

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES
MISSOURI CLEAN WATER COMMISSION



MISSOURI STATE OPERATING PERMIT

In compliance with the Missouri Clean Water Law, (Chapter 644 R.S. Mo. as amended, hereinafter, the Law), and the Federal Water Pollution Control Act (Public Law 92-500, 92nd Congress) as amended,

Permit No. MO-0026671

Owner: City of Lowry City
Address: 406 W. 4th, Lowry City, MO 64763

Continuing Authority: Same as Above
Address: Same as Above

Facility Name: Lowry City WWTF **Class D Operator Required**
Facility Address: South Taylor, Lowry City MO 64763

Legal Description: SE¼, NW¼, Sec. 24, T39N, R26W, St. Clair County
UTM Coordinates: X= 435682, Y=4220847

Receiving Stream: Unnamed Tributary to Gallinipper Creek (U)
First Classified Stream and ID: Gallinipper Creek (C) (01227)
USGS Basin & Sub-watershed No.: (10290105-060005)

is authorized to discharge from the facility described herein, in accordance with the effluent limitations and monitoring requirements as set forth herein:

FACILITY DESCRIPTION

Outfall #001 - POTW / Sewerage Works - SIC #4952

Four cell anaerobic lagoon system / sludge is retained in lagoon.

Design organic population equivalent is 1,036.
Design average daily flow is 103,600 gallons per day.
Design sludge production is 15.5 dry tons/year.

This permit authorizes only wastewater discharges under the Missouri Clean Water Law and the National Pollutant Discharge Elimination System; it does not apply to other regulated areas. This permit may be appealed in accordance with Section 644.051.6 of the Law.

September 21, 2009 October 7, 2013
Effective Date Revised Date

Sara Parker Pauley, Director, Department of Natural Resources

September 20, 2014
Expiration Date

John Madros, Director, Water Protection Program

| A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS | | | | PAGE NUMBER 2 of 9 | | |
|--|------------|------------------------------|------------------------|--------------------------|-------------------------|--------------|
| | | | | PERMIT NUMBER MO-0026671 | | |
| The permittee is authorized to discharge from outfall(s) with serial number(s) as specified in the application for this permit. The interim effluent limitations shall become effective upon issuance and remain in effect until September 30, 2010 . Such discharges shall be controlled, limited and monitored by the permittee as specified below: | | | | | | |
| OUTFALL NUMBER AND EFFLUENT PARAMETER(S) | UNITS | INTERIM EFFLUENT LIMITATIONS | | | MONITORING REQUIREMENTS | |
| | | DAILY MAXIMUM | WEEKLY AVERAGE | MONTHLY AVERAGE | MEASUREMENT FREQUENCY | SAMPLE TYPE |
| <u>Outfall #001</u> | | | | | | |
| Flow | GPD | * | | * | once/weekday** | 24 hr. total |
| Biochemical Oxygen Demand ₅ | mg/L | | 65 | 45 | once/month** | grab |
| Total Suspended Solids | mg/L | | 120 | 80 | once/month** | grab |
| pH – Units | SU | *** | | *** | once/month** | grab |
| Ammonia as N | mg/L | * | | * | once/month** | grab |
| Temperature | °C | * | | * | once/month** | grab |
| Oil & Grease | mg/L | * | | * | once/month** | grab |
| OUTFALL NUMBER AND EFFLUENT PARAMETER(S) | UNITS | DAILY MINIMUM | WEEKLY AVERAGE MINIMUM | MONTHLY AVERAGE MINIMUM | MEASUREMENT FREQUENCY | SAMPLE TYPE |
| Outfall #001 | | | | | | |
| Dissolved Oxygen | mg/L | * | | * | once/month** | grab |
| MONITORING REPORTS SHALL BE SUBMITTED MONTHLY ; THE FIRST REPORT IS DUE November 28, 2009 . THERE SHALL BE NO DISCHARGE OF FLOATING SOLIDS OR VISIBLE FOAM IN OTHER THAN TRACE AMOUNTS. | | | | | | |
| Whole Effluent Toxicity (WET) Test | % Survival | See Special Conditions #8 | | | once / permit cycle | grab |
| MONITORING REPORTS SHALL BE SUBMITTED ONCE PER PERMIT CYCLE ; THE FIRST REPORT IS DUE January 31, 2014 . | | | | | | |
| B. STANDARD CONDITIONS | | | | | | |
| IN ADDITION TO SPECIFIED CONDITIONS STATED HEREIN, THIS PERMIT IS SUBJECT TO THE ATTACHED <u>Parts I, II & III</u> STANDARD CONDITIONS DATED <u>October 1, 1980</u> and <u>August 15, 1994</u> , AND HEREBY INCORPORATED AS THOUGH FULLY SET FORTH HEREIN. | | | | | | |

| A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS | | | | PAGE NUMBER 3 of 9 | | |
|--|------------|----------------------------|------------------------|--------------------------|-------------------------|--------------|
| | | | | PERMIT NUMBER MO-0026671 | | |
| The permittee is authorized to discharge from outfall(s) with serial number(s) as specified in the application for this permit. The final effluent limitations shall become effective October 01, 2010 and remain in effect until expiration of the permit. Such discharges shall be controlled, limited and monitored by the permittee as specified below: | | | | | | |
| OUTFALL NUMBER AND EFFLUENT PARAMETER(S) | UNITS | FINAL EFFLUENT LIMITATIONS | | | MONITORING REQUIREMENTS | |
| | | DAILY MAXIMUM | WEEKLY AVERAGE | MONTHLY AVERAGE | MEASUREMENT FREQUENCY | SAMPLE TYPE |
| <u>Outfall #001</u> | | | | | | |
| Flow | GPD | * | | * | once/weekday** | 24 hr. total |
| Biochemical Oxygen Demand ₅ | mg/L | | 65 | 45 | once/month** | grab |
| Total Suspended Solids | mg/L | | 120 | 80 | once/month** | grab |
| pH – Units | SU | *** | | *** | once/month** | grab |
| Ammonia as N | mg/L | * | | * | once/month** | grab |
| Temperature | °C | * | | * | once/month** | grab |
| Oil & Grease | mg/L | 15 | | 10 | once/month** | grab |
| OUTFALL NUMBER AND EFFLUENT PARAMETER(S) | UNITS | DAILY MINIMUM | WEEKLY AVERAGE MINIMUM | MONTHLY AVERAGE MINIMUM | MEASUREMENT FREQUENCY | SAMPLE TYPE |
| Outfall #001 | | | | | | |
| Dissolved Oxygen | mg/L | * | | * | once/month** | grab |
| MONITORING REPORTS SHALL BE SUBMITTED MONTHLY ; THE NEXT REPORT IS DUE November 28, 2013 . THERE SHALL BE NO DISCHARGE OF FLOATING SOLIDS OR VISIBLE FOAM IN OTHER THAN TRACE AMOUNTS. | | | | | | |
| Whole Effluent Toxicity (WET) Test | % Survival | See Special Conditions #8 | | | once / permit cycle | grab |
| MONITORING REPORTS SHALL BE SUBMITTED ONCE PER PERMIT CYCLE ; THE FIRST REPORT IS DUE January 31, 2014 . | | | | | | |
| B. STANDARD CONDITIONS | | | | | | |
| IN ADDITION TO SPECIFIED CONDITIONS STATED HEREIN, THIS PERMIT IS SUBJECT TO THE ATTACHED <u>Parts I, II & III</u> STANDARD CONDITIONS DATED <u>October 1, 1980 and August 15, 1994</u> , AND HEREBY INCORPORATED AS THOUGH FULLY SET FORTH HEREIN. | | | | | | |

