Law, and both federal and state regulations, as it is not a regulation.

SCHEDULE OF COMPLIANCE (SOC):
A schedule of remedial measures included in a permit, including an enforceable sequence of interim requirements (actions, operations, or milestone events) leading to compliance with the Missouri Clean Water Law, its implementing regulations, and/or the terms and conditions of an operating permit.

Applicable ☒ - The time given for effluent limitations of this permit listed under Interim Effluent Limitation and Final Effluent Limitations where established in accordance with [10 CSR 20-7.031(10)].

STORM WATER POLLUTION PREVENTION PLAN (SWPPP):
In accordance with 40 CFR 122.44(k) *Best Management Practices (BMPs)* to control or abate the discharge of pollutants when: (1) Authorized under section 304(e) of the Clean Water Act (CWA) for the control of toxic pollutants and hazardous substances from ancillary industrial activities: (2) Authorized under section 402(p) of the CWA for the control of storm water discharges; (3) Numeric effluent limitations are infeasible; or (4) the practices are reasonably necessary to achieve effluent limitations and standards or to carry out the purposes and intent of the CWA.

In accordance with the EPA's *Storm Water Management for Industrial Activities: Developing Pollution Prevention Plans and Best Management Practices* [EPA 832-R-92-006] (Storm Water Management), BMPs are measures or practices used to reduce the amount of pollution entering (regarding this operating permit) waters of the state. BMPs may take the form of a process, activity, or physical structure.

Additionally in accordance with the Storm Water Management, a SWPPP is a series of steps and activities to (1) identify sources of pollution or contamination, and (2) select and carry out actions which prevent or control the pollution of storm water discharges.

Not Applicable ☒ - At this time, the permittee is not required to develop and implement a SWPPP.

WASTELOAD ALLOCATIONS (WLA) FOR LIMITS:
As per [10 CSR 20-2.010(78)], the amount of pollutant each discharger is allowed by the department to release into a given stream after the department has determined to total amount of pollutant that may be discharged into that stream without endangering its water quality.

Applicable ☒ - Wasteload allocations were calculated where applicable using water quality criteria or water quality model results and the dilution equation below:

$$C = \frac{(Cs \times Qs) + (Ce \times Qe)}{(Qe + Qs)}$$ (EPA/505/2-90-001, Section 4.5.5)

Where C = downstream concentration
Cs = upstream concentration
Qs = upstream flow
Ce = effluent concentration
Qe = effluent flow

Chronic wasteload allocations were determined using applicable chronic water quality criteria (CCC: criteria continuous concentration) and stream volume of flow at the edge of the mixing zone (MZ). Acute wasteload allocations were determined using applicable water quality criteria (CMC: criteria maximum concentration) and stream volume of flow at the edge of the zone of initial dilution (ZID).

Water quality based maximum daily and average monthly effluent limitations were calculated using methods and procedures outlined in USEPA's "Technical Support Document For Water Quality-based Toxics Control" (EPA/505/2-90-001).

WATER QUALITY STANDARDS:
Per [10 CSR 20-7.031(3)], General Criteria shall be applicable to all waters of the state at all times including mixing zones. Additionally, [40 CFR 122.44(d)(1)] directs the department to establish in each NPDES permit to include conditions to achieve water quality established under Section 303 of the Clean Water Act, including State narrative criteria for water quality.

WHOLE EFFLUENT TOXICITY (WET) TEST:
A WET test is a quantifiable method of determining if a discharge from a facility may be causing toxicity to aquatic life by itself, in combination with or through synergistic responses when mixed with receiving stream water.

