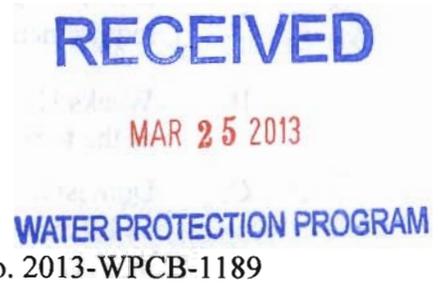


**BEFORE THE  
DEPARTMENT OF NATURAL RESOURCES  
STATE OF MISSOURI**



**IN THE MATTER OF:**

Pulaski County Sewer District No. 1  
Weeks Hollow Wastewater Treatment Facility

**SERVE:**

Pulaski County Sewer District No. 1

**ABATEMENT ORDER ON CONSENT**

**I. NOTICE TO RECIPIENTS OF ABATEMENT ORDERS**

The issuing of this Abatement Order on Consent (AOC) number 2013-WPCB-1189, by the Missouri Department of Natural Resources, is a formal administrative action by the State of Missouri and is being issued because the Weeks Hollow wastewater treatment facility is in violation of the Missouri Clean Water Law (MCWL). This AOC is issued under the authorities of Sections 640.130, 640.131, 644.056 and 644.079, RSMo. Failure to comply with this AOC is, by itself, a violation of the MCWL Section 644.076.1, RSMo. Litigation may occur without further administrative notice if there is not compliance with the requirements of this AOC. This AOC does not constitute a waiver or a modification of any requirements for the MCWL, or its implementing regulations, all of which remain in full force and effect. Compliance with the terms of this AOC shall not relieve Pulaski County Sewer District No. 1 of liability for, or preclude the Department from, initiating an administrative or judicial enforcement action to recover civil penalties for any future violations of the MCWL, or to seek injunctive relief, pursuant to Chapter 644, RSMo.

**II. FINDINGS OF FACT**

A. The Pulaski County Sewer District No. 1 owns and operates the Weeks Hollow wastewater treatment facility located in the SE ¼, SW ¼, Section 02, Township 36 North, Range 11 West, of Pulaski County, Missouri. The facility, which receives wastewater generated from approximately 2,026 connections, consists of an aerated wastewater lagoon with chlorine disinfection, dechlorination, and floating curtains that divide it into four (4) cells. The facility has a design

population equivalent of 5,800, an actual population equivalent of 5,524, a designed average flow of 435,000 gallons per day, and an actual flow of 414,300 gallons per day. Effluent discharges approximately one (1) mile north of the facility to a tributary to Weeks Hollow pursuant to the conditions and requirements of Missouri State Operating Permit (MSOP) number MO-0111716.

- B. Weeks Hollow, the Gasconade River, and their tributaries are waters of the state as the term is defined by Section 644.016(27) RSMo.
- C. Domestic wastewater is a water contaminant as the term is defined in Section 644.016(24), RSMo.
- D. The MSOP was issued to the district on September 26, 2008, and is set to expire by its own terms on September 25, 2013. The MSOP requires the district to sample the effluent discharged from outfall No. 001 and chemically analyze the effluent sample for the water contaminants listed in part "A" every month. The MSOP also requires the effluent to comply with the limitations contained in part "A" and requires the results of the analysis to be submitted to the Department on monthly Discharge Monitoring Reports (DMRs) by the 28<sup>th</sup> day of the month following the reporting period.
- E. The MSOP includes interim and final effluent limitations for Biochemical Oxygen Demand (BOD), Total Suspended Solids (TSS), Total Residual Chlorine (TRC), and Oil and Grease, and a schedule of compliance (SOC) for the district to complete improvements to the facility that would enable the effluent to comply with the final limitations by September 26, 2011.
- F. Monthly DMRs submitted to the Department document that the effluent discharged from the district's facility failed to comply with the applicable permitted effluent limitations for BOD during the months of April, May, and November 2010; February, September, October, and December 2011; and January, February, March, April, May, June, July, August, September and October 2012.
- G. Monthly DMRs submitted to the Department document that the effluent discharged from the district's facility failed to comply with the applicable permitted effluent limitations for TRC during the months of April, May, June, July, August, September, and October 2010; April, May, June, July, August, September and October, 2011; and April, May, June, July, August, September and October 2012.
- H. Monthly DMRs submitted to the Department document that the effluent discharged from the district's facility failed to comply with the applicable permitted effluent limitations for Oil and Grease during the months of April, May and June 2012.
- I. Monthly DMRs submitted to the Department document that the effluent discharged from the district's facility failed to comply with the applicable

permitted effluent limitations for TSS during the months of January, February, March, May, July, and August 2012.