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS (continued)

* Monitoring requirement only.

** Reports shall be submitted by the 28th day of the month following the reporting period, e.g. Reporting period is the month of March (samples collected each weekday or monthly), report due by April 28th.

*** pH is measured in pH units and is not to be averaged. The pH for all lagoons is to be maintained at or above 6.0 pH units.

| C. INFLUENT MONITORING REQUIREMENTS | | PAGE NUMBER 4 of 9 | |
|---|-------|--------------------------|-------------|
| | | PERMIT NUMBER MO-0026671 | |
| The facility is required to meet a removal efficiency of 85% or more. The monitoring requirements shall become effective upon issuance and remain in effect until expiration of the permit. To determine removal efficiencies, the influent wastewater shall be monitored by the permittee as specified below: | | | |
| SAMPLING LOCATION AND PARAMETER(S) | UNITS | MONITORING REQUIREMENTS | |
| | | MEASUREMENT FREQUENCY | SAMPLE TYPE |
| <u>Influent</u> | | | |
| Biochemical Oxygen Demand ₅ | mg/L | once / month** | grab |
| Total Suspended Solids | mg/L | once / month** | grab |
| MONITORING REPORTS SHALL BE SUBMITTED MONTHLY ; THE NEXT REPORT IS DUE November 28, 2013 . | | | |

C. INFLUENT MONITORING REQUIREMENTS (continued)

** Monitor Reports shall be submitted by the 28th day of the month following the reporting period, e.g. Reporting period is the month of March (samples collected monthly), report due by April 28th.

D. SPECIAL CONDITIONS

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.

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

2. All outfalls must be clearly marked in the field.
3. Permittee will cease discharge by connection to areawide wastewater treatment system within 90 days of notice of its availability.
4. Changes in Discharges of Toxic Substances

The permittee shall notify the Director as soon as it knows or has reason to believe:

- (a) That any activity has occurred or will occur which would result in the discharge of any toxic pollutant which is not limited in the permit, if that discharge will exceed the highest of the following "notification levels:"
 - (1) One hundred micrograms per liter (100 µg/L);
 - (2) Two hundred micrograms per liter (200 µg/L) for acrolein and acrylonitrile; five hundred micrograms per liter (500 µg/L) for 2,5 dinitrophenol and for 2-methyl-4, 6-dinitrophenol; and one milligram per liter (1 mg/L) for antimony;
 - (3) Five (5) times the maximum concentration value reported for the pollutant in the permit application;
 - (4) The level established in Part A of the permit by the Director.
- (b) That they have begun or expect to begin to use or manufacture as an intermediate or final product or byproduct any toxic pollutant, which was not reported in the permit application.

D. SPECIAL CONDITIONS (continued)

5. Report as no-discharge when a discharge does not occur during the report period.
6. Water Quality Standards
 - (a) Discharges to waters of the state shall not cause a violation of water quality standards rule under 10 CSR 20-7.031, including both specific and general criteria.
 - (b) General Criteria. The following general water quality criteria shall be applicable to all waters of the state at all times including mixing zones. No water contaminant, by itself or in combination with other substances, shall prevent the waters of the state from meeting the following conditions:
 - (1) Waters shall be free from substances in sufficient amounts to cause the formation of putrescent, unsightly or harmful bottom deposits or prevent full maintenance of beneficial uses;
 - (2) Waters shall be free from oil, scum and floating debris in sufficient amounts to be unsightly or prevent full maintenance of beneficial uses;
 - (3) Waters shall be free from substances in sufficient amounts to cause unsightly color or turbidity, offensive odor or prevent full maintenance of beneficial uses;
 - (4) Waters shall be free from substances or conditions in sufficient amounts to result in toxicity to human, animal or aquatic life;
 - (5) There shall be no significant human health hazard from incidental contact with the water;
 - (6) There shall be no acute toxicity to livestock or wildlife watering;
 - (7) Waters shall be free from physical, chemical or hydrologic changes that would impair the natural biological community;
 - (8) Waters shall be free from used tires, car bodies, appliances, demolition debris, used vehicles or equipment and solid waste as defined in Missouri's Solid Waste Law, section 260.200, RSMo, except as the use of such materials is specifically permitted pursuant to section 260.200-260.247.
7. The permittee shall comply with any applicable requirements listed in 10 CSR 20-8 and 10 CSR 20-9. The monitoring frequencies contained in this permit shall not be construed by the permittee as a modification of the monitoring frequencies listed in 10 CSR 20-9. If a modification of the monitoring frequencies listed in 10 CSR 20-9 is needed, the permittee shall submit a written request to the department for review and, if deemed necessary, approval.

