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-0104736
Owner:	City of Sullivan
Address:	210 West Washington, Sullivan, MO 63080
Continuing Authority:	Same as above
Address:	Same as above
Facility Name:	Sullivan Wastewater Treatment Plant
Facility Address:	320 Emma Lane, Sullivan, MO 63080
Legal Description:	See Page 2
UTM Coordinates:	See Page 2
Receiving Stream:	See Page 2
First Classified Stream and ID:	See Page 2
USGS Basin & Sub-watershed No.:	See Page 2

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

FACILITY DESCRIPTION

See Page 2

This permit authorizes only wastewater and stormwater 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 621.250 RSMo, Section 640.013 RSMo and Section 644.051.6 of the Law.

January 1, 2016
Effective Date

Sara Parker Pauley, Director, Department of Natural Resources

December 31, 2019
Expiration Date

John Madras, Director, Water Protection Program

FACILITY DESCRIPTION (continued):

Outfall #002 – POTW – SIC #4952
The use or operation of this facility shall be by or under the supervision of a Certified "B" Operator.
2 flow retention basins / influent pump station / fine mechanical bar screen / aerated grit chamber / 3 sequencing batch reactors / UV disinfection / aerobic sludge digester /sludge disposal by contract hauler

Design population equivalent is 15,000
Design flow is 1.5 million gallons per day
Actual flow is 1.1 million gallons per day
Design sludge production is 270 dry tons/year

Legal Description:	NE ¼, NE ¼, Sec. 3, T40N, R2W, Franklin County
UTM Coordinates:	X=663685, Y=4233984
Receiving Stream:	Tributary to Winsel Creek
First Classified Stream and ID:	8-20-13 MUDD V1.0 (C) (3960) Losing Stream
USGS Basin & Sub-watershed No.:	(07140103-0402)

Outfall #003 – Eliminated – See Special Condition #23

Permitted Feature #SM1 – Instream Monitoring
Instream monitoring location – Upstream – See Special Condition #21

Permitted Feature #SM2 – Instream Monitoring
Instream monitoring location – Downstream – bridge over Winsel Creek at I-44

Legal Description:	NW ¼, NW ¼, SE ¼, Sec. 34, T41N, R2W, Franklin County
UTM Coordinates:	X=663206, Y=4235082
Receiving Stream:	Winsel Creek (C) Losing Stream
First Classified Stream and ID:	8-20-13 MUDD V1.0 (C) (3960) Losing Stream
USGS Basin & Sub-watershed No.:	(07140103-0402)

OUTFALL #002	TABLE A-1. INTERIM EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS	PAGE NUMBER 3 of 15
		PERMIT NUMBER MO-0104736

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 on **January 1, 2016**, and remain in effect through **December 31, 2017**. Such discharges shall be controlled, limited and monitored by the permittee as specified below:

EFFLUENT PARAMETER(S)	UNITS	INTERIM EFFLUENT LIMITATIONS			MONITORING REQUIREMENTS	
		DAILY MAXIMUM	WEEKLY AVERAGE	MONTHLY AVERAGE	MEASUREMENT FREQUENCY	SAMPLE TYPE
Flow	MGD	*		*	once/day	24 hr. total
Biochemical Oxygen Demand$_5$	mg/L		15	10	once/week	composite**
Total Suspended Solids	mg/L		20	15	once/week	composite**
E. coli (Note 1, Page 5)	#/100mL	126		*	once/week	grab
Ammonia as N (Apr 1 – Sep 30) (Oct 1 – Mar 31)	mg/L	5.5 12.1		1.0 2.5	once/week	grab
Oil & Grease	mg/L	15		10	once/month	grab
Cadmium, Total Recoverable	µg/L	0.9		0.4	once/month	grab
Copper, Total Recoverable	µg/L	20.8		12.3	once/month	grab
Lead, Total Recoverable	µg/L	11		4.9	once/month	grab
Nickel, Total Recoverable	µg/L	140		65	once/month	grab
Cyanide, Amenable to Chlorination (Note 2, Page 5)	µg/L	*		*	once/month	grab
Iron, Total Recoverable (Note 6, Page 5)	µg/L	*		*	once/month	grab
MONITORING REPORTS SHALL BE SUBMITTED MONTHLY; THE FIRST REPORT IS DUE FEBRUARY 28, 2016. THERE SHALL BE NO DISCHARGE OF FLOATING SOLIDS OR VISIBLE FOAM IN OTHER THAN TRACE AMOUNTS.						
Total Phosphorus	mg/L	*		*	once/quarter****	grab
Total Nitrogen	mg/L	*		*	once/quarter****	grab
Arsenic, Total Recoverable	µg/L	*		*	once/quarter****	grab
Mercury, Total Recoverable	µg/L	*		*	once/quarter****	grab
Silver, Total Recoverable	µg/L	*		*	once/quarter****	grab
Vinyl Chloride	µg/L	*		*	once/quarter****	grab
1, 2-cis-dichloroethylene	µg/L	*		*	once/quarter****	grab
Trichloroethylene	µg/L	*		*	once/quarter****	grab
Chromium VI, Dissolved	µg/L	*		*	once/quarter****	grab
MONITORING REPORTS SHALL BE SUBMITTED QUARTERLY; THE FIRST REPORT IS DUE APRIL 28, 2016.						
EFFLUENT PARAMETER(S)	UNITS	MINIMUM		MAXIMUM	MEASUREMENT FREQUENCY	SAMPLE TYPE
pH – Units ***	SU	6.5		9.0	once/week	grab
MONITORING REPORTS SHALL BE SUBMITTED MONTHLY; THE FIRST REPORT IS DUE FEBRUARY 28, 2016.						

* Monitoring requirement only.

** A 24-hour composite sample is composed of 48 aliquots (subsamples) collected at 30 minute intervals by an automatic sampling device.

*** pH is measured in pH units and is not to be averaged.

**** See table on Page 5 for quarterly sampling requirements.

OUTFALL #002	TABLE A-2. FINAL EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS	PAGE NUMBER 4 of 15
		PERMIT NUMBER MO-0104736

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 on **January 1, 2018**, and remain in effect until expiration of the permit. Such discharges shall be controlled, limited and monitored by the permittee as specified below:

EFFLUENT PARAMETER(S)	UNITS	FINAL EFFLUENT LIMITATIONS			MONITORING REQUIREMENTS	
		DAILY MAXIMUM	WEEKLY AVERAGE	MONTHLY AVERAGE	MEASUREMENT FREQUENCY	SAMPLE TYPE
Flow	MGD	*		*	once/day	24 hr. total
Biochemical Oxygen Demand$_5$	mg/L		15	10	once/week	composite**
Total Suspended Solids	mg/L		20	15	once/week	composite**
E. coli (Note 1, Page 5)	#/100mL	126		*	once/week	grab
Ammonia as N (Apr 1 – Sep 30) (Oct 1 – Mar 31)	mg/L	5.5 12.1		1.0 2.5	once/week	grab
Oil & Grease	mg/L	15		10	once/month	grab
Cadmium, Total Recoverable	µg/L	0.7		0.3	once/month	grab
Copper, Total Recoverable	µg/L	20.8		12.3	once/month	grab
Lead, Total Recoverable	µg/L	10.3		4.5	once/month	grab
Nickel, Total Recoverable	µg/L	135		62	once/month	grab
Cyanide, Amenable to Chlorination (Note 2, Page 5)	µg/L	< 10		< 10	once/month	grab
Iron, Total Recoverable (Note 6, Page 5)	µg/L	*		*	once/month	grab
MONITORING REPORTS SHALL BE SUBMITTED MONTHLY; THE FIRST REPORT IS DUE FEBRUARY 28, 2018. THERE SHALL BE NO DISCHARGE OF FLOATING SOLIDS OR VISIBLE FOAM IN OTHER THAN TRACE AMOUNTS.						
Total Phosphorus	mg/L	*		*	once/quarter****	grab
Total Nitrogen	mg/L	*		*	once/quarter****	grab
Arsenic, Total Recoverable	µg/L	*		*	once/quarter****	grab
Mercury, Total Recoverable	µg/L	*		*	once/quarter****	grab
Silver, Total Recoverable	µg/L	*		*	once/quarter****	grab
Vinyl Chloride	µg/L	*		*	once/quarter****	grab
1, 2-cis-dichloroethylene	µg/L	*		*	once/quarter****	grab
Trichloroethylene	µg/L	*		*	once/quarter****	grab
Chromium VI, Dissolved	µg/L	*		*	once/quarter****	grab
MONITORING REPORTS SHALL BE SUBMITTED QUARTERLY; THE FIRST REPORT IS DUE APRIL 28, 2018.						
EFFLUENT PARAMETER(S)	UNITS	MINIMUM		MAXIMUM	MEASUREMENT FREQUENCY	SAMPLE TYPE
pH – Units ***	SU	6.5		9.0	once/week	grab
MONITORING REPORTS SHALL BE SUBMITTED MONTHLY; THE FIRST REPORT IS DUE FEBRUARY 28, 2018.						

* Monitoring requirement only.

** A 24-hour composite sample is composed of 48 aliquots (subsamples) collected at 30 minute intervals by an automatic sampling device.

*** pH is measured in pH units and is not to be averaged.

**** See table on Page 5 for quarterly sampling requirements.

OUTFALL #002	TABLE A-3. FINAL EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS	PAGE NUMBER 5 of 15
		PERMIT NUMBER MO-0104736

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 on **January 1, 2016**, and remain in effect until expiration of the permit. Such discharges shall be controlled, limited and monitored by the permittee as specified below:

EFFLUENT PARAMETER(S)	UNITS	FINAL EFFLUENT LIMITATIONS			MONITORING REQUIREMENTS	
		DAILY MAXIMUM	WEEKLY AVERAGE	MONTHLY AVERAGE	MEASUREMENT FREQUENCY	SAMPLE TYPE
Total Toxic Organics (Note 3)	µg/L	*			once/year	grab
MONITORING REPORTS SHALL BE SUBMITTED ANNUALLY; THE FIRST REPORT IS DUE JANUARY 28, 2017.						

OUTFALL #002	TABLE A-4. WHOLE EFFLUENT TOXICITY FINAL EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

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 on **January 1, 2016**, and remain in effect until expiration of the permit. Such discharges shall be controlled, limited and monitored by the permittee as specified below:

EFFLUENT PARAMETER(S)	UNITS	FINAL EFFLUENT LIMITATIONS			MONITORING REQUIREMENTS	
		DAILY MAXIMUM	WEEKLY AVERAGE	MONTHLY AVERAGE	MEASUREMENT FREQUENCY	SAMPLE TYPE
Acute Whole Effluent Toxicity (Note 4)	TU_a	*			once/year	composite**
MONITORING REPORTS SHALL BE SUBMITTED ANNUALLY; THE FIRST REPORT IS DUE JANUARY 28, 2017.						
Chronic Whole Effluent Toxicity (Note 5)	TU_c	*			once/permit cycle	composite**
WET TEST REPORTS SHALL BE SUBMITTED ONCE PER PERMIT CYCLE; THE FIRST REPORT IS DUE BY DECEMBER 28, 2019.						

* Monitoring requirement only.

** A 24-hour composite sample is composed of 48 aliquots (subsamples) collected at 30 minute intervals by an automatic sampling device.

Minimum Sampling Requirements			
Quarter	**Months**	**Quarterly Effluent Parameters**	**Report is Due**
First	January, February, March	Sample at least once during any month of the quarter	April 28th
Second	April, May, June	Sample at least once during any month of the quarter	July 28th
Third	July, August, September	Sample at least once during any month of the quarter	October 28th
Fourth	October, November, December	Sample at least once during any month of the quarter	January 28th

Note 1 – Effluent limits of 126 #/100 mL daily maximum and monthly average for *E. coli* are applicable year round due to losing stream designation. No more than 10% of samples shall exceed 126 #/100 mL daily maximum.

Note 2 - The Water Quality Based Effluent Limit for Cyanide amenable to chlorination was calculated to be 7.5 µg/L (daily maximum limit) and 4.3 µg/L (monthly average limit). These limits are below the minimum quantification level (ML) of the most common and practical EPA approved Cyanide amenable to chlorination methods. The Department has determined the current acceptable ML of cyanide amenable to chlorination to be 10 µg/L when using Method 4500-CN- from Standard Methods for the Examination of Water and Wastewater. This method is used to determine the concentration of inorganic cyanide present as either soluble salts or complexes in wastes or leachate. The permittee will conduct analyses in accordance with this method, or equivalent, and report actual analytical values. Measured values greater than or equal to the minimum quantification level of 10 µg/L will be considered violations of the permit and values less than the minimum quantification level of 10 µg/L will be considered to be in compliance with the permit limitation. The minimum quantification level does not authorize the discharge of cyanide in excess of the effluent limits stated in the permit.

Note 3 – The TTO test shall be conducted once per year. See Special Condition #29 for additional requirements.

Note 4 – The Acute WET test shall be conducted once per year during the 1st, 2nd, and 3rd of the permit cycle. See Special Condition #25 for additional requirements.

Note 5 – The Chronic WET test shall be conducted during the 4th year of the permit cycle. See Special Condition #26 for additional requirements.

Note 6 - If the facility does not add Ferric Chloride to the basins during the reporting period, the facility shall report "No Iron Added" on the Discharge Monitoring Report.

TABLE B.
INFLUENT MONITORING REQUIREMENTS

The facility is required to meet a removal efficiency of 85% or more as a monthly average. The monitoring requirements shall become effective on **January 1, 2016,** 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
Biochemical Oxygen Demand$_5$	mg/L	once/month	composite**
Total Suspended Solids	mg/L	once/month	composite**

MONITORING REPORTS SHALL BE SUBMITTED MONTHLY; THE FIRST REPORT IS DUE FEBRUARY 28, 2016.

** A 24-hour composite sample is composed of 48 aliquots (subsamples) collected at 30 minute intervals by an automatic sampling device.

PERMITTED FEATURE #SM1

TABLE C-1.
INSTREAM MONITORING REQUIREMENTS

The monitoring requirements shall become effective on **January 1, 2016**, and remain in effect until expiration of the permit.

PARAMETER(S)	UNITS	MONITORING REQUIREMENTS				
		DAILY MAXIMUM	WEEKLY AVERAGE	MONTHLY AVERAGE	MEASUREMENT FREQUENCY	SAMPLE TYPE
Total Phosphorus	mg/L	*		*	once/quarter****	grab
Total Nitrogen	mg/L	*		*	once/quarter****	grab

MONITORING REPORTS SHALL BE SUBMITTED QUARTERLY; THE FIRST REPORT IS DUE APRIL 28, 2016.

* Monitoring requirement only.
**** See table below for quarterly sampling requirements

Minimum Sampling Requirements			
Quarter	**Months**	**Total Nitrogen & Total Phosphorus**	**Report is Due**
First	January, February, March	Sample at least once during any month of the quarter	April 28th
Second	April, May, June	Sample at least once during any month of the quarter	July 28th
Third	July, August, September	Sample at least once during any month of the quarter	October 28th
Fourth	October, November, December	Sample at least once during any month of the quarter	January 28th

PERMITTED FEATURE #SM2

TABLE C-2.
INSTREAM MONITORING REQUIREMENTS

The monitoring requirements shall become effective on **January 1, 2016**, and remain in effect until expiration of the permit.

PARAMETER(S)	UNITS	MONITORING REQUIREMENTS				
		DAILY MINIMUM	WEEKLY AVERAGE	MONTHLY AVERAGE MINIMUM	MEASUREMENT FREQUENCY	SAMPLE TYPE
Hardness, Total	mg/L	*		*	once/month	grab

MONITORING REPORTS SHALL BE SUBMITTED MONTHLY; THE FIRST REPORT IS DUE FEBRUARY 28, 2016.

* Monitoring requirement only.

D. STANDARD CONDITIONS

In addition to specified conditions stated herein, this permit is subject to the attached Parts I, II, & III standard conditions dated August 1, 2014, May 1, 2013, and March 1, 2015, and hereby incorporated as though fully set forth herein.

E. SPECIAL CONDITIONS

1. This permit establishes final ammonia limitations based on Missouri's current Water Quality Standard. On August 22, 2013, the U.S. Environmental Protection Agency (EPA) published a notice in the Federal Register announcing of the final national recommended ambient water quality criteria for protection of aquatic life from the effects of ammonia in freshwater. The EPA's guidance, Final Aquatic Life Ambient Water Quality Criteria for Ammonia – Fresh Water 2013, is not a rule, nor automatically part of a state's water quality standards. States must adopt new ammonia criteria consistent with EPA's published ammonia criteria into their water quality standards that protect the designated uses of the water bodies. The Department of Natural Resources has initiated stakeholder discussions on how to best incorporate these new criteria into the State's rules. A date for when this rule change will occur has not been determined. Also, refer to Section VI of this permit's factsheet for further information including estimated future effluent limits for this facility. It is recommended the permittee view the Department's 2013 EPA criteria Factsheet located at http://dnr.mo.gov/pubs/pub2481.htm.

2. 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.
   (d) Incorporate the requirement to develop a pretreatment program pursuant to 40 CFR 403.8(a) when the Director of the Water Protection Program determines that a pretreatment program is necessary due to any new introduction of pollutants into the Publically Owned Treatment Works or any substantial change in the volume or character of pollutants being introduced.

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

3. All outfalls must be clearly marked in the field. This does not include instream monitoring locations.

4. Permittee will cease discharge by connection to a facility with an area-wide management plan per 10 CSR 20-6.010(3)(B) within 90 days of notice of its availability.

5. Report as "No Discharge" when a discharge does not occur during the report period. For instream samples, if there is no flow, report "No Flow".

6. Water Quality Standards
   (a) To the extent required by law, 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.

E. SPECIAL CONDITIONS (continued)

7. Changes in existing pollutants or the addition of new pollutants to the treatment facility

The permittee must provide adequate notice to the Director of the following:
(a) Any new introduction of pollutants into the POTW from an indirect discharger which would be subject to section 301 or 306 of CWA if it were directly discharging those pollutants; and
(b) Any substantial change in the volume or character of pollutants being introduced into that POTW by a source introducing pollutants into the POTW at the time of issuance of the permit.
(c) For purposes of this paragraph, adequate notice shall include information on;
(1) the quality and quantity of effluent introduced into the POTW, and
(2) any anticipated impact of the change on the quantity or quality of effluent to be discharged from the POTW.

8. Reporting of Non-Detects:
(a) An analysis conducted by the permittee or their contracted laboratory shall be conducted in such a way that the precision and accuracy of the analyzed result can be enumerated.
(b) The permittee shall not report a sample result as "Non-Detect" without also reporting the detection limit of the test. Reporting as "Non Detect" without also including the detection limit will be considered failure to report, which is a violation of this permit.
(c) The permittee shall provide the "Non-Detect" sample result using the less than sign and the minimum detection limit (e.g. <10).
(d) The permittee shall use one-half of the detection limit for the non-detect result when calculating monthly averages.
(e) See Standard Conditions Part I, Section A, #4 regarding proper detection limits used for sample analysis.

9. It is a violation of the Missouri Clean Water Law to fail to pay fees associated with this permit (644.055 RSMo).

10. The permittee shall comply with any applicable requirements listed in 10 CSR 20-9, unless the facility has received written notification that the Department has approved a modification to the requirements. 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.

11. The permittee shall develop and implement a program for maintenance and repair of the collection system. The recommended 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) or the Departments' CMOM Model located at: http://dnr.mo.gov/env/wpp/permits/docs/cmom-template.doc . For additional information regarding the Departments' CMOM Model, see the CMOM Plan Model Guidance document at: http://dnr.mo.gov/pubs/pub2574.htm . The permittee shall report all bypasses and Sanitary Sewer Overflows (SSO) using the Sanitary Sewer Overflow/Facility Bypass Application, located at http://dnr.mo.gov/modnrcag/.

The permittee shall also submit a report to the St. Louis Regional Office annually, by **January 28th**, for the previous calendar year. The report shall contain the following information:
(a) A summary of the efforts to locate and eliminate sources of excessive infiltration and inflow into the collection system serving the facility for the previous year.
(b) A summary of the general maintenance and repairs to the collection system serving the facility for the previous year.
(c) A summary of any planned maintenance and repairs to the collection system serving the facility for the upcoming calendar year. This list shall include locations (GPS, 911 address, manhole number, etc.) and actions to be taken.

E. SPECIAL CONDITIONS (continued)

12. Bypasses are not authorized at this facility unless they meet the criteria in 40 CFR 122.41(m). If a bypass occurs, the permittee shall report in accordance to 40 CFR 122.41(m)(3)(i), and with Standard Condition Part I, Section B, subsection 2.b. Bypasses are to be reported to the St. Louis Regional Office or by using the online Sanitary Sewer Overflow/Facility Bypass Application, located at: http://dnr.mo.gov/modnrcag/ during normal business hours or the Environmental Emergency Response hotline at 573-634-2436 outside of normal business hours. Blending, which is the practice of combining a partially-treated wastewater process stream with a fully-treated wastewater process stream prior to discharge, is not considered a form of bypass. If the permittee wishes to utilize blending, the permittee shall file an application to modify this permit to facilitate the inclusion of appropriate monitoring conditions.

13. The facility must be sufficiently secured to restrict entry by children, livestock and unauthorized persons as well as to protect the facility from vandalism.

14. At least one gate must be provided to access the wastewater treatment facility and provide for maintenance and mowing. The gate shall remain closed except when temporarily opened by; the permittee to access the facility, perform operational monitoring, sampling, maintenance, mowing, or for inspections by the Department. The gate shall be closed and locked when the facility is not staffed.

15. At least one (1) warning sign shall be placed on each side of the facility enclosure in such positions as to be clearly visible from all directions of approach. There shall also be one (1) sign placed for every five hundred feet (500') (150 m) of the perimeter fence. A sign shall also be placed on each gate. Minimum wording shall be SEWAGE TREATMENT FACILITY—KEEP OUT. Signs shall be made of durable materials with characters at least two inches (2") high and shall be securely fastened to the fence, equipment or other suitable locations.

16. An Operation and Maintenance (O & M) manual shall be maintained by the permittee and made available to the operator. The O & M manual shall include key operating procedures and a brief summary of the operation of the facility.

17. An all-weather access road shall be provided to the treatment facility.

18. The discharge from the wastewater treatment facility shall be conveyed to the receiving stream via a closed pipe or a paved or rip-rapped open channel. Sheet or meandering drainage is not acceptable. The outfall sewer shall be protected against the effects of floodwater, ice or other hazards as to reasonably insure its structural stability and freedom from stoppage. The outfall shall be maintained so that a sample of the effluent can be obtained at a point after the final treatment process and before the discharge mixes with the receiving waters.

19. The berms of the flow retention basins shall be mowed and kept free of any deep-rooted vegetation, animal dens, or other potential sources of damage to the berms.

20. The facility shall ensure that adequate provisions are provided to prevent surface water intrusion into the flow retention basins and to divert stormwater runoff around the lagoon and protect embankments from erosion.

21. Receiving Water Monitoring Conditions
    (a) Downstream receiving water samples should be taken at the location(s) specified on Page 2 of this permit. In the event that a safe, accessible location is not present at the location(s) listed, a suitable location can be negotiated with the Department. Samples should be taken at least four feet from the bank or from the middle of the stream (whichever is less) and 6-inches below the surface. The upstream receiving water sample should be collected at a point upstream from any influence of the effluent, where the water is visibly flowing down stream.
    (b) When conducting in-stream monitoring, the permittee shall record observations that include: the time of day, weather conditions, unusual stream characteristics (e.g., septic conditions, algae growth, etc.), the stream segment (e.g., riffle, pool or run) from where the sample was collected. These observations shall be submitted with the sample results.
    (c) Samples shall not be collected from areas with especially turbulent flow, still water or from the stream bank, unless these conditions are representative of the stream reach or no other areas are available for sample collection. Sampling should not be made when significant precipitation has occurred recently. The sampling event should be terminated and rescheduled if any of the following conditions occur:
        - If turbidity in the stream increases notably; or
        - If rainfall over the past two weeks exceeds 2.5 inches or exceeds 1 inch in the last 24 hours
    (d) Always use the correct sampling technique and handling procedure specified for the parameter of interest. Please refer to the latest edition of Standard Methods for the Examination of Water and Wastewater for further discussion of proper sampling techniques. All analyses must be conducted in accordance with an approved EPA method. Meters shall be calibrated immediately (within 1 hour) prior to the sampling event.
    (e) Please contact the Department if you need additional instructions or assistance.

E. SPECIAL CONDITIONS (continued)

22. The permittee shall implement and enforce its approved pretreatment program in accordance with the requirements of 10 CSR 20-6.100. The approved pretreatment program is hereby incorporated by reference.

The permittee shall submit to the Department on or before **March 31st** of each year a report briefly describing its pretreatment activities during the previous calendar year. At a minimum, the report shall include the following:

(a) An updated list of the Permittee's Industrial Users, including their names and addresses, or a list of deletions and additions keyed to a previously submitted list. The Permittee shall provide a brief explanation of each deletion. This list shall identify which Industrial Users are subject to categorical pretreatment Standards and specify which Standards are applicable to each Industrial User. The list shall indicate which Industrial Users are subject to local standards that are more stringent than the categorical Pretreatment Standards. The Permittee shall also list the Industrial Users that are subject only to local Requirements;
(b) A summary of the status of Industrial User compliance over the reporting period;
(c) A summary of compliance and enforcement activities (including inspections) conducted by the Permittee during the reporting period; and
(d) Any other relevant information requested by the Department.

Pursuant to 40 CFR 122.44(j)(2)(ii), the permittee shall submit to the Department a written technical evaluation of the need to revise local limits under 40 CFR 403.5(c)(1) along with the application for renewal of this permit.

23. Stormwater Pollution Prevention Plan (SWPPP): A SWPPP must be developed and implemented within 180 days of the effective date of the permit. Through implementation of the SWPPP, the permittee shalt minimize the release of pollutants in stormwater from the facility to the waters of the state. The SWPPP shall be developed in consultation with the concepts and methods described in the following document: Developing Your Stormwater Pollution Prevention Plan, A Guide for Industrial Operators, (Document number EPA 833-B-09-002) published by the United States Environmental Protection Agency (USEPA) in February 2009.

(a) The SWPPP must identify any stormwater outfall from the facility and Best Management Practices (BMPs) used to prevent or reduce the discharge of contaminants in stormwater. The stormwater outfalls shall either be marked in the field or clearly marked on a map and maintained with the SWPPP.
(b) The SWPPP must include a schedule and procedures for a once per month routine site inspection.
    i. The monthly routine inspection shall be documented in a brief written report, which shall include:
        i. The person(s) conducting the inspection.
        ii. The inspection date and time.
        iii. Weather information for the day of the inspection.
        iv. Precipitation information for the entire period since the last inspection.
        v. Description of the discharges observed, including visual quality of the discharges (sheen, turbid, etc.).
        vi. Condition of BMPs
        vii. If BMPs were replaced or repaired.
        viii. Observations and evaluations of BMP effectiveness.
    ii. Any deficiency observed during the routine inspection must be corrected within seven (7) days and the actions taken to correct the deficiencies shall be included with the written report.
    iii. The routine inspection reports must be kept onsite with the SWPPP and maintained for a period of five (5) years.
    iv. The routine inspection reports shall be made available to Department personnel upon request.
(c) The SWPPP must include a schedule and procedures for a once per year comprehensive site inspection.
    (1) The annual comprehensive inspection shall be documented in a written report, which shall include:
        i. The person(s) conducting the inspection.
        ii. The inspection date and time.
        iii. Findings from the areas of your facility that were examined;
        iv. All observations relating to the implementation of your control measures including:
            1. Previously unidentified discharges from the site,
            2. Previously unidentified pollutants in existing discharges,
            3. Evidence of, or the potential for, pollutants entering the drainage system;
            4. Evidence of pollutants discharging to receiving waters at all facility outfall(s), and the condition of and around the outfall, and
            5. Additional control measures needed to address any conditions requiring corrective action identified during the inspection.
        v. Any required revisions to the SWPPP resulting from the inspection;
        vi. Any incidence of noncompliance observed or a certification stating that the facility is in compliance with Special Condition E. 23.

