



690 Chesterfield Pkwy W • Chesterfield MO 63017-0760
Phone: 636-537-4000 • Fax 636-537-4798 • www.chesterfield.mo.us

May 3, 2016

By Electronic Mail (publicnoticenpdes@DNR.mo.gov)

Mr. Michael Abbott
MS4 Program Coordinator
Water Protection Program
Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65101

RE: Draft Missouri State Operating Permit MOR040000 Comments

Dear Mr. Abbott:

The City of Chesterfield has reviewed the Draft Missouri State Operating Permit MOR040000 placed on public notice April 8, 2016. We support the comments from the Metropolitan St. Louis Sewer District and hope you will carefully consider them.

We acknowledge that the Department has resolved many concerns about the small MS4 general permit, including concerns about requiring stormwater discharges from MS4 outfalls to comply with water quality standards. We also thank the Department for establishing a process for Department review and approval of the Stormwater Management Plan (SWMP) and TMDL Assumption and Requirement Attainment Plan (ARAP). We support the Department's decision not to require in-stream monitoring in this permit.

The City of Chesterfield is committed to working with the Department to ensure that Missouri's waters are protected through application of good science and stakeholder input. Please contact me at (636) 537-4764 or jeckrich@chesterfield.mo.us if you have questions or would like to discuss this matter further.

Sincerely,

James A. Eckrich, P.E.
Public Works Director / City Engineer

cc: Jay Hoskins - MSD



City of Ellisville

April 29, 2016

By Electronic Mail (publicnoticenpdes@DNR.mo.gov)

Mr. Michael Abbott
MS4 Program Coordinator
Water Protection Program
Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65101

RE: Draft Missouri State Operating Permit MOR040000 Comments

Dear Mr. Abbott:

The City of Ellisville has reviewed the Draft Missouri State Operating Permit MOR040000 placed on public notice April 8, 2016. We support the comments from the Metropolitan St. Louis Sewer District and hope you will carefully consider them.

We acknowledge that the Department has resolved many concerns about the small MS4 general permit, including concerns about requiring stormwater discharges from MS4 outfalls to comply with water quality standards. We also thank the Department for establishing a process for Department review and approval of the Stormwater Management Plan (SWMP) and TMDL Assumption and Requirement Attainment Plan (ARAP). We support the Department's decision not to require in-stream monitoring in this permit.

The City of Ellisville is committed to working with the Department to ensure that Missouri's waters are protected through application of good science and stakeholder input. Please contact me at 636-227-9660 if you have any questions or would like to discuss these issues further.

Sincerely,

William L. Schwer, P.E.
City Manager

cc: Jay Hoskins - MSD

CITY OF LADUE

Public Works

May 2, 2016

By Electronic Mail (publicnoticenpdes@DNR.mo.gov)

Mr. Michael Abbott
MS4 Program Coordinator
Water Protection Program
Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65101

RE: Draft Missouri State Operating Permit MOR040000 Comments

Dear Mr. Abbott:

The City of Ladue has reviewed the Draft Missouri State Operating Permit MOR040000 placed on public notice April 8, 2016. We support the comments from the Metropolitan St. Louis Sewer District and hope you will carefully consider them.

We acknowledge that the Department has resolved many concerns about the small MS4 general permit, including concerns about requiring stormwater discharges from MS4 outfalls to comply with water quality standards. We also thank the Department for establishing a process for Department review and approval of the Stormwater Management Plan (SWMP) and TMDL Assumption and Requirement Attainment Plan (ARAP). We support the Department's decision not to require in-stream monitoring in this permit.

The City of Ladue is committed to working with the Department to ensure that Missouri's waters are protected through application of good science and stakeholder input. Please contact me at 314-993-5665 if you have any questions or would like to discuss these issues further.

Sincerely,



Anne C. Lamitola, P.E.
Director of Public Works

cc: Jay Hoskins - MSD



ASSOCIATION OF MISSOURI CLEANWATER AGENCIES

May 6, 2016

By Electronic Mail (publicnoticenpdes@DNR.mo.gov)

Mr. Michael Abbott
Water Protection Program
Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65101

RE: Draft Missouri State Operating Permit MOR040000

Dear Mr. Abbott:

On behalf of the Association of Missouri Cleanwater Agencies, we would like to thank the Department for the opportunity to comment on the referenced draft MS4 permit.

We have previously provided extensive comments on prior drafts of this important permit renewal. We appreciate the Department's consideration of our prior comments. Through this process, we have a better understanding of the Department's goals and intent behind some of the language we found to be of concern.

Accordingly, we are now prepared to live with the compromises and requirements reflected in the referenced draft, with one exception. We ask that the requirement to submit a map showing all MS4 outfalls be (1) limited to constructed outfalls and (2) subject to a compliance schedule as it will take most systems several years to accurately and completely identify all constructed outfalls in their system.

MS4 programs present a significant technical, political and financial challenge to our member

Office of the Director
Busch Municipal Building • 840 Boonville Avenue
Springfield, Missouri 65802 • 417-864-1919 • springfieldmo.gov/recycling



Mr. Michael Abbott
May 4, 2016
Page 2

While the draft MS4 permit raises the bar for MS4 permittees we believe it does so in a reasonable manner, consistent with the evolving nature of MS4 programs statewide and the financial realities our members face over the coming permit term.

Again, we wish to thank the Department for considering our input during this process and we look forward to working with you to facilitate our members' successful implementation of the many new requirements in the renewed permit.