D. SPECIAL CONDITIONS (continued)

8. Whole Effluent Toxicity (WET) tests shall be conducted as follows:

| SUMMARY OF WET TESTING FOR THIS PERMIT | | | | |
|--|----------|-----------------------|-------------|----------------------------|
| OUTFALL | A.E.C. % | FREQUENCY | SAMPLE TYPE | MONTH |
| 001 | 100% | Once per permit cycle | grab | Any, but report in January |

| Dilution Series | | | | | | |
|-----------------|-----|-----|-------|-------|---------------------------------------|---|
| 100% | 50% | 25% | 12.5% | 6.25% | (Control) 100% upstream, if available | (Control) 100% Lab Water, also called synthetic water |

$$\text{AEC\%} = \text{outfall design flow cfs} / (\text{ZID cfs} + \text{outfall design flow cfs})$$

(a) Test Schedule and Follow-Up Requirements

- (1) Perform a MULTIPLE-dilution acute WET test in the months and at the frequency specified above. For tests which are successfully passed, submit test results using the Department's WET test report form #MO-780-1899 along with complete copies of the test reports as received from the laboratory, including copies of chain-of-custody forms within 30 calendar days of availability to the WATER PROTECTION PROGRAM, P.O. Box 176, Jefferson City, MO 65102. If the effluent passes the test, do not repeat the test until the next test period.
 - a. For discharges of stormwater, samples shall be collected within three hours from when discharge first occurs.
 - b. Samples submitted for analysis of stormwater discharges shall be collected as a grab.
 - c. For discharges of non-stormwater, samples shall be collected only when precipitation has not occurred for a period of forty-eight hours prior to sample collection. In no event shall sample collection occur simultaneously with the occurrence of precipitation excepting for stormwater samples.
 - d. A twenty-four hour composite sample shall be submitted for analysis of non-stormwater discharges.
 - e. Upstream receiving water samples, where required, shall be collected upstream from any influence of the effluent where downstream flow is clearly evident.
 - f. Samples submitted for analysis of upstream receiving water may be collected as either a grab or twenty-four-hour composite as appropriate to the nature of the discharge.
 - g. Chemical and physical analysis of the upstream control and effluent sample shall occur immediately upon being received by the laboratory, prior to any manipulation of the effluent sample beyond preservation methods consistent with federal guidelines for WET testing that are required to stabilize the sample during shipping.
 - h. Any and all chemical or physical analysis of the effluent sample performed in conjunction with the WET test shall be performed at the 100% Effluent concentration in addition to analyses performed upon any other effluent concentration.
 - i. All chemical analyses included in the Missouri Department of Natural Resources WET test report form #MO-780-1899 shall be performed and results shall be recorded in the appropriate field of the report form.
 - j. Where flow-weighted composite sample is required for analysis, the samples shall be composited at the laboratory where the test is to be performed.
 - k. Where in stream testing is required downstream from the discharge, sample collection shall occur immediately below the established Zone of Initial Dilution in conjunction with or immediately following a release or discharge.
 - l. Samples submitted for analysis of downstream receiving water may be collected as either a grab or twenty-four-hour composite as appropriate to the nature of the discharge.

D. SPECIAL CONDITIONS (continued)

- m. All instream samples, including downstream samples, shall be tested for toxicity at the 100% concentration in addition to any other assigned AEC for in-stream samples.
 - (2) All failing test results along with complete copies of the test reports as received from the laboratory, INCLUDING THOSE TESTS CONDUCTED UNDER CONDITION (3) BELOW, shall be reported to the WATER PROTECTION PROGRAM, P.O. Box 176, Jefferson City, MO 65102 within 14 calendar days of the availability of the results.
 - (3) If the effluent fails the test, a multiple dilution test shall be performed for BOTH test species within 30 calendar days and biweekly thereafter (for storm water, tests shall be performed on the next and subsequent storm water discharges as they occur, but not less than 7 days apart) until one of the following conditions are met:
 - (a) THREE CONSECUTIVE MULTIPLE-DILUTION TESTS PASS. No further tests need to be performed until next regularly scheduled test period.
 - (b) A TOTAL OF THREE MULTIPLE-DILUTION TESTS FAIL.
 - (4) Failure of at least two multiple-dilution tests during any period of accelerated monitoring violates the permit narrative requirement for aquatic life protection.
 - (5) The permittee shall submit a summary of all test results for the test series along with complete copies of the test reports as received from the laboratory to the WATER PROTECTION PROGRAM, P.O. Box 176, Jefferson City, MO 65102 within 14 calendar days of the third failed test.
 - (6) Additionally, the following shall apply upon failure of the third MULTIPLE DILUTION test: A toxicity identification evaluation (TIE) or toxicity reduction evaluation (TRE) is automatically triggered. The permittee shall contact THE WATER PROTECTION PROGRAM within 14 calendar days from availability of the test results to ascertain as to whether a TIE or TRE is appropriate. The permittee shall submit a plan for conducting a TIE or TRE to the WATER PROTECTION PROGRAM within 60 calendar days of the date of DNR's direction to perform either a TIE or TRE. This plan must be approved by DNR before the TIE or TRE is begun. A schedule for completing the TIE or TRE shall be established in the plan approval.
 - (7) Upon DNR's approval, the TIE/TRE schedule may be modified if toxicity is intermittent during the TIE/TRE investigations. A revised WET test schedule may be established by DNR for this period.
 - (8) If a previously completed TIE has clearly identified the cause of toxicity, additional TIEs will not be required as long as effluent characteristics remain essentially unchanged and the permittee is proceeding according to a DNR approved schedule to complete a TRE and reduce toxicity. Regularly scheduled WET testing as required in the permit, without the follow-up requirements, will be required during this period.
 - (9) When WET test sampling is required to run over one DMR period, each DMR report shall contain a copy of the Department's WET test report form that was generated during the reporting period.
 - (10) Submit a concise summary in tabular format of all WET test results with the annual report.
- (b) PASS/FAIL procedure and effluent limitations:
- (1) To pass a multiple-dilution test:
 - (a) For facilities with a computed percent effluent at the edge of the zone of initial dilution, Allowable Effluent Concentration (AEC) OF 30% OR LESS, the AEC must be less than three-tenths (0.3) of the LC₅₀ concentration for the most sensitive of the test organisms; **OR**,
 - (b) For facilities with an AEC greater than 30%, the LC₅₀ concentration must be greater than 100%; **AND**,
 - (c) all effluent concentrations equal to or less than the AEC must be nontoxic. Mortality observed in all effluent concentrations equal to or less than the AEC shall not be significantly different (at the 95% confidence level; p = 0.05) than that observed in the upstream receiving-water control sample. Where upstream receiving water is not available mortality observed in the AEC test concentration shall not be significantly different (at the 95% confidence level; p = 0.05) than that observed in the laboratory control. The appropriate statistical tests of significance shall be consistent with the most current edition of METHODS FOR MEASURING THE ACUTE TOXICITY OF EFFLUENTS AND RECEIVING WATERS TO FRESHWATER AND MARINE ORGANISMS or other federal guidelines as appropriate or required. Failure of one multiple-dilution test may be considered an effluent limit violation.
- (c) Test Conditions
- (1) Test Type: Acute Static non-renewal
 - (2) All tests, including repeat tests for previous failures, shall include both test species listed below.
 - (3) Test species: Ceriodaphnia dubia and Pimephales promelas (fathead minnow). Organisms used in WET testing shall come from cultures reared for the purpose of conducting toxicity tests and cultured in a manner consistent with the most current USEPA guidelines. All test animals shall be cultured as described in the most current edition of Methods for Measuring the Acute Toxicity of Effluents and Receiving Waters to Freshwater and Marine Organisms.