Applicable ☒ - In accordance with the Clean Water Act (CWA) §101(a)(3), requiring WET testing is reasonably appropriate for site-specific Missouri State Operating Permits for discharges to waters of the state issued under the National Pollutant Discharge Elimination System. Furthermore, WET testing is a means by which the department determines that [10 CSR 20-7.031(3)(D, F, & G)] are being met by the permitted facility. In addition to justification for the WET testing, WET tests are required under [10 CSR 20-6.010(8)(A)4] to be performed by specialist who are properly trained in conducting the test according to the methods prescribed by the Federal Government as referenced in [40 CFR Part 136]. A WET test may be applied to facilities that meet the following criteria:

- ☐ Facility is a designated Major.
- ☐ Facility continuously or routinely exceeds its design flow.
- ☐ Facility (industrial) that alters its production process throughout the year.
- ☐ Facility handles large quantities of toxic substances, or substances that are toxic in large amounts.
- ☐ Facility has Water Quality-based Effluent Limitations for toxic substances (other than NH_3)
- ☒ Facility is a municipality or domestic discharger with a Design Flow ≥ 22,500 gpd.
- ☐ Other – please justify.

303(d) LIST & TOTAL MAXIMUM DAILY LOAD (TMDL):
Section 303(d) of the federal Clean Water Act requires that each state identify waters that are not meeting water quality standards and for which adequate water pollution controls have not been required. Water quality standards protect such beneficial uses of water as whole body contact (such as swimming), maintaining fish and other aquatic life, and providing drinking water for people, livestock and wildlife. The 303(d) list helps state and federal agencies keep track of waters that are impaired but not addressed by normal water pollution control programs.

A TMDL is a calculation of the maximum amount of a given pollutant that a body of water can absorb before its water quality is affected. If a water body is determined to be impaired as listed on the 303(d) list, then a watershed management plan will be developed that shall include the TMDL calculation

Not Applicable ☒ - This facility does not discharge to a 303(d) listed stream.

Part V – Effluent Limits Determination

Outfall #001 – Main Facility Outfall

Effluent Limitations Table:

PARAMETER	Unit	Basis for Limits	Daily Maximum	Weekly Average	Monthly Average	Modified	previous permit limitations
Flow	MGD	1	*		*	NO	S
Biochemical Oxygen Demand$_5$	mg/L	1/4		65	45	NO	S
Total Suspended Solids	mg/L	1/4		120	80	NO	S
pH	SU	1/4	≥ 6		≥ 6	NO	S
Temperature	ºC	1/5/9	*		*	NO	S
Ammonia as N (Interim)	mg/L	2/3/5	*		*	NO	S
Ammonia as N (Final) (May 1 – Oct 31)	mg/L	2/3/5	4.5		1.4	YES	*
Ammonia as N (Final) (Nov 1 – Apr 30)	mg/L	2/3/5	7.5		2.9	YES	*
Oil & Grease	mg/L	1/9	15		10	N/A	**
Escherichia coli	***	1/2	Please see Escherichia Coli (E. coli) in the Derivation and Discussion Section below.				
Whole Effluent Toxicity (WET) Test		11	Please see WET Test in the Derivation and Discussion Section below.				
Monitoring Frequency	Please see Minimum Sampling and Reporting Frequency Requirements in the Derivation and Discussion Section below.						

* - Monitoring requirement only
** - Parameter was not established in previous state operating permit.
*** - # of colonies/100mL; the Monthly Average is a geometric mean.
N/A – Not applicable
S – Same as previous operating permit

Basis for Limitations Codes:
1. State or Federal Regulation/Law
2. Water Quality Standard (includes RPA)
3. Water Quality Based Effluent Limits
4. Lagoon Policy
5. Ammonia Policy
6. Dissolved Oxygen Policy
7. Antidegradation Policy
8. Water Quality Model
9. Best Professional Judgment
10. TMDL or Permit in lieu of TMDL
11. WET test Policy

Outfall #001 – Derivation and Discussion of Limits:

- **Flow**. In accordance with [40 CFR Part 122.44(i)(1)(ii)] the volume of effluent discharged from each outfall is needed to assure compliance with permitted effluent limitations. If the permittee is unable to obtain effluent flow, then it is the responsibility of the permittee to inform the department, which may require the submittal of an operating permit modification.

