

**BEFORE THE MISSOURI DEPARTMENT OF NATURAL RESOURCES**

**In the Matter of:** )  
 )  
City of Lohman )  
Wastewater Treatment Facility ) **Order No. 2015-WPCB-1350**  
 )  
**Serve:** )  
The Honorable Thomas Kirchner, Mayor )  
City of Lohman )

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**ABATEMENT ORDER ON CONSENT**

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**NOTICE TO RECIPIENTS OF ABATEMENT ORDERS ON CONSENT**

The issuing of this Abatement Order on Consent (AOC) No. 2015-WPCB-1350, by the Department of Natural Resources, is a formal administrative action by the state of Missouri and is being issued because the city of Lohman violated 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 the city 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.

## FINDINGS OF FACT

1. The city of Lohman is a fourth class municipality with a population of approximately 163 residents and 75 wastewater connections. The city owns and operates a wastewater treatment facility (WWTF) that consists of an extended aeration unit with aerated sludge holding basins, sludge disposal by land application or contract hauler, and seasonal ultraviolet disinfection. The WWTF is located in the SE ¼, SE ¼, SW ¼, Section 21, Township 44 North, Range 13 West, of Cole County. The design flow of the WWTF is 31,500 gallons per day and the actual flow is 21,000 gallons per day with a design population equivalent of 315. Design sludge production is 5.67 dry tons per year. The WWTF currently operates pursuant to the terms and conditions of Missouri State Operating Permit (MSOP) No. MO-0124664. Treated effluent from the WWTF discharges from Outfall No. 001 to Logan Creek.

2. Logan Creek is waters of the state as the term is defined by Section 644.016 (27), RSMo.

3. Domestic wastewater and sludge are water contaminants as the term is defined in Section 644.016 (24), RSMo.

4. MSOP No. MO-0124664 was re-issued to the city on March 1, 2013, and included final effluent limitations for Ammonia as Nitrogen that became effective on March 1, 2014. Section "E", Schedule of Compliance (SOC), of the MSOP required the city to submit a report to the department by September 1, 2013, regarding the city's compliance with the final effluent limits.

5. MSOP No. MO-0124664 requires the city to sample the effluent discharged from Outfall No. 001 and chemically analyze the effluent sample for the water contaminants listed in

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Part “A” every month. MSOP No. MO-0124664 further requires the effluent to comply with the effluent limitations contained in Part “A” and requires the results of the analysis to be submitted to the department on monthly Discharge Monitoring Reports (DMRs).

6. MSOP No. MO-0124664 requires the city to submit annual sludge reports to the department by January 28<sup>th</sup> of each year for the previous calendar year period. Annual sludge reports must describe the amount of sludge hauled from the WWTF each month and the average percent solids of sludge.

7. On January 28, 2013, the department received the annual sludge report for 2012. The report stated that 5,000 gallons of sludge were hauled from the WWTF during March, June, and October, for a total of 15,000 gallons of sludge removed from the WWTF during 2012. The report did not provide the average percent solids of sludge.

8. On January 28, 2014, the department received the annual sludge report for 2013. The report stated that 7,500 gallons of sludge were hauled from the WWTF during March and September, for a total of 15,000 gallons of sludge removed from the WWTF during 2013. The report did not provide the average percent solids of sludge.

9. On February 19, 2014, department staff conducted a routine compliance inspection of the WWTF. During the inspection, staff observed sludge in the clarifier unit and in the receiving stream directly below the outfall, sludge deposits on the bottom of Logan Creek, and floating sludge in the creek. Staff informed Mr. Gary Frank, operator, that the sludge must be removed from the receiving stream and the clarifier. During a review of the WWTFs file, staff noted that the city failed to report Ammonia and oil and grease data on the September 2013 DMR and had not submitted a Biosolids Management Plan. Staff also found that the city did not

test the Ultraviolet (UV) intensity for the UV Disinfection System twice per week during the recreational season, as required by Special Conditions No. 18 of MSOP No. MO-0124664.

