



Missouri  
Department of  
Natural Resources

WATER PROTECTION PROGRAM  
FINANCIAL ASSISTANCE CENTER

## **Financial Assistance Center Engineering Pre-Submittal Meeting November 2008**

The purpose of a Pre-Submittal Meeting prior to facility plan submittal is to address any potential technical issues that could cause major delays later on in the construction permitting process. We believe the meeting will achieve general agreement on the scope of work so that there are no delays in facility plan approval after the project has completed antidegradation review. Addressing technical issues early and achieving general agreement on the scope of work by all parties involved will help the project progress forward.

The Pre-Submittal Meeting should include the potential applicant, their consultant and department staff very early in the planning process of a wastewater project that will seek department funding. The meeting should take place during the development of a facility plan before it is submitted to the department. The focus of the meeting is to review and generally agree on the scope of work for the project.

In preparation for the meeting, the consulting engineer does not have to prepare detailed engineering calculations or necessarily have evaluated all potential alternatives. The applicant and their consultant should be prepared to discuss the issues identified in the [Typical Agenda](#), attached.

As noted below, there are several types of projects where a [pre-submittal meeting is required](#), but of particular interest are projects that require an antidegradation review. In a typical antidegradation report, the consultant will analyze several different alternatives and propose to use the alternative that meets the requirements of the Antidegradation Review Procedures. The proposed treatment process is approved for purposes of satisfying antidegradation requirements after the public notice process of the National Pollutant Discharge Elimination System, or NPDES, permit is completed.

The construction permitting process begins after antidegradation approval. This is where a project receives a technical review. A technical review could lead to changes in the project. This could result in serious delays and possibly require an applicant to go through the antidegradation review process again.

Our goal is to eliminate avoidable delays in the construction of projects. Therefore, we are now requiring the review of major technical issues and the general scope of work before submittal of the antidegradation report for review. The sequence of this revised process will allow the department to approve facility plans quickly and issue construction permits after public notice of the NPDES permit.

### Projects that require a Pre-Submittal Meeting :

- A. Projects requiring antidegradation review.
- B. Projects to meet more stringent effluent limits.
- C. Where an approved Combined Sewer Overflow Long Term Control Plan exists.
- D. Where applicants have compliance schedules in the NPDES permit or have an enforcement/compliance agreement between the department and the applicant.

### Projects that we recommend a Pre-Submittal Meeting:

- A. Upgrading treatment plants to replace and modernize old equipment where effluent limits and plant design capacity remain the same.
- B. Sewer extensions and pump stations.
- C. Where only adding disinfection and there are no other issues between the department and the community.

### TYPICAL AGENDA

1. 10 CSR 20-8.140, Sewage Treatment Works, requires that design be based on existing measured sewage flows. Please be prepared to present flow data and discuss the proposed design flow and peak flows.
2. Discuss current and future capacity needs.
3. Discuss problems or issues that have caused a need for the project.
4. Discuss preliminary sizing criteria of the treatment plant, such as the size and capacities of aeration tanks, clarifiers, flow equalization tanks, disinfection units and any treatment units related to nutrient removal. Discuss the basis for sizing the various treatment units, such as Chapter 8 or alternative criteria.
5. Discuss evaluated treatment alternatives. Please note that it is the consultant's responsibility to determine what type of treatment plant to propose for antidegradation requirements.
6. Discuss the project schedule, including any schedules contained in NPDES permits or any compliance agreements. The goal is to have a mutual agreement on the project schedule and review timeframes at the conclusion of the meeting.
7. Discuss whether or not the city has bypasses at the treatment plant and how they propose to address the bypasses. Consider the affect on the treatment plant.

8. Discuss sanitary sewer overflows in the collection system and what programs are in place to eventually eliminate them. Consider the affect on the treatment plant.
9. The department will answer questions related to administrative requirements of State Revolving Fund loans or state grants.
10. This discussion point only applies to projects that are applying for a State 40 Percent Construction Grant. In accordance with 10 CSR 20-4.023(14), the facility plan must evaluate passive or less complicated treatment alternatives when a full-time operator is not going to be provided.

Please Note: The assigned review engineer will notify the applicant within two to three weeks after the meeting as to whether or not there are major issues that need further attention.