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-0095818
Owner:	Charles Marta Townes
Address:	174 Bear Creek Dr., Wentzville, MO 63385
Continuing Authority:	Mike Dwyer
Address:	25 Hickory Falls Ct., Foristell, MO 63348
Facility Name:	Blastco Inc.
Facility Address:	131 Fremuth Rd., Wentzville, MO 63385
Legal Description:	Land Grant 888, St. Charles County
UTM Coordinates:	X= 690292.761, Y= 4297742.707
Receiving Stream:	Unnamed tributary to Lake St. Louis (U)
First Classified Stream and ID:	Lake St. Louis (L3) (7054) 303 (d)
USGS Basin & Sub-watershed No.:	(07110009-0101)

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 - Warehouse - SIC #4225

The use or operation of this facility shall be by or under the supervision of a **Certified "A" Operator**

Extended aeration/chlorination/sludge disposal is by contract hauler.
Design population equivalent is 25.
Design flow is 1500 gallons per day.
Actual flow is ~0 gallons per day.
Design sludge production is 0.52 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.

July 25, 2012
Effective Date

Sara Parker Pauley, Director, Department of Natural Resources

July 24, 2017
Expiration Date

John Madras, Director, Water Protection Program

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 through **Issuance date + 2 years – 1 day**. 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/month	24 hr. est.
Biochemical Oxygen Demand$_5$	mg/L		45	30	once/quarter****	Composite**
Total Suspended Solids	mg/L		45	30	once/quarter****	Composite**
E. coli (Note 1)	#/100 ml		*	*	once/quarter****	grab
pH – Units	SU	***		***	once/quarter****	grab
Ammonia as N (April 1 – Sept 30) (Oct 1 – March 31)	mg/L	* *		* *	once/quarter****	grab
Total Residual Chlorine (Note 2)	mg/L	19 .13 ML		10 .13 ML	once/quarter****	grab

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

OUTFALL NUMBER AND EFFLUENT PARAMETER(S)	UNITS	DAILY MINIMUM	WEEKLY AVERAGE MINIMUM	MONTHLY AVERAGE MINIMUM	MEASUREMENT FREQUENCY	SAMPLE TYPE
Outfall #001						
Dissolved Oxygen	mg/L	*		*	once/quarter****	grab

MONITORING REPORTS SHALL BE SUBMITTED QUARTERLY; THE FIRST REPORT IS DUE October 28, 2012.

B. STANDARD CONDITIONS

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

* Monitoring requirement only.
** A 24-hour composite sample is composed of 48 aliquots (subsamples) collected at 30 minute intervals by an automatic sampling device.
*** pH is measured in pH units and is not to be averaged. The pH is limited to the range of 6.5-9.0 pH units.
**** Sample once per quarter in the months of March, June, September, and December.
**** Quarterly sampling is required and samples shall be collected and tested for the parameters listed in Table A if a discharge occurs during the reporting period. If the facility serves a part-time or seasonal establishment/residence(s), then sampling shall occur while the treatment facility is operating and after a discharge begins. See table below for quarterly sampling schedule.

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 **July 25, 2014** 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/month	24 hr. est.
Biochemical Oxygen Demand$_5$	mg/L		45	30	once/quarter****	Composite**
Total Suspended Solids	mg/L		45	30	once/quarter****	Composite**
E. coli (Note 1)	#/100 ml		630	126	once/quarter****	grab
pH – Units	SU	***		***	once/quarter****	grab
Ammonia as N (April 1 – Sept 30) (Oct 1 – March 31)	mg/L	3.7 7.5		1.4 2.9	once/quarter****	grab
Total Residual Chlorine (Note 2)	mg/L	17 .13 ML		8 .13 ML	once/quarter****	grab

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

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Outfall #001						
Dissolved Oxygen	mg/L	*		*	once/quarter****	grab

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*** pH is measured in pH units and is not to be averaged. The pH is limited to the range of 6.5-9.0 pH units.

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

**** Quarterly sampling is required and samples shall be collected and tested for the parameters listed in Table A if a discharge occurs during the reporting period. If the facility serves a part-time or seasonal establishment/residence(s), then sampling shall occur while the treatment facility is operating and after a discharge begins. See table below for quarterly sampling schedule.