- **Biochemical Oxygen Demand (BOD_5).** Effluent limitations from the previous state operating permit have been reassessed and verified that they are still protective of the receiving stream's Water Quality. Therefore, effluent limitations have been retained from previous state operating permit. [10 CSR 20-7.015(8)(B)3.A]

- **Total Suspended Solids (TSS).** Effluent limitations from the previous state operating permit have been reassessed and verified that they are still protective of the receiving stream's Water Quality. Therefore, effluent limitations have been retained from previous state operating permit. [10 CSR 20-7.015(8)(B)3.A]

- **pH**. Effluent limitations have been retained from previous state operating permit. [10 CSR 20-7.015(8)(B)3.A]

- **Temperature.** Monitoring requirement due to the toxicity of Ammonia varies by temperature. [10 CSR 20-7.031(4)(B)7]

- **Total Ammonia Nitrogen**. Early Life Stages Present Total Ammonia Nitrogen criteria apply [10 CSR 20-7.031(4)(B)7.C. & Table B3].]. No mixing considerations allowed; therefore, the WLA = the appropriate criterion. Please note that the facility did not submit any data to calculate limits considering ammonia decay; therefore the facility is being given conservative limits for ammonia.

Season	Temp (^{o}C)	pH (SU)	Total Ammonia Nitrogen CCC (mg/L)	Total Ammonia Nitrogen CMC (mg/L)
Summer	26	7.8	1.5	12.1
Winter	6	7.8	3.1	12.1

Summer: May 1 – October 31

Chronic WLA = 1.5 mg/L

Acute WLA = 12.1 mg/L

LTA_c = 1.5 mg/L (0.693) = **1.0 mg/L** [CV = 0.9, 99th Percentile, 30 day average]
LTA_a = 12.1 mg/L (0.224) = 2.7 mg/L [CV = 0.9, 99th Percentile]

Use most protective number of LTAc or LTAa.

MDL = 1.0 mg/L (4.46) = 4.5 mg/L [CV = 0.9, 99th Percentile]
AML = 1.0 mg/L (1.37) = 1.4 mg/L [CV = 0.9, 95th Percentile, n = 19]

Winter: November 1 – April 30

Chronic WLA = 3.1 mg/L

Acute WLA = 12.1 mg/L

LTA_c = 3.1 mg/L (0.780) = **2.4 mg/L** [CV = 0.6, 99th Percentile, 30 day average]
LTA_a = 12.1 mg/L (0.321) = 3.9 mg/L [CV = 0.6, 99th Percentile]

Use most protective number of LTAc or LTAa.

MDL = 2.4 mg/L (3.11) = 7.5 mg/L [CV = 0.6, 99th Percentile]
AML = 2.4 mg/L (1.22) = 2.9 mg/L [CV = 0.6, 95th Percentile, n = 21]

Season	Maximum Daily Limit (mg/l)	Average Monthly Limit (mg/l)
Summer	4.5	1.4
Winter	7.5	2.9

- ***Escherichia coli (E. coli)***. This facility may be required to have *E. coli* effluent limitations when Missouri adopts the implementation of the *E. coli* standards, as per [10 CSR 20-7.031(4)(C)].

- **Oil & Grease**. Conventional pollutant, effluent limitation for protection of aquatic life; 10 mg/L monthly average, 15 mg/L daily maximum. [10 CSR 20-7.031(4)(B)1]

- **WET Test**. WET Testing schedules and intervals are established in accordance with the department's Permit Manual; Section 5.2 *Effluent Limits / WET Testing for Compliance Bio-monitoring.* It is recommended that WET testing be conducted during the period of lowest stream flow.

☐ Chronic
☒ Acute

☒ No less than **ONCE/PERMIT CYCLE:**
☒ Municipality or domestic facility with a design flow ≥ 22,500 gpd, but less than 1.0 MGD.
☐ Other, please justify.

Acute and/or Chronic Allowable Effluent Concentrations (AECs) for facilities that discharge to unclassified, Class C, Class P (with default Mixing Considerations), or Lakes [10 CSR 20-7.031(4)(A)4.B.(IV)(b)] are 100%, 50%, 25%, 12.5%, & 6.25%.

- **Minimum Sampling and Reporting Frequency Requirements**. Sampling and reporting frequency requirements have been retained from previous state operating permit.