10. On March 27, 2014, the department issued Notice of Violation (NOV) No. NER201422811414206 to the city for causing pollution and discharging water contaminants into Logan Creek. The city was also cited for failure to submit an interim progress report, failure to submit complete DMRs, failure to measure the UV intensity from the UV Disinfection System twice per week and record the data in a log book, failure to submit a Biosolids Management Plan, and failure to submit annual inflow and infiltration reports.

11. On May 13, 2014, department staff conducted a routine compliance inspection of the WWTF. During the inspection, staff observed sludge in the clarifier, directly below the outfall, and sludge deposits on the bottom of Logan Creek. Staff informed Mr. Frank that the sludge in the creek needed to be removed immediately. During a file review, staff found that the WWTF exceeded limits for Biochemical Oxygen Demand (BOD) and pH during the month of March 2014. The WWTF also failed to report effluent sample data for Ammonia during the month of March 2014.

12. On June 4, 2014, the department issued NOV No. NER2014052710493894 to the city for failure to operate the WWTF so that there is no discharge of sludge to waters of the state, causing pollution and discharging water contaminants into Logan Creek, failure to measure the UV intensity from the UV Disinfection System twice per week and record the data in a log book, failure to submit an interim progress report, failure to submit complete DMRs, and failure to comply with permitted effluent limits.

13. In March 2015, the city failed to report Sulfate, Oil and Grease, and Chloride on the monthly DMR submitted to the department.

14. To date, the department has not received an annual sludge report from the city for 2014.

15. Section 644.076.1, RSMo makes it unlawful to violate the MCWL and regulations promulgated pursuant thereto and establishes penalties up to \$10,000.00 per day per violation.

#### **STATEMENT OF VIOLATIONS**

The respondents have violated the MCWL and its implementing regulations as follows:

16. On February 19, 2014, and May 13, 2014, the city caused pollution of Logan Creek, waters of the state, or 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.

17. On February 19, 2014, and May 13, 2014, the city discharged water contaminants into waters of the state, which reduced the quality of such waters below the Water Quality Standards criteria established by the Missouri Clean Water Commission, in violation of Sections 644.051.1(2) and 644.076.1, RSMo, and 10 CSR 20-7.031 or applicable subsections of 10 CSR 20-7.031.

18. For the months of June, September, and December 2013; March 2014; and March 2015, the city failed to submit complete DMRs as required in Part "A" of MSOP No. MO-0124664, in violation of Section 644.076.1, RSMo, and 10 CSR 20-7.015(9)(D)1.

19. Since at least February 19, 2014, to present, the city failed to measure the UV intensity from the UV Disinfection System twice per week and record the data in a log book as required by Special Conditions No. 18 of MSOP MO-0124664, in violation of 644.076.1 RSMo.

20. On September 1, 2014, the city failed to submit a Biosolids Management Plan as required by Special Conditions No. 19 of MSOP No. MO-0124664, in violation of Section 644.076.1 RSMo.

21. On February 19, 2014, and May 13, 2014, the city failed to operate the WWTF so that there is no discharge of sludge to waters of the state as required by the Standard Conditions of MSOP No. MO-0124664, in violation of Section 644.076.1, RSMo.

#### **AGREEMENT**

22. The department and the city desire to amicably resolve all claims that may be brought against the city for violations alleged above in Statement of Violations.

23. 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 as the city under this AOC.

24. The city in compromise and satisfaction of the department's claims relating to the above referenced violations agree without admitting liability or fault, to pay a penalty in the amount of \$10,000.00, of which \$7,000.00 shall be suspended as described in Paragraph 25 below. The payment in the amount of \$3,000.00 shall be in the form of a check made payable to

the “*Cole County Treasurer, as custodian of the Cole County School Fund*” and is due and payable upon execution of this AOC by the city. The check and the signed copy of this AOC shall be delivered to:

Accounting Program  
Department of Natural Resources  
P.O. Box 477  
Jefferson City, MO 65102-0477

25. The suspended penalty described in Paragraph 24, in the amount of \$7,000.00, shall be suspended for a period of two years from the execution of the AOC upon the condition that the city does not violate the terms of this AOC. Upon determination that the city has failed to meet the terms of this AOC, the department shall send a written demand for the suspended penalty to the city. The city shall have 15 days from receipt of the written demand to submit the suspended penalty to the address listed in Paragraph 24.

