

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-0081485

Owner: Moss Rentals c/o John and Julie Moss
Address: 6300 Meadowlake Drive, Washington, MO 63090

Continuing Authority: Moss Rentals
Address: 2085 North Commercial, St. Clair, MO 63077

Facility Name: Commercial Court MHP
Facility Address: 2085 North Commercial, St. Clair, MO 63077

Legal Description: NE ¼, NE ¼, NE ¼, Sec.24, T42N, R1W; Franklin County
UTM Coordinates: X = 677394, Y = 4249561

Receiving Stream: Unnamed tributary of Birch Creek (U)
First Classified Stream and ID: Birch Creek (C) (02073)
USGS Basin & Sub-watershed No.: (07140103 - 100002)

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 – Mobil Home Park – SIC# 6515
Single cell facultative lagoon / Sludge is retained in lagoon.
Design population equivalent is 75.
Design flow is 5,625 gallons per day.
Actual flow is 5,100 gallons per day.
Design sludge production is 1.125 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.

November 25, 2009 June 4, 2010
Effective Date Modification Date



Mark Templeton, Acting Director, Department of Natural Resources

November 24, 2014
Expiration Date



Mike Struckhoff, Director, St. Louis Regional Office

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS					PAGE NUMBER 2 of 3	
					PERMIT NUMBER MO-0081485	
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 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
<u>Outfall #001</u>						
Flow	MGD	*		*	once/month	24 hr. estimate
Biochemical Oxygen Demand ₅	mg/L		65	45	once/quarter**	grab
Total Suspended Solids	mg/L		110	70	once/quarter**	grab
pH – Units	SU	***		***	once/quarter**	grab
Ammonia as N	mg/L	*		*	once/quarter**	grab
Temperature	°C	*		*	once/quarter**	grab
MONITORING REPORTS SHALL BE SUBMITTED <u>QUARTERLY</u> ; THE FIRST REPORT IS DUE <u>April 28, 2010</u> . THERE SHALL BE NO DISCHARGE OF FLOATING SOLIDS OR VISIBLE FOAM IN OTHER THAN TRACE AMOUNTS.						
B. STANDARD CONDITIONS						
IN ADDITION TO SPECIFIED CONDITIONS STATED HEREIN, THIS PERMIT IS SUBJECT TO THE ATTACHED <u>Parts I & III</u> STANDARD CONDITIONS DATED <u>October 1, 1980 and August 15, 1994</u> , AND HEREBY INCORPORATED AS THOUGH FULLY SET FORTH HEREIN.						

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS (continued)

- * Monitoring requirement only.
- ** Sample once per quarter on the months of February, May, August, and November.
- *** 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. 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 area-wide wastewater treatment system within 90 days of notice of its availability.

C. SPECIAL CONDITIONS (continued)

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.

7. 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.

D. SCHEDULE of COMPLIANCE

All DMRs were submitted to the Department from 2006 through June 2009. Numerous effluent violations were reported (See Appendix A following the Statement of Basis). The flow exceeded the design flow for the lagoon 27 months and there were two violations of the BOD limit and seven violation of the TSS limit. By **June 30, 2010**, submit an engineering report to explain how the facility can be brought into compliance with the effluent limitations or by either upgrading the facility or through improved operations or how the facility can be eliminated through connection to regional sewers.

Missouri Department of Natural Resources
Statement of Basis
Commercial Court MHP WWTF
NPDES #: MO-0081485
Franklin County

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: Mobil Home Park WWTF
 Facility SIC Code(s): 6515/ 4952

Facility Description:

Two cell facultative lagoon / Sludge is retained in lagoon.

OUTFALL(S) TABLE:

OUTFALL	DESIGN FLOW (CFS)	TREATMENT LEVEL	EFFLUENT TYPE	DISTANCE TO CLASSIFIED SEGMENT (MI)
001	0.0087	Secondary	Domestic	2.2

Water Quality History:

All required DMRs was submitted to the DNR for the entire period of the expired permit. The facility didn't meet BOD limits during February 2006 and August 2008. The facility exceeded Total Suspended Solid (TSS) limits during February 2006, May 2006, November 2006, February 2007, November 2007, August 2008, November 2008, and February 2009. On July 24, 2008, an inspection was conducted at the facility. A Letter of Warning was issued regarding this violation of the operating permit.

Comments:

This facility provides secondary treatment to the wastewater with single cell facultative lagoons. The treated wastewater is authorized to be discharged into portion of tributary to Birch Creek.