E. SPECIAL CONDITIONS (continued)

(2) Any deficiency observed during the comprehensive inspection must be corrected within seven (7) days and the actions taken to correct the deficiencies shall be included with the written report.
(3) The comprehensive inspection reports must be kept onsite with the SWPPP and maintained for a period of five (5) years.
(4) The comprehensive inspection reports shall be made available to Department personnel upon request.

(d) The SWPPP must be kept on-site and should not be sent to the Department unless specifically requested.
(e) The SWPPP must be reviewed and updated at a minimum once per permit cycle, as site conditions or control measures change.

24. The permittee shall select, install, use, operate, and maintain the Best Management Practices prescribed in the SWPPP.

(a) Permittee shall adhere to the following minimum Best Management Practices (BMPs):
(1) Minimize the exposure of industrial material storage areas, loading and unloading areas, dumpsters and other disposal areas, maintenance activities, and fueling operations to rain, snow, snowmelt, and runoff, by locating industrial materials and activities inside or protecting them with storm resistant coverings, if warranted and practicable.
(2) Provide good housekeeping practices on the site to prevent potential pollution sources from coming into contact with stormwater and provide collection facilities and arrange for proper disposal of waste products, including sludge.
(3) Implement a maintenance program to ensure that the structural control measures and industrial equipment is kept in good operating condition and to prevent or minimize leaks and other releases of pollutants.
(4) Prevent or minimize the spillage or leaks of fluids, oil, grease, fuel, etc. from equipment and vehicle maintenance, equipment and vehicle cleaning, or activities.
(5) Provide sediment and erosion control sufficient to prevent or control sediment loss off of the property. This could include the use of straw bales, silt fences, or sediment basins, if needed.
(6) Provide stormwater runoff controls to divert, infiltrate, reuse, contain, or otherwise minimize pollutants in the stormwater discharge.
(7) Enclose or cover storage piles of salt or piles containing salt, used for deicing or other commercial or industrial purposes.
(8) Provide training to all employees who; work in areas where industrial materials or activities are exposed to stormwater, are responsible for stormwater inspections, are members of the Pollution Prevention Team. Training must cover the specific control measures and monitoring, inspection, planning, reporting and documentation requirements of this permit. Training is recommended annually for any applicable staff and whenever a new employee is hired who meets the description above.
(9) Eliminate and prevent unauthorized non-stormwater discharges at the facility.
(10) Minimize generation of dust and off-site tracking of raw, final, or waste materials by implementing appropriate control measures.

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

SUMMARY OF ACUTE WET TESTING FOR THIS PERMIT					
OUTFALL	AEC	Acute Toxic Unit (TU_a)	FREQUENCY	SAMPLE TYPE	MONTH
001	100%	*	once/year	24 hr. composite	Any

* Monitoring requirement only.

DILUTION SERIES						
100%	50%	25%	12.5%	6.25%	(Control) 100% upstream, if available	(Control) 100% Lab Water, also called synthetic water

(a) Freshwater Species and Test Methods
(1) Species and short-term test methods for estimating the acute toxicity of NPDES effluents are found in the fifth edition of *Methods for Measuring the Acute Toxicity of Effluents and Receiving Waters to Freshwater and Marine Organisms* (EPA/821/R-02/012, 2002; Table IA, 40 CFR Part 136). The permittee shall concurrently conduct 48-hour static non-renewal toxicity tests with the following vertebrate species:

- The fathead minnow, *Pimephales promelas* (Acute Toxicity Test Method 2000.0).

E. SPECIAL CONDITIONS (continued)

And the following invertebrate species:

- The daphnid, *Ceriodaphnia dubia* (Acute Toxicity Test Method 2002.0).

(2) Chemical and physical analysis of an upstream control sample 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. Where upstream receiving water is not available, synthetic laboratory control water may be used.
(3) Test conditions must meet all test acceptability criteria required by the EPA Method used in the analysis.
(4) 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 analysis performed upon any other effluent concentration.
(5) All chemical analyses shall be performed and results shall be recorded in the appropriate field of the report form. The parameters for chemical analysis include Temperature (°C), pH (SU), Conductivity (µmohs/cm), Dissolved Oxygen (mg/L), Total Residual Chlorine (mg/L), Un-ionized Ammonia (mg/L), Total Alkalinity (mg/L), Total Recoverable Cadmium, Total Recoverable Copper, Total Recoverable Lead, Total Recoverable Nickel, Cyanide amenable to chlorination and Total Hardness (mg/L).

(b) Reporting of Acute Toxicity Monitoring Results
(1) WET test results shall be submitted to the St. Louis Regional Office, or by eDMR, with the permittee's Discharge Monitoring Reports annually by **January 28, 2017**. The submittal shall include:
(i) A full laboratory report for all toxicity testing.
(ii) Copies of chain-of-custody forms.
(iii) The WET form provided by the Department upon permit issuance.
(2) The report must include a quantification of acute toxic units ($TU_a = 100/LC_{50}$) reported according to the test methods manual chapter on report preparation and test review. The Lethal Concentration, 50 Percent (LC_{50}) is the toxic or effluent concentration that would cause death in 50 percent of the test organisms over a specified period of time.

(c) Permit Reopener for Acute Toxicity
In accordance with 40 CFR Parts 122 and 124, this permit may be modified to include effluent limitations or permit conditions to address acute toxicity in the effluent or receiving waterbody, as a result of the discharge; or to implement new, revised, or newly interpreted water quality standards applicable to acute toxicity.

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

SUMMARY OF CHRONIC WET TESTING FOR THIS PERMIT					
OUTFALL	AEC	Chronic Toxic Unit (TU_c)	FREQUENCY	SAMPLE TYPE	MONTH
001	100%	*	once/permit cycle	24 hr. composite	any

*Monitoring only

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

(a) Freshwater Species and Test Methods
(1) Species and short-term test methods for estimating the chronic toxicity of NPDES effluents are found in the fourth edition of *Short-term Methods for Estimating the Chronic Toxicity of Effluents and Receiving Waters to Freshwater Organisms* (EPA/821/R-02/013, 2002; Table IA, 40 CFR Part 136). The permittee shall concurrently conduct 7-day, static, renewal toxicity tests with the following vertebrate species:

- The fathead minnow, *Pimephales promelas* (Survival and Growth Test Method 1000.0).

And the following invertebrate species:

- The daphnid, *Ceriodaphnia dubia* (Survival and Reproduction Test Method 1002.0).

E. SPECIAL CONDITIONS (continued)

(2) Chemical and physical analysis of an upstream control sample 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. Where upstream receiving water is not available, synthetic laboratory control water may be used.
(3) Test conditions must meet all test acceptability criteria required by the EPA Method used in the analysis.
(4) 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 analysis performed upon any other effluent concentration.
(5) All chemical analyses shall be performed and results shall be recorded in the appropriate field of the report form. The parameters for chemical analysis include Temperature (°C), pH (SU), Conductivity (µmohs/cm), Dissolved Oxygen (mg/L), Total Residual Chlorine (mg/L), Un-ionized Ammonia (mg/L), Total Alkalinity (mg/L), Total Recoverable Cadmium, Total Recoverable Copper, Total Recoverable Lead, Total Recoverable Nickel, Cyanide amenable to chlorination and Total Hardness (mg/L).

(b) Reporting of Chronic Toxicity Monitoring Results
(1) WET test results shall be submitted to the St. Louis Regional Office, or by eDMR, with the permittee's Discharge Monitoring Reports by **December 28, 2019**. The submittal shall include:
a. A full laboratory report for all toxicity testing.
b. Copies of chain-of-custody forms.
c. The WET form provided by the Department upon permit issuance.
(2) The report must include a quantification of chronic toxic units ($TU_c = 100/IC_{25}$) reported according to the *Methods for Measuring the Chronic Toxicity of Effluents and Receiving Waters to Freshwater and Marine Organisms* chapter on report preparation and test review. The 25 percent Inhibition Effect Concentration (IC_{25}) is the toxic or effluent concentration that would cause 25 percent reduction in mean young per female or in growth for the test populations.

(c) Permit Reopener for Chronic Toxicity
In accordance with 40 CFR Parts 122 and 124, this permit may be modified to include effluent limitations or permit conditions to address chronic toxicity in the effluent or receiving waterbody, as a result of the discharge; or to implement new, revised, or newly interpreted water quality standards applicable to chronic toxicity.

27. This facility is not allowed to accept hazardous wastes.

28. Notification Requirements - New Nondomestic User Discharges and Hauled Non-Hazardous Wastewaters
The permittee shall implement and maintain the following procedures. This Special Condition shall supersede all requirements under Standard Conditions Part I, Section B.1.A. iv, and Part II, Section A.4.
(a) The permittee shall submit to the Hazardous Waste Program and to the St. Louis Regional Office on or before March 31st of each year a report briefly summarizing available information on new nondomestic sources of indirect discharge and hauled non-hazardous wastewaters authorized and accepted by the permittee for treatment during the previous calendar year. At a minimum, the report shall include the following:
(1) A list of new nondomestic sources of indirect discharge regulated under Section 307(b), (c) or (d) of the Clean Water Act, including names, addresses and SIC Codes. Sources which discharge only domestic wastewater are not required to be included in this report.
(2) A list of new underground storage tank facility wastewater discharges authorized and accepted by the permittee for treatment during the previous calendar year, including names and addresses.
(3) A summary of hauled non-hazardous wastewaters accepted by the permittee for treatment during the previous calendar year, including type and quantity of hauled wastewaters.
(b) If the permittee determines that new, different or increased pollutant discharge from a nondomestic source of indirect discharge will result in classification of that source as a Significant Industrial User (SIU), the permittee shall provide notice to the St. Louis Regional Office at least thirty (30) days prior to modifying the list of SIUs maintained under the approved pretreatment program in accordance with the requirements of 40 CFR Part 403.
(a) Authorized representatives of the Department shall be allowed by the permittee to have access to, or copy, any monitoring records maintained by the permittee of new nondomestic sources of indirect discharge, new underground storage tank facility wastewater discharges, and hauled non-hazardous wastewaters authorized and accepted by the permittee for treatment.

E. SPECIAL CONDITIONS (continued)

29. **Total Toxic Organics** – report as a total of all detections

Acenaphthene
Acrolein
Acrylonitrile
Benzene
Benzidine
Carbon Tetrachloride (tetrachloromethane)
Chlorobenzene
1,2,4-trichlorobenzene
Hexachlorobenzene
1,2-dichloroethane
1,1,1-trichloroethane
Hexachloroethane
1,1-dichloroethane
1,1,2-trichloroethane
1,1,2,2-tetrachloroethane
Chloroethane
Bis (2-chloroethyl) ether
2-chloroethyl vinyl ether
N-nitrosodi-n-propylamine
Pentachlorophenol
Phenol
Bis (2-ethylhexyl) phthalate
Butyl benzyl phthalate
Di-n-butyl phthalate

Di-n-octyl phthalate
Diethyl phthalate
Dimethyl phthalate
1,2-benzanthracene (benzo(a)anthracene)
Benzo(a)pyrene (3,4-benzopyrene)
3,4-benzofluoranthene (benzo(b)fluoranthene)
11,12-benzofluoranthene (benzo(k)fluoranthene)
Chrysene
Anthracene
1,12-benzoperylene (benzo(ghi)perylene)
Fluorene
2-chloronaphthalene
2,4,6-trichlorophenol
Parachlorometa cresol
Chloroform (trichloromethane)
2-chlorophenol
1,2-dichlorobenzene
1,3-dichlorobenzene
1,4-dichorobenzene
3,3-dichlorobenzidine
1,1-dichloroethylene
1,2-trans-dichloroethylene
2,4-dichlorophenol
1,2-dichloropropane (1,3-dichloropropane)
2,4-dimethylphenol
2,4-dinitrotoluene
2,6-dinitrotoluene
1,2-diphenylhydrazine
Ethylbenzene
Fluoranthene
4-chlorophenyl phenyl ether
4-bromophenyl phenyl ether
Bis (2-chloroisopropyl) ether
Bis (2-chloroethoxy) methane
Methylene Chloride (dichloromethane)
Methyl Chloride (chloromethane)
Methyl bromide (bromomethane)
Bromoform (tribromomethane)
Dichlorobromomethane
Chlorodibromemethane
Hexachlorobutadiene
Hexachlorocyclopentadiene
Isophorone
Naphthalene
Nitrobenzene
2-nitrophenol
4-nitrophenol
2,4-dinitrophenol
4,6-dintro-o-cresol
N-nitrosodimethylamine
N-nitrosodiphenylamine
Phenanthrene
1,2,5,6-dibenzanthracene (dibenzo(a,h)anthracene)
Indeno (1,2,3-cd) pyrene
(2,3-o-phenylene pyrene)
Pyrene
Tetrachloroethylene
Toluene
Trichloroethylene
Vinyl Chloride (chloroethylene)
Aldrin
Dieldrin
Chlordane (technical mixture and metabolites)
4,4-DDT
4,4-DDE (p,p-DDX)
4,4-DDD (p,p-TDE)
Alpha-endosulfan
Beta-endosulfan
Endosulfan sulfate
Endrin
Endrin aldehyde
Heptachlor
Heptachlor epoxide (BHC hexachlorocyclohexane)
Alpha-BHC
Beta-BHC
Gamma-BHC
Delta-BHC (PCB polychlorinated biphenyls)
PCB-1242 (Arochlor 1242)
PCB-1254 (Arochlor 1254)
PCB-1221 (Arochlor 1221)
PCB-1232 (Arochlor 1232)
PCB-1248 (Arochlor 1248)
PCB-1260 (Arochlor 1260)
PCB-1016 (Arochlor 1016)
Toxaphene

E. SPECIAL CONDITIONS (continued)

30. The peak flow detention basins described in this permit shall be operated in a manner that they are full of liquid for only short periods of time, up to 3 days, except for certain conditions as detailed below. This is due to the severe geologic limitations of the site and the severe collapse potential of the earthen basins. When continuous rainfall events occur, the basins are allowed to contain water for more than 3 days. The stored wastewater shall be returned to the plant as soon as wastewater influent flows normalize. During continuous rainfall events where the basins will contain water for more than 3 days, the facility shall conduct daily visual inspections of the basins. These inspections will commence on the 4th day of storage in the basins and continue until the basins are drained.

    The daily visual inspection shall be documented in a brief written report, which shall include:
    - The name of the person conducting the inspection and the inspection date and time.
    - Water levels in the basins, and any observed issues with the basin berms.
    - The inspection reports must be kept onsite and maintained for a period of five (5) years.
    - The inspection reports shall be made available to Department personnel upon request.

F. SCHEDULE OF COMPLIANCE

The facility shall attain compliance with final effluent limitations as soon as reasonably achievable or no later than **2 years** of the effective date of this permit.

1. The permittee shall submit an interim progress report detailing progress made in attaining compliance with the final effluent limits by **January 1, 2017**.

2. Within **2 years** of the effective date of this permit, the permittee shall attain compliance with the final effluent limits.

    Please submit progress reports to the Missouri Department of Natural Resources, St. Louis Regional Office, 7545 S. Lindbergh, Suite 210, St. Louis, MO 63125.

MISSOURI DEPARTMENT OF NATURAL RESOURCES
FACT SHEET
FOR THE PURPOSE OF RENEWAL
OF
MO-0104736
SULLIVAN WWTP

The Federal Water Pollution Control Act ("Clean Water Act" Section 402 Public Law 92-500 as amended) established the National Pollution Discharge Elimination System (NPDES) permit program. This program regulates the discharge of pollutants from point sources into the waters of the United States, and the release of stormwater from certain point sources. All such discharges are unlawful without a permit (Section 301 of the "Clean Water Act"). After a permit is obtained, a discharge not in compliance with all permit terms and conditions is unlawful. Missouri State Operating Permits (MSOPs) are issued by the Director of the Missouri Department of Natural Resources (Department) under an approved program, operating in accordance with federal and state laws (Federal "Clean Water Act" and "Missouri Clean Water Law" Section 644 as amended). MSOPs are issued for a period of five (5) years unless otherwise specified.

As per [40 CFR Part 124.8(a)] and [10 CSR 20-6.020(1)2.] a Factsheet shall be prepared to give pertinent information regarding the applicable regulations, rationale for the development of effluent limitations and conditions, and the public participation process for the Missouri State Operating Permit (operating permit) listed below.

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

This Factsheet is for a Major

Part I – Facility Information

Facility Type: POTW - SIC #4952

Facility Description:
2 flow retention basins / influent pump station / fine mechanical bar screen / aerated grit chamber / 3 sequencing batch reactors / UV disinfection / aerobic sludge digester /sludge disposal by contract hauler

Have any changes occurred at this facility or in the receiving water body that effects effluent limit derivation?
☒ - Yes; Winsel Creek (C) (3960) is now classified as EPA has approved the Department's new stream classifications.

Application Date: 10/04/2012
Expiration Date: 04/10/2013

OUTFALL(S) TABLE:

OUTFALL	DESIGN FLOW (CFS)	TREATMENT LEVEL	EFFLUENT TYPE
#002	2.325	Secondary	Domestic
#003	Varies	NA	Stormwater

Facility Performance History:
The facility exceeded effluent limits for Ammonia as N on the January, February, and March 2010 Discharge Monitoring Report (DMR). The facility failed to submit Oil & Grease, Arsenic, Cadmium, Copper, Lead, mercury, Nickel, Silver, and Temperature for Outfall #002 on the May 2010 DMR. The facility failed to submit Temperature for Outfall #002 on the June, July, and August 2010 DMRs. The facility failed to meet pH effluent limits on the August 2010 DMR. The facility failed to submit Flow, Rainfall, Oil & Grease, pH, Settleable Solids, Bod, and Fecal Coliform for Outfall #003 on the September 2010 DMR. The facility exceeded effluent limitations for Coper for Outfall #002 on the December 2010 DMR. The facility failed to submit Total Toxic Organics for Outfall #002 for 2011. The facility exceeded effluent limits for pH for Outfall #002 on the September 2011 DMR. The facility exceeded effluent limits for Copper for Outfall #002 on the May 2012 DMR. The facility exceeded effluent limits for Cadmium and Silver for Outfall #002 on the May 2013 DMR. The facility exceeded effluent limits for Cadmium for Outfall #002 on the August 2013 and June 2014 DMRs.

This facility was last inspected on April 8, 2013. The conditions of the facility at the time of inspection were found to be satisfactory.

Comments:
Winsel Creek is now classified as EPA has approved the Department's new stream classifications. Changes in this permit include the addition of Total Phosphorus, Total Nitrogen and Total Recoverable Iron, and the removal of Temperature, Zinc, Chromium III, Aluminum, and Fecal Coliform. See Part VII of the Fact Sheet for further information regarding the addition and removal of effluent parameters. Special conditions were updated to include the addition of inflow and infiltration reporting requirements, reporting of Non-detects, bypass reporting requirements, pretreatment requirements, addition of instream monitoring requirements, the addition of a Stormwater Pollution Prevention Plan, and the removal of sampling requirements for Outfall #003. In addition, a special condition was added regarding the peak flow detention basins and how they are to be operated in a manner that they are full of liquid for only short periods of time (up to 3 days) due to the severe geologic limitations of the site and the severe collapse potential of the earthen basins (Reference DGLS Geologic Report #MO0707, 9 22-06). This information was also contained in Construction Permit CP-22-7690, issued to the City of Sullivan on September 10, 2009 for the construction of the peak flow detention basins.

Part II – Operator Certification Requirements

☒ - This facility is required to have a certified operator.

As per [10 CSR 20-6.010(8) Terms and Conditions of a Permit], the permittee 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 20-9.020(2)(A)], requirements for operation by certified personnel shall apply to all wastewater treatment systems, if applicable, as listed below:

Owned or operated by or for a
- ☒ - Municipalities
- ☐ - Public Sewer District
- ☐ - County
- ☐ - Public Water Supply Districts
- ☐ - Private Sewer Company regulated by the Public Service Commission
- ☐ - State agency
- ☐ - Federal agency

Each of the above entities are only applicable if they have a Population Equivalent greater than two hundred (200) or fifty (50) or more service connections.

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

Operator's Name: William J. Houser
Certification Number: 3054
Certification Level: B

The listing of the operator above only signifies that staff drafting this operating permit have reviewed appropriate Department records and determined that the name listed on the operating permit application has the correct and applicable Certification Level.

☐ - This facility is not required to have a certified operator.

Part III– Operational Monitoring

☐ - As per [10 CSR 20-9.010(4))], the facility is not required to conduct operational monitoring.

☒ - As per [10 CSR 20-9.010(4))], the facility is required to conduct operational monitoring.

Part IV – Receiving Stream Information

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(4)].

RECEIVING STREAM(S) TABLE: OUTFALL #002

WATER-BODY NAME	CLASS	WBID	DESIGNATED USES*	12-DIGIT HUC	DISTANCE TO CLASSIFIED SEGMENT (MI)
Tributary to Winsel Creek	NA	NA	General Criteria	07140103-0402	0.11
8-20-13 MUDD V1.0	C	3960	IRR, LWW, AQL, HHP, WBC-B, SCR		0 - Losing

* - Irrigation (IRR), Livestock & Wildlife Watering (LWW), Protection of Warm Water Aquatic Life (AQL), Human Health Protection (HHP), Cool Water Fishery (CLF), Cold Water Fishery (CDF), Whole Body Contact Recreation – Category A (WBC-A), Whole Body Contact Recreation – Category B (WBC-B), Secondary Contact Recreation (SCR), Drinking Water Supply (DWS), Industrial (IND), Groundwater (GRW).

RECEIVING STREAM(S) LOW-FLOW VALUES:

RECEIVING STREAM (C, E, P, P1)	LOW-FLOW VALUES (CFS)		
	1Q10	7Q10	30Q10
Tributary to Winsel Creek	-	-	-

RECEIVING STREAM MONITORING REQUIREMENTS:

Facilities with a design flow greater than 100,000 gallons per day are required to sample their effluent quarterly for Total Phosphorus and Total Nitrogen per 10 CSR 20-7.015(9)(D)7. Upstream monitoring for these parameters is necessary to determine background concentrations in order to complete calculations that determine instream nutrient loading. In addition, to determine instream hardness for use in determining effluent limitations for metals, instream monitoring for Total Hardness is to be done downstream of the outfall.

Permitted Feature SM1. (Upstream)

Permitted Feature SM2. (Downstream)

Receiving Water Body's Water Quality
No stream surveys have been conducted for this facility.

Part V – 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.

☒ - 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(o); 40 CFR Part 122.44(l)] that requires a reissued permit to be as stringent as the previous permit with some exceptions.

☒ - Limitations in this operating permit for the reissuance of this permit conform to the anti-backsliding provisions of Section 402(o) of the Clean Water Act, and 40 CFR Part 122.44.

☒ - Information is available which was not available at the time of permit issuance (other than revised regulations, guidance, or test methods) and which would have justified the application of a less stringent effluent limitation at the time of permit issuance.

- Ammonia limitations were recalculated.
- Temperature was removed from the permit.
- Zinc was removed from the permit.
- Chromium III was removed from the permit.
- Aluminum was removed from the permit.
- Fecal Coliform was removed from the permit.

☒ - The Department determines that technical mistakes or mistaken interpretations of law were made in issuing the permit under section 402(a)(1)(b). This permit changes WET test requirements for the facility from a pass/fail requirement to monitoring only for toxic units. This change reflects modifications to Missouri's Effluent Regulation found at 10 CSR 20-7.015. 40 CFR 122.44(d)(1)(ii) requires the Department to establish effluent limitations that control all parameters which have the reasonable potential to cause or contribute to an excursion above any state water quality standard, including state narrative criteria. The previous permit imposed a pass/fail limitation without collecting sufficient data to make a reasonable potential determination. Furthermore, the method of reporting associated with the pass/fail limitation prevented the Department from gathering the data necessary to make a finding of reasonable potential. Implementation of the toxic unit monitoring requirement will allow the Department to implement numeric acute criteria in accordance with water quality standards established under §303 of the CWA.

ANTIDEGRADATION:
In accordance with Missouri's Water Quality Standard [10 CSR 20-7.031(3)], the Department is to document by means of Antidegradation Review that the use of a water body's available assimilative capacity is justified. Degradation is justified by documenting the socio-economic importance of a discharging activity after determining the necessity of the discharge.

☒ - No degradation proposed and no further review necessary. Facility did not apply for authorization to increase pollutant loading or to add additional pollutants to their discharge.

AREA-WIDE WASTE TREATMENT MANAGEMENT & CONTINUING AUTHORITY:
As per [10 CSR 20-6.010(3)(B)], …An applicant may utilize a lower preference continuing authority by submitting, as part of the application, a statement waiving preferential status from each existing higher preference authority, providing the waiver does not conflict with any area-wide management plan approved under section 208 of the Federal Clean Water Act or any other regional sewage service and treatment plan approved for higher preference authority by the Department.

BIOSOLIDS & SEWAGE SLUDGE:
Biosolids are solid materials resulting from domestic wastewater treatment that meet federal and state criteria for beneficial uses (i.e. fertilizer). Sewage sludge is solids, semi-solids, or liquid residue generated during the treatment of domestic sewage in a treatment works; including but not limited to, domestic septage; scum or solids removed in primary, secondary, or advanced wastewater treatment process; and a material derived from sewage sludge. Sewage sludge does not include ash generated during the firing of sewage sludge in a sewage sludge incinerator or grit and screening generated during preliminary treatment of domestic sewage in a treatment works. Additional information regarding biosolids and sludge is located at the following web address: http://extension.missouri.edu/main/DisplayCategory.aspx?C=74, items WQ422 through WQ449.

☒ - Permittee is not authorized to land apply biosolids. Sludge/biosolids are removed by contract hauler.

COMPLIANCE AND ENFORCEMENT:
Enforcement is the action taken by the Water Protection Program (WPP) to bring an entity into compliance with the Missouri Clean Water Law, its implementing regulations, and/or any terms and conditions of an operating permit. The primary purpose of the enforcement activity in the WPP is to resolve violations and return the entity to compliance.

☒ - The facility is not currently under Water Protection Program enforcement action.

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)].

Pretreatment programs are required at any POTW (or combination of POTW operated by the same authority) and/or municipality with a total design flow greater than 5.0 MGD and receiving industrial wastes that interfere with or pass through the treatment works or are otherwise subject to the pretreatment standards. Pretreatment programs can also be required at POTWs/municipals with a design flow less than 5.0 MGD if needed to prevent interference with operations or pass through.