26. The city is ordered and agrees to submit to the department complete, accurate, and timely DMRs on or before the 28<sup>th</sup> day of the month following the monitoring period as required by MSOP No. MO-0124664.

27. The city is ordered and agrees to submit to the department complete, accurate, and timely annual sludge reports by January 28<sup>th</sup> of each year for the previous calendar year period.

28. Within 10 days of the effective date of this AOC, the city is ordered and agrees to conduct the following in-plant operational control monitoring requirements, as required in 10 CSR 20-9.010(5)(B), and maintain written records of this activity.

- a. Each day, Monday through Friday, monitor and record weather conditions such as ambient temperature and precipitation, flow and influent pH pursuant to 10 CSR 20-9.010(5)(B)1.

- b. Each day, Monday through Friday, monitor the mixed liquor suspended solids for settleability and dissolved oxygen and record the results pursuant to 10 CSR 20-9.010(5)(B)2.
- c. Once per week, monitor the influent and mixed liquor suspended solids for non-filterable residue pursuant to 10 CSR 20-9.010(5)(B)2.
- d. Samples shall be collected, handled, and analyzed pursuant to department-approved wastewater analysis methods described in 10 CSR 20-7.015(9)(D)2.

29. Within 10 days of the effective date of this AOC, the city is ordered and agrees to measure the UV intensity from the UV Disinfection System twice per week and record the data in a log book. The UV intensity log book shall be kept onsite and made available to the department upon request. The log is to include the following minimum information: name of individual recording data, date and time of observation, and measured UV intensity.

30. Within 10 days of the effective date of this AOC, the city is ordered and agrees to visually inspect the WWTF and receiving stream below the outfall for sludge deposits a minimum of three times per week to ensure that the WWTF is operating properly. The city shall maintain a written log of the inspections and note if there were any issues with the WWTF, whether sludge was observed in the clarifier or below the outfall, and corrective action taken. If there is sludge below the outfall, the city shall report the discharge to the department within 24 hours of discovery of sludge in the receiving stream. The city shall report the discharge of sludge to the department by phone at (660) 385-8000 between 8:00 a.m. and 5:00 p.m. Monday through Friday or at the department's 24-hour spill line at (573) 634-2436 after hours, weekends,

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and holidays. The city is ordered to continue to conduct inspections and maintain the log until receiving written approval from the department to cease the inspections and maintaining the log.

31. The city is ordered and agrees to submit the written records and analytical results of the in-plant operational monitoring required in Paragraph 28 above and the log of inspections required in Paragraph 30 to the department each month by the 15<sup>th</sup> day of the following month as described in Paragraph 35 of this order.

32. Within 90 days of the effective date of this order, the city is ordered and agrees to submit to the department, for review and approval, an Operations and Maintenance (O&M) Manual that shall, at a minimum, address maintenance and operational procedures of the WWTF. The O&M Manual shall include the written Standard Operating Procedures for operations and maintenance of the WWTF, including any applicable operational monitoring as stated in 10 CSR 20-9.010(5)(B)1 through 10 CSR 20-9.010(5)(D). Daily operational monitoring shall document, at a minimum, the weather conditions, including ambient temperature and precipitation; influent pH; and influent or effluent flow. Daily operational monitoring shall also include a settleability analysis of the aeration mixed liquor suspended solids and a dissolved oxygen determination of the aeration mixed liquor suspended solids. Weekly operational monitoring shall include influent Total Suspended Solids (TSS) and mixed liquor suspended solids. All required operational monitoring shall be conducted in accordance with the most current version of the Standard Methods for the Analysis of Water and Wastewater. Effluent monitoring shall include, at a minimum, pH, TSS, BOD, E. coli, Ammonia as Nitrogen, Oil and Grease, Chloride, and Sulfates at the frequency required in MSOP No. MO-0124664. All required effluent analysis shall be conducted in accordance with the requirements found in 10 CSR 20-7.015(9)(D)2. The

city shall also submit to the department, for review and approval, a Biosolids Management Plan. The Biosolids Management Plan shall comply with the conditions stated in Standard Conditions Part III of MSOP No. MO-0124664 and, at a minimum, address the frequency that biosolids will be removed from the WWTF, the primary method and procedure for disposal of biosolids, alternative methods and procedures for disposal when the primary method is unavailable, the frequency of biosolids testing, and the management of the biosolids treatment processes.