Minimum Sampling Requirements				
Quarter	**Months**	**E. coli and Total Residual Chlorine (TRC)**	**All Other Parameters**	**Report is Due**
First	January, February, March	Not required to sample.	Sample at least once during any month of the quarter	April 28th
Second	April, May, June	Sample at least once during any month of the quarter	Sample at least once during any month of the quarter	July 28th
Third	July, August, September	Sample at least once during any month of the quarter	Sample at least once during any month of the quarter	October 28th
Fourth	October, November, December	Sample once during October; no sample required in either November or December	Sample at least once during any month of the quarter	January 28th

Note 1 - Final limitations and monitoring requirements for *E. coli* are applicable only during the recreational season from April 1 through October 31. The Monthly Average Limit for *E. coli* is expressed as a geometric mean. The Weekly Average for *E. coli* will be expressed as a geometric mean if more than one (1) sample is collected during a calendar week (Sunday through Saturday).

Note 2 - This permit contains a Total Residual Chlorine (TRC) limit.

USE IF TOTAL RESIDUAL CHLORINE IS > 0.13 mg/L

(a) Disinfection is required year-round unless the permit specifically states that "Final limitations and monitoring requirements for *E. coli* are applicable only during the recreational season from April 1 through October 31." If your permit does not require disinfection during the non-recreational months, do not chlorinate in those months.

(b) Do not chemically dechlorinate **if it is not needed to meet the limits in your permit.**

(c) If no chlorine was used in a given sampling period, an actual analysis is not necessary. Simply report as "0 mg/L" TRC.

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 a facility with an area-wide management plan per 10 CSR 20-6.010(3)(B) within 90 days of notice of its availability.

4. 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.

C. SPECIAL CONDITIONS (continued)

(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.

5. 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.

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

7. It is a violation of the Missouri Clean Water Law to fail to pay fees associated with this permit (644.055 RSMo).

8. The permittee shall comply with any applicable requirements listed in 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. Bypasses are not authorized at this facility and are subject to 40 CFR 122.41(m). If a bypass occurs, the permittee shall report in accordance to 40 CFR 122.41(m)(3)(i), and with Standard Condition Part I, Section B, subsection 2.b. Bypasses are to be reported to the St. Louis Regional Office.

10. At least one sign shall appear on the fence on each side of each facility. Minimum wording shall be “SEWAGE TREATMENT FACILITY – KEEP OUT”, in letters at least 2 inches high.

11. An Operation and Maintenance (O & M) manual shall be maintained by the permittee and made available to the operator. The O & M manual shall include key operating procedures and a brief summary of the operation of the facility.

12. An all-weather access road shall be provided to the treatment facility.

D. Schedule of Compliance

E. coli, Ammonia, and Chlorine

1. Within six months of issuance of this permit, the permittee shall report progress made in attaining compliance with the final effluent limits.
2. Within one year of issuance of this permit, the permittee shall submit a report detailing progress made in attaining compliance with the final effluent limits.
3. By **July 25. 2014**, the permittee shall attain compliance with the final effluent limits, for E. coli, Ammonia, and Chlorine.

Missouri Department of Natural Resources
FACT SHEET
FOR THE PURPOSE OF RENEWAL
OF
MO-0095818
BLASTCO, INC.

The Federal Water Pollution Control Act ("Clean Water Act" Section 402 Public Law 92-500 as amended) established the National Pollution Discharge Elimination System (NPDES) permit program. This program regulates the discharge of pollutants from point sources into the waters of the United States, and the release of storm water from certain point sources. All such discharges are unlawful without a permit (Section 301 of the "Clean Water Act"). After a permit is obtained, a discharge not in compliance with all permit terms and conditions is unlawful. Missouri State Operating Permits (MSOPs) are issued by the Director of the Missouri Department of Natural Resources (Department) under an approved program, operating in accordance with federal and state laws (Federal "Clean Water Act" and "Missouri Clean Water Law" Section 644 as amended). MSOPs are issued for a period of five (5) years unless otherwise specified.

As per [40 CFR Part 124.8(a)] and [10 CSR 20-6.020(1)2.] a Factsheet shall be prepared to give pertinent information regarding the applicable regulations, rationale for the development of effluent limitations and conditions, and the public participation process for the Missouri State Operating Permit (operating permit) listed below.

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

This Factsheet is for a Minor ☒

Part I – Facility Information

Facility Type: Warehouse
Facility SIC Code(s): 4225

Facility Description:
Extended aeration/chlorination/sludge disposal is by contract hauler.

Have any changes occurred at this facility or in the receiving water body that effects effluent limit derivation?
☒ - No.