- J. The MSOP requires the district to conduct an annual Whole Effluent Toxicity (WET) test during the month of July as described in special conditions, paragraph 10 and submit the results of the WET test to the Department by the 28<sup>th</sup> day of October. The Department has not received the district's WET test results for 2010.
- K. On November 9 and 10, 2011, Department staff conducted an inspection of the facility and collected a sample of the effluent. Chemical analysis documented that the effluent violated the monthly effluent limitations for BOD by 333% and TSS by 110%. As a result of the violations found during the inspection, the Department issued Notice of Violation number 19072 SE to the district on December 2, 2011.
- L. On November 16, 2011, the Department issued Notice of Violation number 19066 SE to the district for failing to comply with the SOC contained in the MSOP, which required the district to complete upgrades that would enable the effluent to comply with final effluent limitations by September 26, 2011.
- M. On September 6, 2012 the district submitted a facility plan to the Department recommending improvements that will enable the effluent to comply with final effluent limitations contained in the MSOP.
- N. Section 644.076.1, RSMo, makes it unlawful to violate the MCWL and regulations promulgated pursuant thereto and establishes civil penalties of up to ten thousand dollars (\$10,000.00) per day per violation.
- O. Pursuant to Section 644.145 RSMo, the Department's Affordability Finding addressing the obligations included within this AOC is attached hereto as Exhibit A.

### III. CITATIONS AND CONCLUSIONS OF LAW

Violations of the MCWL and its implementing regulations alleged herein and found to have been committed by the district at the facility are as follows:

1. Failed to improve wastewater treatment facility as required in part "B," Standard Conditions, and part "D," Schedule of Compliance, of the MSOP, in violation of Section 644.076.1, RSMo, and 10 CSR 20-6.010(7)(A).
2. Failed to comply with the effluent limits contained in part "A" of the MSOP, in violation of Sections 644.051.1(3) and 644.076.1, RSMo.
3. Placed or caused or permitted to be placed water contaminants in a location where they are reasonably certain to cause pollution of waters of the state, in violation of Sections 644.051.1(1) and 644.076.1, RSMo.

4. Failed to conduct the 2010 WET test and submit the results to the Department as required in part "A" of the MSOP, in violation of Section 644.076.1, RSMo, and 10 CSR 20-7.015(9)(A).

#### IV. AGREEMENT

- A. The Department and the district desire to amicably resolve all claims that may be brought against the district for violations alleged above in Section III, Citations and Conclusions of Law, without the district admitting to the validity or accuracy of such claims.
- B. The provisions of this AOC shall apply to and be binding upon the parties executing this AOC, their successors, assigns, agents, subsidiaries, affiliates, and lessees, including the officers, agents, servants, corporations, and any persons acting under, through, or for the parties. Any changes in ownership or corporate status, including but not limited to any transfer of assets or real or personal property, shall not affect the responsibilities of the district under this AOC.
- C. The district in compromise and satisfaction of the Department claims relating to the above-referenced violations agrees, without admitting liability or fault, to pay a civil penalty in the amount of twelve thousand dollars and zero cents (\$12,000.00). The payment shall be in the form of a certified check or cashier's check made payable to "Pulaski County Treasurer, as custodian of the Pulaski County School Fund." The Department and district further agree that nine thousand dollars and zero cents (\$9,000.00) shall be suspended for a period of three (3) years on the condition that the district does not violate the terms of this AOC. Upon determination that the district has failed to meet the terms of this AOC, including the requirements of paragraph D through paragraph J, the Department shall send a written demand for the suspended penalty in the amount of nine thousand dollars and zero cents (\$9,000.00). The district shall have fifteen (15) days from receipt of the written demand to submit the suspended penalty. The check in the amount of three thousand dollars and zero cents (\$3,000.00) is due and payable upon execution of this AOC by the district. The check and signed copies of the AOC shall be delivered to:

Accounting Program  
Missouri Department of Natural Resources  
P.O. Box 477  
Jefferson City, MO 65102-0176

- D. In the period of time from the effective date of this AOC until the new or upgraded facility is completed, the district shall operate and maintain the existing facility at all times in compliance with the interim effluent limitations and conditions and requirements of MSOP number MO-0111716. All units or components of the existing facility shall be maintained in an operable condition, even if this requires the purchase and installation of new parts or equipment, or repair of the facility.