33. The city is ordered and agrees to properly operate and maintain the WWTF at all times so as to produce the highest quality of effluent possible that complies with permitted effluent limits and is free from sludge and other solids.

34. The city is ordered and agrees to comply with the MCWL, Chapter 644, RSMo, and its implementing regulations at all times in the future.

#### **SUBMISSIONS**

35. All other documentation submitted to the department for compliance with this order shall be submitted within the timeframes specified to:

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

#### **OTHER PROVISIONS**

36. Immediately upon becoming aware that a deadline or milestone as set forth in this AOC will not be completed by the required deadline, the city 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 days of notifying the department, the city shall submit to the department for review and approval a written request containing the same information. 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 city's right to request an extension and may be grounds for the department to deny the extension.

37. Should the city fail to meet the terms of this AOC, the city 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	\$50.00 per day
31 to 90 days	\$100.00 per day
91 days and above	\$250.00 per day

Stipulated penalties will be paid in the form of a check made payable to "*Cole County Treasurer, as custodian of the Cole County School Fund*". Any such stipulated penalty shall be paid within ten days of demand by the department and shall be delivered to:

Accounting Program  
Department of Natural Resources  
P.O. Box 477  
Jefferson City, MO 65102-0477

38. Compliance with this AOC resolves only the specific violations described herein, and this AOC shall not be construed as a waiver or modification or any other requirements of the MCWL and regulations, or any other source of law. Nor does this order resolve any future violations of this order or any law or regulation. Consistent with 10 CSR 20-3.010(5), this order shall not be construed as satisfying any claim by the state or federal government for natural resource damages.

39. Nothing in this AOC forgives the city 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 non-compliance 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 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.

40. 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.

41. 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 city for their records.

#### **COST ANALYSIS FOR COMPLIANCE**

Pursuant to Section 644.145, the Cost Analysis for Compliance (CAFCom) is attached hereto as Exhibit 1. This CAFCom does not address future improvements that may be necessary to comply with the MCWL or its implementing regulations. This AOC requires the city to conduct daily in-plant operational control monitoring, and inspections of the outfall and receiving stream three times a week.

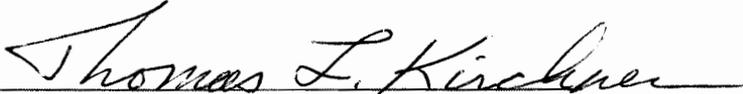
#### **NOTICE OF APPEAL RIGHTS**

By signing this AOC No. 2015-WPCB-1350, the city 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,

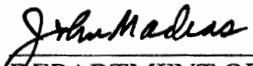
644.145, RSMo, 10 CSR 20-1.020, 10 CSR 20-3.010, 10 CSR 20-6.020(5), the Missouri Constitution, or any other source of law.

**SIGNATURE AUTHORITY**

Agreed to and Ordered this 7 day of March, 2016

  
The Honorable Thomas Kirchner, Mayor  
City of Lohman

Agreed to and Ordered this 5<sup>th</sup> day of April, 2016

  
DEPARTMENT OF NATURAL RESOURCES  
John Madras, Director  
Water Protection Program

Copies of the foregoing served by certified mail to:

The Honorable Thomas Kirchner  
City of Lohman  
8619 East Lohman Road  
Lohman, MO 65053

CERTIFIED MAIL # 7012 2920 0002 0660 6290

c: Ms. Irene Crawford, Director, Northeast Regional Office  
Ms. Diane Huffman, Environmental Protection Agency  
Missouri Clean Water Commission  
Accounting Program

**Missouri Department of Natural Resources  
Water Protection Program  
Cost Analysis for Compliance  
(In accordance with RSMo 644.145)**

**Lohman Wastewater Treatment Plant**

**Missouri State Operating Permit No. MO-0124664**

Section 644.145 RSMo requires the 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 for publicly-owned treatment works.”