Application Date: 11/24/2010
Expiration Date: 05/25/2011

OUTFALL(S) TABLE:

OUTFALL	DESIGN FLOW (CFS)	TREATMENT LEVEL	EFFLUENT TYPE	DISTANCE TO CLASSIFIED SEGMENT (MI)
#001	0.002325	Equivalent to Secondary	Domestic	~1.03

Outfall #001

Legal Description: Land Grant 888, St. Charles County
UTM Coordinates: X= 690292.761, Y= 4297742.707
Receiving Stream: Unnamed tributary to Lake St. Louis (U)
First Classified Stream and ID: Lake St. Louis (L3) (7054)
USGS Basin & Sub-watershed No.: (07110009-0101)

Receiving Water Body's Water Quality & Facility Performance History:
Lake St. Louis is on the 2010 303 (d) list for Mercury and Chlordane. This facility is not believed to be a contributing source.

Part II – 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:

Check boxes below that are applicable to the facility;

Owned or operated by or for:

- Municipalities ☒

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.

- Department required: ☒
  The Department requires this facility to retain the services of a certified operator.

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

Operator's Name: Mike A. Dwyer
Certification Number: 2876
Certification Level: WW A

The listing of the operator above only signifies that staff drafting this operating permit have reviewed appropriate Department records and determined that the name listed on the operating permit application has the correct and applicable Certification Level.

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.

Lake or Reservoir [10 CSR 20-7.015(3)]: ☒

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*	12-DIGIT HUC	EDU**
Unnamed tributary to Lake St. Louis	U	-----	General Criteria	07110009-0101	Central Plains/ Cuivre/ Salt
Lake St. Louis	L3	7054	AQL, LWW WBC "A"		

* - 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

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 does not discharge to a Losing Stream as defined by [10 CSR 20-2.010(36)] & [10 CSR 20-7.031(1)(N)], or 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 operating permit 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.

AREA-WIDE WASTE TREATMENT MANAGEMENT & CONTINUING AUTHORITY:
As per [10 CSR 20-6.010(3)(B)], …An applicant may utilize a lower preference continuing authority by submitting, as part of the application, a statement waiving preferential status from each existing higher preference authority, providing the waiver does not conflict with any area-wide management plan approved under section 208 of the Federal Clean Water Act or any other regional sewage service and treatment plan approved for higher preference authority by the Department.

BIOSOLIDS & SEWAGE SLUDGE:
Biosolids are solid materials resulting from domestic wastewater treatment that meet federal and state criteria for beneficial uses (i.e. fertilizer). Sewage sludge is solids, semi-solids, or liquid residue generated during the treatment of domestic sewage in a treatment works; including but not limited to, domestic septage; scum or solids removed in primary, secondary, or advanced wastewater treatment process; and a material derived from sewage sludge. Sewage sludge does not include ash generated during the firing of sewage sludge in a sewage sludge incinerator or grit and screening generated during preliminary treatment of domestic sewage in a treatment works. Additional information regarding biosolids and sludge is located at the following web address: http://dnr.mo.gov/env/wpp/pub/index.html, items WQ422 through WQ449.

☒ - Sludge/biosolids are removed by contract hauler.

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)].

Pretreatment programs are required at any POTW (or combination of POTW operated by the same authority) and/or municipality with a total design flow greater than 5.0 MGD and receiving industrial wastes that interfere with or pass through the treatment works or are otherwise subject to the pretreatment standards. Pretreatment programs can also be required at POTWs/municipals with a design flow less than 5.0 MGD if needed to prevent interference with operations or pass through.

Several special conditions pertaining to the permittee's pretreatment program may be included in the permit, and are as follows:
- Implementation and enforcement of the program,
- Annual pretreatment report submittal,
- Submittal of list of industrial users,
- Technical evaluation of need to establish local limitations, and
- Submittal of the results of the evaluation

Not Applicable ☒
The permittee, at this time, is not required to have a Pretreatment Program or does not have an approved pretreatment program.

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.

Not Applicable ☒
A RPA was not conducted for this facility. Data was not available on the facility DMR reports, therefore, a PRA analysis could not be conducted.

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.

Applicable ☒
Secondary Treatment is 85% removal [40 CFR Part 133.102(a)(3) & (b)(3)].