- E. Within thirty (30) days of receipt of Department comments on the district's facility plan, the district shall respond to and adequately address, to the Department's satisfaction, all of the Department's comments on the facility plan.
- F. Within one hundred eighty days (180) days of the Department's approval of the facility plan, the district shall submit to the Department for review and approval, a complete application for a construction permit including the applicable fee, design summary, plans and specifications signed and sealed by a professional engineer licensed to practice in the State of Missouri for improvements that will enable the effluent to comply with final effluent limitations contained in the MSOP.
- G. Within thirty (30) days of receipt of Department comments on the district's construction permit application, the district shall respond to and adequately address, to the Department's satisfaction, all of the Department's comments on the construction permit application.
- H. Within four hundred fifty-five days (455) days of the date the Department issues the district a construction permit, the district shall complete construction of the improvements as approved by the Department.
- I. Within sixty (60) days of completing construction, the district shall submit to the Department a Statement of Work Complete Form, signed, sealed and dated by a professional engineer registered in the State of Missouri certifying that the project is complete and operable in accordance with Department approved plans and specifications, and a complete application with the applicable fee to modify the MSOP.
- J. Within sixty (60) days of completing construction of the improvements, the district shall achieve compliance with the final effluent limitations contained in part "A" of the MSOP.
- K. Immediately upon becoming aware that a deadline or milestone as set forth in this AOC will not be completed by the required deadline, the district shall notify the Department by telephone or electronic mail i) identifying the deadline that will not be completed; ii) identifying the reason for failing to meet the deadline; and iii) proposing an extension to the deadline. Within five (5) days of notifying the Department, the district shall submit to the Department for review and approval a written request containing the same basic provisions of i, ii, and iii listed above. The Department may grant an extension if it deems appropriate. Failure to submit a written notice to the Department may constitute a waiver of the district's right to request an extension and may be grounds for the Department to deny the district an extension.
- L. Should the district fail to meet the terms of this AOC, including the deadlines for completion of construction set out in paragraphs D through J, the district shall be subject to pay stipulated penalties in the following amount:

<u>Days of Violation</u>	<u>Amount of Penalty</u>
1 to 30 days	\$500.00 per day
31 to 90 days	\$1,000.00 per day
91 days and above	\$2,500.00 per day

Stipulated penalties will be paid in the form of a certified or cashier's check made payable to "Pulaski County Treasurer, as custodian of the Pulaski County School Fund." Any such stipulated penalty shall be paid within ten (10) days of demand by the Department and shall be delivered to:

Accounting Program  
Missouri Department of Natural Resources  
P.O. Box 477  
Jefferson City, MO 65102-0176

- M. No portion of the stipulated penalties paid pursuant to this AOC may be used to reduce the district's federal or state tax obligation.
- N. Nothing in this AOC forgives the district from future non-compliance with the laws of the State of Missouri, nor requires the Department or State of Missouri to forego pursuing by any legal means any noncompliance with the laws of the State of Missouri. The terms stated herein constitute the entire and exclusive agreement of the parties. There are no other obligations of the parties, be they express or implied, oral or written, except those within are expressly set forth herein. The terms of this AOC supersede all previous memoranda or understanding, notes, conversations, and agreements, express or implied. This AOC may not be modified orally.
- O. By signing this AOC, all signatories assert that they have read and understood the terms of this AOC, and that they have the authority to sign this AOC on behalf of their respective party.
- P. The effective date of the AOC shall be the date the Department signs the AOC. The Department shall send a fully executed copy of this AOC to the district for its records.
- Q. The district shall comply with the MCWL, Chapter 644, RSMo and its implementing regulations at all times in the future.