D. SPECIAL CONDITIONS (continued)

- (4) Test period: 48 hours at the "Acceptable Effluent Concentration" (AEC) specified above.
- (5) Upstream receiving stream water shall be used as dilution water. If upstream water is unavailable or if mortality in the upstream water exceeds 10%, "reconstituted" water will be used as dilution water. Procedures for generating reconstituted water will be supplied by the MDNR upon request.
- (6) Multiple-dilution tests will be run with:
 - (a) 100%, 50%, 25%, 12.5%, and 6.25% effluent, unless the AEC is less than 25% effluent, in which case dilutions will be 4 times the AEC, two times the AEC, AEC, 1/2 AEC and 1/4 AEC;
 - (b) 100% receiving-stream water (if available), collected upstream of the outfall at a point beyond any influence of the effluent; and
 - (c) reconstituted water.
- (7) If reconstituted-water control mortality for a test species exceeds 10%, the entire test will be rerun.
- (8) If upstream control mortality exceeds 10%, the entire test will be rerun using reconstituted water as the dilutant.

E. SCHEDULE OF COMPLIANCE

I & I

1. By **March 17, 2010** the permittee shall develop and implement a program for maintenance and repair of the collection system. The suggested guidance is the US EPA's Guide For Evaluating Capacity, Management, Operation, And Maintenance (CMOM) Programs At Sanitary Sewer Collection Systems (Document number EPA 305-B-05-002). A written summary of this program shall be submitted to the Southwest Regional Office via mail, Missouri Department of Natural Resources, 2040 West Woodland, Springfield, Missouri, 65807
2. By **May 16, 2010** the permittee shall submit to the Southwest Regional Office Regional Office a written Plan to Reduce Inflow and Infiltration (Plan) into the sewer collection system. The Plan will include a schedule for locating sources of inflow and infiltration, describing the sources and their believed causes, and rate its priority for correction. The suggested format for the Plan would be to divide the collection system into designated areas that would be prioritized by the City based on currently known problem areas with target dates to TV or smoke test the lines within a given area. Lines that are newer than 15 years old may be excluded from the plan unless the City has reason to believe they are a major source of inflow or infiltration. Once the Plan is approved by the Department, the City will immediately implement the plan.
3. By October 30th of each year following approval of the Plan, the City must report the findings of the work accomplished during the year for the targeted area and note which inflow/infiltration problems were corrected during the year. In the event that revisions to the Plan are necessary, the City will submit requested revisions to the Plan with the October 30th report to the Southwest Regional Office Regional Office Regional Office for review and approval. In addition the city must prepare an annual summary report noting the influent biological oxygen demand and total suspended solids, rainfall during discharge events, effluent biological oxygen demand and total suspended solids, and calculate the percent removal.

D. SPECIAL CONDITIONS (continued)

SUMMARY OF TEST METHODOLOGY FOR WHOLE-EFFLUENT TOXICITY TESTS

Whole-effluent-toxicity test required in NPDES permits shall use the following test conditions when performing single or multiple dilution methods. Any future changes in methodology will be supplied to the permittee by the Missouri Department of Natural Resources (MDNR). Unless more stringent methods are specified by the DNR, the procedures shall be consistent with the most current edition of Methods for Measuring the Acute Toxicity of Effluents and Receiving Waters to Freshwater and Marine Organisms.

Test conditions for Ceriodaphnia dubia:

| | |
|----------------------------------|--|
| Test duration: | 48 h |
| Temperature: | 25 ± 1°C Temperatures shall not deviate by more than 3°C during the test. |
| Light Quality: | Ambient laboratory illumination |
| Photoperiod: | 16 h light, 8 h dark |
| Size of test vessel: | 30 mL (minimum) |
| Volume of test solution: | 15 mL (minimum) |
| Age of test organisms: | <24 h old |
| No. of animals/test vessel: | 5 |
| No. of replicates/concentration: | 4 |
| No. of organisms/concentration: | 20 (minimum) |
| Feeding regime: | None (feed prior to test) |
| Aeration: | None |
| Dilution water: | Upstream receiving water; if no upstream flow, synthetic water modified to reflect effluent hardness. |
| Endpoint: | Pass/Fail (Statistically significant Mortality when compared to upstream receiving water control or synthetic control if upstream water was not available at $p \leq 0.05$) |
| Test acceptability criterion: | 90% or greater survival in controls |