SANITARY SEWER OVERFLOWS (SSO) AND INFLOW AND INFILTRATION (I&I):
Sanitary Sewer Overflows (SSOs) are defined as an untreated or partially treated sewage release are considered bypassing under state regulation [10 CSR 20-2.010(11)] and should not be confused with the federal definition of bypass. SSO's have a variety of causes including blockages, line breaks, and sewer defects that allow excess storm water and ground water to (1) enter and overload the collection system, and (2) overload the treatment facility. Additionally, SSO's can be also be caused by lapses in sewer system operation and maintenance, inadequate sewer design and construction, power failures, and vandalism. SSOs also include overflows out of manholes and onto city streets, sidewalks, and other terrestrial locations.

Additionally, Missouri RSMo §644.026.1 mandates that the Department require proper maintenance and operation of treatment facilities and sewer systems and proper disposal of residual waste from all such facilities.

☒ - 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 given for effluent limitations of this permit listed under Interim Effluent Limitation and Final Effluent Limitations were established in accordance with [10 CSR 20-7.031(10)]. E. coli, Ammonia, Chlorine and Dissolved Oxygen limits have been added to this permit, therefore, a schedule for compliance was also added to the permit.

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 *Developing Your Stormwater Pollution Prevention Plan, A Guide for Industrial Operators*, (Document number EPA 833-B-09-002) [published by the United States Environmental Protection Agency (USEPA) in February 2009], 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.

VARIANCE:
As per the Missouri Clean Water Law § 644.061.4, variances shall be granted for such period of time and under such terms and conditions as shall be specified by the commission in its order. The variance may be extended by affirmative action of the commission. In no event shall the variance be granted for a period of time greater than is reasonably necessary for complying with the Missouri Clean Water Law §§644.006 to 644.141 or any standard, rule or regulation promulgated pursuant to Missouri Clean Water Law §§644.006 to 644.141.

Not Applicable ☒
This operating permit is not drafted under premises of a petition for variance.

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 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).

Number of Samples "n":
Additionally, in accordance with the TSD for water quality-based permitting, effluent quality is determined by the underlying distribution of daily values, which is determined by the Long Term Average (LTA) associated with a particular Wasteload Allocation (WLA) and by the Coefficient of Variation (CV) of the effluent concentrations. Increasing or decreasing the monitoring frequency does not affect this underlying distribution or treatment performance, which should be, at a minimum, be targeted to comply with the values dictated by the WLA. Therefore, it is recommended that the actual planned frequency of monitoring normally be used to determine the value of "n" for calculating the AML. However, in situations where monitoring frequency is once per month or less, a higher value for "n" must be assumed for AML derivation purposes. Thus, the statistical procedure being employed using an assumed number of samples is "n = 4" at a minimum. For Total Ammonia as Nitrogen, "n = 30" is used.

WLA MODELING:
There are two general types of effluent limitations, technology-based effluent limits (TBELs) and water quality based effluent limits (WQBELs). If TBELs do not provide adequate protection for the receiving waters, then WQBEL must be used.

Not Applicable ☒
A WLA study was either not submitted or determined not applicable by Department staff.

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.

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

40 CFR 122.41(M) - BYPASSES:
The federal Clean Water Act (CWA), Section 402 prohibits wastewater dischargers from "bypassing" untreated or partially treated sewage (wastewater) beyond the headworks. A bypass, which includes blending, is defined as an intentional diversion of waste streams from any portion of a treatment facility, [40 CFR 122.41(m)(1)(i)]. Additionally, Missouri regulation 10 CSR 20-2.010(11) defines a bypass as the diversion of wastewater from any portion of wastewater treatment facility or sewer system to waters of the state. Only under exceptional and specified limitations do the federal regulations allow for a facility to bypass some or all of the flow from its treatment process. Bypasses are prohibited by the CWA unless a permittee can meet all of the criteria listed in 40 CFR 122.41(m)(4)(i)(A), (B), & (C). Any bypasses from this facility are subject to the reporting required in 40 CFR 122.41(l)(6) and per Missouri's Standard Conditions I, Section B, part 2.b. Additionally, Anticipated Bypasses include bypasses from peak flow basins or similar devices designed for peak wet weather flows.

☒ - Not Applicable. This facility does not bypass.

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

Applicable ☒
Lake St. Louis is listed on the 2010 Missouri 303(d) List for Mercury and Chlordane.

☒ – This facility is not considered to be a source of the above listed pollutant(s) or considered to contribute to the impairment of Lake St. Louis.