Several special conditions pertaining to the permittee's pretreatment program may be included in the permit, and are as follows:
- Implementation and enforcement of the program,
- Annual pretreatment report submittal,
- Submittal of list of industrial users,
- Technical evaluation of need to establish local limitations, and
- Submittal of the results of the evaluation

☒ - This permittee has an approved pretreatment program in accordance with the requirements of [40 CFR Part 403] and [10 CSR 20-6.100] and is expected to implement and enforce its approved program.

REASONABLE POTENTIAL ANALYSIS (RPA):
Federal regulation [40 CFR Part 122.44(d)(1)(i)] requires effluent limitations for all pollutants that are or may be discharged at a level that will cause or have the reasonable potential to cause or contribute to an in-stream excursion above narrative or numeric water quality standard.

In accordance with [40 CFR Part 122.44(d)(1)(iii)] if the permit writer determines that any given pollutant has the reasonable potential to cause, or contribute to an in-stream excursion above the WQS, the permit must contain effluent limits for that pollutant.

☒ - A RPA was conducted on appropriate parameters. Please see **APPENDIX – RPA RESULTS.**

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 (BOD_5) and Total Suspended Solids (TSS) for Publicly Owned Treatment Works (POTWs)/municipals.

☒ - Secondary Treatment is 85% removal [40 CFR Part 133.102(a)(3) & (b)(3)].

SANITARY SEWER OVERFLOWS (SSO) AND INFLOW AND INFILTRATION (I&I):

Sanitary Sewer Overflows (SSOs) are defined as untreated sewage releases and are considered bypassing under state regulation [10 CSR 20-2.010(11)] and should not be confused with the federal definition of bypass. SSOs result from a variety of causes including blockages, line breaks, and sewer defects that can either allow wastewater to backup within the collection system during dry weather conditions or allow excess stormwater and groundwater to enter and overload the collection system during wet weather conditions. SSOs can also result from lapses in sewer system operation and maintenance, inadequate sewer design and construction, power failures, and vandalism. SSOs include overflows out of manholes, cleanouts, broken pipes, and other into waters of the state and onto city streets, sidewalks, and other terrestrial locations.

Inflow and Infiltration (I&I) is defined as unwanted intrusion of stormwater or groundwater into a collection system. This can occur from points of direct connection such as sump pumps, roof drain downspouts, foundation drains, and storm drain cross-connections or through cracks, holes, joint failures, faulty line connections, damaged manholes, and other openings in the collection system itself. I&I results from a variety of causes including line breaks, improperly sealed connections, cracks caused by soil erosion/settling, penetration of vegetative roots, and other sewer defects. In addition, excess stormwater and groundwater entering the collection system from line breaks and sewer defects have the potential to negatively impact the treatment facility.

Missouri RSMo §644.026.1.(13) mandates that the Department issue permits for discharges of water contaminants into the waters of this state, and also for the operation of sewer systems. Such permit conditions shall ensure compliance with all requirements as established by sections 644.006 to 644.141. Standard Conditions Part I, referenced in the permit, contains provisions requiring proper operation and maintenance of all facilities and systems of treatment and control. Missouri RSMo §644.026.1.(15) instructs the Department to require proper maintenance and operation of treatment facilities and sewer systems and proper disposal of residual waste from all such facilities. To ensure that public health and the environment are protected, any noncompliance which may endanger public health or the environment must be reported to the Department within 24 hours of the time the permittee becomes aware of the noncompliance. Standard Conditions Part I, referenced in the permit, contains the reporting requirements for the permittee when bypasses and upsets occur. The permit also contains requirements for permittees to develop and implement a program for maintenance and repair of the collection system. The permit requires that the permittee submit an annual report to the Department for the previous calendar year that contains a list of all SSOs and building backups (locations, features of collection system where the SSO/building backup occurred, volumes, durations, receiving stream, causes, mitigation efforts, and actions to prevent reoccurrences), a summary of efforts taken by the permittee to locate and eliminate sources of excess I & I, a summary of general maintenance and repairs to the collection system, and a summary of any planned maintenance and repairs to the collection system for the upcoming calendar year.

☒ - At this time, the Department recommends the US EPA's Guide for Evaluating Capacity, Management, Operation and Maintenance (CMOM) Programs At Sanitary Sewer Collection Systems (Document # EPA 305-B-05-002) or the Departments' CMOM Model located at http://dnr.mo.gov/env/wpp/permits/docs/cmom-template.doc. For additional information regarding the Departments' CMOM Model, see the CMOM Plan Model Guidance document at http://dnr.mo.gov/pubs/pub2574.htm. The CMOM identifies some of the criteria used to evaluate a collection system's management, operation, and maintenance and was intended for use by the EPA, state, regulated community, and/or third party entities. The CMOM is applicable to small, medium, and large systems; both public and privately owned; and both regional and satellite collection systems. The CMOM does not substitute for the Clean Water Act, the Missouri Clean Water Law, and both federal and state regulations, as it is not a regulation

SCHEDULE OF COMPLIANCE (SOC):

Per 644.051.4 RSMo, a permit may be issued with a Schedule of Compliance (SOC) to provide time for a facility to come into compliance with new state or federal effluent regulations, water quality standards, or other requirements. Such a schedule is not allowed if the facility is already in compliance with the new requirement, or if prohibited by other statute or regulation. A SOC includes 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. *See also* Section 502(17) of the Clean Water Act, and 40 CFR §122.2. For new effluent limitations, the permit includes interim monitoring for the specific parameter to demonstrate the facility is not already in compliance with the new requirement. Per 40 CFR § 122.47(a)(1) and 10 CSR 20-7.031(11), compliance must occur as soon as possible. If the permit provides a schedule for meeting new water quality based effluent limits, a SOC must include an enforceable, final effluent limitation in the permit even if the SOC extends beyond the life of the permit.

A SOC is not allowed:

- For effluent limitations based on technology-based standards established in accordance with federal requirements, if the deadline for compliance established in federal regulations has passed. 40 CFR § 125.3.
- For a newly constructed facility in most cases. Newly constructed facilities must meet applicable effluent limitations when discharge begins, because the facility has installed the appropriate control technology as specified in a permit or antidegradation review. A SOC is allowed for a new water quality based effluent limit that was not included in a previously public noticed permit or antidegradation review, which may occur if a regulation changes during construction.
- To develop a TMDL, UAA, or other study associated with development of a site specific criterion. A facility is not prohibited from conducting these activities, but a SOC may not be granted for conducting these activities.

In order to provide guidance to Permit Writers in developing SOCs, and attain a greater level of consistency, on October 25, 2012 the Department issued a policy on development of SOCs. This policy provides guidance to Permit Writers on the standard time frames for schedules for common activities, and guidance on factors that may modify the length of the schedule such as a cost analysis.

☒ - The time given for effluent limitations of this permit listed under Interim Effluent Limitation and Final Effluent Limitations were established in accordance with [10 CSR 20-7.031(11)]. The facility has been given a schedule of compliance to meet final effluent limits for Total Recoverable Cadmium, Total Recoverable Copper, Total Recoverable Lead, Total Recoverable Nickel, and Cyanide amenable to chlorination. The facility has been given a two year schedule of compliance to meet final effluent limits. This will allow the facility time to conduct sampling using proper methods to determine if the facility can meet the current limits and also implement changes to the Pretreatment Program if necessary.

STORMWATER POLLUTION PREVENTION PLAN (SWPPP):

In accordance with 40 CFR 122.44(k) *Best Management Practices (BMPs)* to control or abate the discharge of pollutants when: (1) Authorized under section 304(e) of the Clean Water Act (CWA) for the control of toxic pollutants and hazardous substances from ancillary industrial activities: (2) Authorized under section 402(p) of the CWA for the control of stormwater discharges; (3) Numeric effluent limitations are infeasible; or (4) the practices are reasonably necessary to achieve effluent limitations and standards or to carry out the purposes and intent of the CWA.

In accordance with the EPA's *Developing Your Stormwater Pollution Prevention Plan, A Guide for Industrial Operators*, (Document number EPA 833-B-09-002) [published by the United States Environmental Protection Agency (USEPA) in February 2009], BMPs are measures or practices used to reduce the amount of pollution entering (regarding this operating permit) waters of the state. BMPs may take the form of a process, activity, or physical structure.

Additionally in accordance with the Stormwater Management, a SWPPP is a series of steps and activities to (1) identify sources of pollution or contamination, and (2) select and carry out actions which prevent or control the pollution of stormwater discharges.

☒ - 10 CSR 20-6.200 and 40 CFR 122.26 includes treatment works treating domestic sewage or any other sewage sludge or wastewater treatment device or system, used in the storage treatment, recycling, and reclamation of municipal or domestic sewage, including land dedicated to the disposal of sewage sludge that is located within the confines of the facility, with a design flow of 1.0 mgd or more, or are required to have an approved pretreatment program under 40 CFR part 403, as an industrial activity in which permit coverage is required.

In lieu of requiring sampling in the site-specific permit, the facility is required to develop and implement a Stormwater Pollution Prevention Plan. A facility can apply for conditional exclusion for "no exposure" of industrial activities and materials to stormwater by submitting to the Department a completed NPDES Form 3510-11 – No Exposure Certification for Exclusion from NPDES Stormwater Permitting. That document and additional information may be found at http://water.epa.gov/polwaste/npdes/stormwater/Conditional-No-Exposure-Exclusion.cfm. Upon approval on the "No Exposure", the permit can be modified to remove the SWPPP requirements. If the facility chooses to retain the conditional exclusion for "no exposure", the facility is required to renew the "No Exposure" exemption during the permit renewal period by submitting NPDES Form 3510-11 with Form B2.

VARIANCE:
As per the Missouri Clean Water Law § 644.061.4, variances shall be granted for such period of time and under such terms and conditions as shall be specified by the commission in its order. The variance may be extended by affirmative action of the commission. In no event shall the variance be granted for a period of time greater than is reasonably necessary for complying with the Missouri Clean Water Law §§644.006 to 644.141 or any standard, rule or regulation promulgated pursuant to Missouri Clean Water Law §§644.006 to 644.141.

☒ - This operating permit is not drafted under premises of a petition for variance.

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 total amount of pollutant that may be discharged into that stream without endangering its water quality.

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

$$Ce = \frac{(Qe+Qs)C-(Cs\times Qs)}{(Qe)}$$ (EPA/505/2-90-001, Section 4.5.5)

Where C = downstream concentration
Cs = upstream concentration
Qs = upstream flow
Ce = effluent concentration
Qe = 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).

Number of Samples "n":
Additionally, in accordance with the TSD for water quality-based permitting, effluent quality is determined by the underlying distribution of daily values, which is determined by the Long Term Average (LTA) associated with a particular Wasteload Allocation (WLA) and by the Coefficient of Variation (CV) of the effluent concentrations. Increasing or decreasing the monitoring frequency does not affect this underlying distribution or treatment performance, which should be, at a minimum, be targeted to comply with the values dictated by the WLA. Therefore, it is recommended that the actual planned frequency of monitoring normally be used to determine the value of "n" for calculating the AML. However, in situations where monitoring frequency is once per month or less, a higher value for "n" must be assumed for AML derivation purposes. Thus, the statistical procedure being employed using an assumed number of samples is "n = 4" at a minimum. For Total Ammonia as Nitrogen, "n = 30" is used

WLA MODELING:
There are two general types of effluent limitations, technology-based effluent limits (TBELs) and water quality based effluent limits (WQBELs). If TBELs do not provide adequate protection for the receiving waters, then WQBEL must be used.

☒ - A WLA study was either not submitted or determined not applicable by Department staff.

WATER QUALITY STANDARDS:
Per [10 CSR 20-7.031(4)], General Criteria shall be applicable to all waters of the state at all times including mixing zones. Additionally, [40 CFR 122.44(d)(1)] directs the Department to establish in each NPDES permit to include conditions to achieve water quality established under Section 303 of the Clean Water Act, including State narrative criteria for water quality.

WHOLE EFFLUENT TOXICITY (WET) TEST:

☒ - The permittee is required to conduct WET test for this facility.

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.

Under the federal 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 (NPDES). WET testing is also required by 40 CFR 122.44(d)(1). WET testing ensures that the provisions in the 10 CSR 20-6.010(8)(A)7. and the Water Quality Standards 10 CSR 20-7.031(4)(D),(F),(G),(I)2.A & B are being met. Under [10 CSR 20-6.010(8)(A)4], the Department may require other terms and conditions that it deems necessary to assure compliance with the Clean Water Act and related regulations of the Missouri Clean Water Commission. In addition the following MCWL apply: §§§644.051.3 requires the Department to set permit conditions that comply with the MCWL and CWA; 644.051.4 specifically references toxicity as an item we must consider in writing permits (along with water quality-based effluent limits, pretreatment, etc…); and 644.051.5 is the basic authority to require testing conditions. WET test will be required by facilities meeting the following criteria:

- ☒ Facility is a designated Major.
- ☐ Facility continuously or routinely exceeds its design flow.
- ☐ Facility that exceeds its design population equivalent (PE) for BOD_5 whether or not its design flow is being exceeded.
- ☐ Facility (whether primarily domestic or 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 NH_3)
- ☒ Facility is a municipality with a Design Flow ≥ 22,500 gpd.
- ☐ Other – please justify.

40 CFR 122.41(M) - BYPASSES:

The federal Clean Water Act (CWA), Section 402 prohibits wastewater dischargers from "bypassing" untreated or partially treated sewage (wastewater) beyond the headworks. A bypass is defined as an intentional diversion of waste streams from any portion of a treatment facility, [40 CFR 122.41(m)(1)(i)]. Additionally, Missouri regulation 10 CSR 20-7.015(9)(G) states a bypass means the intentional diversion of waste streams from any portion of a treatment facility, except in the case of blending, to waters of the state. Only under exceptional and specified limitations do the federal regulations allow for a facility to bypass some or all of the flow from its treatment process. Bypasses are prohibited by the CWA unless a permittee can meet all of the criteria listed in 40 CFR 122.41(m)(4)(i)(A), (B), & (C). Any bypasses from this facility are subject to the reporting required in 40 CFR 122.41(l)(6) and per Missouri's Standard Conditions I, Section B, part 2.b. Additionally, Anticipated Bypasses include bypasses from peak flow basins or similar devices designed for peak wet weather flows.

☒ - This facility does not anticipate bypassing.

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

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

Part VI –2013 Water Quality Criteria for Ammonia

Upcoming changes to the Water Quality Standard for ammonia may require significant upgrades to wastewater treatment facilities.

On August 22, 2013, the U.S. Environmental Protection Agency (EPA) finalized new water quality criteria for ammonia, based on toxicity studies of mussels and gill breathing snails. Missouri's current ammonia criteria are based on toxicity testing of several species, but did not include data from mussels or gill breathing snails. Missouri is home to 69 of North America's mussel species, which are spread across the state. According to the Missouri Department of Conservation nearly two-thirds of the mussel species in Missouri are considered to be "of conservation concern". Nine species are listed as federally endangered, with an additional species currently proposed as endangered and another species proposed as threatened.

The adult forms of mussels that are seen in rivers, lakes, and streams are sensitive to pollutants because they are sedentary filter feeders. They vacuum up many pollutants with the food they bring in and cannot escape to new habitats, so they can accumulate toxins in their bodies and die. But very young mussels, called glochidia, are exceptionally sensitive to ammonia in water. As a result of a citizen suit, the EPA was compelled to conduct toxicity testing and develop ammonia water quality criteria that would be protective if young mussels may be present in a waterbody. These new criteria will apply to any discharge with ammonia levels that may pose a reasonable potential to violate the standards. Nearly all discharging domestic wastewater treatment facilities (cities, subdivisions, mobile home parks, etc.), as well as certain industrial and stormwater dischargers with ammonia in their effluent, will be affected by this change in the regulations.

When new water quality criteria are established by the EPA, states must adopt them into their regulations in order to keep their authorization to issue permits under the National Pollutant Discharge Elimination System (NPDES). States are required to review their water quality standards every three years, and if new criteria have been developed they must be adopted. States may be more protective than the Federal requirements, but not less protective. Missouri does not have the resources to conduct the studies necessary for developing new water quality standards, and therefore our standards mirror those developed by the EPA; however, we will utilize any available flexibility based on actual species of mussels that are native to Missouri and their sensitivity to ammonia.

Many treatment facilities in Missouri are currently scheduled to be upgraded to comply with the current water quality standards. But these new ammonia standards may require a different treatment technology than the one being considered by the permittee. It is important that permittees discuss any new and upcoming requirements with their consulting engineers to ensure that their treatment systems are capable of complying with the new requirements. The Department encourages permittees to construct treatment technologies that can attain effluent quality that supports the EPA ammonia criteria.

Ammonia toxicity varies by temperature and by pH of the water. Assuming a stable pH value, but taking into account winter and summer temperatures, Missouri includes two seasons of ammonia effluent limitations. Current effluent limitations in this permit are:

Summer – 5.5 mg/L daily maximum, 1.0 mg/L monthly average.
Winter – 12.1 mg/L daily maximum, 2.5 mg/L monthly average.

Under the new EPA criteria, where mussels of the family Unionidae are present or expected to be present, the estimated effluent limitations for a facility in a location such as this that discharges to a receiving stream with no mixing will be:

Season	Temp (°C)	pH (SU)	Total Ammonia Nitrogen CCC (mg/L)	Total Ammonia Nitrogen CMC (mg/L)
Summer	26	7.8	0.7	3.4
Winter	6	7.8	2.3	8.1

Summer: April 1 – September 30

Chronic WLA: $C_e = ((2.325 + 0.0)0.7 – (0.0 * 0.01))/2.325$
$C_e = 0.7$ mg/L

Acute WLA: $C_e = ((2.325 + 0.0)3.4 – (0.0 * 0.01))/2.325$
$C_e = 3.4$ mg/L

$LTA_c = 0.7$ mg/L (0.33) = 0.23 mg/L [CV = 3.19, 99th Percentile, 30 day avg.]
$LTA_a = 3.4$ mg/L (0.090) = 0.306 mg/L [CV = 3.19, 99th Percentile]

Use most protective number of LTA_c or LTA_a.

MDL = 0.23 mg/L (11.1) = 2.6 mg/L [CV = 3.19, 99th Percentile]
AML = 0.23 mg/L (2.1) = 0.5 mg/L [CV = 3.19, 95th Percentile, n =30]

Winter: October 1 – March 31
Chronic WLA: $C_e = ((2.325+ 0.0)2.3 – (0.0 * 0.01))/2.325$
$C_e = 2.3$ mg/L

Acute WLA: $C_e = ((2.325 + 0.0)8.1 – (0.0 * 0.01))/2.325$
$C_e = 8.1$ mg/L

$LTA_c = 2.3$ mg/L (0.528) = 1.21 mg/L [CV = 1.64, 99th Percentile, 30 day avg.]
$LTA_a = 8.1$ mg/L (0.135) = 1.09 mg/L [CV = 1.64, 99th Percentile]

Use most protective number of LTA_c or LTA_a.

MDL = 1.09 mg/L (7.42) = 8.1 mg/L [CV = 1.64, 99th Percentile]
AML = 1.09 mg/L (1.55) = 1.7 mg/L [CV = 1.64, 95th Percentile, n =30]

Summer – 2.6 mg/L daily maximum, 0.5 mg/L monthly average.
Winter – 8.1 mg/L daily maximum, 1.7 mg/L monthly average.

These estimated limits above are based in part on the actual performance of the plant at the time of the drafting of this permit and should not be construed as future effluent limitations. Future effluent limits, based on the EPA's 2013 water quality criteria for ammonia, will depend in part on the actual performance of the facility at the time the permit is renewed.

Operating permits for facilities in Missouri must be written based on current statutes and regulations. Therefore permits will be written with the existing effluent limitations until the new standards are adopted. To aid permittees in decision making, an advisory will be added to permit Fact Sheets notifying permittees of the expected effluent limitations for ammonia. When setting schedules of compliance for ammonia effluent limitations, consideration will be given to facilities that have recently constructed upgraded facilities to meet the current ammonia limitations.

For more information on this topic feel free to contact the Missouri Department of Natural Resources, Water Protection Program, Water Pollution Control Branch, Operating Permits Section at (573) 751-1300.

Part VII – Effluent Limits Determination

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 lists 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.

Losing [10 CSR 20-7.015(4)] ☒
All Other Waters [10 CSR 20-7.015(8)] ☒

OUTFALL #001 – MAIN FACILITY OUTFALL

Effluent limitations derived and established in the below Effluent Limitations Table are based on current operations of the facility. Future permit action due to facility modification may contain new operating permit terms and conditions that supersede the terms and conditions, including effluent limitations, of this operating permit.

EFFLUENT LIMITATIONS TABLE:

PARAMETER	Unit	Basis for Limits	Daily Maximum	Weekly Average	Monthly Average	Modified	Previous Permit Limitations
Flow	MGD	1	*		*	No	*/*
BOD_5	mg/L	1		15	10	No	15/10
TSS	mg/L	1		20	15	No	20/15
Ammonia as N (Apr 1 –Sep 30)	mg/L	2, 3	5.5		1.0	Yes	3.7/1.4
Ammonia as N (Oct 1 – Mar 31)	mg/L	2, 3	12.1		2.5	Yes	7.5/2.9
Escherichia coli **	#/100mL	1, 3	126		*	Yes	1000/400 Fecal
Cadmium, Total Recoverable	µg/L	1, 3	0.7		0.3	Yes	0.9/0.4
Copper, Total Recoverable	µg/L	1, 3	20.8		12.3	No	20.8/12.3
Lead, Total Recoverable	µg/L	1, 3	10.3		4.5	Yes	11/4.9
Nickel, Total Recoverable	µg/L	1, 3	135		62	Yes	140/65
Cyanide, Amenable to Chlorination	µg/L	1, 3	< 10		< 10	Yes	*/*
Iron, Total Recoverable	µg/L	7	*		*	Yes	***
Arsenic, Total Recoverable	µg/L	7	*		*	Yes	17.1/7.9
Mercury, Total Recoverable	µg/L	7	*		*	Yes	0.9/0.4
Silver, Total Recoverable	µg/L	7	*		*	Yes	9.4/3.6
Vinyl Chloride	µg/L	7	*		*	No	*/*
1, 2-cis-dichloroethylene	µg/L	7	*		*	No	*/*
Trichloroethylene	µg/L	7	*		*	No	*/*
Chromium VI, Dissolved	µg/L	7	*		*	Yes	*/* TR CR VI
Oil & Grease	mg/L	1, 3	15		10	No	15/10
Total Nitrogen	mg/L	1	*		*	Yes	***
Total Phosphorus	mg/L	1	*		*	Yes	***
TTO	µg/L	7	*			No	*
Acute Whole Effluent Toxicity	TUa	1, 9	*			Yes	Pass/Fail
Chronic Whole Effluent Toxicity	TUc	1, 9	*			Yes	***
PARAMETER	Unit	Basis for Limits	Minimum		Maximum	Modified	Previous Permit Limitations
pH	SU	1	6.5		9.0	Yes	6.0 – 9.0

* - Monitoring requirement only.
** - #/100mL; the Monthly Average for *E. coli* is a geometric mean.
*** - Parameter not previously established in previous state operating permit.

Basis for Limitations Codes:
1. State or Federal Regulation/Law
2. Water Quality Standard (includes RPA)
3. Water Quality Based Effluent Limits
4. Antidegradation Review
5. Antidegradation Policy
6. Water Quality Model
7. Best Professional Judgment
8. TMDL or Permit in lieu of TMDL
9. WET Test Policy

OUTFALL #001 – DERIVATION AND DISCUSSION OF LIMITS:

- **Flow**. In accordance with [40 CFR Part 122.44(i)(1)(ii)] the volume of effluent discharged from each outfall is needed to assure compliance with permitted effluent limitations. If the permittee is unable to obtain effluent flow, then it is the responsibility of the permittee to inform the Department, which may require the submittal of an operating permit modification.

- **Biochemical Oxygen Demand (BOD_5).**

  ☒ - 15 mg/L Weekly Average and 10 mg/L Monthly Average effluent limitations, as per [10 CSR 20-7.015].

- **Total Suspended Solids (TSS).**

  ☒ - 20 mg/L Weekly Average and 15 mg/L Monthly Average effluent limitations, as per [10 CSR 20-7.015].

- **Total Ammonia Nitrogen**. Early Life Stages Present Total Ammonia Nitrogen criteria apply [10 CSR 20-7.031(5)(B)7.C. & Table B3]. Background total ammonia nitrogen = 0.01 mg/L. No mixing considerations allowed; therefore, WLA = appropriate criterion.

Season	Temp (°C)	pH (SU)	Total Ammonia Nitrogen CCC (mg/L)	Total Ammonia Nitrogen CMC (mg/L)
Summer	26	7.8	1.5	12.1
Winter	6	7.8	3.1	12.1

Summer: April 1 – September 30
Chronic WLA: $C_e = ((2.325 + 0.0)1.5 – (0.0 * 0.01))/2.325$
$C_e = 1.5$ mg/L

Acute WLA: $C_e = ((2.325 + 0.0)12.1 – (0.0 * 0.01))/2.325$
$C_e = 12.1$ mg/L

$LTA_c = 1.5$ mg/L (0.330) = 0.495 mg/L [CV = 3.19, 99th Percentile, 30 day avg.]
$LTA_a = 12.1$ mg/L (0.090) = 1.09 mg/L [CV = 3.19, 99th Percentile]

Use most protective number of LTA_c or LTA_a.

MDL = 0.495 mg/L (11.09) = 5.5 mg/L [CV = 3.19, 99th Percentile]
AML = 0.495 mg/L (2.10) = 1.0 mg/L [CV = 3.19, 95th Percentile, n =30]

Winter: October 1 – March 31
Chronic WLA: $C_e = ((2.325 + 0.0)3.1 – (0.0 * 0.01))/2.325$
$C_e = 3.1$ mg/L

Acute WLA: $C_e = ((2.325 + 0.0)12.1 – (0.0 * 0.01))/2.325$
$C_e = 12.1$ mg/L

$LTA_c = 3.1$ mg/L (0.528) = 1.64 mg/L [CV = 1.64, 99th Percentile, 30 day avg.]
$LTA_a = 12.1$ mg/L (0.135) = 1.63 mg/L [CV = 1.64, 99th Percentile]

Use most protective number of LTA_c or LTA_a.

MDL = 1.63 mg/L (7.42) = 12.1 mg/L [CV = 1.64, 99th Percentile]
AML = 1.63 mg/L (1.55) = 2.5 mg/L [CV = 1.64, 95th Percentile, n =30]

- ***Escherichia coli (E. coli)***. Discharges to losing streams shall not exceed 126 per 100 mL as a Daily Maximum and Monthly Average at any time, as per 10 CSR 20-7.031(5)(C). No more than 10% of samples shall exceed 126 #/100 mL daily maximum as per 10 CSR 20-7.015(9)(B)1.G.

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

- **Total Phosphorus and Total Nitrogen**. Monitoring required for facilities greater than 100,000 gpd design flow per 10 CSR 20-7.015(9)(D)7. Total Nitrogen shall be determined by testing for Total Kjeldahl Nitrogen (TKN) and Nitrate + Nitrite and reporting the sum of the results (reported as N). Nitrate + Nitrite can be analyzed together or separately.

- **pH**. – 6.5-9.0 SU. Technology based effluent limitations of 6.0-9.0 SU [10 CSR 20-7.015] are not protective of the Water Quality Standard, which states that water contaminants shall not cause pH to be outside the range of 6.5-9.0 SU. No mixing zone is allowed due to the classification of the receiving stream, therefore the water quality standard must be met at the outfall.