Test conditions for Pimephales promelas:

| | |
|----------------------------------|--|
| Test duration: | 48 h |
| Temperature: | 25 ± 1°C Temperatures shall not deviate by more than 3°C during the test. |
| Light Quality: | Ambient laboratory illumination |
| Photoperiod: | 16 h light/ 8 h dark |
| Size of test vessel: | 250 mL (minimum) |
| Volume of test solution: | 200 mL (minimum) |
| Age of test organisms: | 1-14 days (all same age) |
| No. of animals/test vessel: | 10 |
| No. of replicates/concentration: | 4 (minimum) single dilution method 2 (minimum) multiple dilution method |
| No. of organisms/concentration: | 40 (minimum) single dilution method 20 (minimum) multiple dilution method |
| Feeding regime: | None (feed prior to test) |
| Aeration: | None, unless DO concentration falls below 4.0 mg/L; rate should not exceed 100 bubbles/min. |
| Dilution water: | Upstream receiving water; if no upstream flow, synthetic water modified to reflect effluent hardness. |
| Endpoint: | Pass/Fail (Statistically significant Mortality when compared to upstream receiving water control or synthetic control if upstream water was not available at $p \leq 0.05$) |
| Test Acceptability criterion: | 90% or greater survival in controls |

Missouri Department of Natural Resources
Statement of Basis
#MO-0026671
Lowry City WWTF

This Statement of Basis (Statement) gives pertinent information regarding minor/simple modification(s) to the above listed operating permit without the need for a public comment process.

A Statement is not an enforceable part of a Missouri State Operating Permit.

Part I – Facility Information

Facility Type: POTW / Sewerage Works
Facility SIC Code(s): #4952

Outfall #001

Four cell anaerobic lagoon system / sludge is retained in lagoon.

Design organic population equivalent is 1,036.
Design average daily flow is 103,600 gallons per day.
Design sludge production is 15.5 dry tons/year.

Part II – Modification Rationale

This operating permit is hereby modified to reflect a change in sample type from composite to grab for BOD, TSS, and WET testing. This change is consistent with 10 CSR 20-7.015 (8)(B)3.A.

No other changes were made to the permit.

Part III – Administrative Requirements

On the basis of preliminary staff review and the application of applicable standards and regulations, the Department, as administrative agent for the Missouri Clean Water Commission, proposes to issue a permit(s) subject to certain effluent limitations, schedules, and special conditions contained herein and within the operating permit.

Date of Statement of Basis: 10/1/2013

Submitted by

Cameron Eisterhold, Environmental Specialist
Domestic Wastewater Unit
Operating Permits Section
Water Protection Program
(573)751-7326
cameron.eisterhold@dnr.mo.gov

**Missouri Department of Natural Resources
 Statement of Basis
 City of Lowry City
 NPDES #: MO-0026671
 St. Clair County**

A Statement of Basis (Statement) gives pertinent information regarding the applicable regulations and rationale for the development of the NPDES Missouri State Operating Permit (operating permit). This Statement includes Wasteload Allocations, Water Quality Based Effluent Limitations, and Reasonable Potential Analysis calculations as well as any other calculations that effect the effluent limitations of this operating permit. This Statement does not pertain to operating permits that include sewage sludge land application plans and variance procedures, and does not include the public comment process for this operating permit.

A Statement is not an enforceable part of an operating permit.

Part I – Facility Information

Facility Type: Sewerage Works
 Facility SIC Code(s): 4952

Facility Description: Four cell anaerobic lagoon system / sludge is retained in lagoon.

OUTFALL(S) TABLE:

| OUTFALL | DESIGN FLOW (CFS) | TREATMENT LEVEL | EFFLUENT TYPE | DISTANCE TO CLASSIFIED SEGMENT (MI) |
|---------|-------------------|-------------------------|---------------------|-------------------------------------|
| 001 | 0.16 | Equivalent to Secondary | Domestic Reissuance | 2.2 |

Water Quality History: A review of Discharge Monitoring Reports (DMRs) from January 2007 to December 2008 shows one (1) exceedance of BOD in April of 2007.

Comments: The facility was last inspected on December 1, 2004. The facility was considered to be in compliance during the inspection with comments on excessive inflow and infiltration. An Environmental Assistance Visit (EAV) was conducted May 14, 2007 and indicated that the outfall needed to be marked but the overall condition was good.

Part II – Operator Certification Requirements

As per [10 CSR 20-6.010(8) Terms and Conditions of a Permit], permittees shall operate and maintain facilities to comply with the Missouri Clean Water Law and applicable permit conditions and regulations. Operators or supervisors of operations at regulated wastewater treatment facilities shall be certified in accordance with [10 CSR 20-9.020(2)] and any other applicable state law or regulation. As per [10 CSR 20-9.010(2)(A)], requirements for operation by certified personnel shall apply to all wastewater treatment systems, if applicable, as listed below:

Check boxes below that are applicable to the facility;

- Population Equivalent greater than two hundred (200):
- Owned or operated by or for:
 - Municipalities

This facility currently requires an operator with a D Certification Level. Please see **Appendix A – Classification**. Modifications made to the wastewater treatment facility may cause the classification to be modified.

Operator's Name: Michael T. Clark
 Certification Number: 6106
 Certification Level: A

Part III – Receiving Stream Information

APPLICABLE DESIGNATIONS OF WATERS OF THE STATE:

As per Missouri’s Effluent Regulations [10 CSR 20-7.015], the waters of the state are divided into the below listed seven (7) categories. Each category list effluent limitations for specific parameters, which are presented in each outfall’s Effluent Limitation Table and further discussed in the Derivation & Discussion of Limits section.

- Missouri or Mississippi River [10 CSR 20-7.015(2)]:
- Lake or Reservoir [10 CSR 20-7.015(3)]:
- Losing [10 CSR 20-7.015(4)]:
- Metropolitan No-Discharge [10 CSR 20-7.015(5)]:
- Special Stream [10 CSR 20-7.015(6)]:
- Subsurface Water [10 CSR 20-7.015(7)]:
- All Other Waters [10 CSR 20-7.015(8)]:

10 CSR 20-7.031 Missouri Water Quality Standards, the department defines the Clean Water Commission water quality objectives in terms of "water uses to be maintained and the criteria to protect those uses." The receiving stream and/or 1st classified receiving stream’s beneficial water uses to be maintained are located in the Receiving Stream Table located below in accordance with [10 CSR 20-7.031(3)].