Part V – Effluent Limits Determination

Outfall #001 – Main Facility Outfall

Effluent limitations derived and established in the below Effluent Limitations Table are based on current operations of the facility. Future permit action due to facility modification may contain new operating permit terms and conditions that supersede the terms and conditions, including effluent limitations, of this operating permit.

EFFLUENT LIMITATIONS TABLE:

PARAMETER	UNIT	BASIS FOR LIMITS	DAILY MAXIMUM	WEEKLY AVERAGE	MONTHLY AVERAGE	MODIFIED	PREVIOUS PERMIT LIMITATIONS
FLOW	GPD		*		*	NO	*/*
BOD_5	MG/L			45	30	NO	45/30
TSS	MG/L			45	30	NO	45/30
pH	SU		6.5-9.0		6.5-9.0	YES	6.0-9.0
AMMONIA AS N (APRIL 1 – SEPT 30)	MG/L		3.7		1.4	YES	*/*
AMMONIA AS N (OCT 1 – MARCH 31)	MG/L		7.5		2.9	YES	*/*
DISSOLVED OXYGEN (DO)	MG/L		*		*	YES	NONE
ESCHERICHIA COLI	***			630	126	YES	FECAL COLIFORM 1000/400
CHLORINE, TOTAL RESIDUAL	MG/L		17		8	YES	0.019/0.01

* - Monitoring requirement only.
** - For DO the Daily Maximum is a Daily Minimum and the Monthly Average is a Monthly Average Minimum.
*** - # of colonies/100mL; the Monthly Average for *E. coli* is a geometric mean.
**** - Parameter not previously established in previous state 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. Antidegradation Review
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, please see the **APPLICABLE DESIGNATION OF WATERS OF THE STATE** sub-section of the **Receiving Stream Information.**

- **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, please see the **APPLICABLE DESIGNATION OF WATERS OF THE STATE** sub-section of the **Receiving Stream Information.**

- **pH**. Effluent limitation range is 6.5 – 9.0 Standard pH Units (SU), as per the applicable section of 10 CSR 20-7.015. pH is not to be averaged.

- **Total Ammonia Nitrogen.** Early Life Stages Present Total Ammonia Nitrogen criteria apply [10 CSR 20-7.031(4)(B)7.C. & Table B3] default pH 7.8 SU Background total ammonia nitrogen = 0.01 mg/L (Default).

Season	Temp (^oC)	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: April 1 – September 30

Chronic WLA: $C_e = ((0.002325 + 0.0)1.5 – (0.0 * 0.01))/0.002325$
$C_e = 1.5$ mg/L

Acute WLA: $C_e = ((0.002325 + 0.0)12.1 – (0.0 * 0.01))/0.002325$
$C_e = 12.1$ mg/L

LTA_c = 1.5 mg/L (0.780) = **1.2 mg/L** [CV = 0.6, 99th Percentile, 30 day avg.]
LTA_a = 12.1 mg/L (0.321) = 3.9 mg/L [CV = 0.6, 99th Percentile]

Use most protective number of LTA_c or LTA_a.

MDL = 1.2 mg/L (3.11) = 3.7 mg/L [CV = 0.6, 99th Percentile]
AML = 1.2 mg/L (1.19) = 1.4 mg/L [CV = 0.6, 95th Percentile, n =30]

Winter: October 1 – March 31
Chronic WLA: $C_e = ((0.002325 + 0.0)3.1 – (0.0 * 0.01))/0.002325$
$C_e = 1233.8$ mg/L

Acute WLA: $C_e = ((0.002325 + 0.0)12.1 – (0.0 * 0.01))/0.002325$
$C_e = 12.1$ mg/L

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

Use most protective number of LTA_c or LTA_a.

MDL = 2.4 mg/L (3.11) = 7.5 mg/L [CV = 0.6, 99th Percentile]
AML = 2.4 mg/L (1.19) = 2.9 mg/L [CV = 0.6, 95th Percentile, n =30]

- **Dissolved Oxygen**. A monitoring only requirement has been placed in the permit to evaluate the stream quality during chlorination.

- ***Escherichia coli (E. coli)***. Monthly average of 126 per 100 ml as a geometric mean and Weekly Average of 630 during the recreational season (April 1 – October 31), to protect Whole Body Contact Recreation (A) designated use of the receiving stream, as per 10 CSR 20-7.031(4)(C). Weekly Average effluent variability will be evaluated in development of a future effluent limit. An effluent limit for both monthly average and weekly average is required by 40 CFR 122.45(d).

