

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

Matt Blunt, Governor • Doyle Childers, Director

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FEB 25 2008

Mr. John A. DeLashmit, P.E.
U.S. Environmental Protection Agency
Region VII
901 North Fifth Street
Kansas City, KS 66101

Re: Permit for Oak Grove Wastewater Treatment Plant in Lieu of Total Maximum Daily Load for Horseshoe Creek (WBID 3413)

Dear Mr. DeLashmit:

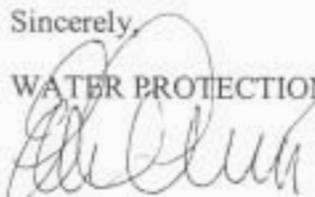
Horseshoe Creek near the City of Oak Grove in Jackson County, Missouri, is on the 2002 303(d) list for Biochemical Oxygen Demand (BOD) and ammonia. The source of these impairments is listed as the Oak Grove Northwest Wastewater Treatment Plant (WWTP), Permit Number MO-0040886 and Oak Grove South WWTP, Permit Number MO-0106259. The Missouri Department of Natural Resources (department) has opted to correct these impairments through permit limits in lieu of a Total Maximum Daily Load (TMDL).

The outfalls for Oak Grove's Northwest and South lagoons were near the headwaters of Horseshoe Creek, near the upstream end of the classified portion. There were no other WWTPs upstream and the land use is largely sparse rural development. The North and South WWTPs are believed to have been the sole source of the BOD and ammonia loads to the creek. The listing for the impaired reach (first listed in 1998) was based on visual inspections of Horseshoe Creek during summer low flow conditions. Fifty samples were taken in the stream in 2001 and 2003, showing very low dissolved oxygen and high ammonia levels in the stream. The city upgraded their WWTPs in 2005 by constructing a new mechanical plant that eliminates both the north and south lagoons. The new facility discharges to a tributary of Sni-a-Bar Creek, eliminating the discharge of wastewater to Horseshoe Creek.

Enclosed please find the Missouri State Operating Permit for the new Oak Grove WWTP. The Horseshoe Creek discharges are now eliminated and the final limits are based on discharge to a tributary of Sni-a-Bar Creek. The department has scheduled post construction water quality monitoring of Horseshoe Creek for Fiscal Year 2008 (summer 2007). A reopener clause is included in the permit to allow for stricter limits if future monitoring shows WQS violations. In-stream water quality monitoring, upstream and downstream of the confluence of the discharge tributary and Sni-a-Bar Creek, is a permit requirement.

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With this letter, the department submits the Oak Grove WWTP permit to the U.S. EPA for concurrence that the permit will serve in lieu of a TMDL. We appreciate EPA taking prompt action on this. If you have any questions, please contact Mr. Philip Schroeder at (573) 751-6770 or by mail at Missouri Department of Natural Resources, Water Protection Program, P.O. Box 176, Jefferson City, Missouri 65102-0176.

Sincerely,

WATER PROTECTION PROGRAM

Edward Galbraith
Director

EG:mcl

Enclosures

c: Mr. William Bryan, Attorney General's Office
Mr. Daniel Schuette, Director Division of Environmental Quality
Mr. Earl Pabst, Deputy Division Director
Missouri Clean Water Commission