RECEIVING STREAM(S) TABLE:

| WATERBODY NAME | CLASS | WBID | DESIGNATED USES* | 8-DIGIT HUC | EDU** |
|--|-------|-------|--------------------|-------------|-------------|
| Unnamed Tributary to Gallinipper Creek | U | N/A | General Criteria | 10290105 | Ozark/Osage |
| Gallinipper Creek | C | 01227 | LWW, AQL, WBC-B*** | | |

* - Irrigation (IRR), Livestock & Wildlife Watering (LWW), Protection of Warm Water Aquatic Life and Human Health-Fish Consumption (AQL), Cool Water Fishery(CLF), Cold Water Fishery (CDF), Whole Body Contact Recreation (WBC), Secondary Contact Recreation (SCR), Drinking Water Supply (DWS), Industrial (IND).

** - Ecological Drainage Unit

*** - UAA has not been conducted.

RECEIVING STREAM(S) LOW-FLOW VALUES TABLE:

| RECEIVING STREAM (U) | LOW-FLOW VALUES (CFS) | | |
|--|-----------------------|------|-------|
| | 1Q10 | 7Q10 | 30Q10 |
| Unnamed Tributary to Gallinipper Creek | 0 | 0 | 0 |

MIXING CONSIDERATIONS

Mixing Zone: Not Allowed [10 CSR 20-7.031(4)(A)4.B.(I)(a)].

Zone of Initial Dilution: Not Allowed [10 CSR 20-7.031(4)(A)4.B.(I)(b)].

Part IV – Rationale and Derivation of Effluent Limitations & Permit Conditions

ALTERNATIVE EVALUATIONS FOR NEW FACILITIES:

As per [10 CSR 20-7.015(4)(A)], discharges to losing streams shall be permitted only after other alternatives including land application, discharges to a gaining stream and connection to a regional wastewater treatment facility have been evaluated and determined to be unacceptable for environmental and/or economic reasons.

Not Applicable ;

The facility does not discharge to a Losing Stream as defined by [10 CSR 20-2.010(36)] & [10 CSR 20-7.031(1)(N)], or is an existing facility.

ANTI-BACKSLIDING:

A provision in the Federal Regulations [CWA §303(d)(4); CWA §402(c); CFR §122.44(I)] that requires a reissued permit to be as stringent as the previous permit with some exceptions.

- Backsliding proposed in this statement for the reissuance of this permit conform to the anti-backsliding provisions of Section 402(o) of the Clean Water Act, and 40 § CFR 122.44.

ANTIDegradation:

Policies which ensure protection of water quality for a particular water body where the water quality exceeds levels necessary to protect fish and wildlife propagation and recreation on and in the water. This also includes special protection of waters designated as outstanding natural resource waters. Antidegradation requirements are consistent with 40 CFR 131.12 that outlines methods used to assess activities that may impact the integrity of a water and protect existing uses. This policy may compel the state to maintain a level of water quality above those mandated by criteria.

Not Applicable ;

Renewal no degradation proposed and no further review necessary.

APPLICABLE PERMIT PARAMETERS:

Effluent parameters for conventional, non-conventional, and toxic pollutants have been obtained from the previous NPDES operating permit for this facility, technology based effluent limits, and from appropriate sections of the renewal application.

COMPLIANCE AND ENFORCEMENT:

Action taken by the department to resolve violations of the Missouri Clean Water Law, its implementing regulations, and/or any terms and condition of an operating permit.

Not Applicable ;

The permittee/facility is not under enforcement action and is considered to be in compliance with the Missouri Clean Water Law, its implementing regulations, and/or any terms and condition of an operating permit.

PRETREATMENT PROGRAM:

The reduction of the amount of pollutants, the elimination of pollutants, or the alteration of the nature of pollutant properties in wastewater prior to or in lieu of discharging or otherwise introducing such pollutants into a Publicly Owned Treatment Works [40 CFR Part 403.3(q)].

Not Applicable ;

At this time, the permittee is not required to implement and enforce a Pretreatment Program.

REASONABLE POTENTIAL ANALYSIS (RPA):

Limitations must control all pollutants or pollutant parameters that are or may be discharged at a level which will cause, have reasonable potential to cause, or contribute to an excursion above the Missouri Water Quality Standards.

Not Applicable ;

A RPA was not conducted for this facility.

REMOVAL EFFICIENCY:

Removal efficiency is a method by which the Federal Regulations define Secondary Treatment and Equivalent to Secondary Treatment, which applies to Biochemical Oxygen Demand 5-day (BOD₅) and Total Suspended Solids (TSS) for Publicly Owned Treatment Works (POTWs). Please see the United States Environmental Protection Agency's (EPA) website for interpretation of percent removal requirements for National Pollutant Discharge Elimination System Permit Application Requirements for Publicly Owned Treatment Works and Other Treatment Works Treating Domestic Sewage @ www.epa.gov/fedrgstr/EPA-WATER/1999/August/Day-04/w18866.htm

Applicable ;

Equivalent to Secondary Treatment is 65% removal [40 CFR Part 105(a)(3) & (b)(3)].

SANITARY SEWER OVERFLOWS (SSOs), AND INFLOW & INFILTRATION (I&I):

Collection systems are a critical element in the successful performance of the wastewater treatment process. Under certain conditions, poorly designed, built, managed, operated, and/or maintained systems can pose risks to public health, the environment, or both. Causes of SSOs include, but are not limited to, the following: high levels of I&I during wet weather; blockages; structural, mechanical, or electrical failures; collapsed or broken sewer pipes; insufficient conveyance capacity; and vandalism. Effective and continuous management, operation, and maintenance, as well as ensuring adequate capacity and rehabilitation when necessary are critical to maintaining collection system capacity and performance while extending the life of the system.

Applicable ;

The permittee is required to develop or implement a program for maintenance and repair of the collection system and shall be required in this operating permit by either means of a Special Condition or Schedule of Compliance.

SCHEDULE OF COMPLIANCE (SOC):

A schedule of remedial measures included in a permit, including an enforceable sequence of interim requirements (actions, operations, or milestone events) leading to compliance with the Missouri Clean Water Law, its implementing regulations, and/or the terms and conditions of an operating permit.

Applicable ;

The most recent inspection indicated excessive Inflow & Infiltration therefore a SOC was added.

STORM WATER POLLUTION PREVENTION PLAN (SWPPP):

A plan to schedule activities, prohibitions of practices, maintenance procedures, and other management practices to prevent or reduce the pollution of waters of the state. The plan may include, but is not limited to, treatment requirements, operating procedures, and practices to control facility site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw material storage.