- **Cyanide, Amenable to Chlorination.** Protection of Aquatic Life CCC = 5 µg/L, CMC = 22 µg/L, Background CN = 0 µg/L

Chronic WLA: $C_e = ((2.325 + 0.0)5 – (0.0 * 0.0))/2.325$
$C_e = 5$ µg/L

Acute WLA: $C_e = ((2.325 + 0.0)22 – (0.0 * 0.0))/2.325$
$C_e = 22$ µg/L

LTA_c = 5 (0.624) = 3.12 µg/L [CV = 0.4294, 99th Percentile]
LTA_a = 22 (0.418) = 9.196 µg/L [CV = 0.4294, 99th Percentile]

Use most protective number of LTA_c or LTA_a.

MDL = 3.12 (2.39) = 7.5 µg/L [CV = 0.4294, 99th Percentile]
AML = 3.12 (1.39) = 4.3 µg/L [CV = 0.4294, 95th Percentile, n = 4]

The Water Quality Based Effluent Limit for Cyanide amenable to chlorination was calculated to be 7.5 µg/L (daily maximum limit) and 4.3 µg/L (monthly average limit). These limits are below the minimum quantification level (ML) of the most common and practical EPA approved Cyanide amenable to chlorination methods. The Department has determined the current acceptable ML of cyanide amenable to chlorination to be 10 µg/L when using Method 4500-CN- from Standard Methods for the Examination of Water and Wastewater. This method is used to determine the concentration of inorganic cyanide present as either soluble salts or complexes in wastes or leachate. The permittee will conduct analyses in accordance with this method, or equivalent, and report actual analytical values. Measured values greater than or equal to the minimum quantification level of 10 µg/L will be considered violations of the permit and values less than the minimum quantification level of 10 µg/L will be considered to be in compliance with the permit limitation. The minimum quantification level does not authorize the discharge of cyanide in excess of the effluent limits stated in the permit.

Metals

Effluent limitations for total recoverable metals were developed using methods and procedures outlined in the "Technical Support Document for Water Quality-based Toxic Controls" (EPA/505/2-90-001) and "The Metals Translator: Guidance For Calculating a Total Recoverable Permit Limit from a Dissolved Criterion" (EPA 823-B-96-007). General warm-water fishery criteria apply and a water hardness of 162 mg/L is used in the conversion below.

Due to the absence of contemporaneous effluent and instream data for total recoverable metals, dissolved metals, hardness, and total suspended solids with which to calculate metals translators, partitioning between the dissolved and absorbed phases was assumed to be minimal (Section 5.7.3, EPA/505/2-90-001). Freshwater criteria conversion factors for dissolved metals were used as the metals translator as recommended in guidance (Section 1.3, 1.5.3, and Table 1, EPA 823-B-96-007). If concurrent site-specific data for total recoverable metals, dissolved metals, hardness, and total suspended solids are provided to the Department, partitioning evaluations may be considered and site-specific translators developed.

METAL	CONVERSION FACTORS	
	ACUTE	CHRONIC
Cadmium	0.924	0.889
Copper	0.960	0.960
Lead	0.721	0.721
Nickel	0.998	0.997

Conversion factors for Cadmium, Copper, Lead, and Nickel are hardness dependent. Values calculated using equation found in Section 1.3 of EPA 823-B-96-007 and hardness = 162 mg/L.

- **Cadmium, Total Recoverable**. Protection of Aquatic Life Chronic Criteria = 0.344 µg/L, Acute Criteria = 7.6 µg/L.

Chronic =0.344/0.889=0.39 µg/L
Acute = 7.6/0.924 = 8.23 µg/L

Chronic WLA: $C_e = ((2.325 + 0.0)0.39 – (0.0 * 0.0))/2.325$
C_e = 0.39 µg/L

Acute WLA: $C_e = ((2.325 + 0.0)8.23 – (0.0 * 0.0))/2.325$
C_e = 8.23 µg/L

LTA_c = 0.39 (0.432) = 0.17 µg/L [CV = 0.82, 99th Percentile]
LTA_a = 8.23 (0.244) = 2.01 µg/L [CV = 0.82, 99th Percentile]

Use most protective number of LTA_c or LTA_a.

MDL = 0.17(4.10) = 0.7 µg/L [CV = 0.82, 99th Percentile]
AML = 0.17 (1.77) = 0.3 µg/L [CV = 0.82, 95th Percentile, n = 4]

- **Copper, Total Recoverable**. Protection of Aquatic Life Chronic Criteria = 13.525 µg/L, Acute Criteria = 21.17 µg/L.

  Chronic =13.525/0.7210=14.09 µg/L
  Acute = 21.17/0.721= 22.05 µg/L

  Chronic WLA: C_e = ((2.325 + 0.0)14.09 – (0.0 * 0.0))/2.325
  C_e = 14.09 µg/L

  Acute WLA: C_e = ((2.325 + 0.0)22.05 – (0.0 * 0.0))/2.325
  C_e = 22.05 µg/L

  LTA_c = 14.09 (0.636) = 8.96 µg/L [CV = 0.41, 99th Percentile]
  LTA_a = 22.05 (0.431) = 9.50 µg/L [CV = 0.41, 99th Percentile]

  Use most protective number of LTA_c or LTA_a.

  MDL = 8.96(2.32) = 20.8 µg/L [CV = 0.41, 99th Percentile]
  AML = 8.96 (1.37) = 12.3 µg/L [CV = 0.41, 95th Percentile, n = 4]

- **Lead, Total Recoverable**. Protection of Aquatic Life Chronic Criteria = 4.238 µg/L, Acute Criteria = 108.7 µg/L.

  Chronic = 4.238/0.721=5.88 µg/L
  Acute = 108.7/0.721 = 150.8 µg/L

  Chronic WLA: C_e = ((2.325 + 0.0)5.88 – (0.0 * 0.0))/2.325
  C_e = 5.88 µg/L

  Acute WLA: C_e = ((2.325 + 0.0)150.8 – (0.0 * 0.0))/2.325
  C_e = 150.8 µg/L

  LTA_c = 5.88 (0.444) = 2.61 µg/L [CV = 0.78, 99th Percentile]
  LTA_a = 150.8 (0.253) = 38.2 µg/L [CV = 0.78, 99th Percentile]

  Use most protective number of LTA_c or LTA_a.

  MDL = 2.61(3.96) = 10.3 µg/L [CV = 0.78, 99th Percentile]
  AML = 2.61 (1.74) = 4.5 µg/L [CV = 0.78, 95th Percentile, n = 4]

- **Nickel, Total Recoverable**. Protection of Aquatic Life Chronic Criteria = 78.3 µg/L, Acute Criteria = 704.7 µg/L.

  Chronic = 78.3/0.997=78.5 µg/L
  Acute = 704.7/0.998 = 706.1 µg/L

  Chronic WLA: C_e = ((2.325 + 0.0)78.5 – (0.0 * 0.0))/2.325
  C_e = 78.5 µg/L

  Acute WLA: C_e = ((2.325 + 0.0)706.1 – (0.0 * 0.0))/2.325
  C_e = 706.1 µg/L

  LTA_c = 78.5 (0.47245) = 37.1 µg/L [CV = 0.72, 99th Percentile]
  LTA_a = 706.1 (0.2745) = 193.8 µg/L [CV = 0.72, 99th Percentile]

  Use most protective number of LTA_c or LTA_a.

  MDL = 37.1(3.64) = 135 µg/L [CV = 0.72, 99th Percentile]
  AML = 37.1 (1.67) = 62 µg/L [CV = 0.72, 95th Percentile, n = 4]

- **Arsenic, Total Recoverable**. Reasonable Potential Analysis indicates that this discharge does not have the potential to violate Water Quality Standards at this time. Monitoring will continue to verify this determination.

- **Mercury, Total Recoverable**. Reasonable Potential Analysis indicates that this discharge does not have the potential to violate Water Quality Standards at this time. Monitoring will continue to verify this determination.

- **Silver, Total Recoverable**. Reasonable Potential Analysis indicates that this discharge does not have the potential to violate Water Quality Standards at this time. Monitoring will continue to verify this determination.

- **Arsenic, Total Recoverable**. Reasonable Potential Analysis indicates that this discharge does not have the potential to violate Water Quality Standards at this time. Monitoring will continue to verify this determination.

- **Vinyl Chloride**. A Reasonable Potential determination indicates that this discharge does not have the potential to violate Water Quality Standards at this time. Monitoring will continue to verify this determination. Monitoring for TCE and its breakdown products shall continue to be included as long as this facility receives the wastewater from the remediation project.

- **1, 2-cis-dichloroethylene**. A Reasonable Potential determination indicates that this discharge does not have the potential to violate Water Quality Standards at this time. Monitoring will continue to verify this determination. Monitoring for TCE and its breakdown products shall continue to be included as long as this facility receives the wastewater from the remediation project.

- **Trichloroethylene**. A Reasonable Potential determination indicates that this discharge does not have the potential to violate Water Quality Standards at this time. Monitoring will continue to verify this determination. Monitoring for TCE and its breakdown products shall continue to be included as long as this facility receives the wastewater from the remediation project.

- **Chromium VI, Dissolved**. The previous permit required Total Recoverable Chromium VI; however, the Department requires this to be sampled as Dissolved Chromium VI. Monitoring will continue for this permit and the results will be reviewed at the next permit renewal.

- **Iron, Total Recoverable.** Monitoring Only. Total Recoverable Iron was added to Outfall #001 as the facility is planning on using Ferric Chloride in the SBR basins to help settle sludge. This data will be used in the next permit renewal to determine if a reasonable potential exists to violate Water Quality Standards. If the facility does not add Ferric Chloride to the basins for the reporting period, the facility is to report "No Iron Added" on the Discharge Monitoring Reports.

Whole Effluent Toxicity

- **Acute Whole Effluent Toxicity**. Monitoring requirement only. Monitoring is required to determine if reasonable potential exists for this facility's discharge to exceed water quality standards.

  Acute and/or Chronic Allowable Effluent Concentrations (AECs) for facilities that discharge to Waters of the State lacking designated uses, Class C, Class P (with default Mixing Considerations), or Lakes [10 CSR 20-7.031(5)(A)4.B.(IV)(b)] are 100%, 50%, 25%, 12.5%, & 6.25%.

- **Chronic Whole Effluent Toxicity**. Monitoring requirement only. Monitoring is required to determine if reasonable potential exists for this facility's discharge to exceed water quality standards.

  Acute and/or Chronic Allowable Effluent Concentrations (AECs) for facilities that discharge to Waters of the State lacking designated uses, Class C, Class P (with default Mixing Considerations), or Lakes [10 CSR 20-7.031(5)(A)4.B.(IV)(b)] are 100%, 50%, 25%, 12.5%, & 6.25%.

- **Total Toxic Organics**. Monitoring required because of the industrial contributors to the POTW.

- **Parameters Removed**: Temperature, Zinc, Chromium III, Aluminum, and Fecal Coliform were removed from the permit. Temperature, Zinc, Chromium III and Aluminum did not show a reasonable potential to violate Water Quality Standards. E. coli replaced Fecal Coliform.

Minimum Sampling and Reporting Frequency Requirements.

PARAMETER	SAMPLING FREQUENCY	REPORTING FREQUENCY
Flow	once/day	once/month
BOD_5	once/week	once/month
TSS	once/week	once/month
pH	once/week	once/month
Ammonia as N	once/week	once/month
E. coli	once/week	once/month
Cadmium, Total Recoverable	once/month	once/month
Copper, Total Recoverable	once/month	once/month
Lead, Total Recoverable	once/month	once/month
Nickel, Total Recoverable	once/month	once/month
Cyanide, Amenable to Chlorination	once/month	once/month
Iron, Total Recoverable	once/month	once/month
Arsenic, Total Recoverable	once/quarter	once/quarter
Mercury, Total Recoverable	once/quarter	once/quarter
Silver, Total Recoverable	once/quarter	once/quarter
Vinyl Chloride	once/quarter	once/quarter
1, 2-cis-dichloroethylene	once/quarter	once/quarter
Trichloroethylene	once/quarter	once/quarter
Chromium VI, Dissolved	once/quarter	once/quarter
Oil & Grease	once/month	once/quarter
Total Nitrogen	once/quarter	once/quarter
Total Phosphorus	once/quarter	once/quarter
TTO	once/year	once/year
Acute Whole Effluent Toxicity	once/year	once/year
Chronic Whole Effluent Toxicity	once/permit cycle	once/permit cycle

Sampling Frequency Justification:

Sampling and Reporting Frequency was retained from previous permit, except for Arsenic, Mercury, and Silver, which were reduced to quarterly sampling and reporting, and the Chronic WET test which is to be conducted once per permit cycle.

WET Test Sampling Frequency Justification. 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 Whole Effluent Toxicity

☒ - No less than **ONCE/YEAR:**
- ☒ -Facility is designated as a Major facility or has a design flow ≥ 1.0 MGD.
- ☒ -Facility has Water Quality-based effluent limitations for toxic substances (other than NH_3).

Chronic Whole Effluent Toxicity

☒ -No less than **ONCE/PERMIT CYCLE:**
- ☒ -POTW facilities with a design flow of greater than 1.0 million gallons per day, but less than 10 million gallons per day, shall conduct and submit to the Department a chronic WET test no less than once per five years.

Sampling Type Justification

As per 10 CSR 20-7.015, BOD_5, TSS, and WET test samples collected for mechanical plants shall be a 24 hour composite sample. Grab samples, however, must be collected for pH, Ammonia as N, *E. coli*, Oil & Grease, and Total Phosphorus. This is due to the holding time restriction for *E. coli*, the volatility of Ammonia, and the fact that pH cannot be preserved and must be sampled in the field. As Ammonia, Oil & Grease, and Total Phosphorus samples must be immediately preserved, these samples are to be collected as a grab.

PERMITTED FEATURE #SM1 – INSTREAM MONITORING (UPSTREAM)

The monitoring requirements established in the below Monitoring Requirements Table are based on current operations of the facility. Future permit action due to facility modification may contain new operating permit terms and conditions that supersede the terms and conditions, including the monitoring requirements listed in this table..

MONITORING REQUIREMENTS TABLE:

PARAMETER	Unit	Basis for Limits	Daily Maximum	Weekly Average	Monthly Average	Modified	Previous Permit Limitations
Total Nitrogen	mg/L	7	*		*	Yes	****
Total Phosphorus	mg/L	7	*		*	Yes	****

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

Basis for Limitations Codes:

1. State or Federal Regulation/Law
2. Water Quality Standard (includes RPA)
3. Water Quality Based Effluent Limits
4. Antidegradation Review
5. Antidegradation Policy
6. Water Quality Model
7. Best Professional Judgment
8. TMDL or Permit in lieu of TMDL
9. WET Test Policy

PERMITTED FEATURE #SM1 – DERIVATION AND DISCUSSION OF MONITORING REQUIREMENTS:

- **Total Phosphorus and Total Nitrogen**. Facilities with a design flow greater than 100,000 gallons per day are required to sample their effluent quarterly for Total Phosphorus and Total Nitrogen per 10 CSR 20-7.015(9)(D)7. Upstream monitoring for these parameters is necessary to determine background stream concentrations in order to complete calculations that determine instream nutrient loading.

Minimum Sampling and Reporting Frequency Requirements.

PARAMETER	SAMPLING FREQUENCY	REPORTING FREQUENCY
Total Phosphorus	once/quarter	once/quarter
Total Nitrogen	once/quarter	once/quarter

Sampling Frequency Justification:
The sampling and reporting frequency for Total Phosphorus and Total Nitrogen has been established to match the required sampling frequency of these parameters in the effluent.

Sampling Type Justification
As Total Phosphorus and Total Nitrogen samples must be immediately preserved; these samples are to be collected as a grab.

PERMITTED FEATURE #SM2 – INSTREAM MONITORING (DOWNSTREAM)

The monitoring requirements established in the below Monitoring Requirements Table are based on current operations of the facility. Future permit action due to facility modification may contain new operating permit terms and conditions that supersede the terms and conditions, including the monitoring requirements listed in this table..

MONITORING REQUIREMENTS TABLE:

PARAMETER	Unit	Basis for Limits	Daily Maximum	Weekly Average	Monthly Average	Modified	Previous Permit Limitations
Total Hardness	mg/L	1, 3	*		*	Yes	****

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

Basis for Limitations Codes:
1. State or Federal Regulation/Law
2. Water Quality Standard (includes RPA)
3. Water Quality Based Effluent Limits
4. Antidegradation Review
5. Antidegradation Policy
6. Water Quality Model
7. Best Professional Judgment
8. TMDL or Permit in lieu of TMDL
9. WET Test Policy

PERMITTED FEATURE #SM2 – DERIVATION AND DISCUSSION OF MONITORING REQUIREMENTS:

- **Total Hardness**.

Minimum Sampling and Reporting Frequency Requirements.

PARAMETER	SAMPLING FREQUENCY	REPORTING FREQUENCY
Total Hardness	once/month	once/month

Sampling Frequency Justification:
The sampling and reporting frequency for Total Hardness has been established to match the required sampling frequency of the metals parameters in the effluent.

Sampling Type Justification
As Total Hardness samples must be immediately preserved; these samples are to be collected as a grab.

Part VIII – Cost Analysis for Compliance

Pursuant to Section 644.145, RSMo, when issuing permits under this chapter that incorporate a new requirement for discharges from publicly owned combined or separate sanitary or storm sewer systems or publicly owned treatment works, or when enforcing provisions of this chapter or the Federal Water Pollution Control Act, 33 U.S.C. 1251 et seq., pertaining to any portion of a publicly owned combined or separate sanitary or storm sewer system or [publicly owned] treatment works, the Department of Natural Resources shall make a "finding of affordability" on the costs to be incurred and the impact of any rate changes on ratepayers upon which to base such permits and decisions, to the extent allowable under this chapter and the Federal Water Pollution Control Act. This process is completed through a cost analysis for compliance. Permits that do not include new requirements may be deemed affordable.

☒ - The Department is required to determine "findings of affordability" because the permit applies to a **combined or separate sanitary sewer system for a publically-owned treatment works.**

Cost Analysis for Compliance - The Department has made a reasonable search for empirical data indicating the permit is affordable. The search consisted of a review of Department records that might contain economic data on the community, a review of information provided by the applicant as part of the application, and public comments received in response to public notices of this draft permit. If the empirical cost data was used by the permit writer, this data may consist of median household income, any other ongoing projects that the Department has knowledge, and other demographic financial information that the community provided as contemplated by Section 644. 145.3. See **Appendix – Cost Analysis for Compliance**

Part IX – 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.

PERMIT SYNCHRONIZATION:
The Department of Natural Resources is currently undergoing a synchronization process for operating permits. Permits are normally issued on a five-year term, but to achieve synchronization many permits will need to be issued for less than the full five years allowed by regulation. The intent is that all permits within a watershed will move through the Watershed Based Management (WBM) cycle together will all expire in the same fiscal year. This will allow further streamlining by placing multiple permits within a smaller geographic area on public notice simultaneously, thereby reducing repeated administrative efforts. This will also allow the Department to explore a watershed based permitting effort at some point in the future. Renewal applications must continue to be submitted within 180 days of expiration, however, in instances where effluent data from the previous renewal is less than 4 years old, that data may be re-submitted to meet the requirements of the renewal application. If the permit provides a schedule of compliance for meeting new water quality based effluent limits beyond the expiration date of the permit, the time remaining in the schedule of compliance will be allotted in the renewed permit. This permit will expire in the 4th Quarter of calendar year 2019.

PUBLIC NOTICE:
The Department shall give public notice that a draft permit has been prepared and its issuance is pending. Additionally, public notice will be issued if a public hearing is to be held because of a significant degree of interest in and water quality concerns related to a draft permit. No public notice is required when a request for a permit modification or termination is denied; however, the requester and permittee must be notified of the denial in writing. The Department must issue public notice of a pending operating permit or of a new or reissued statewide general permit. The public comment period is the length of time not less than 30 days following the date of the public notice which interested persons may submit written comments about the proposed permit. For persons wanting to submit comments regarding this proposed operating permit, then please refer to the Public Notice page located at the front of this draft operating permit. The Public Notice page gives direction on how and where to submit appropriate comments.

☒ - The Public Notice period for this operating permit was from October 2, 2015 to November 2, 2015. No responses received.

DATE OF FACT SHEET: SEPTEMBER 22, 2015

COMPLETED BY:

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MISSOURI DEPARTMENT OF NATURAL RESOURCES
WATER PROTECTION PROGRAM
OPERATING PERMITS SECTION - DOMESTIC WASTEWATER UNIT
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Appendices

APPENDIX - CLASSIFICATION WORKSHEET:

ITEM	POINTS POSSIBLE	POINTS ASSIGNED
Maximum Population Equivalent (P.E.) served (Max 10 pts.)	1 pt./10,000 PE or major fraction thereof.	1.5
Maximum: 10 pt Design Flow (avg. day) or peak month; use greater (Max 10 pts.)	1 pt. / MGD or major fraction thereof.	1.5
EFFLUENT DISCHARGE RECEIVING WATER SENSITIVITY:		
Missouri or Mississippi River	0	
All other stream discharges except to losing streams and stream reaches supporting whole body contact	1	
Discharge to lake or reservoir outside of designated whole body contact recreational area	2	
Discharge to losing stream, or stream, lake or reservoir area supporting whole body contact recreation	3	
PRELIMINARY TREATMENT - Headworks		
Screening and/or comminution	3	3
Grit removal	3	3
Plant pumping of main flow (lift station at the headworks)	3	3
PRIMARY TREATMENT		
Primary clarifiers	5	
Combined sedimentation/digestion	5	
Chemical addition (except chlorine, enzymes)	4	
REQUIRED LABORATORY CONTROL – performed by plant personnel (highest level only)		
Push – button or visual methods for simple test such as pH, Settleable solids	3	
Additional procedures such as DO, COD, BOD, titrations, solids, volatile content	5	
More advanced determinations such as BOD seeding procedures, fecal coliform, nutrients, total oils, phenols, etc.	7	
Highly sophisticated instrumentation, such as atomic absorption and gas chromatograph	10	10
ALTERNATIVE FATE OF EFFLUENT		
Direct reuse or recycle of effluent	6	
Land Disposal – low rate	3	
High rate	5	
Overland flow	4	
Total from page **ONE (1)**	----	22

APPENDIX - CLASSIFICATION WORKSHEET (CONTINUED):

ITEM	POINTS POSSIBLE	POINTS ASSIGNED
VARIATION IN RAW WASTE (highest level only) (DMR exceedances and Design Flow exceedances)		
Variation do not exceed those normally or typically expected	0	
Recurring deviations or excessive variations of 100 to 200 % in strength and/or flow	2	
Recurring deviations or excessive variations of more than 200 % in strength and/or flow	4	4
Raw wastes subject to toxic waste discharge	6	
SECONDARY TREATMENT		
Trickling filter and other fixed film media with secondary clarifiers	10	
Activated sludge with secondary clarifiers (including extended aeration and oxidation ditches)	15	15
Stabilization ponds without aeration	5	
Aerated lagoon	8	
Advanced Waste Treatment Polishing Pond	2	
Chemical/physical – without secondary	15	
Chemical/physical – following secondary	10	
Biological or chemical/biological	12	
Carbon regeneration	4	
DISINFECTION		
Chlorination or comparable	5	
Dechlorination	2	
On-site generation of disinfectant (except UV light)	5	
UV light	4	4
SOLIDS HANDLING - SLUDGE		
Solids Handling Thickening	5	5
Anaerobic digestion	10	
Aerobic digestion	6	6
Evaporative sludge drying	2	
Mechanical dewatering	8	
Solids reduction (incineration, wet oxidation)	12	
Land application	6	
Total from page **TWO (2)**	----	34
Total from page **ONE (1)**	---	22
Grand Total	---	56

☐ - A: 71 points and greater
☒ - B: 51 points – 70 points
☐ - C: 26 points – 50 points
☐ - D: 0 points – 25 points

APPENDIX – RPA RESULTS:

Parameter	CMC*	RWC Acute*	CCC*	RWC Chronic*	n**	Range max/min	CV***	MF	RP Yes/No
Total Ammonia as Nitrogen (Summer) mg/L	12.1	180.42	1.5	180.42	32.00	27.2/0.07	3.19	6.63	YES
Total Ammonia as Nitrogen (Winter) mg/L	12.1	83.92	3.1	83.92	30.00	20/0.14	1.64	4.20	YES
Cadmium, Total Recoverable	8.2	0.53	0.4	0.53	59.00	0.5/0.00265	0.82	1.05	YES
Copper, Total Recoverable	22.0	20.98	14.1	20.98	63.00	15/2	0.41	1.40	YES
Lead, Total Recoverable	150.8	7.76	5.9	7.76	59.00	4.9/0.24	0.79	1.58	YES
Nickel, Total Recoverable	706.1	89.53	78.5	89.53	63.00	52/0.027	0.72	1.72	YES
Cyanide amenable to chlorination	22.0	6.69	5.0	6.69	22.00	7/0.0025	0.43	0.96	YES
Aluminum, Total Recoverable	750.0	215.85	NA	NA	22.00	81/7.5	0.78	2.66	NO
Arsenic, Total Recoverable	NA	NA	20.0	16.62	63.00	10/0.0075	0.99	1.66	NO
Chromium III, Total Recoverable	2676.9	48.56	128.0	48.56	18.00	19/1	0.92	2.56	NO
Mercury, Total Recoverable	2.8	0.23	0.5	0.23	61.00	0.2/0.02	0.18	1.16	NO
Silver, Total Recoverable	8.7	1.36	NA	NA	55.00	2.5/0.00495	0.87	0.55	NO
Zinc, Total Recoverable	180.3	176.97	180.3	176.97	22.00	91/8.9	0.49	1.94	NO

N/A – Not Applicable
* - Units are (µg/L) unless otherwise noted.
** - If the number of samples is 10 or greater, then the CV value must be used in the WQBEL for the applicable constituent. If the number of samples is < 10, then the default CV value must be used in the WQBEL for the applicable constituent.
*** - Coefficient of Variation (CV) is calculated by dividing the Standard Deviation of the sample set by the Mean of the same sample set.
RWC – Receiving Water Concentration. It is the concentration of a toxicant or the parameter toxicity in the receiving water after mixing (if applicable).
n – Is the number of samples.
MF – Multiplying Factor. 99% Confidence Level and 99% Probability Basis.
RP – Reasonable Potential. It is where an effluent is projected or calculated to cause an excursion above a water quality standard based on a number of factors including, as a minimum, the four factors listed in 40 CFR 122.44(d)(1)(ii).

Reasonable Potential Analysis is conducted as per (TSD, EPA/505/2-90-001, Section 3.3.2). A more detailed version including calculations of this RPA is available upon request.

APPENDIX – COST ANALYSIS FOR COMPLIANCE:

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

Sullivan WWTP, Permit Renewal
City of Sullivan
Missouri State Operating Permit #MO-0104736

Section 644.145 RSMo requires the Department of Natural Resources (DNR) 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."

The Department is required to issue a permit with final effluent limits in accordance with 644.051.1.(1) RSMo, 644.051.1.(2) RSMo, and the Clean Water Act. The practical result of many affordability findings will be to allow longer compliance schedules to mitigate adverse impact to distressed populations resulting from the costs of upgrading the wastewater treatment facility.