Part VI – Administrative Requirements

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

Date of Statement of Basis: May 11, 2009
Date of Public Notice: June 26, 2009

Submitted by:

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Lantz Tipton Date

Part VII – Appendices

APPENDIX A - CLASSIFICATION WORKSHEET:

ITEM	POINTS POSSIBLE	POINTS ASSIGNED
Maximum Population Equivalent (P.E.) served	1 pt. /10,000 PE or major fraction thereof.	0.076
Maximum: 10 pt Design Flow (avg. day) or peak month; use greater	1 pt. / MGD or major fraction thereof.	0.076
EFFLUENT DISCHARGE RECEIVING WATER SENSITIVITY: maximum points allowed is 10		
Missouri or Mississippi River	0	
All other stream discharges except to losing streams and stream reaches supporting whole body contact	1	1
Discharge to lake or reservoir outside of designated whole body contact recreational area	2	
Discharge to losing stream, or stream, lake or reservoir area supporting whole body contact recreation	3	
HEADWORKS – Preliminary Treatment		
Raw wastes subject to toxic waste discharge	6	
Screening and/or comminution	3	
Grit removal	3	
Plant pumping of main flow (lift station at the headworks)	3	3
PRIMARY TREATMENT		
Primary clarifiers	5	
Combined sedimentation/digestion	5	
Chemical addition (except chlorine, enzymes)	4	
REQUIRED LABORATORY CONTROL – performed by plant personnel (highest level only)		
Lab work conducted outside of plant	0	
Push – button or visual methods for simple test such as pH, settleable solids	3	
Additional procedures such as DO, COD, BOD, titrations, solids, volatile content	5	5
More advanced determinations such as BOD seeding procedures, fecal coliform, nutrients, total oils, phenols, etc.	7	
Highly sophisticated instrumentation, such as atomic absorption and gas chromatograph	10	
ALTERNATIVE FATE OF EFFLUENT		
Direct reuse or recycle of effluent	6	
Land Disposal – low rate	3	
High rate	5	
Overland flow	4	
Total from page **ONE (1)**	----	9.15

APPENDIX A - CLASSIFICATION WORKSHEET (CONTINUED):

ITEM	POINTS POSSIBLE	POINTS ASSIGNED
VARIATION IN RAW WASTE (highest level only) (DMR exceedances and Design Flow exceedances)		
Variation do not exceed those normally or typically expected	0	
Recurring deviations or excessive variations of 100 to 200 % in strength and/or flow	2	2
Recurring deviations or excessive variations of more than 200 % in strength and/or flow	4	
SECONDARY TREATMENT		
Trickling filter and other fixed film media with secondary clarifiers	10	
Activated sludge with secondary clarifiers (including extended aeration and oxidation ditches)	15	
Stabilization ponds without aeration	5	5
Aerated lagoon	8	
Advanced Waste Treatment Polishing Pond	2	
Chemical/physical – without secondary	15	
Chemical/physical – following secondary	10	
Biological or chemical/biological	12	
Carbon regeneration	4	
DISINFECTION		
Chlorination or comparable	5	
Dechlorination	2	
On-site generation of disinfectant (except UV light)	5	
UV light	4	
SOLIDS HANDLING – SLUDGE		
Solids Handling Thickening	5	
Anaerobic digestion	10	
Aerobic digestion	6	
Evaporative sludge drying	2	
Mechanical dewatering	8	
Solids reduction (incineration, wet oxidation)	12	
Land application	6	
Total from page **TWO (2)**	----	7.0
Total from page **ONE (1)**	---	9.15
Grand Total	---	16.15

☐ - A: 71 points and greater
☐ - B: 51 points – 70 points
☐ - C: 26 points – 50 points
☒ - D: 0 points – 25 points

APPENDIX B– RPA RESULTS:

CONSTITUENT	CMC*	RWC ACUTE*	CCC*	RWC CHRONIC*	REASONABLE POTENTIAL	# OF SAMPLES**	CV***
AMMONIA AS N - SUMMER	12.1	34.98	1.5	16.96	YES	19	0.9
AMMONIA AS N - WINTER	12.1	11.44	3.1	5.72	YES	21	0.6

* - Units are (mg/L) unless otherwise noted.
** - If the number of samples is greater than 10, then the CV value must be used in the WQBEL for the applicable constituent.
*** - Coefficient of Variation (CV) is calculated by dividing the Standard Deviation (**σ**) of the sample by the Mean (μ) of the sample.