Not Applicable ;

At this time, the permittee is not required to develop and implement a SWPPP.

WASTELOAD ALLOCATIONS (WLA) FOR LIMITS:

As per [10 CSR 20-2.010(78)], the amount of pollutant each discharger is allowed by the department to release into a given stream after the department has determined to total amount of pollutant that may be discharged into that stream without endangering its water quality.

Applicable ;

Wasteload allocations were calculated where applicable using water quality criteria or water quality model results and the dilution equation below:

$$C = \frac{(C_s \times Q_s) + (C_e \times Q_e)}{(Q_e + Q_s)} \quad (\text{EPA/505/2-90-001, Section 4.5.5})$$

Where C = downstream concentration

C_s = upstream concentration

Q_s = upstream flow

C_e = effluent concentration

Q_e = effluent flow

Chronic wasteload allocations were determined using applicable chronic water quality criteria (CCC: criteria continuous concentration) and stream volume of flow at the edge of the mixing zone (MZ). Acute wasteload allocations were determined using applicable water quality criteria (CMC: criteria maximum concentration) and stream volume of flow at the edge of the zone of initial dilution (ZID).

Water quality based maximum daily and average monthly effluent limitations were calculated using methods and procedures outlined in USEPA's "Technical Support Document For Water Quality-based Toxics Control" (EPA/505/2-90-001).

WLA MODELING:

Not Applicable ;

A WLA study was either not submitted or determined not applicable by department staff.

WHOLE EFFLUENT TOXICITY (WET) TEST:

A WET test is a quantifiable method of determining if a discharge from a facility may be causing toxicity to aquatic life by itself, in combination with or through synergistic responses when mixed with receiving stream water.

Applicable ;

In accordance with the Clean Water Act (CWA) §101(a)(3), requiring WET testing is reasonably appropriate for site-specific Missouri State Operating Permits for discharges to waters of the state issued under the National Pollutant Discharge Elimination System. Furthermore, WET testing is a means by which the department determines that [10 CSR 20-7.031(3)(D, F, & G)] are being met by the permitted facility. In addition to justification for the WET testing, WET tests are required under [10 CSR 20-6.010(8)(A)4] to be performed by specialist who are properly trained in conducting the test according to the methods prescribed by the Federal Government as referenced in [40 CFR Part 136]. WET test will be required by all facilities meeting the following criteria:

- Facility is a designated Major.
- Facility continuously or routinely exceeds its design flow.
- Facility (industrial) that alters its production process throughout the year.
- Facility handles large quantities of toxic substances, or substances that are toxic in large amounts.
- Facility has Water Quality-based Effluent Limitations for toxic substances (other than NH₃)
- Facility is a municipality or domestic discharger with a Design Flow ≥ 22,500 gpd.
- Other – please justify.

303(d) LIST & TOTAL MAXIMUM DAILY LOAD (TMDL):

Section 303(d) of the federal Clean Water Act requires that each state identify waters that are not meeting water quality standards and for which adequate water pollution controls have not been required. Water quality standards protect such beneficial uses of water as whole body contact (such as swimming), maintaining fish and other aquatic life, and providing drinking water for people, livestock and wildlife. The 303(d) list helps state and federal agencies keep track of waters that are impaired but not addressed by normal water pollution control programs.

A TMDL is a calculation of the maximum amount of a given pollutant that a body of water can absorb before its water quality is affected. If a water body is determined to be impaired as listed on the 303(d) list, then a watershed management plan will be developed that shall include the TMDL calculation

Not Applicable ;

This facility does not discharge to a 303(d) listed stream.

Adjusted Design Flow:

10 CSR 20-6.011(1)(B)1. provides for an Adjusted Design Flow when calculating permit fees on human sewage treatment facilities. If the average flow is sixty percent (60%) or less than the system's design flow, the average flow may be substituted for the design flow when calculating the permit fee on human sewage treatment facilities. If the facility's actual average flow is consistently 60% or less than the permitted design flow, the facility may qualify for a reduction in your fee when:

- The facility has a valid permit, or has applied for re-issuance, is in compliance with the terms, conditions and effluent limitations of the permit, and the facility has a good compliance history; and
- Flow is not expected to exceed 60% of design flow for the remaining term of the existing operating permit.

Not Applicable ;

Municipalities, POTWs, and Industrials do not qualify for Adjusted Design flows.

Outfall #001 – Main Facility Outfall

EFFLUENT LIMITATIONS TABLE:

| PARAMETER | UNIT | BASIS FOR LIMITS | DAILY MAXIMUM | WEEKLY AVERAGE | MONTHLY AVERAGE | MODIFIED | PREVIOUS PERMIT LIMITATIONS |
|------------------------------------|--|------------------|---------------|----------------|-----------------|----------|-----------------------------|
| FLOW | GPD | 1 | * | | * | NO | S |
| BOD ₅ ** | MG/L | 1 | -- | 65 | 45 | NO | S |
| TSS ** | MG/L | 1 | | 120 | 80 | NO | S |
| pH (S.U.) | SU | 1 | ABOVE 6.0 | -- | ABOVE 6.0 | NO | S |
| AMMONIA AS N | MG/L | 1,5 | * | -- | * | YES | NONE |
| TEMPERATURE | °C | 1,5 | * | -- | * | YES | NONE |
| DISSOLVED OXYGEN | MG/L | 1,11 | * | -- | * | YES | NONE |
| TOTAL PHOSPHORUS | MG/L | 8 | -- | -- | -- | YES | MONITORING |
| OIL & GREASE | MG/L | 1 | 15 | -- | 10 | YES | NONE |
| WHOLE EFFLUENT TOXICITY (WET) TEST | Please see WET Test in the Derivation and Discussion Section below. | | | | | | |
| MONITORING FREQUENCY | Please see Minimum Sampling and Reporting Frequency Requirements in the Derivation and Discussion Section below. | | | | | | |

*** - Monitoring requirement only**

*** - # of colonies/100mL; the Monthly Average for Fecal Coliform is a geometric mean.

**** - Parameter not previously established in previous state operating permit.

N/A – Not applicable

S – Same as previous operating permit

Basis for Limitations Codes:

- | | |
|--|-----------------------------------|
| 1. State or Federal Regulation/Law | 6. Antidegradation Policy |
| 2. Water Quality Standard (includes RPA) | 7. Water Quality Model |
| 3. Water Quality Based Effluent Limits | 8. Best Professional Judgment |
| 4. Lagoon Policy | 9. TMDL or Permit in lieu of TMDL |
| 5. Ammonia Policy | 10. WET test Policy |
| | 11. Dissolved Oxygen Policy |

OUTFALL #001 – DERIVATION AND DISCUSSION OF LIMITS:

Biochemical Oxygen Demand (BOD₅).