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 (City of Sullivan):	2672
Residential Connections (Oak Grove Village):	240
Residential Connections (West Sullivan Village/Woodland Heights):	158
Commercial Connections (City of Sullivan):	206
Commercial Connections (Oak Grove Village):	24
Commercial Connections(West Sullivan Village/Woodland Heights):	5
Industrial Connections (City of Sullivan):	80
Industrial Connections (Oak Grove Village):	1
Industrial Connections(West Sullivan Village/Woodland Heights):	5
Total Connections for this facility:	3391

New Permit Requirements:

The permit requires compliance with new effluent monitoring requirements for Total Nitrogen, Total Phosphorus and Total Recoverable Iron, addition of new instream monitoring requirements for total nitrogen, total phosphorus, and total hardness, the addition of effluent limitations for Cyanide, the revision of effluent limits for Nickel, Lead, Cadmium, and Ammonia, the addition of a Chronic Whole Effluent Toxicity (WET) test, and the addition of a Stormwater Pollution Prevention Plan.

Anticipated Costs Associated with Complying with the New Requirements:

The cost estimated for new quarterly monitoring requirements for Total Nitrogen and Total Phosphorus is $400 annually. The cost estimated for new Total Recoverable Iron is $360. The cost estimated for new instream quarterly monitoring requirements for Total Nitrogen and Total Phosphorus is $400 annually. The cost estimated for new instream monthly monitoring requirements for Total Hardness is $240 annually. No additional costs are required for Cyanide, Nickel, Lead, and Cadmium as these pollutants are controlled through the City's pretreatment program. The estimated cost of the addition of a once per permit cycle Chronic WET test is $300 (1,500 per test, once per 5 year permit cycle). The Stormwater Pollution Prevention Plan is estimated to cost $2,000, or $400 per year of the permit cycle.

The total estimated cost is $2,100 per year. This cost, if financed through user fees, might cost each household an extra $0.05[1] per month. A community sets their user rates based on several factors. The percentage of the current user rate that is available to cover new debt is unknown to the Department.

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

Due to the minimal cost associated with this new permit requirement, the Department anticipates the City of Sullivan has the means to raise $2,100 annually.

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

The total cost estimated for the new requirements is $2,100 annually. This cost, if financed through user fees, might cost each household an extra $0.05 per month. This would make the additional cost per household as a percent of median household income (MHI) 0.005%[2] based on the City's MHI of $33,182. Due to the minimal cost associated with this new requirement, the Department anticipates an extremely 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;

Nutrients are mineral compounds that are required for organisms to grow and thrive. Of the six (6) elemental macronutrients, Nitrogen and Phosphorus are generally not readily available and limit growth of organisms. If excess Nitrogen and Phosphorus are introduced into a waterbody, some species' populations will dramatically increase, while other populations will not be able to sustain life. This causes a shift in the ecosystem's food web. Competition and productivity are two factors in which nutrients can alter aquatic ecosystems and the designated uses of a waterbody. For example, designated uses, like drinking water source or recreational uses, become impaired when algal blooms take over a waterbody. These blooms can cause foul tastes and odors in the drinking water, and also cause unsightly appearance, and fish mortality in the waterbody. Some algae also produce toxins that may cause serious adverse health conditions such as liver damage, tumor promotion, paralysis, and kidney damage. Increased productivity of aquatic life may also clog treatment equipment, cause an increase in organic matter, bacteria, and fungi, and die-off and decomposition of algal blooms can reduce dissolved oxygen and suffocate fish and other aquatic life in the waterbody. The monitoring requirements for Nitrogen and Phosphorus have been added to the permit to provide data to the Department regarding the health of the receiving stream's aquatic life.

(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 community reported their outstanding debt for their current wastewater collection and treatment systems to be $6,740,000. The community reported that each user pays $20.14 each month, which is used toward payments on the current outstanding debt.

(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[3-6]:

Potentially Distressed Populations – City of Sullivan	
Unemployment	5.9%
Adjusted Median Household Income (MHI)*	$33,182
Percent Change in MHI (1990-2012)	+51.7%
Percent Population Growth/Decline (1990-2012)	+33.6%
Change in Median Age in Years (1990-2012)	+ 0.8
Percent of Households in Poverty	13.1%
Percent of Households Relying on Food Stamps	18.1%

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

The City reported that they will be adding an additional 14,400 linear feet of 12" water main and a well to the Sullivan Industrial Park East in 2015 for $2,000,000. The City also reported an ongoing water town maintenance program starting in 2015 and continuing till 2025 for $2,500,000. The City also is planning on adding two SBR basins in 2016/2017 for $2,000,000. In addition, the City is working on the sewer collection system as budget allows.

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

The new requirements associated with this permit will not impose a financial burden on the community, nor will the new requirements require the City of Sullivan to seek funding from an outside source.

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

The City reported that it is losing a manufacturing plant to another community, but that several local manufacturing plants are looking at expansions, and a possibility of new manufacturing/distribution facility for additional jobs.

Conclusion and Finding

As a result of new regulations, the Department is proposing modifications to the current operating permit that may require the permittee to conduct additional monitoring and reporting. The Department identified the actions for which cost analysis for compliance is required under Section 644.145 RSMo.

The Department estimates the cost for new quarterly monitoring requirements for Total Nitrogen and Total Phosphorus is $400 annually. The cost estimated for new instream quarterly monitoring requirements for Total Nitrogen and Total Phosphorus is $400 annually. The cost estimated for new instream monthly monitoring requirements for Total Hardness is $240 annually. No additional costs are required for Cyanide, Nickel, Lead, and Cadmium as these pollutants are controlled through the City's pretreatment program. The estimated cost of the addition of a once per permit cycle Chronic WET test is $300 (1,500 per test, once per 5 year permit cycle). The Stormwater Pollution Prevention Plan is estimated to cost $2,000, or $400 per year of the permit cycle.

The Department considered the eight (8) 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 permit modifications 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 action described above may result in a low burden with regard to the community's overall financial capability and a low financial impact for most individual customers/households; therefore, the new permit requirements are affordable.

References:

1. (($2,100/3,391)/12 months) = $0.05 per household per month
2. ($0.05/(33,182/12))*100 = 0.005 per household as a percent of MHI
3. Unemployment data was obtained from Missouri Department of Economic Development (July 2014) – http://www.missourieconomy.org/pdfs/urel1407.pdf
4. Median Household Income data from American Community Survey – Median income in the past 12 months – http://factfinder2.census.gov/faces/tableservices/jsf/pages/productview.xhtml?fpt=table
5. Population trend data was obtained from online at: 2012 Census Bureau Population Data - http://factfinder2.census.gov/faces/tableservices/jsf/pages/productview.xhtml?fpt=table, 2000 Census Bureau Population Data - http://www.census.gov/popest/data/cities/totals/2009/tables/SUB-EST2009-04-29.xls, 1990 Census Bureau Population Data - http://www.census.gov/prod/cen1990/cp1/cp-1-27.pdf
6. Poverty data – American Community Survey- http://factfinder2.census.gov/faces/nav/jsf/pages/searchresults.xhtml?refresh=t

STANDARD CONDITIONS FOR NPDES PERMITS
ISSUED BY
THE MISSOURI DEPARTMENT OF NATURAL RESOURCES
MISSOURI CLEAN WATER COMMISSION
REVISED
AUGUST 1, 2014

These Standard Conditions incorporate permit conditions as required by 40 CFR 122.41 or other applicable state statutes or regulations. These minimum conditions apply unless superseded by requirements specified in the permit.

Part I – General Conditions
Section A – Sampling, Monitoring, and Recording

1. **Sampling Requirements.**
   a. Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity.
   b. All samples shall be taken at the outfall(s) or Missouri Department of Natural Resources (Department) approved sampling location(s), and unless specified, before the effluent joins or is diluted by any other body of water or substance.

2. **Monitoring Requirements**.
   a. Records of monitoring information shall include:
      i. The date, exact place, and time of sampling or measurements;
      ii. The individual(s) who performed the sampling or measurements;
      iii. The date(s) analyses were performed;
      iv. The individual(s) who performed the analyses;
      v. The analytical techniques or methods used; and
      vi. The results of such analyses.
   b. If the permittee monitors any pollutant more frequently than required by the permit at the location specified in the permit using test procedures approved under 40 CFR Part 136, or another method required for an industry-specific waste stream under 40 CFR subchapters N or O, the results of such monitoring shall be included in the calculation and reported to the Department with the discharge monitoring report data (DMR) submitted to the Department pursuant to Section B, paragraph 7.

3. **Sample and Monitoring Calculations.** Calculations for all sample and monitoring results which require averaging of measurements shall utilize an arithmetic mean unless otherwise specified in the permit.

4. **Test Procedures**. The analytical and sampling methods used shall conform to the reference methods listed in 10 CSR 20-7.015 unless alternates are approved by the Department. The facility shall use sufficiently sensitive analytical methods for detecting, identifying, and measuring the concentrations of pollutants. The facility shall ensure that the selected methods are able to quantify the presence of pollutants in a given discharge at concentrations that are low enough to determine compliance with Water Quality Standards in 10 CSR 20-7.031 or effluent limitations unless provisions in the permit allow for other alternatives. A method is "sufficiently sensitive" when; 1) the method minimum level is at or below the level of the applicable water quality criterion for the pollutant or, 2) the method minimum level is above the applicable water quality criterion, but the amount of pollutant in a facility's discharge is high enough that the method detects and quantifies the level of pollutant in the discharge, or 3) the method has the lowest minimum level of the analytical methods approved under 10 CSR 20-7.015. These methods are also required for parameters that are listed as monitoring only, as the data collected may be used to determine if limitations need to be established. A permittee is responsible for working with their contractors to ensure that the analysis performed is sufficiently sensitive.

5. **Record Retention.** Except for records of monitoring information required by the permit related to the permittee's sewage sludge use and disposal activities, which shall be retained for a period of at least five (5) years (or longer as required by 40 CFR part 503), the permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports required by the permit, and records of all data used to complete the application for the permit, for a period of at least three (3) years from the date of the sample, measurement, report or application. This period may be extended by request of the Department at any time.

6. **Illegal Activities.**
   a. The Federal Clean Water Act provides that any person who falsifies, tampers with, or knowingly renders inaccurate any monitoring device or method required to be maintained under the permit shall, upon conviction, be punished by a fine of not more than $10,000, or by imprisonment for not more than two (2) years, or both. If a conviction of a person is for a violation committed after a first conviction of such person under this paragraph, punishment is a fine of not more than $20,000 per day of violation, or by imprisonment of not more than four (4) years, or both.
   b. The Missouri Clean Water Law provides that any person or who falsifies, tampers with, or knowingly renders inaccurate any monitoring device or method required to be maintained pursuant to sections 644.006 to 644.141 shall, upon conviction, be punished by a fine of not more than $10,000, or by imprisonment for not more than six (6) months, or by both. Second and successive convictions for violation under this paragraph by any person shall be punished by a fine of not more than $50,000 per day of violation, or by imprisonment for not more than two (2) years, or both.

Section B – Reporting Requirements

1. **Planned Changes.**
   a. The permittee shall give notice to the Department as soon as possible of any planned physical alterations or additions to the permitted facility when:
      i. The alteration or addition to a permitted facility may meet one of the criteria for determining whether a facility is a new source in 40 CFR 122.29(b); or
      ii. The alteration or addition could significantly change the nature or increase the quantity of pollutants discharged. This notification applies to pollutants which are subject neither to effluent limitations in the permit, nor to notification requirements under 40 CFR 122.42(a)(1);
      iii. The alteration or addition results in a significant change in the permittee's sludge use or disposal practices, and such alteration, addition, or change may justify the application of permit conditions that are different from or absent in the existing permit, including notification of additional use or disposal sites not reported during the permit application process or not reported pursuant to an approved land application plan;
      iv. Any facility expansions, production increases, or process modifications which will result in a new or substantially different discharge or sludge characteristics must be reported to the Department 60 days before the facility or process modification begins. Notification may be accomplished by application for a new permit. If the discharge does not violate effluent limitations specified in the permit, the facility is to submit a notice to the Department of the changed discharge at least 30 days before such changes. The Department may require a construction permit and/or permit modification as a result of the proposed changes at the facility.

2. **Non-compliance Reporting.**
   a. The permittee shall report any noncompliance which may endanger health or the environment. Relevant information shall be provided orally or via the current electronic method approved by the Department, within 24 hours from the time the permittee becomes aware of the circumstances, and shall be reported to the appropriate Regional Office during normal business hours or the Environmental Emergency Response hotline at 573-634-2436 outside of normal business hours. A written submission shall also be provided within five (5) business days of the time the permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the period of noncompliance, including exact dates and times, and if the noncompliance has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent reoccurrence of the noncompliance.

b. The following shall be included as information which must be reported within 24 hours under this paragraph.
   i. Any unanticipated bypass which exceeds any effluent limitation in the permit.
   ii. Any upset which exceeds any effluent limitation in the permit.
   iii. Violation of a maximum daily discharge limitation for any of the pollutants listed by the Department in the permit required to be reported within 24 hours.

c. The Department may waive the written report on a case-by-case basis for reports under paragraph 2. b. of this section if the oral report has been received within 24 hours.

3. **Anticipated Noncompliance**. The permittee shall give advance notice to the Department of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements. The notice shall be submitted to the Department 60 days prior to such changes or activity.

4. **Compliance Schedules.** Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of the permit shall be submitted no later than 14 days following each schedule date. The report shall provide an explanation for the instance of noncompliance and a proposed schedule or anticipated date, for achieving compliance with the compliance schedule requirement.

5. **Other Noncompliance.** The permittee shall report all instances of noncompliance not reported under paragraphs 2, 3, and 6 of this section, at the time monitoring reports are submitted. The reports shall contain the information listed in paragraph 2. a. of this section.

6. **Other Information**. Where the permittee becomes aware that it failed to submit any relevant facts in a permit application, or submitted incorrect information in a permit application or in any report to the Department, it shall promptly submit such facts or information.

7. **Discharge Monitoring Reports.**
   a. Monitoring results shall be reported at the intervals specified in the permit.
   b. Monitoring results must be reported to the Department via the current method approved by the Department, unless the permittee has been granted a waiver from using the method. If the permittee has been granted a waiver, the permittee must use forms provided by the Department.
   c. Monitoring results shall be reported to the Department no later than the 28th day of the month following the end of the reporting period.

Section C – Bypass/Upset Requirements

1. **Definitions.**
   a. *Bypass*: the intentional diversion of waste streams from any portion of a treatment facility, except in the case of blending.
   b. *Severe Property Damage*: substantial physical damage to property, damage to the treatment facilities which causes them to become inoperable, or substantial and permanent loss of natural resources which can reasonably be expected to occur in the absence of a bypass. Severe property damage does not mean economic loss caused by delays in production.
   c. *Upset*: an exceptional incident in which there is unintentional and temporary noncompliance with technology based permit effluent limitations because of factors beyond the reasonable control of the permittee. An upset does not include noncompliance to the extent caused by operational error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventive maintenance, or careless or improper operation.

2. **Bypass Requirements.**
   a. Bypass not exceeding limitations. The permittee may allow any bypass to occur which does not cause effluent limitations to be exceeded, but only if it also is for essential maintenance to assure efficient operation. These bypasses are not subject to the provisions of paragraphs 2. b. and 2. c. of this section.
   b. Notice.
      i. Anticipated bypass. If the permittee knows in advance of the need for a bypass, it shall submit prior notice, if possible at least 10 days before the date of the bypass.
      ii. Unanticipated bypass. The permittee shall submit notice of an unanticipated bypass as required in Section B – Reporting Requirements, paragraph 5 (24-hour notice).
   c. Prohibition of bypass.
      i. Bypass is prohibited, and the Department may take enforcement action against a permittee for bypass, unless:
         1. Bypass was unavoidable to prevent loss of life, personal injury, or severe property damage;
         2. There were no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment downtime. This condition is not satisfied if adequate back-up equipment should have been installed in the exercise of reasonable engineering judgment to prevent a bypass which occurred during normal periods of equipment downtime or preventive maintenance; and
         3. The permittee submitted notices as required under paragraph 2. b. of this section.
      ii. The Department may approve an anticipated bypass, after considering its adverse effects, if the Department determines that it will meet the three (3) conditions listed above in paragraph 2. c. i. of this section.

3. **Upset Requirements.**
   a. Effect of an upset. An upset constitutes an affirmative defense to an action brought for noncompliance with such technology based permit effluent limitations if the requirements of paragraph 3. b. of this section are met. No determination made during administrative review of claims that noncompliance was caused by upset, and before an action for noncompliance, is final administrative action subject to judicial review.
   b. Conditions necessary for a demonstration of upset. A permittee who wishes to establish the affirmative defense of upset shall demonstrate, through properly signed, contemporaneous operating logs, or other relevant evidence that:
      i. An upset occurred and that the permittee can identify the cause(s) of the upset;
      ii. The permitted facility was at the time being properly operated; and
      iii. The permittee submitted notice of the upset as required in Section B – Reporting Requirements, paragraph 2. b. ii. (24-hour notice).
      iv. The permittee complied with any remedial measures required under Section D – Administrative Requirements, paragraph 4.
   c. Burden of proof. In any enforcement proceeding, the permittee seeking to establish the occurrence of an upset has the burden of proof.

Section D – Administrative Requirements

1. **Duty to Comply.** The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Missouri Clean Water Law and Federal Clean Water Act and is grounds for enforcement action; for permit termination, revocation and reissuance, or modification; or denial of a permit renewal application.
   a. The permittee shall comply with effluent standards or prohibitions established under section 307(a) of the Federal Clean Water Act for toxic pollutants and with standards for sewage sludge use or disposal established under section 405(d) of the CWA within the time provided in the regulations that establish these standards or prohibitions or standards for sewage sludge use or disposal, even if the permit has not yet been modified to incorporate the requirement.
   b. The Federal Clean Water Act provides that any person who violates section 301, 302, 306, 307, 308, 318 or 405 of the Act, or any permit condition or limitation implementing any such sections in a permit issued under section 402, or any requirement imposed in a pretreatment program approved under sections 402(a)(3) or 402(b)(8) of the Act, is subject to a civil penalty not to exceed $25,000 per day for each violation. The Federal Clean Water Act provides that any person who negligently violates sections 301, 302, 306, 307, 308, 318, or 405 of the Act, or any condition or limitation implementing any of such sections in a permit issued under section 402 of the Act, or any requirement

imposed in a pretreatment program approved under section 402(a)(3) or 402(b)(8) of the Act, is subject to criminal penalties of $2,500 to $25,000 per day of violation, or imprisonment of not more than one (1) year, or both. In the case of a second or subsequent conviction for a negligent violation, a person shall be subject to criminal penalties of not more than $50,000 per day of violation, or by imprisonment of not more than two (2) years, or both. Any person who knowingly violates such sections, or such conditions or limitations is subject to criminal penalties of $5,000 to $50,000 per day of violation, or imprisonment for not more than three (3) years, or both. In the case of a second or subsequent conviction for a knowing violation, a person shall be subject to criminal penalties of not more than $100,000 per day of violation, or imprisonment of not more than six (6) years, or both. Any person who knowingly violates section 301, 302, 303, 306, 307, 308, 318 or 405 of the Act, or any permit condition or limitation implementing any of such sections in a permit issued under section 402 of the Act, and who knows at that time that he thereby places another person in imminent danger of death or serious bodily injury, shall, upon conviction, be subject to a fine of not more than $250,000 or imprisonment of not more than 15 years, or both. In the case of a second or subsequent conviction for a knowing endangerment violation, a person shall be subject to a fine of not more than $500,000 or by imprisonment of not more than 30 years, or both. An organization, as defined in section 309(c)(3)(B)(iii) of the CWA, shall, upon conviction of violating the imminent danger provision, be subject to a fine of not more than $1,000,000 and can be fined up to $2,000,000 for second or subsequent convictions.

c. Any person may be assessed an administrative penalty by the EPA Director for violating section 301, 302, 306, 307, 308, 318 or 405 of this Act, or any permit condition or limitation implementing any of such sections in a permit issued under section 402 of this Act. Administrative penalties for Class I violations are not to exceed $10,000 per violation, with the maximum amount of any Class I penalty assessed not to exceed $25,000. Penalties for Class II violations are not to exceed $10,000 per day for each day during which the violation continues, with the maximum amount of any Class II penalty not to exceed $125,000.

d. It is unlawful for any person to cause or permit any discharge of water contaminants from any water contaminant or point source located in Missouri in violation of sections 644.006 to 644.141 of the Missouri Clean Water Law, or any standard, rule or regulation promulgated by the commission. In the event the commission or the director determines that any provision of sections 644.006 to 644.141 of the Missouri Clean Water Law or standard, rules, limitations or regulations promulgated pursuant thereto, or permits issued by, or any final abatement order, other order, or determination made by the commission or the director, or any filing requirement pursuant to sections 644.006 to 644.141 of the Missouri Clean Water Law or any other provision which this state is required to enforce pursuant to any federal water pollution control act, is being, was, or is in imminent danger of being violated, the commission or director may cause to have instituted a civil action in any court of competent jurisdiction for the injunctive relief to prevent any such violation or further violation or for the assessment of a penalty not to exceed $10,000 per day for each day, or part thereof, the violation occurred and continues to occur, or both, as the court deems proper. Any person who willfully or negligently commits any violation in this paragraph shall, upon conviction, be punished by a fine of not less than $2,500 nor more than $25,000 per day of violation, or by imprisonment for not more than one year, or both. Second and successive convictions for violation of the same provision of this paragraph by any person shall be punished by a fine of not more than $50,000 per day of violation, or by imprisonment for not more than two (2) years, or both.

2. **Duty to Reapply.**
   a. If the permittee wishes to continue an activity regulated by this permit after the expiration date of this permit, the permittee must apply for and obtain a new permit.
   b. A permittee with a currently effective site-specific permit shall submit an application for renewal at least 180 days before the expiration date of the existing permit, unless permission for a later date has been granted by the Department. (The Department shall not grant permission for applications to be submitted later than the expiration date of the existing permit.)
   c. A permittees with currently effective general permit shall submit an application for renewal at least 30 days before the existing permit expires, unless the permittee has been notified by the Department that an earlier application must be made. The Department may grant permission for a later submission date. (The Department shall not grant permission for applications to be submitted later than the expiration date of the existing permit.)

3. **Need to Halt or Reduce Activity Not a Defense.** It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

4. **Duty to Mitigate.** The permittee shall take all reasonable steps to minimize or prevent any discharge or sludge use or disposal in violation of this permit which has a reasonable likelihood of adversely affecting human health or the environment.

5. **Proper Operation and Maintenance**. The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems which are installed by a permittee only when the operation is necessary to achieve compliance with the conditions of the permit.

6. **Permit Actions.**
   a. Subject to compliance with statutory requirements of the Law and Regulations and applicable Court Order, this permit may be modified, suspended, or revoked in whole or in part during its term for cause including, but not limited to, the following:
      i. Violations of any terms or conditions of this permit or the law;
      ii. Having obtained this permit by misrepresentation or failure to disclose fully any relevant facts;
      iii. A change in any circumstances or conditions that requires either a temporary or permanent reduction or elimination of the authorized discharge; or
      iv. Any reason set forth in the Law or Regulations.
   b. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition.

7. **Permit Transfer.**
   a. Subject to 10 CSR 20-6.010, an operating permit may be transferred upon submission to the Department of an application to transfer signed by the existing owner and the new owner, unless prohibited by the terms of the permit. Until such time the permit is officially transferred, the original permittee remains responsible for complying with the terms and conditions of the existing permit.
   b. The Department may require modification or revocation and reissuance of the permit to change the name of the permittee and incorporate such other requirements as may be necessary under the Missouri Clean Water Law or the Federal Clean Water Act.
   c. The Department, within 30 days of receipt of the application, shall notify the new permittee of its intent to revoke or reissue or transfer the permit.

8. **Toxic Pollutants.** The permittee shall comply with effluent standards or prohibitions established under section 307(a) of the Federal Clean Water Act for toxic pollutants and with standards for sewage sludge use or disposal established under section 405(d) of the Federal Clean Water Act within the time provided in the regulations that establish these standards or prohibitions or standards for sewage sludge use or disposal, even if the permit has not yet been modified to incorporate the requirement.

9. **Property Rights.** This permit does not convey any property rights of any sort, or any exclusive privilege.

10. **Duty to Provide Information.** The permittee shall furnish to the Department, within a reasonable time, any information which the Department may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit or to determine compliance with this permit. The permittee shall also furnish to the Department upon request, copies of records required to be kept by this permit.

11. **Inspection and Entry.** The permittee shall allow the Department, or an authorized representative (including an authorized contractor acting as a representative of the Department), upon presentation of credentials and other documents as may be required by law, to:
    a. Enter upon the permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of the permit;
    b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
    c. Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and
    d. Sample or monitor at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by the Federal Clean Water Act or Missouri Clean Water Law, any substances or parameters at any location.

12. **Closure of Treatment Facilities.**
    a. Persons who cease operation or plan to cease operation of waste, wastewater, and sludge handling and treatment facilities shall close the facilities in accordance with a closure plan approved by the Department.
    b. Operating Permits under 10 CSR 20-6.010 or under 10 CSR 20-6.015 are required until all waste, wastewater, and sludges have been disposed of in accordance with the closure plan approved by the Department and any disturbed areas have been properly stabilized. Disturbed areas will be considered stabilized when perennial vegetation, pavement, or structures using permanent materials cover all areas that have been disturbed. Vegetative cover, if used, shall be at least 70% plant density over 100% of the disturbed area.

13. **Signatory Requirement.**
    a. All permit applications, reports required by the permit, or information requested by the Department shall be signed and certified. (See 40 CFR 122.22 and 10 CSR 20-6.010)
    b. The Federal Clean Water Act provides that any person who knowingly makes any false statement, representation, or certification in any record or other document submitted or required to be maintained under this permit, including monitoring reports or reports of compliance or non-compliance shall, upon conviction, be punished by a fine of not more than $10,000 per violation, or by imprisonment for not more than six (6) months per violation, or by both.
    c. The Missouri Clean Water Law provides that any person who knowingly makes any false statement, representation or certification in any application, record, report, plan, or other document filed or required to be maintained pursuant to sections 644.006 to 644.141 shall, upon conviction, be punished by a fine of not more than ten thousand dollars, or by imprisonment for not more than six months, or by both.

14. **Severability.** The provisions of the permit are severable, and if any provision of the permit, or the application of any provision of the permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of the permit, shall not be affected thereby.

STANDARD CONDITIONS FOR NPDES PERMITS
ISSUED BY
THE MISSOURI DEPARTMENT OF NATURAL RESOURCES
MISSOURI CLEAN WATER COMMISSION
REVISED
MAY 1, 2013

PART II - SPECIAL CONDITIONS – PUBLICLY OWNED TREATMENT WORKS
SECTION A – INDUSTRIAL USERS

1. Definitions

Definitions as set forth in the Missouri Clean Water Laws and approved by the Missouri Clean Water Commission shall apply to terms used herein.

Significant Industrial User (SIU). Except as provided in the *General Pretreatment Regulation* 10 CSR 20-6.100, the term Significant Industrial User means:

1. All Industrial Users subject to Categorical Pretreatment Standards; and
2. Any other Industrial User that: discharges an average of 25,000 gallons per day or more of process wastewater to the Publicly-Owned Treatment Works (POTW) (excluding sanitary, noncontact cooling and boiler blowdown wastewater); contributes a process wastestream which makes up 5 percent or more of the average dry weather hydraulic or organic capacity of the POTW treatment plant; or is designated as such by the Control Authority on the basis that the Industrial User has a reasonable potential for adversely affecting the POTW's or for violating any Pretreatment Standard or requirement.