Sincerely,



Steve Meyer
President
AMCA

C: AMCA Members
Mr. John Madras
Ms. Leanne Tippet Mosby



**Metropolitan St. Louis
Sewer District**

2350 Market Street
St. Louis, MO 63103
Phone: 314.768.6200
www.stlmsd.com

May 5, 2016

By Electronic Mail (publicnoticenpdes@DNR.mo.gov)

Mr. Michael Abbott
MS4 Program Coordinator
Water Protection Program
Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65101

RE: Draft Missouri State Operating Permit MOR040000 Comments

Dear Mr. Abbott:

The Metropolitan St. Louis Sewer District (MSD) has reviewed the Draft Missouri State Operating Permit MOR040000 placed on public notice April 8, 2016. We appreciate the opportunity to provide the Department with our comments.

We acknowledge that the Department has resolved many concerns about the small MS4 general permit, including concerns about requiring stormwater discharges from MS4 outfalls to comply with water quality standards. We also thank the Department for establishing a process for Department review and approval of the Stormwater Management Plan (SWMP) and TMDL Assumption and Requirement Attainment Plan (ARAP). We support the Department's decision not to require in-stream monitoring in this permit.

We offer three specific comments for your consideration (below), as well as a markup of the document to correct several typographical items.

MS4 Outfall Locations and MS4 Boundary Point Sources

In Section 2.1, we are requesting the submittal list be limited to the complete application and the Stormwater Management Plan (SWMP).

Metropolitan St. Louis Sewer District
Draft Missouri State Operating Permit MOR040000 Comments
May 5, 2016

The specific requirement to provide locations of outfalls and MS4 Boundary Point Sources should be removed from this section. We note the permittee is still required to submit the location of outfalls, as the SWMP requires the permittee to provide a storm sewer map (see Section 4.2.3.1). Information on MS4 boundary point sources is required for the application.

TMDL ARAP Submittal Deadline

In Section 3.1.3, please clarify that “the permittee shall draft and submit the TMDL ARAP to the Department within 30 months of the effective date of their MS4 general permit or the date EPA approves or establishes the TMDL, whichever is later. The deadline for the TMDL ARAP may be extended by request of the permittee and with written approval by the Department. (emphasis for clarity of comment)

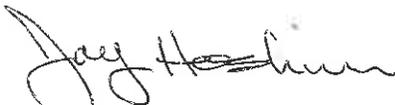
This revision is necessary to clarify that permittees who receive a TMDL WLA after the effective date of their permit would also be allowed 30 months to prepare the TMDL ARAP. We further suggest moving the language on extension of deadlines from 3.1.3.1 to 3.1.3.

Post-Construction BMP Inspection

In Section 4.2.5.1.4, please clarify that permittees are to inspect or require inspect or require inspection of post-construction BMPs. (emphasis for clarity of comment)

Thank you for the opportunity to provide comments during this process. If you have any questions please feel free to contact Jay Hoskins at (314) 436-8757.

Sincerely,



Jay Hoskins, P.E.
Program Manager

cc: John Lodderhose - MSD
Susan Myers - MSD
Roland Biehl - MSD



Terry W. Briggs, Mayor

May 3, 2016

By Electronic Mail (publicnoticenpdes@DNR.mo.gov)

Mr. Michael Abbott
MS4 Program Coordinator
Water Protection Program
Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65101

RE: Draft Missouri State Operating Permit MOR040000 Comments

Dear Mr. Abbott:

The City of Bridgeton has reviewed the Draft Missouri State Operating Permit MOR040000 placed on public notice April 8, 2016. We support the comments from the Metropolitan St. Louis Sewer District and hope you will carefully consider them.

We acknowledge that the Department has resolved many concerns about the small MS4 general permit, including concerns about requiring stormwater discharges from MS4 outfalls to comply with water quality standards. We also thank the Department for establishing a process for Department review and approval of the Stormwater Management Plan (SWMP) and TMDL Assumption and Requirement Attainment Plan (ARAP). We support the Department's decision not to require in-stream monitoring in this permit.

The City of Bridgeton is committed to working with the Department to ensure that Missouri's waters are protected through application of good science and stakeholder input. Please contact Brian Petersen at 314-373-3812 if you have any questions or would like to discuss these issues further.

Sincerely,

A handwritten signature in blue ink that reads "B. Petersen". The signature is stylized and includes a horizontal line at the end.

Brian Petersen
Assistant City Engineer

cc: Jay Hoskins - MSD

City of Ballwin
Government Center
14811 Manchester Road
Ballwin, MO 63011-4617



(636) 227-8580
Fax: (636) 207-2320
www.ballwin.mo.us

May 5, 2016

By Electronic Mail (publicnoticenpdes@DNR.mo.gov)

Mr. Michael Abbott
MS4 Program Coordinator
Water Protection Program
Missouri Department of Natural Resources
1101 Riverside Drive
Jefferson City, MO 65101

RE: Draft Missouri State Operating Permit MOR040000 Comments

Dear Mr. Abbott:

The City of Ballwin has reviewed the Draft Missouri State Operating Permit MOR040000 placed on public notice April 8, 2016. We support the comments from the Metropolitan St. Louis Sewer District and hope you will carefully consider them.

We acknowledge that the Department has resolved many concerns about the small MS4 general permit, including concerns about requiring stormwater discharges from MS4 outfalls to comply with water quality standards. We also thank the Department for establishing a process for Department review and approval of the Stormwater Management Plan (SWMP) and TMDL Assumption and Requirement Attainment Plan (ARAP). We support the Department's decision not to require in-stream monitoring in this permit.

The City of Ballwin is committed to working with the Department to ensure that Missouri's waters are protected through application of good science and stakeholder input. Please contact City Engineer Gary Kramer at 636-227-2185 if you have any questions or would like to discuss these issues further.

Sincerely,


Gary R. Kramer, P.E.
City Engineer/Director
Ballwin Public Works Department

cc: Jay Hoskins - MSD