V. FINDING OF AFFORDABILITY

Pursuant to Section 644.145, the Affordability Finding, which addresses the obligations included within this Order through December 31, 2014, based upon the city's cost estimate of \$6,201,423.00 through completion of corrective actions outlined in the district's facility plan is attached hereto as Exhibit 1. This Affordability Finding does not address future improvements that may be necessary to comply with the MCWL or its implementing regulations. This AOC requires the district to complete the construction of

a wastewater treatment facility in accordance with a Department approved facility plan, designs, and specifications.

VI. RIGHT OF APPEAL

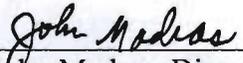
By signing this AOC, the district consents to its terms and waives any right to appeal, seek judicial review, or otherwise challenge the terms and conditions of this AOC pursuant to Sections 621.250, 640.010, 640.013, 644.056.3, 644.079.2, Chapter 536 RSMo, 644.145, RSMo, 10 CSR 20-1.020, 10 CSR 20-3.010, 10 CSR 20-6.020(5), the Missouri Constitution, or any other source of law.

VI. CORRESPONDENCE AND DOCUMENTATION

Correspondence or documentation with regard to conditions outlined in this AOC shall be directed to:

Ms. Kristi Savage-Clarke  
Compliance and Enforcement Section  
Water Protection Program  
Missouri Department of Natural Resources  
P.O. Box 176  
Jefferson City, MO 65102-0176

Agreed to and Ordered this 27<sup>th</sup> day of March, 2013

  
\_\_\_\_\_  
John Madras, Director  
Water Protection Program  
Missouri Department of Natural Resources

Agreed to and Ordered this 19<sup>th</sup> day of March, 2013

  
\_\_\_\_\_  
Gary Porter, Chairman  
Pulaski County Sewer District No. 1

Copies of the foregoing served by certified mail to:

Mr. Gary Porter, Chairman  
Pulaski County Sewer District No. 1  
P.O. Box 3008  
Waynesville, MO 65583-0549

CERTIFIED MAIL: 7009 2250 0000 0886 9972

c: Ms. Diane Huffman  
Chief, NPDES and Facilities Management Branch  
Water, Wetlands, and Pesticides Division  
U.S. Environmental Protection Agency, Region VII  
11201 Renner Blvd  
Lenexa, KS 66219

Mr. Chris Wieberg, Chief  
Operating Permits Section  
Water Protection Program  
Missouri Department of Natural Resources  
P.O. Box 176  
Jefferson City, MO 65102-0176

Mr. Jackson Bostic, Director  
Southeast Regional Office  
Missouri Department of Natural Resources  
2155 N. Westwood Blvd.  
Poplar Bluff, MO 63901

Ms. Janet Pointer, Accounting Specialist  
Accounting Program  
Missouri Department of Natural Resources  
P.O. Box 477  
Jefferson City, MO 65102-0176

Dr. Samuel M. Hunter, Chair  
Missouri Clean Water Commission  
P O Box 984  
216 Tanner Street  
Sikeston, MO 63801

Mr. Ben A. "Todd" Parnell, III, Vice Chair  
Missouri Clean Water Commission  
Drury University  
900 N. Benton  
Springfield, MO 65802

Mr. John Cowherd, Commissioner  
Missouri Clean Water Commission  
1303 Deer Lane  
Mount Vernon, MO 65712

Mr. Samuel D. Leake, Commissioner  
Missouri Clean Water Commission  
41690 Harrison Trail  
Perry, MO 63462

Ms. Wallis Warren, Commissioner  
Missouri Clean Water Commission  
2671 Jefferiesburg Road  
Beaufort, MO 63013

Mr. Dennis Wood, Commissioner  
Missouri Clean Water Commission  
P.O. Box 112  
284 Lillian Lane  
Kimberling City, MO 65686

Mr. Buddy Bennett, Commissioner  
Missouri Clean Water Commission  
1922 N Main Street  
Higginsville, MO 64037-1527



**Missouri Department of Natural Resources  
Water Protection Program  
Affordability Determination and Finding  
(In accordance with RSMo 644.145)**

**Pulaski County Sewer District No. 1  
Weeks Hollow Wastewater Treatment Facility,  
MO-0111716, Enf.ID 2191, Pulaski County**

Section 644.145 RSMo requires the Missouri Department of Natural Resources to make a “finding of affordability” when “issuing permits under” or “enforcing provisions of” state or federal clean water laws “pertaining to any portion of a combined or separate sanitary sewer system or publicly-owned treatment works.”

