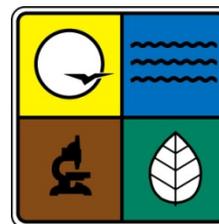


Permit Shield

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Domestic Wastewater Unit



MISSOURI
DEPARTMENT OF
NATURAL RESOURCES

Changes...

- Due to a change in statute, Mo now has a 'permit shield' as appears in Federal regulations.
- A stakeholder has argued that this means Mo should remove the conditions from permits protecting general criteria.
- We must protect water quality, therefore we came up with new permit language.

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.

(d) Address any situation where the discharge prevents full maintenance of the beneficial or designated uses of the receiving stream. This includes violations of General Criteria, which are applicable at all times including mixing zones.

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

4. There shall be no discharge of toxic pollutants at levels which would cause an exceedance of water quality standards.

7. Only pollutants documented in the application for this permit, or pollutants considered by the department to be common constituents of the wastewater from this type of facility, are authorized to be discharged. Discharge of other pollutants is not authorized. This includes any chemical, biological material, radiological material, or any other material that may effect the ability of the receiving stream to fully support it's beneficial and designated uses.

8. There shall be no discharge of a solid waste to waters of the state. This includes any materials removed during treatment of a wastewater or stormwater, as well as trash. This does not include discharge of solids below the concentrations noted in Table A above, which were noted in the permit application and considered part of the wastewater that is treated.

Missouri Department of
Natural Resources

<i>E. coli</i> (Note 1)	#/100 ml			once/ <u>week</u>	grab
pH – Units	SU			once/month	grab
Ammonia as N (April 1 – Sept 30) (Oct 1 – March 31)	mg/L			once/month	grab
Oil & Grease	mg/L			once/month	grab
Total Residual Chlorine (Note 2)	µg/L			once/month	grab

MONITORING REPORTS SHALL BE SUBMITTED MONTHLY; THE FIRST REPORT IS DUE _____. **THERE SHALL BE NO DISCHARGE OF VISIBLE OIL, SCUM, FLOATING SOLIDS OR FOAM, OR WATER WITH A VISIBLE SHEEN. THERE SHALL BE NO DISCHARGE OF WATER THAT CAUSES A DISCERNABLE COLOR CHANGE IN THE RECEIVING STREAM.**

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.

EPA

- When we attempted to make this change, the EPA threatened to file objections.
- The EPA has stated that Mo must retain a mechanism for addressing violations of general criteria caused by a facility, but not detected by routine testing. And that this mechanism must continue to appear in the permit.

EPA

- The proposed language failed to cover physical/hydrologic changes and turbidity.
- EPA claimed removal of the general criteria protection was backsliding, as the new language did not offer the same level of protection.

Example

- A facility has effluent limits for solids which are protective of general criteria. During weekly testing the facility was in compliance. But after the test an operational error results in a release of sludge to the receiving stream, causing a violation of general criteria.

- What additional permit language should DNR include in permits to deal with this example?
 - Daily stream surveys & documentation by the facility?