This cost analysis is based on data available to the department as provided by the permittee and data obtained from readily available sources. For the most accurate analysis, it is essential that the permittee provides the department with current information about the city’s financial and socioeconomic situation.

**Facility Description:**

Residential Connections:	75 <sup>i</sup>
Commercial Connections:	0 <sup>i</sup>
Industrial Connections:	0 <sup>i</sup>
Total Connections for this facility:	75 <sup>i</sup>

**New Requirements or Requirements Now Being Enforced:**

The city was cited for failing to measure the ultraviolet (UV) intensity from the UV Disinfection System twice per week and record the data in a log book as required by the Missouri State Operating Permit (MSOP). The city was also cited for failing to submit a Biosolids Management Plan to the department. The wastewater treatment facility (WWTF) operator will now be required to inspect the outfall and receiving stream three times a week and maintain an inspection log, measure the UV intensity from the UV Disinfection System twice per week, and complete daily in-plant operational control monitoring. The city will also be required to submit to the department, for review and approval, an Operations and Maintenance Manual and a Biosolids Management Plan.

**Anticipated Costs Associated with Complying with the New Requirements:**

The total cost estimated to visually inspect the outfall and receiving stream is minimal, since it is a visual inspection done by the operator that does not require any new equipment or sampling. The city should already be performing the other requirements listed in the Abatement Order on Consent and should already be included in the city’s budget for the WWTF.

**(1) A community’s financial capability and ability to raise or secure necessary funding;**

Due to the minimal cost associated with this new monitoring requirement, the department anticipates that the city of Lohman has the means to implement the requirement.

**(2) Affordability of pollution control options for the individuals or households at or below the median household income level of the community;**

The department estimates an annual cost of \$5,000.00 to implement the new requirements. This cost, if financed through user fees, might cost each household an extra \$5.56<sup>ii</sup> per month. This would make the total sewer cost per household as a percent of median household income (MHI) 1.12%<sup>iii</sup> based on the State’s MHI of \$47,333<sup>vi</sup>. It is possible that the new monitoring requirements could be completed during the operator’s regular schedule at the WWTF, resulting in no additional cost to the city to implement this requirement. Due to the minimal cost associated

with this new requirement, the department anticipates a low to no rate increase will be necessary that could impact individuals or households of the community.

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

The receiving stream for the city's WWTF is Logan Creek, a Class C stream, which has beneficial uses of livestock and wildlife watering, protection of warm water aquatic life and human health-fish consumption, and whole body contact recreation. The discharge of sludge into the creek violates the water quality standards established by 10 CSR 20-7.031 and endangers the aquatic life in the stream, livestock, wildlife, and public health. Such discharges have the potential to contaminate lakes and streams causing serious water quality problems that negatively impact the beneficial uses. Regular inspections of the WWTFs outfall to ensure that no sludge is being discharged will improve the water quality in the receiving stream to protect the beneficial uses as described above.

**(4) Inclusion of ongoing costs of operating and maintaining the existing wastewater collection and treatment system, including payments on outstanding debts for wastewater collection and treatment systems when calculating projected rates:**

The city reported their outstanding debt for their current wastewater collection and treatment systems to be \$193,253.61. The city reported that each user pays \$39.00 each month, which is used toward payments on the current outstanding debt.<sup>iv</sup> The city pays their certified operator \$450.00 each month plus \$22.50 an hour for additional time spent at the WWTF for maintenance. The city pays their uncertified operator \$16.00 an hour for time spent at the WWTF.

**(5) 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:**

- (a) Allowing adequate time in implementation schedules to mitigate potential adverse impacts on distressed populations resulting from the costs of the improvements and taking into consideration local community economic considerations.
- (b) Allowing for reasonable accommodations for regulated entities when inflexible standards and fines would impose a disproportionate financial hardship in light of the environmental benefits to be gained.