Description:

The Pulaski County Sewer District No. 1 owns and operates the Weeks Hollow wastewater treatment facility. The facility collects and treats effluent from 2,026 connections. The facility consists of a single lagoon with floating curtains that divides it into four (4) cells. The first three (3) cells of the lagoon are aerated with year round chlorine disinfection and dechlorination in the last cell. The facility has a design population equivalent of 5,800, an actual population equivalent of 5,524, a designed average flow of 435,000 gallons per day, and an actual flow of 414,300 gallons per day. Effluent discharges to Weeks Hollow pursuant to the conditions and requirements of Missouri State Operating Permit (MSOP) number MO-0111716.

Residential Connections: 2,017<sup>1</sup>

Commercial Connections: 9<sup>1</sup>

Total Connections: 2,026<sup>1</sup>

Permit Requirements Being Enforced:

Missouri State Operating Permit number MO-0111716 was issued to the district on September 26, 2008, and will expire by its own terms on September 25, 2013. The MSOP required the district to upgrade the facility to enable the effluent to comply with final limitations for Biochemical Oxygen Demand (BOD), Total Suspended Solids (TSS), Total Residual Chlorine (TRC), and Oil and Grease by September 26, 2011. Effluent discharged from the treatment facility has failed to consistently comply with the applicable permitted effluent limitations for BOD and TSS.

---

<sup>1</sup> Missouri Department of Natural Resources Water, Protection Program Sewer Connections List, 2012 value

Range of Anticipated Costs Associated with Complying with Requirements:

The district plans to construct a new wastewater treatment facility that will replace the existing facility. The district estimates the costs to construct a wastewater treatment facility will total \$6,204,424.<sup>2</sup>

Construction Costs: \$5,387,655  
 Bonding and Administrative: \$161,630  
 Engineering Design: \$344,810  
 Engineering Observation: \$310,329

**(1) A community's financial capability and ability to raise or secure necessary funding**  
*(examine key indicators of the community's ability to raise funds):*

Current User Rates \$42.02 per 5,000 gallons<sup>3</sup>  
 (42.02\*12)=\$504.24 per year

Rate Capacity or Pay as You Go Option:

Municipal Bond Rating (if applicable): \$5,750,000<sup>4</sup>

Bonding Capacity: Unknown<sup>5</sup>

*(General Obligation Bond capacity allowed by constitution:*

*cities=up to 20% of taxable tangible property*

*sewer districts=up to 5% of taxable tangible property)*

Current Outstanding Debt: \$6,600,014.64<sup>6</sup>

Other Indicators:

The district's users approved an 8 million dollar bond in August 2008 to fund this and other projects. Sewer User Fee Income for 2011 was \$7,740,127.24<sup>7</sup>

<sup>2</sup> Integrity Engineering, INC. Probable Cost of PCSD No. 1 WWTP Upgrade worksheet, included with letter dated May 16, 2012

<sup>3</sup> Integrity Engineering, INC., letter dated May 16, 2012.

<sup>4</sup> Pulaski County Sewer District, Letter dated February 4, 2013

<sup>5</sup> Information not available to the Department at the time the Affordability Analysis was conducted

<sup>6</sup> Piper Jaffray & Co. Public Finance. Sewerage System Revenue Bonds Certificates of Participation Series 2006. Itemized Net Debt Service, Pulaski County Sewer District No. 1, Aggregate March 4, 2005.

<sup>7</sup> Sewer User Fee Income for 2011 provided by Ms. Nola Wood, Office Manager at the Pulaski County Sewer District No. 1, via electronic correspondence from Terris L. Cates, PE, PLS of Integrity Engineering, Inc. on December 4, 2012.