Clean Water Act (CWA) is the the federal Clean Water Act of 1972, 33 U.S.C. § 1251 et seq. (2002).

2. Identification of Industrial Discharges

Pursuant to 40 CFR 122.44(j)(1), all POTWs shall identify, in terms of character and volume of pollutants, any Significant Industrial Users discharging to the POTW subject to Pretreatment Standards under section 307(b) of the CWA and 40 CFR 403.

3. Application Information

Applications for renewal or modification of this permit must contain the information about industrial discharges to the POTW pursuant to 40 CFR 122.21(j)(6)

4. Notice to the Department

Pursuant to 40 CFR 122.42(b), all POTWs must provide adequate notice of the following:

1. Any new introduction of pollutants into the POTW from an indirect discharger which would be subject to section 301 or 306 of CWA if it were directly discharging these pollutants; and
2. Any substantial change into the volume or character of pollutants being introduced into that POTW by a source introducing pollutants into the POTW at the time of issuance of the permit.
3. For purposes of this paragraph, adequate notice shall include information on:
   i. the quality and quantity of effluent introduced into the POTW, and
   ii. any anticipated impact of the change on the quantity or quality of effluent to be discharged from the POTW.

For POTWs without an approved pretreatment program, the notice of industrial discharges which was not included in the permit application shall be made as soon as practicable. For POTWs with an approved pretreatment program, notice is to be included in the annual pretreatment report required in the special conditions of this permit. Notice may be sent to:

Missouri Department of Natural Resources
Water Protection Program
Attn: Pretreatment Coordinator
P.O. Box 176
Jefferson City, MO 65102

STANDARD CONDITIONS FOR NPDES PERMITS
ISSUED BY
THE MISSOURI DEPARTMENT OF NATURAL RESOURCES
MISSOURI CLEAN WATER COMMISSION
March 1, 2015

PART III – SLUDGE AND BIOSOLIDS FROM DOMESTIC AND INDUSTRIAL WASTEWATER TREATMENT FACILITIES

SECTION A – GENERAL REQUIREMENTS

1. This permit pertains to sludge requirements under the Missouri Clean Water Law and regulation for domestic wastewater and industrial process wastewater. This permit also incorporates applicable federal sludge disposal requirements under 40 CFR 503 for domestic wastewater. The Environmental Protection Agency (EPA) has principal authority for permitting and enforcement of the federal sludge regulations under 40 CFR 503 for domestic wastewater. EPA has reviewed and accepted these standard sludge conditions. EPA may choose to issue a separate sludge addendum to this permit or a separate federal sludge permit at their discretion to further address the federal requirements.
2. These PART III Standard Conditions apply only to sludge and biosolids generated at domestic wastewater treatment facilities, including public owned treatment works (POTW), privately owned facilities and sludge or biosolids generated at industrial facilities.
3. Sludge and Biosolids Use and Disposal Practices:
    a. The permittee is authorized to operate the sludge and biosolids treatment, storage, use, and disposal facilities listed in the facility description of this permit.
    b. The permittee shall not exceed the design sludge volume listed in the facility description and shall not use sludge disposal methods that are not listed in the facility description, without prior approval of the permitting authority.
    c. The permittee is authorized to operate the storage, treatment or generating sites listed in the Facility Description section of this permit.
4. Sludge Received from other Facilities:
    a. Permittees may accept domestic wastewater sludge from other facilities including septic tank pumpings from residential sources as long as the design sludge volume is not exceeded and the treatment facility performance is not impaired.
    b. The permittee shall obtain a signed statement from the sludge generator or hauler that certifies the type and source of the sludge
5. These permit requirements do not supersede nor remove liability for compliance with county and other local ordinances.
6. These permit requirements do not supersede nor remove liability for compliance with other environmental regulations such as odor emissions under the Missouri Air Pollution Control Law and regulations.
7. This permit may (after due process) be modified, or alternatively revoked and reissued, to comply with any applicable sludge disposal standard or limitation issued or approved under Section 405(d) of the Clean Water Actor under Chapter 644 RSMo.
8. In addition to STANDARD CONDITIONS, the Department may include sludge limitations in the special conditions portion or other sections of a site specific permit.
9. Alternate Limits in the Site Specific Permit.
   Where deemed appropriate, the Department may require an individual site specific permit in order to authorize alternate limitations:
    a. A site specific permit must be obtained for each operating location, including application sites.
    b. To request a site specific permit, an individual permit application, permit fee, and supporting documents shall be submitted for each operating location. This shall include a detailed sludge/biosolids management plan or engineering report.
10. Exceptions to these Standard Conditions may be authorized on a case-by-case basis by the Department, as follows:
    a. The Department will prepare a permit modification and follow permit notice provisions as applicable under 10 CSR 20-6.020, 40 CFR 124.10, and 40 CFR 501.15(a)(2)(ix)(E). This includes notification of the owner of the property located adjacent to each land application site, where appropriate.
    b. Exceptions cannot be granted where prohibited by the federal sludge regulations under 40 CFR 503.

SECTION B – DEFINITIONS

1. Best Management Practices include agronomic loading rates, soil conservation practices and other site restrictions.
2. Biosolids means organic fertilizer or soil amendment produced by the treatment of domestic wastewater sludge.
3. Biosolids land application facility is a facility where biosolids are spread onto the land at agronomic rates for production of food or fiber. The facility includes any structures necessary to store the biosolids until soil, weather, and crop conditions are favorable for land application.
4. Class A biosolids means a material that has met the Class A pathogen reduction requirements or equivalent treatment by a Process to Further Reduce Pathogens (PFRP) in accordance with 40 CFR 503.
5. Class B biosolids means a material that has met the Class B pathogen reduction requirements or equivalent treatment by a Process to Significantly Reduce Pathogens (PFRP) in accordance with 40 CFR 503.
6. Domestic wastewater means wastewater originating from the sanitary conveniences of residences, commercial buildings, factories and institutions; or co-mingled sanitary and industrial wastewater processed by a (POTW) or a privately owned facility.
7. Industrial wastewater means any wastewater, also known as process water, not defined as domestic wastewater. Per 40 CFR Part 122, process water means any water which, during manufacturing or processing, comes into direct contact with or results from the production or use of any raw material, intermediate product, finished product, byproduct, or waste product.
8. Mechanical treatment plants are wastewater treatment facilities that use mechanical devices to treat wastewater, including septic tanks, sand filters, extended aeration, activated sludge, contact stabilization, trickling filters, rotating biological discs, and other similar facilities. It does not include wastewater treatment lagoons and constructed wetlands for wastewater treatment.
9. Operating location as defined in 10 CSR 20-2.010 is all contiguous lands owned, operated or controlled by one (1) person or by two (2) or more persons jointly or as tenants in common.
10. Plant Available Nitrogen (PAN) is the nitrogen that will be available to plants during the growing seasons after biosolids application.
11. Public contact site is land with a high potential for contact by the public. This includes, but is not limited to, public parks, ball fields, cemeteries, plant nurseries, turf farms, and golf courses.
12. Sludge is the solid, semisolid, or liquid residue removed during the treatment of wastewater. Sludge includes septage removed from septic tanks or equivalent facilities. Sludge does not include carbon coal byproducts (CCBs)
13. Sludge lagoon is part of a mechanical wastewater treatment facility. A sludge lagoon is an earthen basin that receives sludge that has been removed from a wastewater treatment facility. It does not include a wastewater treatment lagoon or sludge treatment units that are not a part of a mechanical wastewater treatment facility.
14. Septage is the material pumped from residential septic tanks and similar treatment works (with a design population of less than 150 people). The standard for biosolids from septage is different from other sludges.

SECTION C – MECHANICAL WASTEWATER TREATMENT FACILITIES

1. Sludge shall be routinely removed from wastewater treatment facilities and handled according to the permit facility description and sludge conditions of this permit.
2. The permittee shall operate the facility so that there is no sludge discharged to waters of the state.
3. Mechanical treatment plants shall have separate sludge storage compartments in accordance with 10 CSR 20, Chapter 8. Failure to remove sludge from these storage compartments on the required design schedule is a violation of this permit.

SECTION D – SLUDGE DISPOSED AT OTHER TREATMENT FACILITY OR CONTRACT HAULER

1. This section applies to permittees that haul sludge to another treatment facility for disposal or use contract haulers to remove and dispose of sludge.
2. Permittees that use contract haulers are responsible for compliance with all the terms of this permit including final disposal, unless the hauler has a separate permit for sludge or biosolids disposal issued by the Department; or the hauler transports the sludge to another permitted treatment facility.
3. Haulers who land apply septage must obtain a state permit.
4. Testing of sludge, other than total solids content, is not required if sludge is hauled to a municipal wastewater treatment facility or other permitted wastewater treatment facility, unless it is required by the accepting facility.

SECTION E – INCINERATION OF SLUDGE

1. Sludge incineration facilities shall comply with the requirements of 40 CFR 503 Subpart E; air pollution control regulations under 10 CSR 10; and solid waste management regulations under 10 CSR 80.
2. Permittee may be authorized under the facility description of this permit to store incineration ash in lagoons or ash ponds. This permit does not authorize the disposal of incineration ash. Incineration ash shall be disposed in accordance with 10 CSR 80; or if the ash is determined to be hazardous with 10 CSR 25.
3. In addition to normal sludge monitoring, incineration facilities shall report the following as part of the annual report, quantity of sludge incinerated, quantity of ash generated, quantity of ash stored, and ash used or disposal method, quantity, and location. Permittee shall also provide the name of the disposal facility and the applicable permit number.

SECTION F – SURFACE DISPOSAL SITES AND SLUDGE LAGOONS

1. Surface disposal sites of domestic facilities shall comply with the requirements in 40 CFR 503 Subpart C; air pollution control regulations under 10 CSR 10; and solid waste management regulations under 10 CSR 80.
2. Sludge storage lagoons are temporary facilities and are not required to obtain a permit as a solid waste management facility under 10 CSR 80. In order to maintain sludge storage lagoons as storage facilities, accumulated sludge must be removed routinely, but not less than once every two years unless an alternate schedule is approved in the permit. The amount of sludge removed will be dependent on sludge generation and accumulation in the facility. Enough sludge must be removed to maintain adequate storage capacity in the facility.
    a. In order to avoid damage to the lagoon seal during cleaning, the permittee may leave a layer of sludge on the bottom of the lagoon, upon prior approval of the Department; or
    b. Permittee shall close the lagoon in accordance with Section H.

SECTION G – LAND APPLICATION

1. The permittee shall not land apply sludge or biosolids unless land application is authorized in the facility description or the special conditions of the issued NPDES permit.
2. Land application sites within a 20 miles radius of the wastewater treatment facility are authorized under this permit when biosolids are applied for beneficial use in accordance with these standard conditions unless otherwise specified in a site specific permit. If the permittee's land application site is greater than a 20 mile radius of the wastewater treatment facility, approval must be granted from the Department.
3. Land application shall not adversely affect a threatened or endangered species or its designated critical habitat.
4. Biosolids shall not be applied unless authorized in this permit or exempted under 10 CSR 20, Chapter 6.
    a. This permit does not authorize the land application of domestic sludge except for when sludge meets the definition of biosolids.
    b. This permit authorizes "Class A or B" biosolids derived from domestic wastewater and/or process water sludge to be land applied onto grass land, crop land, timber or other similar agricultural or silviculture lands at rates suitable for beneficial use as organic fertilizer and soil conditioner.
5. Public Contact Sites:

    Permittees who wish to apply Class A biosolids to public contact sites must obtain approval from the Department after two years of proper operation with acceptable testing documentation that shows the biosolids meet Class A criteria. A shorter length of testing will be allowed with prior approval from the Department. Authorization for land applications must be provided in the special conditions section of this permit or in a separate site specific permit.
    a. After Class B biosolids have been land applied, public access must be restricted for 12 months.
    b. Class B biosolids are only land applied to root crops, home gardens or vegetable crops whose edible parts will not be for human consumption.
6. Agricultural and Silvicultural Sites:

    Septage – Based on Water Quality guide 422 (WQ422) published by the University of Missouri
    a. Haulers that land apply septage must obtain a state permit
    b. Do not apply more than 30,000 gallons of septage per acre per year.
    c. Septage tanks are designed to retain sludge for one to three years which will allow for a larger reduction in pathogens and vectors, as compared to other mechanical type treatment facilities.
    d. To meet Class B sludge requirements, maintain septage at 12 pH for at least thirty (30) minutes before land application. 50 pounds of hydrated lime shall be added to each 1,000 gallons of septage in order to meet pathogen and vector stabilization for septage biosolids applied to crops, pastures or timberland.
    e. Lime is to be added to the pump truck and not directly to the septic tanks, as lime would harm the beneficial bacteria of the septic tank.

Biosolids - Based on Water Quality guide 423, 424, and 425 (WQ423, WQ424, WQ425) published by the University of Missouri;

a. Biosolids shall be monitored to determine the quality for regulated pollutants

b. The number of samples taken is directly related to the amount of sludge produced by the facility (See Section I of these Standard Conditions). Report as dry weight unless otherwise specified in the site specific permit. Samples should be taken only during land application periods. When necessary, it is permissible to mix biosolids with lower concentrations of biosolids as well as other suitable Department approved material to reach the maximum concentration of pollutants allowed.

c. Table 1 gives the maximum concentration allowable to protect water quality standards

TABLE 1

Biosolids ceiling concentration [1]	
Pollutant	Milligrams per kilogram dry weight
Arsenic	75
Cadmium	85
Copper	4,300
Lead	840
Mercury	57
Molybdenum	75
Nickel	420
Selenium	100
Zinc	7,500

[1] Land application is not allowed if the sludge concentration exceeds the maximum limits for any of these pollutants

d. The low metal concentration biosolids has reduced requirements because of its higher quality and can safely be applied for 100 years or longer at typical agronomic loading rates. (See Table 2)

TABLE 2

Biosolids Low Metal Concentration [1]	
Pollutant	Milligrams per kilogram dry weight
Arsenic	41
Cadmium	39
Copper	1,500
Lead	300
Mercury	17
Nickel	420
Selenium	36
Zinc	2,800

[1] You may apply low metal biosolids without tracking cumulative metal limits, provided the cumulative application of biosolids does not exceed 500 dry tons per acre.

e. Each pollutant in Table 3 has an annual and a total cumulative loading limit, based on the allowable pounds per acre for various soil categories.

TABLE 3

Pollutant	CEC 15+		CEC 5 to 15		CEC 0 to 5	
	Annual	Total [1]	Annual	Total [1]	Annual	Total [1]
Arsenic	1.8	36.0	1.8	36.0	1.8	36.0
Cadmium	1.7	35.0	0.9	9.0	0.4	4.5
Copper	66.0	1,335.0	25.0	250.0	12.0	125.0
Lead	13.0	267.0	13.0	267.0	13.0	133.0
Mercury	0.7	15.0	0.7	15.0	0.7	15.0
Nickel	19.0	347.0	19.0	250.0	12.0	125.0
Selenium	4.5	89.0	4.5	44.0	1.6	16.0
Zinc	124.0	2,492.0	50.0	500.0	25.0	250.0

[1] Total cumulative loading limits for soils with equal or greater than 6.0 pH (salt based test) or 6.5 pH (water based test)

TABLE 4 - Guidelines for land application of other trace substances [1]

Cumulative Loading	
Pollutant	Pounds per acre
Aluminum	4,000[2]
Beryllium	100
Cobalt	50
Fluoride	800
Manganese	500
Silver	200
Tin	1,000
Dioxin	(10 ppt in soil)[3]
Other	[4]

[1] Design of land treatment systems for Industrial Waste, 1979. Michael Ray Overcash, North Carolina State University and Land Treatment of Municipal Wastewater, EPA 1981.)

[2] This applies for a soil with a pH between 6.0 and 7.0 (salt based test) or a pH between 6.5 to 7.5 (water based test). Case-by-case review is required for higher pH soils.

[3] Total Dioxin Toxicity Equivalents (TEQ) in soils, based on a risk assessment under 40 CFR 744, May 1998.

[4] Case by case review. Concentrations in sludge should not exceed the 95th percentile of the National Sewage Sludge Survey, EPA, January 2009.

Best Management Practices – Based on Water Quality guide 426 (WQ426) published by the University of Missouri

a. Use best management practices when applying biosolids.
b. Biosolids cannot discharge from the land application site
c. Biosolid application is subject to the Missouri Department of Agriculture State Milk Board concerning grazing restrictions of lactating dairy cattle.
d. Biosolid application must be in accordance with section 4 of the Endangered Species Act.
e. Do not apply more than the agronomic rate of nitrogen needed.
f. The applicator must document the Plant Available Nitrogen (PAN) loadings, available nitrogen in the soil, and crop removal when either of the following occurs: 1) When biosolids are greater than 50,000 mg/kg TN; or 2) When biosolids are land applied at an application rate greater than two dry tons per acre per year.
    i. PAN can be determined as follows and is in accordance with WQ426
    (Nitrate + nitrite nitrogen) + (organic nitrogen x 0.2) + (ammonia nitrogen x volatilization factor[1]).
    [1] Volatilization factor is 0.7 for surface application and 1 for subsurface application.
g. Buffer zones are as follows:
    i. 300 feet of a water supply well, sinkhole, lake, pond, water supply reservoir or water supply intake in a stream;
    ii. 300 feet of a losing stream, no discharge stream, stream stretches designated for whole body contact recreation, wild and scenic rivers, Ozark National Scenic Riverways or outstanding state resource waters as listed in the Water Quality Standards, 10 CSR 20-7.031;
    iii. 150 feet if dwellings;
    iv. 100 feet of wetlands or permanent flowing streams;
    v. 50 feet of a property line or other waters of the state, including intermittent flowing streams.
h. Slope limitation for application sites are as follows;
    i. A slope 0 to 6 percent has no rate limitation
    ii. Applied to a slope 7 to 12 percent, the applicator may apply biosolids when soil conservation practices are used to meet the minimum erosion levels
    iii. Slopes > 12 percent, apply biosolids only when grass is vegetated and maintained with at least 80 percent ground cover at a rate of two dry tons per acre per year or less.
i. No biosolids may be land applied in an area that it is reasonably certain that pollutants will be transported into waters of the state.
j. Do not apply biosolids to sites with soil that is snow covered, frozen or saturated with liquid without prior approval by the Department.
k. Biosolids / sludge applicators must keep detailed records up to five years.

SECTION H – CLOSURE REQUIREMENTS

1. This section applies to all wastewater facilities (mechanical, industrial, and lagoons) and sludge or biosolids storage and treatment facilities and incineration ash ponds. It does not apply to land application sites.
2. Permittees of a domestic wastewater facility who plan to cease operation must obtain Department approval of a closure plan which addresses proper removal and disposal of all residues, including sludge, biosolids. Mechanical plants, sludge lagoons, ash ponds and other storage structures must obtain approval of a closure plan from the Department. Permittee must maintain this permit until the facility is closed in accordance with the approved closure plan per 10 CSR 20 – 6. 010 and 10 CSR 20 – 6.015.
3. Residuals that are left in place during closure of a lagoon or earthen structure or ash pond shall not exceed the agricultural loading rates as follows:
    a. Residuals shall meet the monitoring and land application limits for agricultural rates as referenced in Section H of these standard conditions.
    b. If a wastewater treatment lagoon has been in operation for 15 years or more without sludge removal, the sludge in the lagoon qualifies as a Class B biosolids with respect to pathogens due to anaerobic digestion, and testing for fecal coliform is not required. For other lagoons, testing for fecal coliform is required to show compliance with Class B biosolids limitations. In order to reach Class B biosolids requirements, fecal coliform must be less than 2,000,000 colony forming units or 2,000,000 most probable number. All fecal samples must be presented as geometric mean per gram.
    c. The allowable nitrogen loading that may be left in the lagoon shall be based on the plant available nitrogen (PAN) loading. For a grass cover crop, the allowable PAN is 300 pounds/acre.
        i. PAN can be determined as follows:

        (Nitrate + nitrite nitrogen) + (organic nitrogen x 0.2) + (ammonia nitrogen x volatilization factor[1]).

        [1] Volatilization factor is 0.7 for surface application and 1 for subsurface application.
4. When closing a domestic wastewater treatment lagoon with a design treatment capacity equal or less than 150 persons, the residuals are considered "septage" under the similar treatment works definition. See Section B of these standard conditions. Under the septage category, residuals may be left in place as follows:
    a. Testing for metals or fecal coliform is not required
    b. If the wastewater treatment lagoon has been in use for less than 15 years, mix lime with the sludge at a rate of 50 pounds of hydrated lime per 1000 gallons (134 cubic feet) of sludge.
    c. The amount of sludge that may be left in the lagoon shall be based on the plant available nitrogen (PAN) loading. 100 dry tons/acre of sludge may be left in the basin without testing for nitrogen. If 100 dry tons/acre or more will be left in the lagoon, test for nitrogen and determine the PAN using the calculation above. Allowable PAN loading is 300 pounds/acre.
5. Residuals left within the domestic lagoon shall be mixed with soil on at least a 1 to 1 ratio, the lagoon berm shall be demolished, and the site shall be graded and contain ≥70% vegetative density over 100% of the site so as to avoid ponding of storm water and provide adequate surface water drainage without creating erosion.
6. Lagoons and/or earthen structure and/or ash pond closure activities shall obtain a storm water permit for land disturbance activities that equal or exceed one acre in accordance with 10 CSR 20-6.200
7. When closing a mechanical wastewater and/or industrial process wastewater plant; all sludge must be cleaned out and disposed of in accordance with the Department approved closure plan before the permit for the facility can be terminated.
    a. Land must be stabilized which includes any grading, alternate use or fate upon approval by the Department, remediation, or other work that exposes sediment to stormwater per 10 CSR 20-6.200. The site shall be graded and contain ≥70% vegetative density over 100% of the site, so as to avoid ponding of storm water and provide adequate surface water drainage without creating erosion.
    b. Per 10 CSR 20-6.015(4)(B)6, Hazardous Waste shall not be land applied or disposed during industrial and mechanical plant closures unless in accordance with Missouri Hazardous Waste Management Law and Regulations under 10 CSR 25.
    c. After demolition of the mechanical plant / industrial plant, the site must only contain clean fill defined in RSMo 260.200 (5) as uncontaminated soil, rock, sand, gravel, concrete, asphaltic concrete, cinderblocks, brick, minimal amounts of wood and metal, and inert solids as approved by rule or policy of the Department for fill or other beneficial use. Other solid wastes must be removed.
8. If sludge from the domestic lagoon or mechanical treatment plant exceeds agricultural rates under Section G and/or H, a landfill permit or solid waste disposal permit must be obtained if the permittee chooses to seek authorization for on-site sludge disposal under the Missouri Solid Waste Management Law and regulations per 10 CSR 80, and the permittee must comply with the surface disposal requirements under 40 CFR 503, Subpart C.

SECTION I – MONITORING FREQUENCY

1. At a minimum, sludge or biosolids shall be tested for volume and percent total solids on a frequency that will accurately represent sludge quantities produced and disposed. Please see the table below.

TABLE 5

Design Sludge Production (dry tons per year)	Monitoring Frequency (See Notes 1, 2 and 3)			
	Metals, Pathogens and Vectors	Nitrogen TKN [1]	Nitrogen PAN [2]	Priority Pollutants and TCLP [3]
0 to 100	1 per year	1 per year	1 per month	1 per year
101 to 200	biannual	biannual	1 per month	1 per year
201 to 1,000	quarterly	quarterly	1 per month	1 per year
1,001 to 10,000	1 per month	1 per month	1 per week	--[4]
10,001 +	1 per week	1 per week	1 per day	--[4]

[1] Test total Kjeldahl nitrogen, if biosolids application is 2 dry tons per acre per year or less.

[2] Calculate plant available nitrogen (PAN) when either of the following occurs: 1) when biosolids are greater than 50,000 mg/kg TN; or 2) when biosolids are land applied at an application rate greater than two dry tons per acre per year.

[3] Priority pollutants (40 CFR 122.21, Appendix D, Tables II and III) and toxicity characteristic leaching procedure (40 CFR 261.24) is required only for permit holders that must have a pre-treatment program.

[4] One sample for each 1,000 dry tons of sludge.

Note 1: Total solids: A grab sample of sludge shall be tested one per day during land application periods for percent total solids. This data shall be used to calculate the dry tons of sludge applied per acre.
Note 2: Total Phosphorus: Total phosphorus and total potassium shall be tested at the same monitoring frequency as metals.
Note 3: Table 5 is not applicable for incineration

2. If you own a wastewater treatment lagoon or sludge lagoon that is cleaned out once a year or less, you may choose to sample only when the sludge is removed or the lagoon is closed. Test one composite sample for each 100 dry tons of sludge or biosolids removed from the lagoon during the year within the lagoon at closing. Composite sample must represent various areas at one-foot depth.
3. Additional testing may be required in the special conditions or other sections of the permit. Permittees receiving industrial wastewater may be required to conduct additional testing upon request from the Department.
4. At this time, the Department recommends monitoring requirements shall be performed in accordance with, "POTW Sludge Sampling and Analysis Guidance Document," United States Environmental Protection Agency, August 1989, and the subsequent revisions.

SECTION J – RECORD KEEPING AND REPORTING REQUIREMENTS

1. The permittee shall maintain records on file at the facility for at least five years for the items listed in these standard conditions and any additional items in the Special Conditions section of this permit. This shall include dates when the sludge facility is checked for proper operation, records of maintenance and repairs and other relevant information.
2. Reporting period
    a. By January 28th of each year, an annual report shall be submitted for the previous calendar year period for all mechanical wastewater treatment facilities, sludge lagoons, and sludge or biosolids disposal facilities.
    b. Permittees with wastewater treatment lagoons shall submit the above annual report only when sludge or biosolids are removed from the lagoon during the report period or when the lagoon is closed.
3. Report Forms. The annual report shall be submitted on report forms provided by the Department or equivalent forms approved by the Department.
4. Reports shall be submitted as follows:

Major facilities (those serving 10,000 persons or 1 million gallons per day) shall report to both the Department and EPA. Other facilities need to report only to the Department. Reports shall be submitted to the addresses listed as follows:

DNR regional office listed in your permit
(see cover letter of permit)
ATTN: Sludge Coordinator

EPA Region VII
Water Compliance Branch (WACM)
Sludge Coordinator
11201 Renner Blvd.
Lenexa, KS 66219

5. Annual report contents. The annual report shall include the following:
    a. Sludge and biosolids testing performed. Include a copy or summary of all test results, even if not required by the permit.
    b. Sludge or biosolids quantity shall be reported as dry tons for quantity generated by the wastewater treatment facility, the quantity stored on site at the end of the year, and the quantity used or disposed.
    c. Gallons and % solids data used to calculate the dry ton amounts.
    d. Description of any unusual operating conditions.
    e. Final disposal method, dates, and location, and person responsible for hauling and disposal.
        i. This must include the name, address for the hauler and sludge facility. If hauled to a municipal wastewater treatment facility, sanitary landfill, or other approved treatment facility, give the name of that facility.
        ii. Include a description of the type of hauling equipment used and the capacity in tons, gallons, or cubic feet.
    f. Contract Hauler Activities:
    If contract hauler, provide a copy of a signed contract from the contractor. Permittee shall require the contractor to supply information required under this permit for which the contractor is responsible. The permittee shall submit a signed statement from the contractor that he has complied with the standards contained in this permit, unless the contract hauler has a separate sludge or biosolids use permit.
    g. Land Application Sites:
        i. Report the location of each application site, the annual and cumulative dry tons/acre for each site, and the landowners name and address. The location for each spreading site shall be given as a legal description for nearest ¼, ¼, Section, Township, Range, and county, or UTM coordinates. The facility shall report PAN when either of the following occurs: 1) When biosolids are greater than 50,000 mg/kg TN; or 2) when biosolids are land applied at an application rate greater than two dry tons per acre per year.
        ii. If the “Low Metals” criteria are exceeded, report the annual and cumulative pollutant loading rates in pounds per acre for each applicable pollutant, and report the percent of cumulative pollutant loading which has been reached at each site.
        iii. Report the method used for compliance with pathogen and vector attraction requirements.
        iv. Report soil test results for pH, CEC, and phosphorus. If none was tested during the year, report the last date when tested and results.