**Socioeconomic Data<sup>i</sup>**

Potentially Distressed Populations -- City of Lohman	
Unemployment	4.9% <sup>v</sup>
Adjusted Median Household Income (MHI)*	\$47,333 <sup>vi</sup>
Percent Change in MHI (1990-2012)	+27.3% <sup>vii</sup>
Percent Population Growth/Decline (1990-2012)	+46.8% <sup>viii</sup>
Change in Median Age in Years (1990-2012)	+12.2 <sup>ix</sup>
Percent of Households in Poverty	10.2% <sup>x</sup>
Percent of Households Relying on Food Stamps	7.1% <sup>xi</sup>

\* The State's average MHI of \$47,333 is used in this analysis

**(6) An assessment of other community investments and operating costs relating to environmental improvements and public health protection;**

The city did not report any other investments relating to environmental improvements.

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

The community did not report any other relevant local economic conditions.

### **Conclusion and Finding**

As a result of the city's non-compliance with the Missouri Clean Water Law, its implementing regulations, and MSOP No. MO-0124664, the department is requiring additional monitoring at the WWTF and receiving stream. The department identified the actions for which cost analysis for compliance is required under Section 644.145 RSMo.

The department estimates the cost for weekly outfall monitoring is \$5,000.00 per year. Should these additional costs be financed through user fees, it may require a total sewer cost per household as a percent of MHI, 1.12% of the State's MHI.

The department considered the seven criteria presented in subsection 644.145.3 when evaluating the cost associated with the relevant actions. Taking into consideration these criteria, this analysis examined whether the above referenced monitoring requirements affects the ability of an individual customer or household to pay a utility bill without undue hardship or unreasonable sacrifice in the essential lifestyle or spending patterns of the individual or household. As a result of reviewing the above criteria, the department hereby finds that the requirement contained in Abatement order Consent No. 2015-WPCB-1350 will result in a low burden with regard to the community's overall financial capability and a low financial impact for most individual customers/households.

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<sup>i</sup> Department of Natural Resources Fee Tracking System, April 2015

<sup>ii</sup>  $((\text{Estimated annual cost}/\text{Total connections})/12 \text{ months}) = \text{Cost per household per month}$   
 $(\$5,000/75)/12 \text{ months} = \$5.56 \text{ per month}$

<sup>iii</sup>  $(\text{Cost per household per month}/(\text{MHI}/12)) * 100 = \text{Cost per household as a percent of MHI}$   
 $((\$5.56 + \$39)/(\$47,333/12)) * 100 = 1.12\%$

<sup>iv</sup> Information provided by the city in the "Cost Analysis for Compliance (CAFCom) Questions for City of Lohman" returned to the department on April 7, 2015

<sup>v</sup> Missouri Department of Economic Development (March 2015)

<http://www.missourieconomy.org/indicators/unemp/index.stm>

<sup>vi</sup> American Community Survey, U.S. Census Bureau,

<http://factfinder.census.gov/faces/nav/jsf/pages/searchresults.xhtml?refresh=t>

<sup>vii</sup> 1990 Median Household Income, <http://mcdc.missouri.edu/websas/xtabs3menus/mo/Places/>; and American Community Survey, U.S. Census Bureau,

<http://factfinder.census.gov/faces/nav/jsf/pages/searchresults.xhtml?refresh=t>

<sup>viii</sup> Total Population Universe: Total Population American Community Survey B01003,

<http://factfinder2.census.gov/faces/nav/jsf/pages/searchresults.xhtml?refresh=t>

<sup>ix</sup> 1990 Median Age, <http://www.oseda.missouri.edu/mscdc/census/mo/trendplaces.html>; Median Age by Sex – American Community Survey 5-year Estimates – B01002,

<http://factfinder2.census.gov/faces/nav/jsf/pages/searchresults.xhtml?ref=geo&refresh=t>

<sup>x</sup> Poverty data – American Community Survey-

<http://factfinder2.census.gov/faces/nav/jsf/pages/searchresults.xhtml?refresh=t>

<sup>xi</sup> Food Stamps/SNAP ACS Community Survey 5-year Estimates - S2201,

<http://factfinder2.census.gov/faces/nav/jsf/pages/searchresults.xhtml?refresh=t>