- Effluent limitations have been retained from previous state operating permit, please see the **APPLICABLE DESIGNATION OF WATERS OF THE STATE** sub-section of the **Receiving Stream Information.**

Total Suspended Solids (TSS).

- Effluent limitations have been retained from previous state operating permit, please see the **APPLICABLE DESIGNATION OF WATERS OF THE STATE** sub-section of the **Receiving Stream Information.**

pH.

- Effluent limitations have been retained from previous state operating permit, please see the **APPLICABLE DESIGNATION OF WATERS OF THE STATE** sub-section of the **Receiving Stream Information.**

Temperature. Monitoring requirement due to the toxicity of Ammonia varies by temperature.

Total Ammonia Nitrogen. Monitoring requirement only. Monitoring for ammonia is included to determine whether a “reasonable potential” exists to exceed water quality standards after the discharge begins.

Total Phosphorus

Total phosphorus limitations were removed due to the fact that the facility does not discharge to a 303d impaired stream and there are no water quality standards for phosphorus.

Dissolved Oxygen. Monitoring requirement only. Monitoring for dissolved oxygen are included to determine whether “reasonable potential” to exceed water quality standards exists after the discharge begins.

Oil & Grease. Conventional pollutant, effluent limitation for protection of aquatic life; 10 mg/L monthly average, 15 mg/L daily maximum.

WET Test. WET Testing schedules and intervals are established in accordance with the department’s Permit Manual; Section 5.2 *Effluent Limits / WET Testing for Compliance Bio-monitoring*. It is recommended that WET testing be conducted during the period of lowest stream flow.

- Acute

- No less than ONCE/PERMIT CYCLE:**

- Municipality or domestic facility with a design flow \geq 22,500 gpd, but less than 1.0 MGD.

Allowable Effluent Concentration (AEC) calculations determine if the facility is to conduct single dilution or multiple dilution WET testing. Facilities that discharge to unclassified or Class C receiving streams, the AEC% is 100%. Facilities with less than 100% for an AEC% will have multiple dilution WET testing. Facilities that discharge to Lakes and have Acute WET testing, the AEC% is 100% due to [10 CSR 20-7.031(4)(A)4.B.(IV)(b)] ZID not allowed for Lakes.

Minimum Sampling and Reporting Frequency Requirements.

| PARAMETER | SAMPLING FREQUENCY | REPORTING FREQUENCY |
|------------------|--------------------|---------------------|
| FLOW | WEEKDAY | MONTHLY |
| BOD ₅ | MONTHLY | MONTHLY |
| TSS | MONTHLY | MONTHLY |
| PH | MONTHLY | MONTHLY |
| TEMPERATURE | MONTHLY | MONTHLY |
| AMMONIA AS N | MONTHLY | MONTHLY |
| DISSOLVED OXYGEN | MONTHLY | MONTHLY |
| OIL & GREASE | MONTHLY | MONTHLY |

Administrative Requirements

On the basis of preliminary staff review and the application of applicable standards and regulations, the Department, as administrative agent for the Missouri Clean Water Commission, proposes to issue a permit(s) subject to certain effluent limitations, schedules, and special conditions contained herein and within the operating permit. The proposed determinations are tentative pending public comment.

Date of Factsheet: February 10, 2009

Mr. Joshua L. Grosvenor, EI
WP Engineering Unit
(417) 891-4300
josh.grosvenor@dnr.mo.gov

Appendix A

10 CSR 20-9.020

All wastewater treatment systems serving a population equivalent greater than two hundred (200) or with fifty (50) or more service connections, owned or operated by or for municipalities, public sewer districts, counties, public water supply districts, private sewer companies regulated by the Public Service Commission and the state or federal agencies.

| Column A | | | Column B | | |
|--|---|------------------------|--|---------------|------------------------|
| Item | Points | Points Assigned | Item | Points | Points Assigned |
| Maximum population equivalent (P.E.) served, peak day | 1 pt. Per 10,000 PE or major fraction thereof | | EFFLUENT DISCHARGE RECEIVING WATER SENSITIVITY | | |
| Design flow (avg. day) or peak month's flow, (avg. day) whichever is larger | Maximum: 10 Points 1 pt. Per MGD or major fraction thereof | | Missouri or Mississippi River | 0 | |
| REQUIRED LABORATORY CONTROL Performed by plant personnel (highest level only) | | | All other stream discharges except to losing streams and stream reaches supporting whole body contact reaction | 1 | |
| Lab work done outside the plant | 0 | | Discharge to lake or reservoir outside of designated whole body contact recreational area | 2 | |
| Push – button or visual methods for simple tests such as pH, settleable solids | 3 | | Discharge to losing stream, or stream, lake or reservoir area supporting whole body contact recreation | 3 | 3 |
| Additional procedures such as DO, COD, BOD, titrations, solids, volatile content | | | HEADWORKS - PRELIMINARY TREATMENT | | |
| | 5 | 5 | Raw wastes subject to toxic waste discharges | 6 | |
| | | | Screening and/or comminution | 3 | |
| | | | Grit removal | 3 | |
| More advanced determinations such as BOD seeding procedure, fecal coliform, nutrients, total oils, phenols, etc. | 7 | | Plant pumping of main flow (If 51% or greater flow comes into plant) | 3 | |
| | | | PRIMARY TREATMENT | | |
| | | | Primary clarifiers (Flow EQ basins) | 5 | |
| | | | Combined sedimentation/digestion (includes big septic tank or if cities clean out STEP system) | 5 | |
| | | | Chemical addition (except chlorine, enzymes) | 4 | |
| TOTAL Page 1 Column A | | 5 | TOTAL Page 1 Column B | | 3 |