**(2) Affordability of pollution control options for the individuals or households of the community:**

Current Annual Operating Costs (Exclude Depreciation): \$225,844.00<sup>8</sup>

Current User Rate: \$42.02 per 5,000 gallons<sup>8</sup>  
(42.02\*12)=\$504.24 per year

Estimated Capital Cost of Pollution Control Options: \$6,204,424<sup>8</sup>

Annual Cost of Additional (*Operating Costs and Debt Service*): Unknown<sup>5</sup>

Estimated Resulting User Rate and/or Cost per Household: \$66.30 per month (\$66.30 x 12 months = \$795.6 per year)<sup>8</sup>

Median Household Income: \$31,104<sup>9</sup>

Rate and/or Cost per Household as a Percent of Median Household Income:  $(\$795.6 / \$31,104) \times 100 = 2.6\%$

<i>(Rate or Cost/MHI)</i> Check Appropriate Box	Financial Impact	Residential Indicatory (Cost or Usage Rate as a percent of MHI)
<input type="checkbox"/>	Low	Less than 1% MHI
<input type="checkbox"/>	Medium	Between 1% and 2% MHI
<input checked="" type="checkbox"/>	High	Greater than 2% MHI

**(3) An evaluation of the overall costs and environmental benefits of the control technologies:**

From February of 2011 to October 2012, the effluent violated permitted limitations (more than 40%) for BOD, TSS, and TRC. Building a wastewater treatment facility to comply with final effluent limitations contained in Missouri State Operating Permit number MO-0111716 will improve the water quality in the receiving stream to protect the beneficial uses of Weeks Hollow and the Gasconade River. The beneficial uses of the Gasconade River include protection of Aquatic Life and Human Health, Cool Water Fishery, Livestock & Wildlife Watering, Whole Body Contact Recreation, Boating & Canoeing, and Drinking Water Supply.

<sup>8</sup> Integrity Engineering, Inc., letter dated May 16, 2012.

<sup>9</sup> Median Household Income – 2006-2010 American Community Survey 5-year Estimates – Median Income in the Past 12 months - <http://factfinder2.census.gov/faces/nav/jsf/pages/searchresults.xhtml?refresh=t> 1990 Median Household Income - Summary Tape File 3 - <http://mcdc.missouri.edu/websas/xtabs3menu/mo/Places/> (\$31,104 = \$30,795 (Dixon City MHI) +\$28,969 (Richland City MHI) + \$33,547 (Crocker City MHI))

- (4) An inclusion of ways to reduce economic impacts on distressed populations in the community, including but not limited to, low and fixed income populations. This requirement includes but is not limited to:**

Potentially Distressed Populations for <i>Pulaski County</i>	
Unemployment	6.8% <sup>10</sup>
Median Household Income	\$31,104 <sup>9</sup>
Percentage Change in Median Household Income (1990–2010)	Unknown <sup>5</sup>
Percentage Population Growth/Decline (1990-2010)	26.5% <sup>11</sup>
Change in Median Age in Years (1990-2010)	-1.5 <sup>12</sup>
Percent of Households in Poverty	30.70% <sup>13</sup>
Percent of Households Relying on Food Stamps	11.2% <sup>14</sup>

Opportunity for cost savings or cost avoidance:

None noted

Opportunity for changes to implementation/compliance schedule:

An AOC between the Department and the district will provide the district with additional time to complete the improvements necessary to comply with the final effluent limitations contained in Missouri State Operating Permit number MO-0111716.

- (5) An assessment of other community investments relating to environmental improvements:**

Not applicable

<sup>10</sup> Unemployment data from Missouri Department of Economic Development for February, 2012 – <http://www.missourieconomy.org/pdfs/urel1202.pdf>

<sup>11</sup> 2010 Census Population Data - <http://factfinder2.census.gov/faces/nav/jsf/pages/searchresults.xhtml?refresh=t>  
2000 Census Population Data - <http://www.census.gov/popest/data/cities/totals/2009/tables/SUB-EST2009-04-29.xls>  
1990 Census Population Data – <http://www.census.gov/prod/cen1990/cp1/cp-1-27.pdf>

<sup>12</sup> Median Age – 2010 American Community Survey 5-year Estimates – B01002 – <http://factfinder2.census.gov/faces/nav/jsf/pages/searchresults.xhtml?ref=geo&refresh=t>