C10281
AP13412

MISSOURI DEPARTMENT OF NATURAL RESOURCES
WATER PROTECTION PROGRAM, WATER POLLUTION CONTROL BRANCH

FORM B2 – APPLICATION FOR CONSTRUCTION OR OPERATING PERMIT FOR FACILITIES WHICH RECEIVE PRIMARILY DOMESTIC WASTE AND HAVE A DESIGN FLOW MORE THAN 100,000 GALLONS PER DAY

FOR AGENCY USE ONLY	
CHECK NUMBER: NO FEE Required	
DATE RECEIVED: 10/4/12	FEE SUBMITTED: Ø

(C)

PART A – BASIC APPLICATION INFORMATION

1. This application is for:

- ☐ An operating permit and antidegradation review public notice.
- ☐ A construction permit following an appropriate operating permit and antidegradation review public notice.
- ☐ A construction permit, a concurrent operating permit and antidegradation review public notice.
- ☐ A construction permit (submitted before Aug. 30, 2008 or antidegradation review is not required).
- ☐ An operating permit for a new ~~or unpermitted facility.~~ Construction Permit # _____
- ☑ An operating permit renewal: Permit #MO- 0104736 Expiration Date 4-10-13
- ☐ An operating permit modification~~: Permit #MO-~~_____ Reason: _____

1.1 Is this a Federal/State Funded Project? ☐ Yes ☐ No Funding Agency/Project #: _____

1.2 Is the appropriate fee included with the application (See instructions for appropriate fee)? ☐ Yes ☑ No

2. FACILITY

NAME		TELEPHONE NUMBER WITH AREA CODE	
Sullivan Wastewater Treatment Plant		573-468-8223	
ADDRESS (PHYSICAL)	CITY	STATE	ZIP
320 Emma Lane	Sullivan	MO	63080

2.1 **LEGAL DESCRIPTION** (Plant Site): NE ¼, NE ¼, NE ¼, Sec. 3 , T 40N, R 2W County Franklin

2.2 UTM Coordinates Easting (X): 663680 Northing (Y): 4233940
For Universal Transverse Mercator (UTM), Zone 15 North referenced to North American Datum 1983 (NAD83)

3. OWNER City of Sullivan

NAME	TITLE	TELEPHONE NUMBER WITH AREA CODE	
Tom Harman	Water & Sewer Commissioner	573-468-4812	
ADDRESS	CITY	STATE	ZIP
210 W. Washington	Sullivan	MO	63080

3.1 Request review of draft permit prior to Public Notice? ☑ Yes ☐ No

4. CONTINUING AUTHORITY: Permanent organization which will serve as the continuing authority for the operation, maintenance and modernization of the facility.

NAME		CITY	
City Of Sullivan		Sullivan	
ADDRESS	CERTIFICATE NUMBER (IF APPLICABLE)	STATE	ZIP
210 W. Washington		Mo	63080

5. OPERATOR

NAME	TITLE	TELEPHONE NUMBER WITH AREA CODE
William Houser	Operator (Certificate #3454)	573-468-8223

6. FACILITY CONTACT

NAME	TITLE
William Houser	Operator (Certificate #3454)

MO 780-1805 (09-08)

MISSOURI DEPARTMENT OF NATURAL RESOURCES
WATER PROTECTION PROGRAM, WATER POLLUTION CONTROL BRANCH

FORM B2 – APPLICATION FOR CONSTRUCTION OR OPERATING PERMIT FOR FACILITIES WHICH RECEIVE PRIMARILY DOMESTIC WASTE AND HAVE A DESIGN FLOW MORE THAN 100,000 GALLONS PER DAY

FACILITY NAME	
Sullivan Wastewater Treatment Plant	
PERMIT NO.	COUNTY
Mo. 0104736	Franklin

APPLICATION OVERVIEW

Form B2 has been developed in a modular format and consists of Parts A, B and C and a Supplemental Application Information (Parts D, E, F and G) packet. All applicants must complete Parts A, B and C. Some applicants must also complete parts of the Supplemental Application Information packet. The following items explain which parts of Form B2 you must complete. Submittal of an incomplete application may result in the application being returned.

BASIC APPLICATION INFORMATION

A. Basic Application Information for all Applicants. All applicants must complete Part A.

B. Additional Application Information for all Applicants. All applicants must complete Part B.

C. Certification. All applicants must complete Part C.

SUPPLEMENTAL APPLICATION INFORMATION

D. Expanded Effluent Testing Data. A treatment works that discharges effluent to surface water of the United States and meets one or more of the following criteria must complete *Part D - Expanded Effluent Testing Data*:

1. Has a design flow rate greater than or equal to 1 million gallons per day.
2. Is required to have or currently has a pretreatment program.
3. Is otherwise required by the permitting authority to provide the information.

E. Toxicity Testing Data. A treatment works that meets one or more of the following criteria must complete *Part E - Toxicity Testing Data*:

1. Has a design flow rate greater than or equal to 1 million gallons per day.
2. Is required to have or currently has a pretreatment program.
3. Is otherwise required by the permitting authority to provide the information.

F. Industrial User Discharges and Resource Conservation and Recovery Act / Comprehensive Environmental Response, Compensation and Liability Act Wastes. A treatment works that accepts process wastewater from any significant industrial users, also known as SIUs, or receives a Resource Conservation and Recovery Act or CERCLA wastes must complete *Part F - Industrial User Discharges and Resource Conservation and Recovery Act /CERCLA Wastes*.

SIUs are defined as:

1. All Categorical Industrial Users, or CIUs, subject to Categorical Pretreatment Standards under 40 Code of Federal Regulations 403.6 and 40 Code of Federal Regulations 403.6 and 40 CFR Chapter 1, Subchapter N.
2. Any other industrial user that meets one or more of the following:
   - i. Discharges an average of 25,000 gallons per day or more of process wastewater to the treatment works (with certain exclusions).
   - ii. Contributes a process waste stream that makes up five percent or more of the average dry weather hydraulic or organic capacity of the treatment plant.
   - iii. Is designated as an SIU by the control authority.

G. Combined Sewer Systems. A treatment works that has a combined sewer system must complete *Part G - Combined Sewer Systems*.

ALL APPLICANTS MUST COMPLETE PARTS A, B and C

FACILITY NAME	PERMIT NO.	OUTFALL NO.
Sullivan Wastewater Treatment Plant	MO- 0104736	2

PART A – BASIC APPLICATION INFORMATION

7. ADDITIONAL FACILITY INFORMATION

7.1 BRIEF DESCRIPTION OF FACILITIES

Influent lift station/screening & grit removal/peak flow holding basins/sequencing batch reactor/ultraviolet disinfection/aerobic sludge digester/sludge contract hauler. Effluent supply to golf course (0 - 100% of flow) in the future.

7.2 TOPOGRAPHIC MAP. ATTACH TO THIS APPLICATION A TOPOGRAPHIC MAP OF THE AREA EXTENDING AT LEAST ONE MILE BEYOND FACILITY PROPERTY BOUNDARIES. THIS MAP MUST SHOW THE OUTLINE OF THE FACILITY AND THE FOLLOWING INFORMATION. (YOU MAY SUBMIT MORE THAN ONE MAP IF ONE MAP DOES NOT SHOW THE ENTIRE AREA.)

(See attached)

a. The area surrounding the treatment plant, including all unit processes.
b. The location of the downstream landowner(s). (See Item 10.)
c. The major pipes or other structures through which wastewater enters the treatment works and the pipes or other structures through which treated wastewater is discharged from the treatment plant. Include outfalls from bypass piping, if applicable.
d. The actual point of discharge.
e. Wells, springs, other surface water bodies and drinking water wells that are: 1) within ¼ mile of the property boundaries of the treatment works, and 2) listed in public record or otherwise known to the applicant.
f. Any areas where the sewage sludge produced by the treatment works is stored, treated or disposed.
g. If the treatment works receives waste that is classified as hazardous under the Resource Conservation and Recovery Act, or RCRA, by truck, rail or special pipe, show on the map where that hazardous waste enters the treatment works and where it is treated, stored or disposed.

7.3 PROCESS FLOW DIAGRAM OR SCHEMATIC. PROVIDE A DIAGRAM SHOWING THE PROCESSES OF THE TREATMENT PLANT. ALSO, PROVIDE A WATER BALANCE SHOWING ALL TREATMENT UNITS, INCLUDING DISINFECTION (E.G. CHLORINATION AND DECHLORINATION). THE WATER BALANCE MUST SHOW DAILY AVERAGE FLOW RATES AT INFLUENT AND DISCHARGE POINTS AND APPROXIMATE DAILY FLOW RATES BETWEEN TREATMENT UNITS. INCLUDE A BRIEF NARRATIVE DESCRIPTION OF THE DIAGRAM.

7.4 FACILITY SIC CODE	DISCHARGE SIC CODE:	FACILITY NAICS CODE:	DISCHARGE NAICS CODE:
4952 .	4952 .	____ . 221320	____ . 221320

7.5 NUMBER OF SEPARATE DISCHARGE POINTS

One

7.6 NUMBER OF PEOPLE PRESENTLY CONNECTED OR POPULATION EQUIVALENT	DESIGN POPULATION EQUIVILENT
10,100 PE	20,000

NUMBER OF UNITS PRESENTLY CONNECTED

HOMES ____ APARTMENTS ____ TRAILERS ____ OTHER ____

TOTAL DESIGN FLOW (ALL OUTFALLS)	ACTUAL FLOW
2.0 MGD	1.1 MGD

7.7 DOES ANY BYPASSING OCCUR ANYWHERE IN THE COLLECTION SYSTEM OR AT THE TREATMENT FACILITY?

Yes ☐ No ■ (If Yes, attach an explanation.)

7.8 LENGTH OF THE SANITARY SEWER COLLECTION SYSTEM IN MILES

85

7.9 IS INDUSTRIAL WASTE DISCHARGED TO THE FACILITY IDENTIFIED IN ITEM 2? Yes ☑ No ☐

7.10 WILL THE DISCHARGE BE CONTINUOUS THROUGH THE YEAR? Yes ☑ No ☐

A. DISCHARGE WILL OCCUR DURING THE FOLLOWING MONTHS	B. HOW MANY DAYS OF THE WEEK WILL THE DISCHARGE OCCUR?
Continuous	7 Days Continuous

7.11 IS WASTEWATER LAND APPLIED? (If Yes, Attach Form I)	7.12 DOES THIS FACILITY DISCHARGE TO A LOSING STREAM OR SINKHOLE?
Yes ☐ No ☑	Yes ☑ No ☐

7.13 HAS A WASTE LOAD ALLOCATION STUDY BEEN COMPLETED FOR THIS FACILITY?

Yes ☐ No ☑

7.14 LIST ALL PERMIT VIOLATIONS, INCLUDING EFFLUENT LIMIT EXCEEDANCES IN THE LAST FIVE YEARS. (See Attached)

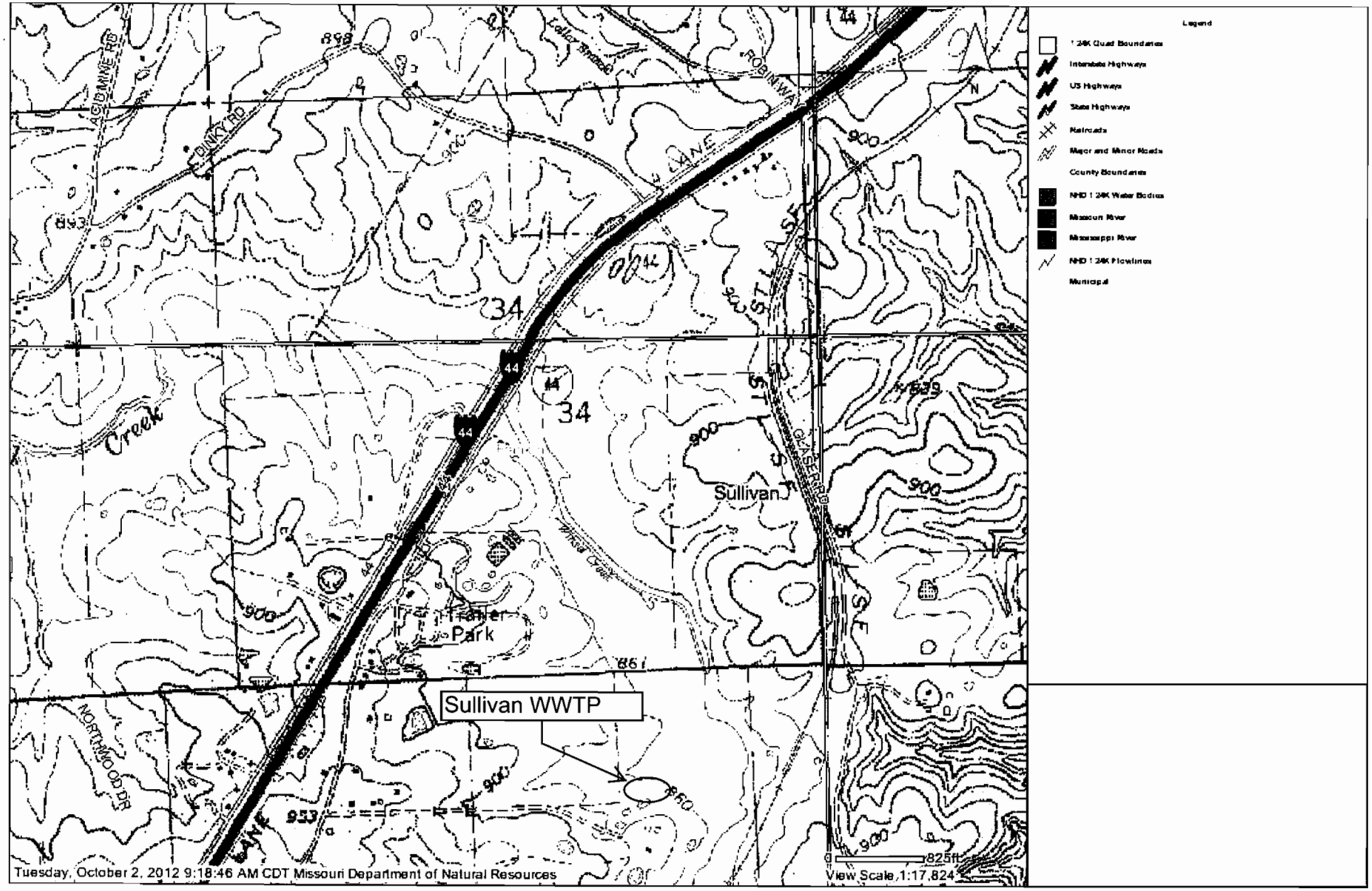
ATTACH A SEPARATE SHEET IF NECESSARY. IF NONE, WRITE NONE. NOV 2365SL and NOV #SLRO 9133318

8. LABORATORY CONTROL INFORMATION

8.1 LABORATORY WORK CONDUCTED BY PLANT PERSONNEL

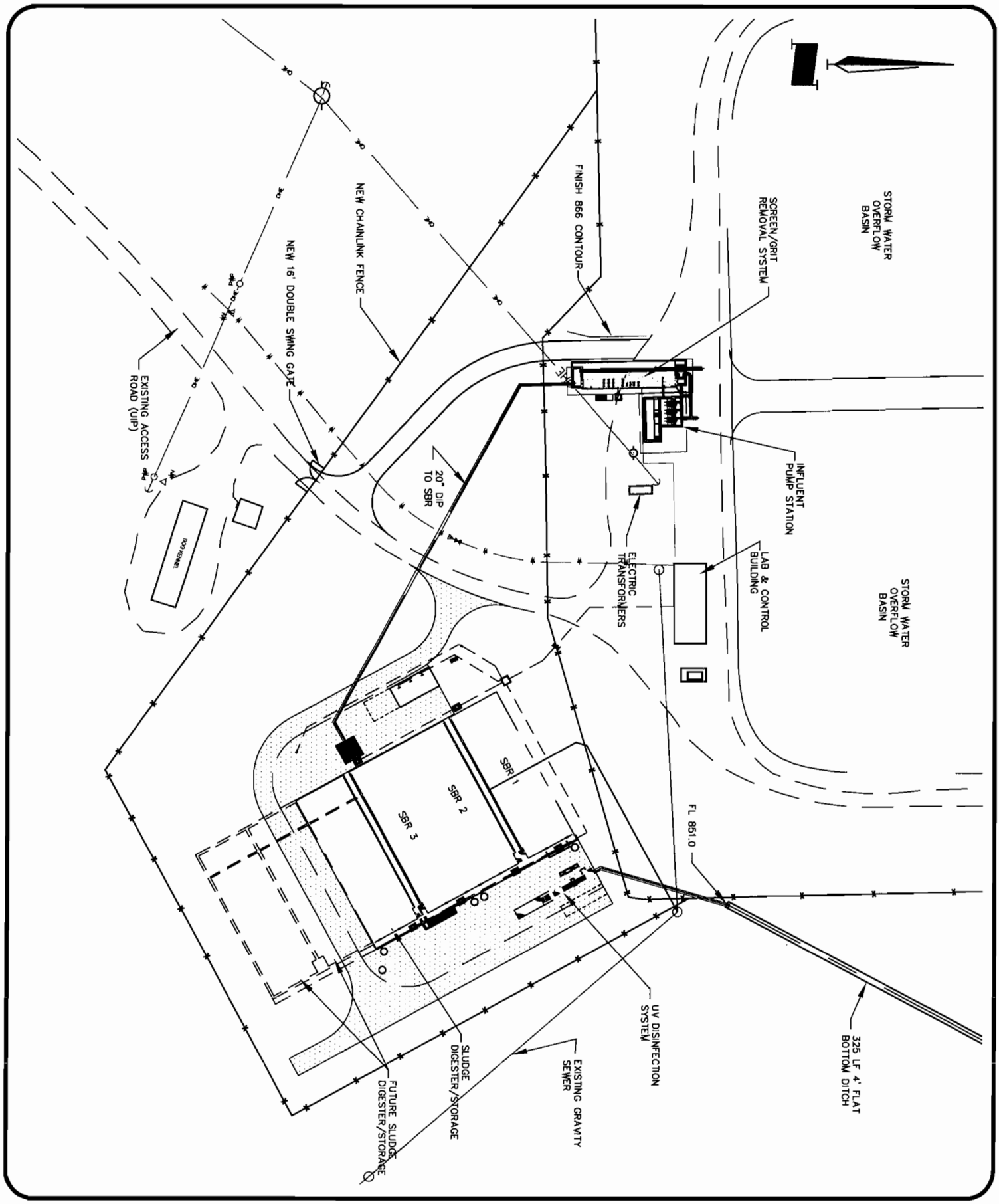
Lab work conducted outside of plant. Some tests are done outside of plant.	Yes ☐	No ☑
Push–button or visual methods for simple test such as pH, settleable solids.	Yes ☑	No ☐
Additional procedures such as Dissolved Oxygen, Chemical Oxygen Demand, Biological Oxygen Demand, titrations, solids, volatile content.	Yes ☑	No ☐
More advanced determinations such as BOD seeding procedures, fecal coliform, nutrients, total oils, phenols, etc.	Yes ☑	No ☐
Highly sophisticated instrumentation, such as atomic absorption and gas chromatograph Spectrometer	Yes ☑	No ☐

Sullivan WWTP Area Topo



Missouri Department of Natural Resources

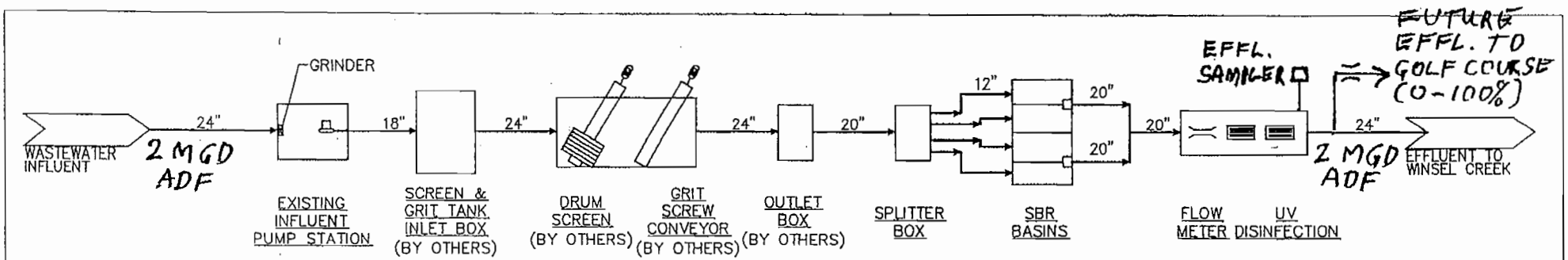
Disclaimer: Although this map has been compiled by the Missouri Department of Natural Resources, no warranty, expressed or implied, is made by the department as to the accuracy of the data and related materials. The act of distribution shall not constitute any such warranty, and no responsibility is assumed by the department in the use of these data or related materials.



SULLIVAN MISSOURI

WWTP PLAN EXHIBIT

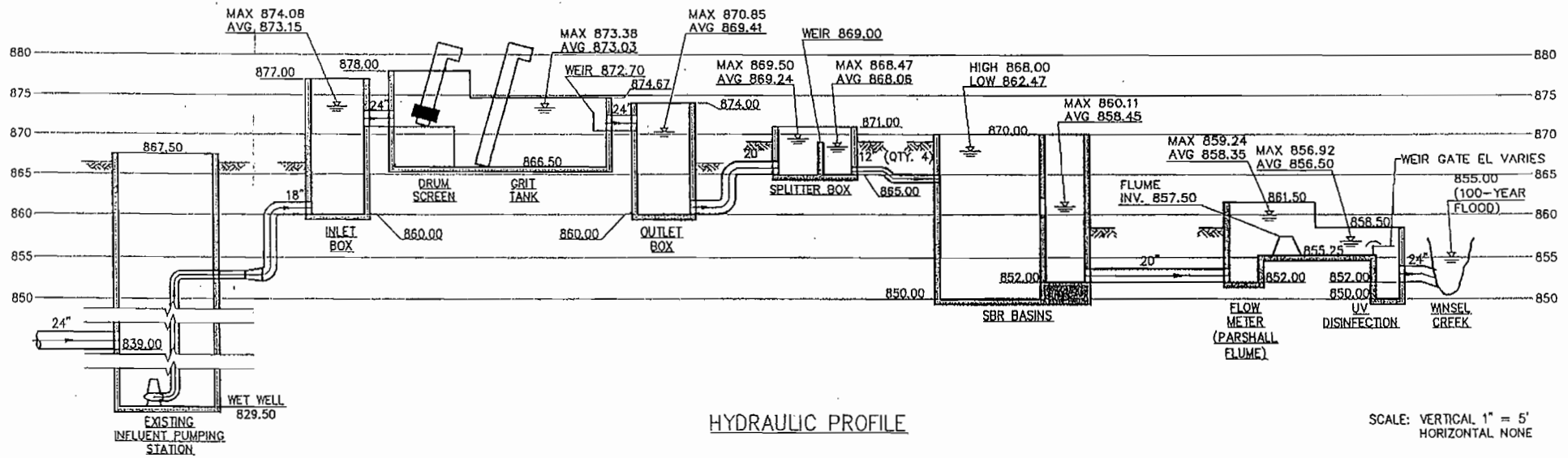
DATE: OCT 02, 2012
DRAWN BY: DG
CHECKED BY: RS
PLOT SCALE: 1" = 80'
FILE NAME: WWTP Permit 2012



PROCESS FLOW DIAGRAM

LEGEND

MAX WATER LEVEL AT MAXIMUM FLOW OF 6 MGD
AVG WATER LEVEL AT AVERAGE FLOW OF 2 MGD
HIGH MAXIMUM WATER LEVEL IN SBR
LOW WATER LEVEL IN SBR AFTER DECANT



HYDRAULIC PROFILE

SCALE: VERTICAL 1" = 5'
HORIZONTAL NONE

No.	Date	Description	Drawn	Checked	Approved	Submitted
0	08/28/07	FOR MODIFY REVIEW & BIDDING				

P.K. MATHAI

WASTEWATER TREATMENT PLANT
PHASE 2
CITY OF SULLIVAN, MISSOURI
JACOBS

GENERAL
PROCESS FLOW DIAGRAM AND HYDRAULIC PROFILE

Date	AUGUST 2007
Designed	G. NICKERSON
Drawn	E. RATZELL
Checked	P.K. MATHAI
Approved	
Submitted	-

Drawing Number: **G-01**

June 9, 2010

Regional Branch-Enforcement Section
1101 Riverside Drive (Lewis & Clark Bldg.)
Jefferson City, MO 65101

RE: Notice of Violation No. 2365 SL

Dear Sirs:

We are in the 3rd phase of construction at the new WWTP for Sullivan.
This stage involves the sludge removal and construction of a new lined basin.
This began in late May of 09 and has been ongoing till present. The dewatering of the lagoon ended in mid March this year and the sludge removal is done. The earth work has started on the new basin also.

During the period from May of 09 till March of 2010 is when the dewatering was happening. We noticed effluent numbers were getting out of control and started trying to figure out the problem. It turned out that the wastewater from the lagoon was being pumped to fast by the contractor into the SBR. We sampled the lagoon for ammonia and the results were over 20 mg/L. We started adding bacteria in the lagoon and treatment plant, plus made the contractor slow his pumping rate. This was helping, but we were still out of compliance. By late fall and winter, the temperature was having its affect too. Since dewatering has stopped in March this year our ammonia and fecal numbers are in compliance, plus we have learned what happens in the winter. The city is looking into trying to enclose the grit chamber and add insulation and some heat. This should make the mechanical process run better and add a little temperature to the influent.

I hope this response is satisfactory and meets with your approval.
I am also enclosing the letter we received in February from the Water Protection Program by Elena Seon, along with my response.