- **Total Residual Chlorine (TRC)**. Warm-water Protection of Aquatic Life CCC = 10 µg/L, CMC = 19 µg/L [10 CSR 20-7.031, Table A]. Background TRC = 0.0 µg/L.

  Chronic WLA: $C_e = ((0.002325 + 0.0)10 – (0.0 * 0.0))/0.002325$
  $C_e = 10$ µg/L

  Acute WLA: $C_e = ((0.002325 + 0.0)19 – (0.0 * 0.0))/0.002325$
  $C_e = 19$ µg/L

  $LTA_c = 10\ (0.527) =$ **5.3** µg/L [CV = 0.6, 99th Percentile]
  $LTA_a = 19\ (0.321) = 6.1$ µg/L [CV = 0.6, 99th Percentile]

  Use most protective number of LTA_c or LTA_a.

  MDL = 5.3 (3.11) = 17 mg/L [CV = 0.6, 99th Percentile]
  AML = 5.3 (1.55) = 8 mg/L [CV = 0.6, 95th Percentile, n = 4]

  Total Residual Chlorine effluent limits of 17 mg/L daily maximum, 8 mg/L monthly average are recommended if chlorine is used as a disinfectant. Standard compliance language for TRC, including the minimum level (ML), should be included in the permit.

Part VI – Finding of Affordability

Pursuant to Section 644.145, RSMo., the Department is required to determine whether a permit or decision is affordable and makes a finding of affordability for certain permitting and enforcement decisions. This requirement applies to discharges from combined or separate sanitary sewer systems or publically-owned treatment works.

☒ Not Applicable;
The Department is not required to determine findings of affordability because the facility is not a **combined or separate sanitary sewer system for a publically-owned treatment works.**

Part VII – 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.

PUBLIC NOTICE:
The Department shall give public notice that a draft permit has been prepared and its issuance is pending. Additionally, public notice will be issued if a public hearing is to be held because of a significant degree of interest in and water quality concerns related to a draft permit. No public notice is required when a request for a permit modification or termination is denied; however, the requester and permittee must be notified of the denial in writing.

The Department must issue public notice of a pending operating permit or of a new or reissued statewide general permit. The public comment period is the length of time not less than 30 days following the date of the public notice which interested persons may submit written comments about the proposed permit.

For persons wanting to submit comments regarding this proposed operating permit, then please refer to the Public Notice page located at the front of this draft operating permit. The Public Notice page gives direction on how and where to submit appropriate comments.

☒ - The Public Notice period for this operating permit from May 18, 2012 to June 18, 2012. No responses received or responses to the Public Notice of this operating permit do not warrant the modification of effluent limits and/or the terms and conditions of this permit.

DATE OF FACT SHEET: (04/30/2012, 06/19/2012)

COMPLETED BY:

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OPERATING PERMITS UNIT
PERMITTING SECTION
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Appendices

APPENDIX - CLASSIFICATION WORKSHEET:

ITEM	POINTS POSSIBLE	POINTS ASSIGNED
Maximum Population Equivalent (P.E.) served (Max 10 pts.)	1 pt./10,000 PE or major fraction thereof.	
Maximum: 10 pt Design Flow (avg. day) or peak month; use greater (Max 10 pts.)	1 pt. / MGD or major fraction thereof.	
EFFLUENT DISCHARGE RECEIVING WATER SENSITIVITY:		
Missouri or Mississippi River	0	
All other stream discharges except to losing streams and stream reaches supporting whole body contact	1	
Discharge to lake or reservoir outside of designated whole body contact recreational area	2	2
Discharge to losing stream, or stream, lake or reservoir area supporting whole body contact recreation	3	
PRELIMINARY TREATMENT - Headworks		
Screening and/or comminution	3	3
Grit removal	3	
Plant pumping of main flow (lift station at the headworks)	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)		
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	
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)**	----	5

APPENDIX - 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	
Recurring deviations or excessive variations of more than 200 % in strength and/or flow	4	
Raw wastes subject to toxic waste discharge	6	
SECONDARY TREATMENT		
Trickling filter and other fixed film media with secondary clarifiers	10	10
Activated sludge with secondary clarifiers (including extended aeration and oxidation ditches)	15	
Stabilization ponds without aeration	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	5
Dechlorination	2	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)**	----	
Total from page **ONE (1)**	---	5
Grand Total	---	17

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