Reasonable Potential Analysis is conducted as per (TSD, EPA/505/2-90-001, Section 3.3.2).

Step 1 Determine the number of total Observations ("n") for a particular set of effluent data and determine the highest value from that data set.

Summer: n=19; max = 10.6 Winter: n=21; max = 4.4

Step 2 Determine the coefficient of variation for the data set. For a data set where n<10, the coefficient of variation (CV) is estimated to equal 0.6, or the CV is calculated from data obtained from the discharger. For a data set where n>10, the CV is calculated as a standard deviation/mean. For less than 10 items of data, the uncertainty in the CV is too large to calculate a standard deviation or mean with sufficient confidence.

$$CV = \sigma / \mu$$

Summer: $\boldsymbol{\mu}$ = (2.8+0.4+4.8+8.1+**10.6**+8.4+0.88+1.3+1.1+1.4+2.19+3.0+2.30+3.17+2.8+1.82+1.60+1.44+1.25)/19 = **3.12**

σ^2 =[(2.8-3.12)^2+(0.4-3.12)^2+(4.8-3.12)^2+(8.1-3.12)^2+(10.6-3.12)^2+(8.4-3.12)^2+(0.88-3.12)^2+(1.3-3.12)^2+(1.1-3.12)^2+(1.4-3.12)^2+(2.19-3.12)^2+(3.0-3.12)^2+(2.30-3.12)^2+(3.17-3.12)^2+(2.8-3.12)^2+(1.82-3.12)^2+(1.6-3.12)^2+(1.44-3.12)^2+(1.25-3.12)^2]/19

σ^2 = 7.6998 **σ = 2.775**

CV = 2.775/3.12 = 0.889 = 0.9

Winter: $\boldsymbol{\mu}$ = (0.88+1.0+1.1+1.2+1.5+2.01+2.6+3.0+2.8+2.1+0.88+0.96+0.96+1.01+0.68+3.1+**4.4**+3.1+2.18+1.01+1.32)/21 = **1.80**

σ^2=[(0.88-1.80)^2+(1.0-1.80)^2+(1.1-1.80)^2+(1.2-1.80)^2+(1.5-1.80)^2+(2.01-1.80)^2+(2.6-1.80)^2+(3.0-1.80)^2+(2.8-1.80)^2+(2.1-1.80)^2+(0.88-1.80)^2+(0.96-1.80)^2+(0.96-1.80)^2+(1.01-1.80)^2+(0.68-1.80)^2+(3.1-1.80)^2+(4.4-1.80)^2+(3.1-1.80)^2+(2.18-1.80)^2+(1.01-1.80)^2+(1.32-1.80)^2]/21

σ^2 = 0.99598 **σ = 0.99799**

CV = 0.99799/1.80 = 0.5544 = 0.6

Step 3 Determine the appropriate ratio from Table 3-1 or 3-2.

Summer: 3.3 (upper bound); 1.6 Winter: 2.6 (upper bound); 1.3

Step 4 Multiply the highest value from a data set by the value from Table 3-1 or 3-2. Use this value with the appropriate dilution to project a maximum receiving water concentration (RWC).

Unclassified stream, therefore no dilution allowed.

Summer: 10.6 mg/L X 3.3 = 34.98 mg/L Winter: 4.4 mg/L X 2.6 = 11.44 mg/L
10.6 mg/L X 1.6 = 16.96 mg/L 4.4 mg/L X 1.3 = 5.72 mg/L

Step 5 Compare the projected maximum RWC to the applicable standard (criteria maximum concentration [CMC], criteria continuous concentration [CCC], or reference ambient concentration). EPA recommends that permitting authorities find reasonable potential when the projected RWC is greater than an ambient criterion.

Summer: 34.98 > 12.1 (acute); 16.96 > 1.5 (chronic)
Winter 11.44 < 12.1 (acute); 5.72 > 3.1 (chronic)

There is a reasonable potential for the facility to cause an excursion above the CCC, therefore limits will be given for Ammonia as N.