1990 Median Age - <http://www.oseda.missouri.edu/mscdc/census/mo/trendplaces.html>

<sup>13</sup> Poverty data – American Community Survey - <http://factfinder2.census.gov/faces/nav/jsf/pages/searchresults.xhtml?refresh=t>

<sup>14</sup> Food stamps – 2006-2010 American community Survey 5-year Estimates – S2201 <http://factfinder2.census.gov/faces/nav/jsf/pages/searchresults.xhtml?refresh=t>

**(6) An assessment of factors set forth in the United States Environmental Protection Agency's guidance, including but not limited to the "Combined Sewer Overflow Guidance for Financial Capability Assessment and Schedule Development" that may ease the cost burdens of implementing wet weather control plans, including but not limited to, small system considerations, the attainability of water quality standards, and the development of wet weather standards:**

Secondary indicators for consideration [for each item, insert the appropriate score or 'NA'.]

Socioeconomic, Debt and Financial Indicators

Indicators	Strong (3 points)	Mid-Range (2 points)	Weak (1 point)	Score
Bond Rating Indicator	Above BBB or Baa	BBB or Baa	Below BBB or Baa	NA
Overall Net Debt as a % of Full Market Property Value	Below 2%	2% - 5%	Above 5%	\$6,600,014.64 <sup>15</sup> . Full market Property value not available
Unemployment Rate	>1% below Missouri average	± 1% of Missouri average	>1% above Missouri average	<b>2</b> 6.80% <sup>16</sup> County – 6.3% <sup>16</sup> State = +0.5% above Missouri
Median Household Income	More than 25% above Missouri MHI	± 25% of Missouri MHI	More than 25% below Missouri average	<b>1</b> \$31,104 <sup>9</sup> - \$44,306 / \$44,306 <sup>9</sup> = -0.297 x 100 = 29.7 Below Missouri
Property Tax Revenues as a % of Full Market Property Value	Below 2%	2% - 4%	Above 4%	Full market Property value not available
Property Tax Collection Rate	Above 98%	94% - 98%	Below 94%	

Average Score for Financial Capability Matrix:  $(2+1)/2=1.5$  Weak-Range  
Residential Indicator (from Criteria #2 above): >2% High Impact

<sup>15</sup> Piper Jaffray & Co. Public Finance. Sewerage System Revenue Bonds Certificates of Participation Series 2006. Itemized Net Debt Service, Pulaski County Sewer District No. 1, Aggregate March 4, 2005.

<sup>16</sup> Unemployment data from Missouri Department of Economic Development for February, 2012 – <http://www.missourieconomy.org/pdfs/ure11202.pdf>

**Financial Capability Matrix**

<b>Financial Capability Indicators Score from above ↓</b>	<b>Residential Indicator (User rate as a % of MHI)</b>		
	Low (Below 1%)	Mid-Range (Between 1.0% and 2.0%)	High (Above 2.0%)
Weak (below 1.5)	Medium Burden	High Burden	<b>High Burden</b>
Mid-Range (1.5 – 2.5)	Low Burden	Medium Burden	High Burden
Strong (above 2.5)	Low Burden	Low Burden	Medium Burden

Estimated Financial Burden: High Burden

***(7) An assessment of any other relevant local community economic condition.***

Pulaski County's population increased 26.5% from 1990-2010. In terms of economic strength, Pulaski County is below average when compared to other counties in the State. The percentage of labor force is 19% below the State average, the per capita wealth<sup>17</sup> is 51% below the State average, and the per capita income is the 16% above the State's average.

In terms of retail Sales, Pulaski County loses retail customers to surrounding counties and County residents spend less than the state average on retail goods and services. The buying power index of Pulaski County residents is above average compared to the rest of the regional economy<sup>18</sup>.

**Conclusion and Finding**

As a result of reviewing the above criteria, the Department hereby finds that the action described above will result in a high burden with regard to the community's overall financial capability and a high financial impact for most individual customers/households.

<sup>17</sup> Per capita wealth is calculated by taking a sum of appraised value of residential property, mobile homes and motor vehicles and this sum is then divided by County population.

<sup>18</sup>[http://www.missourieconomy.org/pdfs/central\\_wia\\_retail\\_trade\\_analysis.pdf](http://www.missourieconomy.org/pdfs/central_wia_retail_trade_analysis.pdf)