Part II – Operator Certification Requirements

As per [10 CSR 20-9.02`1`0(2)(A)], requirements for operation by certified personnel shall apply to all wastewater treatment systems, if applicable, as listed below:

Not Applicable ; This facility is not required to have a certified operator.

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 list 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.

Please mark the correct designated waters of the state categories of the receiving stream.

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

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**
Wet Weather Branch of Birch Creek	U	N/A	General criteria	07140103	Ozark/ Meramec
Birch Creek	C	02073	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.

RECEIVING STREAM(S) LOW-FLOW VALUES TABLE:

RECEIVING STREAM (U, C, P)	LOW-FLOW VALUES (CFS)		
	1Q10	7Q10	30Q10
Tributary to Fox Creek (U)	0	0	0

Mixing Zone: Not Allowed [10 CSR 20-7.031(4)(A)4.B.(I)(a)].

Zone of Initial Dilution: Not Allowed [10 CSR 20-7.031(4)(A)4.B.(I)(b)].

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

ALTERNATIVE EVALUATIONS FOR NEW FACILITIES:

As per [10 CSR 20-7.015(4)(A)], discharges to losing streams shall be permitted only after other alternatives including land application, discharges to a gaining stream and connection to a regional wastewater treatment facility have been evaluated and determined to be unacceptable for environmental and/or economic reasons.

Not Applicable ; The facility doesn't discharge to a Losing Stream as defined by [10 CSR 20-2.010(36)] & [10 CSR 20-7.031(1)(N)] an is an existing facility.

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.

ANTIDegradation:

In accordance with Missouri's Water Quality Standard [10 CSR 20-7.031(2)], the department is to document by means of Antidegradation Review that the use of a water body's available assimilative capacity is justified. Degradation is justified by documenting the socio-economic importance of a discharging activity after determining the necessity of the discharge.

- Renewal no degradation proposed and no further review necessary.

APPLICABLE PERMIT PARAMETERS:

Effluent parameters for conventional, non-conventional, and toxic pollutants have been obtained from the previous NPDES operating permit for this facility, technology based effluent limits, water quality based effluent limits, and from appropriate sections of the renewal application.

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.

PRETREATMENT PROGRAM:

The reduction of the amount of pollutants, the elimination of pollutants, or the alteration of the nature of pollutant properties in wastewater prior to or in lieu of discharging or otherwise introducing such pollutants into a Publicly Owned Treatment Works [40 CFR Part 403.3(q)].

Not Applicable ; At this time, the permittee is not required to implement and enforce a Pretreatment Program.

REASONABLE POTENTIAL ANALYSIS (RPA):

Limitations must control all pollutants or pollutant parameters that are or may be discharged at a level which will cause, have reasonable potential to cause, or contribute to an excursion above the Missouri Water Quality Standards.

Not Applicable ; A RPA was not conducted for this facility.

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 (BOD₅) and Total Suspended Solids (TSS) for Publicly Owned Treatment Works (POTWs). 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 @ www.epa.gov/fedrgstr/EPA-WATER/1999/August/Day-04/w18866.htm

Not Applicable ; This wastewater treatment facility is not a POTW. Influent monitoring is not being required to determine percent removal.

SANITARY SEWER OVERFLOWS (SSOS), AND INFLOW & INFILTRATION (I&I):

Collection systems are a critical element in the successful performance of the wastewater treatment process. Under certain conditions, poorly designed, built, managed, operated, and/or maintained systems can pose risks to public health, the environment, or both. Causes of SSOs include, but are not limited to, the following: high levels of I&I during wet weather; blockages; structural, mechanical, or electrical failures; collapsed or broken sewer pipes; insufficient conveyance capacity; and vandalism. Effective and continuous management, operation, and maintenance, as well as ensuring adequate capacity and rehabilitation when necessary are critical to maintaining collection system capacity and performance while extending the life of the system.

Not Applicable ; This facility is not required to develop or implement a program for maintenance and repair of the collection system; however, it is a violation of Missouri State Environmental Laws and Regulations to allow untreated wastewater to discharge to waters of the state.

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 is given for facility to take actions to ensure the effluent meet limits of this permit listed under Final Effluent Limitations

STORM WATER POLLUTION PREVENTION PLAN (SWPPP):

A plan to schedule activities, prohibitions of practices, maintenance procedures, and other management practices to prevent or reduce the pollution of waters of the state. The plan may include, but is not limited to, treatment requirements, operating procedures, and practices to control facility site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw material storage.

