

STATE OF MISSOURI  
DEPARTMENT OF NATURAL RESOURCES

Jeremiah W. (Jay) Nixon, Governor • Sara Parker Pauley, Director

www.dnr.mo.gov

JUN 17 2016

Lake of the Ozarks Water and Sewer  
Ms. Betty Boushie  
840 Thunder Mountain Road  
Camdenton, MO 65020

Dear Ms. Boushie:

Thank you for submitting your email dated May 3, 2016, in which you commented on the National Pollutant Discharge Elimination System Permit modification for Zeolite Filter Backwash, also known as MO-G641000. The Department of Natural Resources appreciates the time you have taken to participate in the public comment period which expired on May 27, 2016. The below paragraphs include your comment and the Department's response.

Comment:

"Big Island Sewer and Water has a general permit for the water softener that was installed on the water system to help with gross alpha and combined radium 226 and 228. We do not feel they should have to endure the increased cost of lead and copper testing since there has never been an issue with the lead and copper in their drinking water. We are asking that those tests be removed from their general permit MOG641032."

Response:

Zeolite water treatment filters are designed to remove water contaminants from drinking water which are then periodically discharged in concentrate. In the case of this permit the discharge is allowed to waters of the state which are required to be protected from toxicity of aquatic life. Lead and Copper discharged at concentrated levels above the Missouri Water Quality Standards will result in toxicity therefore this permit action is needed to address this issue. Not all water being treated by Zeolite filters in Missouri have lead and copper concentrations that would result in a backwash above the water quality standards however, since this is a general permit that covers all zeolite filter backwashes, the permit must be protective of all backwash discharge scenarios. Given the broad coverage of this permit the department is requiring all authorized discharges to sample for lead and copper and achieve compliance with water quality standards no later than 2 years from the issuance of this permit modification.

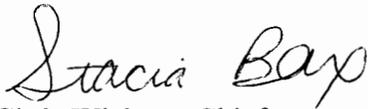
Facilities that wish to seek a no discharge status and forgo testing requirements in the permit modification can:

- Convert to a land application system and transfer to MO-G640000 General Permit for Land Application of Water Treatment Plant Filter Backwash;
- Begin operation as a no discharge pump and haul facility. This option would not require a permit if the owner has a written contract with the hauler and approval from the receiving facility. Facilities wishing to choose this option must supply the hauler contract and receiving facility approval to the department prior to termination of this discharge permit; or
- Directly discharge to a wastewater treatment plant that is currently permitted to accept wastewater that is similar in nature to the zeolite filter backwash from your filter. It is important to note that permitted wastewater treatment plants are required to notify the department when accepting wastewaters that may change the nature of their discharge as it relates to toxic pollutants such as lead and copper. This notification may result in the department modifying the receiving facilities permit in cases where dilution with other wastewater or the receiving waterbody is not available to avoid toxicity in the receiving stream.

Thank you again for your comments on MO-G641000. This response to comments will be posted to the department's website at <http://dnr.mo.gov/env/wpp/permits/issued/wpcpermits-general.htm> on June 17, 2016. If you have any questions or require more information regarding MO-G641000, please contact Ms. Susan Higgins of my staff at (573) 526-1002 or by mail at the Missouri Department of Natural Resources, Water Protection Program, P. O. Box 176, Jefferson City, MO 65102-0176.

Sincerely,

WATER PROTECTION PROGRAM



*for* Chris Wieberg, Chief  
Operating Permits Section

CW:shs

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Jeremiah W. (Jay) Nixon, Governor • Sara Parker Pauley, Director  
**DEPARTMENT OF NATURAL RESOURCES**

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JUN 17 2016

Big Island Water Company  
Ms. Pamela Holstead  
3458 Big Island Drive  
Roach, MO 65787

Dear Ms. Holstead:

Thank you for submitting your email dated May 3, 2016, in which you commented on the National Pollutant Discharge Elimination System Permit modification for Zeolite Filter Backwash, also known as MO-G641000. The Department of Natural Resources appreciates the time you have taken to participate in the public comment period which expired on May 27, 2016. The below paragraphs include your comment and the Departments' response.

Comment:

“In 2015, Big Island Water Company installed a water softening system at the well to address excess radium levels. Discharge from the system is small and does not enter Lake of the Ozarks, nor any streams or creeks or other waterways. The proposed additional testing on water softener discharge makes no exception for small water providers who do not discharge into a public waterway and discharge very little over a one year period. Please note this objection to the proposed modification as it would create an additional unwarranted expense for small water providers.”

Response:

Zeolite water treatment filters are designed to remove water contaminants from drinking water which are then periodically discharged in concentrate. In the case of this permit the discharge is allowed to waters of the state which are required to be protected from toxicity of aquatic life. Lead and Copper discharged at concentrated levels above the Missouri Water Quality Standards will result in toxicity therefore this permit action is needed to address this issue. Not all water being treated by Zeolite filters in Missouri have lead and copper concentrations that would result in a backwash above the water quality standards however, since this is a general permit that covers all zeolite filter backwashes, the permit must be protective of all backwash discharge scenarios. Given the broad coverage of this permit the department is requiring all authorized discharges to sample for lead and copper and achieve compliance with water quality standards no later than 2 years from the issuance of this permit modification.

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- Begin operation as a no discharge pump and haul facility. This option would not require a permit if the owner has a written contract with the hauler and approval from the receiving facility. Facilities wishing to choose this option must supply the hauler contract and receiving facility approval to the department prior to termination of this discharge permit; or
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