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.

Not Applicable ; Wasteload allocations weren't calculated.

WLA MODELING:

Not Applicable ; A WLA study was either not submitted or determined not applicable by department staff.

WHOLE EFFLUENT TOXICITY (WET) TEST:

As per [10 CSR 20-7.031(1)(CC)], a toxicity test conducted under specified laboratory conditions on specific indicator organism; and as per [40 CFR Part 122.2], the aggregate toxic effect of an effluent measured directly by a toxicity test.

Not Applicable ; At this time, the permittee is not required to conduct WET test for this facility.

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
BOD ₅	MG/L	1/4		65	45	NO	S
TSS	MG/L	1/4		110	70	NO	S
pH (S.U.)	SU	1/4	> 6.0		> 6.0	NO	S
TEMPERATURE (°C)	°C	1/8	*		*	YES	**
AMMONIA AS N	MG/L	2/3/5	*		*	YES	**
MONITORING FREQUENCY	Please see Minimum Sampling and Reporting Frequency Requirements in the Derivation and Discussion Section below.						

* - Monitoring requirement only

** - Parameter not previously established in previous state operating permit.

N/A – Not applicable

S – Same as previous operating permit

Basis for Limitations Codes:

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

OUTFALL #001 – DERIVATION AND DISCUSSION OF LIMITS:

- **Biochemical Oxygen Demand (BOD₅).** Effluent limitations have been retained from previous state operating permit, [10 CSR 20-7.015(8)(B)1.].
- **Total Suspended Solids (TSS).** Effluent limitations have been retained from previous state operating permit, [10 CSR 20-7.015(8)(B)1.].
- **pH.** Effluent limitation has been retained from previous state operating permit.

- **Total Ammonia Nitrogen.** Monitoring requirement only. Monitoring for temperature and ammonia are included to determine whether “reasonable potential” to exceed water quality standards exists.
- **Temperature.** Monitoring requirement due to the toxicity of Ammonia varies by temperature.
- **Minimum Sampling and Reporting Frequency Requirements.**

PARAMETER	SAMPLING FREQUENCY	REPORTING FREQUENCY
FLOW	ONCE/MONTH	ONCE/QUARTER
BOD ₅	ONCE/QUARTER	ONCE/QUARTER
TSS	ONCE/QUARTER	ONCE/QUARTER
PH (S.U.)	ONCE/QUARTER	ONCE/QUARTER
TEMPERATURE (°C)	ONCE/QUARTER	ONCE/QUARTER
AMMONIA AS N (MG/L)	ONCE/QUARTER	ONCE/QUARTER

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 Factsheet: October 6, 2009

Lei Hou, EE II
 St. Louis Regional Office
 (314) 416-2060
 lei.hou@dnr.mo.gov

Appendix A

MONTH	YEAR	FLOW	BOD-5	TSS	PH
Effluent	Limitation	5,625 GPD	45 mg/l	70 mg/l	> 6.0
June	2009	6,900			
May	2009	6,000	28.2	21.5	7.6
April	2009	7,500			
March	2009	5,400			
February	2009	3,100	42.6	138.2	8.3
January	2009	6,500			
December	2008	3,100			
November	2008	20	60.0	165.0	7.3
October	2008	5,500			
September	2008	7,200			
August	2008	26,000	22.2	260.0	7.5
July	2008	6,800			
June	2008	7,900			
May	2008	5,500	32.4	59.3	9.5
April	2008	3,000			
March	2008	5,000			
February	2008	8,500	27.0	47.9	6.9
January	2008	12,500			
December	2007	6,800			
November	2007	4,500	29.1	85.2	7.3
October	2007	8,500			
September	2007	6,900			
August	2007	2,800	31.2	15.0	7.1
July	2007	9,500			
June	2007	8,200			
May	2007	6,900	24.0	68.0	7.6
April	2007	10,000			
March	2007	8,500			
February	2007	18,000	37.2	98.9	8.3
January	2007	7,000			
December	2006	8,500			
November	2006	5,500	22.4	77.5	7.2
October	2006	8,500			
September	2006	8,600			
August	2006	6,500	36.0	13.2	7.2
July	2007	1,900			
June	2006	No Discharge			
May	2006	6,500	27.3	101.2	7.4
April	2006	18,500			
March	2006	8,500			
February	2006	2,500	52.8	132.5	9.3
January	2006	1,800			