Sincerely,

Tom Harman
Water and Sewer Supervisor

cc: Mike Struckhoff, Regional Director

Franklin County (WP)
City of Sullivan WWTF
MO-0104736

STATE OF MISSOURI
Jeremiah W. (Jay) Nixon, Governor • Mark N. Templeton, Director
DEPARTMENT OF NATURAL RESOURCES
www.dnr.mo.gov

May 26, 2010

CERTIFIED MAIL #7007 3020 0000 1318 6842
RETURN RECEIPT REQUESTED

City of Sullivan
210 West Washington
Sullivan, MO 63080

Dear Sir or Madam: **Notice of Violation No. 2365 SL**

The enclosed Notice of Violation (NOV), No. 2365 SL, is issued to the City of Sullivan WWTF for failure to meet state operating permit limits for ammonia every month since July 2009 in violation of the Missouri Clean Water Law and associated State Regulation 10 CSR 20-7.015(9), *Effluent Regulations.*

Within 30 days of receipt of this letter and NOV, please submit to the Water Pollution Branch-Enforcement Section, 1101 Riverside Drive (Lewis & Clark Building), Jefferson City, MO 65101, 573-751-1300, a comprehensive ammonia reduction plan for review and approval and provide a copy of all correspondence to the St. Louis Regional Office (SLRO) - Engineering Section at the address and telephone number below.

If you have any additional questions or comments, please contact **Scott Hoffman at the Franklin County Satellite Office at (573) 860-4308 or SLRO at (314) 416-2960.** All correspondence to the **SLRO Engineering Section** should be sent to **7545 South Lindbergh Blvd., Suite 210, St. Louis, Missouri 63125; telephone 314-416-2960.**

Sincerely,

ST. LOUIS REGIONAL OFFICE

Mike Struckhoff
Regional Director

CITY OF SULLIVAN
RECEIVED
5/27/10
[illegible] City Clerk

MS/RSH/jh
Enclosure

Recycled Paper

c: Kevin Mohammadi, Chief Enforcement, Water Pollution Branch

P.O. BOX 176
JEFFERSON CITY MO 65102

MISSOURI DEPARTMENT OF NATURAL RESOURCES

NOTICE OF VIOLATION

REGION/PROGRAM
☐ KC ☐ NE ☐ SE ☒ SL
☐ SW ☐ DW ☐ HWP
☐ LRP ☐ SWMP ☐ WPC

VIOLATION NUMBER
NO. 2365 SL

DATE AND TIME ISSUED
May 26, 2010 ☐ AM ☐ PM

SOURCE (NAME, ADDRESS, PERMIT NUMBER, LOCATION)

City of Sullivan WWTF
Emma Lane, Sullivan, MO 63080
Location: NE 1/4, NE 1/4, Sec 3, T40N, R2W, Franklin County
Permit #MO-0104736

MAILING ADDRESS	CITY	STATE	ZIP CODE
210 West Washington	Sullivan	MO	63080

NAME OF OWNER OR MANAGER	TITLE OF OWNER OR MANAGER	COUNTY
City of Sullivan		Franklin

LAW, REGULATION OR PERMIT VIOLATED

MO Clean Water Law, Section 644.051.1(3) - Prohibited Acts
MO Clean Water Commission Regulation 10 CSR 20-7.015(9) - Effluent Regulations

NATURE OF VIOLATION — DATE(S): — TIME(S):

Failure to meet state operating permit limits for ammonia every month since July 2009.

SIGNATURE (PERSON RECEIVING NOTICE)	SIGNATURE (PERSON ISSUING NOTICE)
By Certified Mail	R. Scott Hoffman
TITLE OR POSITION	TITLE OR POSITION
	Environmental Specialist/SLRO-FCSO

February 9, 2011

Mr. Hoffman, SLRO
7545 South Lindberg Blvd., Suite 210
St. Louis, Missouri 63125

RE: (NOV) #SLRO 9133318

Dear Mr. Hoffman:

On the 14th of January, the COS WWTP operator was decanting supernatant off the top of the sludge basin back into the plant. During the process being done manually, the operator failed to see the overflow happen in the discharge box. The event happened within a minute or two and was stopped immediately. To keep this from happening again, closer attention will be made during this process.

The other issue about reporting the event within 24 hours was my fault. The operator had made me aware of the situation the same day that it happened. At the time I was told, I didn't realize that the overflow had made it's way to the plant's effluent. In my mind it had run over the edge and down the outside wall of the basin and on to the ground around it. After further discussion days later, I realized that the incident should have been reported within 24 hrs.

Closer attention and understanding should remedy any more situations like this one from happening again.

Sincerely,

Tom Harman

Water & Sewer Supervisor

Franklin County (WP)
City of Sullivan WWTF
Sanitary Sewer Overflow/Illegal Discharge
MO-0104736

STATE OF MISSOURI
Jeremiah W. (Jay) Nixon, Governor • Sara Parker Pauley, Director
DEPARTMENT OF NATURAL RESOURCES
www.dnr.mo.gov

January 26, 2011

CERTIFIED MAIL #7007 3020 0000 1318 7153
RETURN RECEIPT REQUESTED

Mark Falloon, City Administrator
City of Sullivan
210 West Washington
Sullivan, MO 63080

Dear Mr. Falloon: **NOTICE OF VIOLATION**

On January 21, 2011, Mr. Bill Houser of the City of Sullivan faxed a sanitary sewer overflow (SSO)/wastewater bypass report to the St. Louis Regional Office (SLRO). The report indicated that the city had created a bypass from an unpermitted discharge to the creek during the decanting of the wastewater treatment plant's sludge basin.

Illegally discharging from an unpermitted wastewater treatment outfall, as well as failing to timely report the overflow/discharge as required are both violations of the Missouri Clean Water Law and associated Missouri Clean Water Regulation, 10 CSR 20-7.015, *Effluent Regulations*.

The enclosed "Notice of Violation" (NOV) #SLR09133318 is issued for the aforementioned water pollution violations.

***Within 30 days of receipt of this NOV*:**

Please notify this office in writing (address given below) what actions/procedures you have put in place to ensure that an overflow/bypass is not created when decanting the sludge basin, and what procedures you have put in place to ensure all SSOs and bypasses are reported to the St. Louis Regional Office in a timely manner.

If you have any questions about this NOV, you may call Mr. Hoffman at the Franklin County Satellite Office at 573-860-4308 or the St. Louis Regional Office at 314-416-2960 (on Wednesdays) or you may write him at the SLRO at 7545 South Lindbergh Blvd., Suite 210, St. Louis, Missouri 63125.

Thank you for your cooperation in resolving these water pollution violations.

Sincerely,

ST. LOUIS REGIONAL OFFICE

Mike Struckhoff
Regional Director

MS/RSH/jh

Enclosure

P.O. BOX 176
JEFFERSON CITY MO 65102

MISSOURI DEPARTMENT OF NATURAL RESOURCES

NOTICE OF VIOLATION

TRACKING NUMBER: SLR 2011012609133318

DATE ISSUED	TIME ISSUED	REGION/PROGRAM
01-26-2011		St.Louis Regional Office (SLRO)

SOURCE (NAME, ADDRESS, PERMIT NUMBER, LOCATION)
City of Sullivan WWTF MO-0104736

Emma Lane

Sullivan, MO 63080

MAILING ADDRESS	CITY	STATE	ZIP CODE
210 West Washington	Sullivan	MO	63080

NAME OF OWNER OR MANAGER	TITLE OF OWNER OR MANAGER	COUNTY
Mr. Mark Falloon	City Administrator	Franklin

LAW, REGULATION OR PERMIT VIOLATED

Missouri Clean Water Law Sections: 644.051-Prohibited Acts, and; 644.076-Unlawful Acts Prohibited.

Missouri Clean Water Regulation: 10 CSR 20-7.015 (9)(E)-Effluent Regulations; 10 CSR 20-6.010(1)-Construction and Operating Permits.

NATURE OF VIOLATION — DATE(S): — TIME(S):

Illegal discharge/bypass from an unpermitted wastewater outfall, and; 01-26-2011

failure to report, in a timely manner, a sanitary sewer overflow/bypass as required by Missouri State Clean Water regulations.

SIGNATURE (PERSON RECEIVING NOTICE)	SIGNATURE (PERSON ISSUING NOTICE)
Sent by Certified Mail	R Scott Hoffman
TITLE OR POSITION: City Administrator	TITLE OR POSITION: Environmental Specialist III / SLRO

ADDENDUM

LOCATIONAL DATA	
UTM EASTING	UTM NORTHING
HORIZONTAL COLLECTION METHOD	ESTIMATED POSITION ERROR OR PDOP
REFERENCE POINT	COORDINATE DATA SOURCE

ADDITIONAL COMMENTS

IMAGE 1	IMAGE 2

REPORT OF
SANITARY SEWER OVERFLOW (SSO) OR
WASTEWATER TREATMENT PLANT BYPASS

PERMITTEE INFORMATION

PERMITTEE(MUNICIPALITY/DISTRICT & PLANT):	PERMIT NUMBER:
SULLIVAN WASTE WATER PLANT	MO-0104736
COUNTY: FRANKLIN	PHONE NUMBER: 573-468-8223

SSO/BYPASS DETAILS

a. Street Address/Landmark/Cross Street:

b. Complaint Name & Telephone #:

c. Start Date & Time: 1-14-11 11:15 | End Date & Time: 1-14-11 11:18

d. Total Time: 2-3 MIN | Volume (Gallons): ~4000

e. Categories of SSO

- ☐ Vandalism
- ☐ Inflow & Infiltration — Rain Inches ____
- ☐ Power Outage
- ☐ Plugged Sewer — Manhole location # ____
- ☐ Broken Sewer
- ☐ Equipment Failure
- ☐ Widespread Flooding
- ☒ Other DECANTING SLUDGE BASIN

f. Categories of STP Bypass

- ☐ Head Works
- ☐ Primary Basins
- ☐ Aeration/Biological Treatment
- ☐ Clarifiers
- ☒ Digester
- ☐ Solids Handling/Drying Beds
- ☐ Other

g. Strength of SSO/Bypass: ☐ Raw (Dry weather SSO or Influent) ☒ Partially Treated Bypass or Wet weather SSO) Was sampling performed? ☐ yes ☒ no

Type of Samples Taken: ☐ BOD ☐ TSS ☐ Fecal ☐ Ammonia ☐ DO ☐ Other ____

RECEIVING WATERS

a. Name of Receiving Stream: WINSEL CREEK | Length Affected:

b. Discharge Course

- ☐ Runs on ground and absorbs into the soil.
- ☒ Ditch. Name of surface water it drains to: WINSEL CREEK
- ☐ Storm sewer. Name of surface water it drains to: ____
- ☐ Surface water direct discharge: ____
- ☐ Other, describe: ____

CLEAN UP

a. ☒ Flushing ☐ Removing ☐ Chemical Application ☐ Other: ____

b. Describe detailed actions taken to correct & clean up the SSO/Bypass and any follow up actions:

Failed to get faxed in time

CLEAN UP PREFORMED BY: Bill Houser

REPORT PREPARED/SUBMITTED BY

NAME (PRINTED): Bill Houser	TITLE: OPERATOR
SIGNATURE: Bill Houser	DATE: 1-14-11

NOTE: Any SSO, bypass or shutdown of a wastewater treatment facility and/or tributary sewer system, is prohibited unless necessary to prevent loss of life, personal injury or property damages. **The Continuing Authority is required to notify the Department of Natural Resources by TELEPHONE or FAX by the next business day of any SSO or bypass, and to follow with a written report within 5 business days.**

FACILITY NAME	PERMIT NO.	OUTFALL NO.
Sullivan Wastewater Treatment Plant	MO- 0104736	2

PART A – BASIC APPLICATION INFORMATION

9. SLUDGE HANDLING, USE AND DISPOSAL

9.1 IS THE SLUDGE A HAZARDOUS WASTE AS DEFINED BY 10 CSR 25?
Yes ☐ No ☑

9.2 SLUDGE PRODUCTION, INCLUDING SLUDGE RECEIVED ROM OTHERS
Design Dry Tons/Year 381 (raw) 259 (digested) Actual Dry Tons/Year 270

9.3 CAPACITY OF SLUDGE HOLDING STRUCTURES

9.4 SLUDGE STORAGE PROVIDED
Cubic Feet 61,200 Days of Storage 90-180 Average Percent Solids of Sludge 2%+ ☐ No Sludge Storage is Provided

9.5 TYPE OF STORAGE
☐ Holding Tank ☐ Basin ☐ Building ☐ Concrete Pad ☑ Other (Describe) Aerobic Digester

9.6 SLUDGE TREATMENT
☐ Anaerobic Digester ☐ Storage Tank ☐ Lime Stabilization ☐ Lagoon
☑ Aerobic Digester ☐ Air or Heat Drying ☐ Composting ☐ Other (Attach Description)

9.7 SLUDGE USE OR DISPOSAL
☐ Land Application ☑ Contract Hauler ☐ Hauled to Another Treatment Facility ☐ Solid Waste Landfill
☐ Surface Disposal (Sludge Disposal Lagoon, Sludge Held For More Than Two Years) ☐ Incineration
☐ Other (Attach Explanation Sheet) _____

9.8 PERSON RESPONSIBLE FOR HAULING SLUDGE TO DISPOSAL FACILITY

NAME			
Oros & Busch			
ADDRESS	CITY	STATE	ZIP
PO BOX 37	Defiance	Mo	63080
CONTACT PERSON	TELEPHONE NUMBER WITH AREA CODE	PERMIT NO	
Joe Busch	314-651-4673	MO-	

9.9 SLUDGE USE OR DISPOSAL FACILITY
☐ By Applicant ☐ By Others (Complete Below)

NAME			
ADDRESS	CITY	STATE	ZIP
CONTACT PERSON	TELEPHONE NUMBER WITH AREA CODE	PERMIT NO	
		MO-	

9.10 DO THE SLUDGE OR BIOSOLIDS DISPOSAL COMPLY WITH FEDERAL SLUDGE REGULATIONS UNDER 40 CFR 503?
■ Yes ☐ No (Attach Explanation)

10. DOWNSTREAM LANDOWNER(S). (ATTACH ADDITIONAL SHEETS AS NECESSARY.)

NAME			
Richard Kuhn			
ADDRESS	CITY	STATE	ZIP
1776 E. Springfield Road	Sullivan	MO	63080

11. DRINKING WATER SUPPLY INFORMATION

11.1 SOURCE OF YOUR DRINKING WATER SUPPLY

A. PUBLIC SUPPLY (MUNICIPAL OR WATER DISTRICT WATER) (IF PUBLIC, PLEASE GIVE NAME OF PUBLIC SUPPLY)
City Of Sullivan

B. PRIVATE WELL

C. SURFACE WATER (LAKE, POND OR STREAM)

11.2 DOES YOUR DRINKING WATER SOURCE SERVE AT LEAST 25 PEOPLE AT LEAST 60 DAYS PER YEAR (NOT NECESSARILY CONSECUTIVE DAYS)? Yes ☑ No ☐

11.3 DOES YOUR SPPLY SERVE HOUSING THAT IS OCCUPIED YEAR ROUND BY THE SAME PEOPLE? THIS DOES NOT INCLUDE HOUSING THAT IS OCCUPIED SEASONALLY? Yes ☑ No ☐

END OF PART A

MAKE ADDITIONAL COPIES OF THIS FORM FOR EACH OUTFALL

FACILITY NAME	PERMIT NO.	OUTFALL NO.
Sullivan Wastewater Treatment Plant	MO- 0104736	2

PART B – ADDITIONAL APPLICATION INFORMATION

20. INFLOW AND INFILTRATION

ESTIMATE THE AVERAGE NUMBER OF GALLONS PER DAY THAT FLOW INTO THE TREATMENT WORKS FROM INFLOW AND INFILTRATION.

Gallons Per Day 50,000

BRIEFLY EXPLAIN ANY STEPS UNDERWAY OR PLANNED TO MINIMIZE INFLOW AND INFILTRATION.

Lining of sewer mains & manholes is done as an annual program. Smoke testing of sewers.

20.1 OPERATION AND MAINTENANCE PERFORMED BY CONTRACTOR(S)

ARE ANY OPERATIONAL OR MAINTENANCE ASPECTS (RELATED TO WASTEWATER TREATMENT AND EFFLUENT QUALITY) OF THE TREATMENT WORKS THE RESPONSIBILITY OF A CONTRACTOR?

Yes ☐ No ☑ If Yes, list the name, address, telephone number and status of each contractor and describe the contractor's responsibilities. (Attach additional pages if necessary.)

NAME

MAILING ADDRESS

TELEPHONE NUMBER WITH AREA CODE

RESPONSIBILITIES OF CONTRACTOR

20.2 SCHEDULED IMPROVEMENTS AND SCHEDULES OF IMPLEMENTATION. PROVIDE INFORMATION ABOUT ANY UNCOMPLETED IMPLEMENTATION SCHEDULE OR UNCOMPLETED PLANS FOR IMPROVEMENTS THAT WILL AFFECT THE WASTEWATER TREATMENT, EFFLUENT QUALITY OR DESIGN CAPACITY OF THE TREATMENT WORKS. IF THE TREATMENT WORKS HAS SEVERAL DIFFERENT IMPLEMENTATION SCHEDULES OR IS PLANNING SEVERAL IMPROVEMENTS, SUBMIT SEPARATE RESPONSES FOR EACH. (IF NONE, GO TO QUESTION B-20.3.)

A. List the outfall number that is covered by this implementation schedule	B. Indicate whether the planned improvements or implementation schedule are required by local, state or federal agencies.
Outfall No.	Yes ☐ No ☐

20.3 WASTEWATER DISCHARGES:

COMPLETE QUESTIONS 20.4 THROUGH 20.7 ONCE FOR EACH OUTFALL (INCLUDING BYPASS POINTS) THROUGH WHICH EFFLUENT IS DISCHARGED. DO NOT INCLUDE INFORMATION ON COMBINED SEWER OVERFLOWS IN THIS SECTION.

20.4 DESCRIPTION OF OUTFALL

OUTFALL NUMBER 2

A. LOCATION

¼ NE ¼ NE ¼ NE Section 3 Township 40N Range 2 ☐ E ☑ W

UTM Coordinates Easting (X): 663810 Northing (Y): 4233940

For Universal Transverse Mercator (UTM), Zone 15 North referenced to North American Datum 1983 (NAD83)

B. Distance from Shore (If Applicable)	C. Depth Below Surface (If Applicable)	D. Average Daily Flow Rate
300+ ft.	_____ ft.	1.1 mgd

E. Does this outfall have either an intermittent or periodic discharge?

☐ Yes ☑ No If Yes, Provide the following information:

Number of Days Per Year Discharge Occurs:	Average Duration of Each Discharge:	Average Flow Per Discharge: mgd	Months in Which Discharge Occurs:

Is Outfall Equipped with a Diffuser? ☐ Yes ■ No

20.5 DESCRIPTION OF RECEIVING WATER

B. Name of Receiving Water

Unnamed tributary of Winsel Creek / Winsel Creek (U) Losing

B. Name of Watershed (If Known)	U.S. Soil Conservation Service 14-Digit Watershed Code (If Known)
Spring Creek (C) (2072)	07140103-090007
B. Name of State Management/River Basin (If Known)	U.S. Geological Survey 8-Digit Hydrologic Cataloging Unit Code (If Known)
B. Critical Flow of Receiving Stream (If Applicable) Acute _____ cfs Chronic _____ cfs	B. Total Hardness of Receiving Stream at Critical Low Flow (If Applicable) mg/L of $CaCO_3$

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FACILITY NAME	PERMIT NO.	OUTFALL NO.
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PART B – ADDITIONAL APPLICATION INFORMATION (CONTINUED)

20.6 DESCRIPTION OF TREATMENT

A. WHAT LEVELS OF TREATMENT ARE PROVIDED? Check All That Apply

☑ Primary ☑ Secondary ☐ Advanced ☐ Other (Describe)

B. INDICATE THE FOLLOWING REMOVAL RATES (AS APPLICABLE)

Design BOD_5 Removal Or Design $CBOD_5$ Removal 90 % Design SS Removal 90 %

Design P Removal ___% Design N Removal ___% Other _____ ___%

C. What type of disinfection is used for the effluent from this outfall? If disinfection varies by season, please describe:

Ultraviolet Disinfection

If disinfection is by chlorination, is dechlorination used for this outfall? ☐ Yes ☐ No

Does the treatment plant have post aeration? ☑ Yes ☐ No

20.7 EFFLUENT TESTING DATA. ALL APPLICANTS THAT DISCHARGE TO WATERS OF THE U.S. MUST PROVIDE EFFLUENT TESTING DATA FOR THE FOLLOWING PARAMETERS. PROVIDE THE INDICATED EFFLUENT DATA **FOR EACH OUTFALL THROUGH WHICH EFFLUENT IS DISCHARGED**. DO NOT INCLUDE INFORMATION OF COMBINED SEWER OVERFLOWS IN THIS SECTION. ALL INFORMATION REPORTED MUST BE BASED ON DATA COLLECTED THROUGH ANALYSIS CONDUCTED USING 40 CFR PART 136 METHODS. IN ADDITION, THIS DATA MUST COMPLY WITH QA/QC REQUIREMENTS OF 40 CFR PART 136 AND OTHER APPROPRIATE QA/QC REQUIREMENTS FOR STANDARD METHODS FOR ANALYTES NOT ADDRESSED BY 40 CFR PART 136.

OUTFALL NUMBER

PARAMETER	MAXIMUM DAILY VALUE		AVERAGE DAILY VALUE		
	VALUE	UNITS	VALUE	UNITS	NO. OF SAMPLES
pH (Minimum)	6.39	S.U.	6.88	S.U.	254
pH (Maximum)	7.56	S.U.		S.U.	
FLOW RATE	4.4828	MGD		MGD	
TEMPERATURE (Winter)	14.4	°C	13.2	°C	63
TEMPERATURE (Summer)	28	°C	26.6	°C	65

*For pH report a minimum and a maximum daily value.

POLLUTANT		MAXIMUM DAILY DISCHARGE		AVERAGE DAILY DISCHARGE			ANALYTICAL METHOD	ML/MDL
		CONC.	UNITS	CONC.	UNITS	NO. OF SAMPLES		
Conventional and Nonconventional Compounds								
BIOCHEMICAL OXYGEN DEMAND (Report One)	BOD_5	9.0	mg/L	3.22	mg/L	255	SM5210	
	$CBOD_5$		mg/L		mg/L			
FECAL COLIFORM		375	#/100 mL	80.7	#/100 mL	52	SM9222	
TOTAL SUSPENDED SOLIDS (TSS)		8.4	mg/L	2.23	mg/L	255	SM2540D	
AMMONIA (AS N)		1.24	mg/L	.488	mg/L	52	colorimetric	
CHLORINE (TOTAL RESIDUAL, TRC)			mg/L		mg/L			
DISSOLVED OXYGEN			mg/L		mg/L			
TOTAL KJELDAHL NITROGEN (TKN)			mg/L		mg/L			
NITRATE PLUS NITRITE NITROGEN			mg/L		mg/L			
OIL AND GREASE		<5	mg/L	<5	mg/L	12	EPA 1664A	
PHOSPHORUS (TOTAL)			mg/L		mg/L			
TOTAL DISSOLVE SOLIDS (TDS)			mg/L		mg/L			
OTHER			mg/L		mg/L			

END OF PART B

PART C - CERTIFICATION

30. CERTIFICATION

All applicants must complete the Certification Section. This certification must be signed by an officer of the company or city official. All applicants must complete all applicable sections as explained in the Application Overview. By signing this certification statement, applicants confirm that they have reviewed the entire form and have completed all sections that apply to the facility for which this application is submitted.

ALL APPLICANTS MUST COMPLETE THE FOLLOWING CERTIFICATION.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

PRINTED NAME AND OFFICIAL TITLE (MUST BE AN OFFICER OF THE COMPANY OR CITY OFFICIAL)

Tom Harman, Water and Sewer Supervisor

SIGNATURE

Tom Harman

TELEPHONE NUMBER WITH AREA CODE

573-468-4812

DATE SIGNED

10/02/2012

Upon request of the permitting authority, you must submit any other information necessary to assess wastewater treatment practices at the treatment works or identify appropriate permitting requirements.

For Design Flows Less than 1 Million Gallons Per Day, Send Completed Form to:	For Design Flows of 1 Million Gallons Per Day or Greater, Send Completed Form to:
Appropriate Regional Office Map of regional offices with addresses and phone numbers is available on the Web at www.dnr.mo.gov/regions/ro-map.pdf.	Department of Natural Resources Water Protection Program ATTN: NPDES Permits and Engineering Section P.O. Box 176 Jefferson City, MO 65102

END OF PART C.
REFER TO THE APPLICATION OVERVIEW TO DETERMINE WHICH OTHER PARTS OF FORM B2 YOU MUST COMPLETE.

Do not complete the remainder of this application, unless:

1. Your facility design flow is equal to or greater than 1,000,000 gallons per day.
2. Your facility is a pretreatment treatment works.
3. Your facility is a combined sewer system.

Submittal of an incomplete application may result in the application being returned. Permit fees for returned applications shall be forfeited. Permit fees for applications being processed by the department that are withdrawn by the applicant shall be forfeited.

MAKE ADDITIONAL COPIES OF THIS FORM FOR EACH OUTFALL.

FACILITY NAME	PERMIT NO.	OUTFALL NO.
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PART D – EXPANDED EFFLUENT TESTING DATA

40. EXPANDED EFFLUENT TESTING DATA

Refer to the supplemental application information to determine whether Part D applies to the treatment works.

40.1 EFFLUENT TESTING: IF THE TREATMENT WORKS HAS A DESIGN FLOW GREATER THAN OR EQUAL TO 1 MILLION GALLONS PER DAY OR IT HAS (OR IS REQUIRED TO HAVE) A PRETREATMENT PROGRAM, OR IS OTHERWISE REQUIRED BY THE PERMITTING AUTHORITY TO PROVIDE THE DATA, THEN PROVIDE EFFLUENT TESTING DATA FOR THE FOLLOWING POLLUTANTS. PROVIDE THE INDICATED EFFLUENT TESTING INFORMATION **FOR EACH OUTFALL THROUGH WHICH EFFLUENT IS DISCHARGED**. DO NOT INCLUDE INFORMATION ON COMBINED SEWER OVERFLOWS IN THIS SECTION. ALL INFORMATION REPORTED MUST BE BASED ON DATA COLLECTED THROUGH ANALYSIS CONDUCTED USING 40 CFR PART 136 METHODS. IN ADDITION, THIS DATA MUST COMPLY WITH QA/QC REQUIREMENTS OF 40 CFR PART 136 AND OTHER APPROPRIATE QA/QC REQUIREMENTS FOR STANDARD METHODS FOR ANALYTES NOT ADDRESSED BY 40 CFR PART 136. INDICATE IN THE BLANK ROWS PROVIDED BELOW ANY DATA YOU MAY HAVE ON POLLUTANTS NOT SPECIFICALLY LISTED IN THIS FORM. EFFLUENT TESTING MUST NOT BE MORE THAN FOUR AND ONE-HALF YEARS OLD.

OUTFALL NUMBER (Complete Once for Each Outfall Discharging Effluent to Waters of the State.)

POLLUTANT	MAXIMUM DAILY DISCHARGE				AVERAGE DAILY DISCHARGE					ANALYTICAL METHOD	ML/MDL
	CONC	UNITS	MASS	UNITS	CONC	UNITS	MASS	UNITS	NO. OF SAMPLES		
METALS (TOTAL RECOVERABLE), CYANIDE, PHENOLS AND HARDNESS											
ANTIMONY											
ARSENIC	<7	ug/l			<7	ug/l			13	200.8R5.4	
BERYLLIUM											
CADMIUM	.4	ug/l			.4	ug/l			13	200.8R5.4	
CHROMIUM	10	ug/l			5.5	ug/l			6	200.8R5.4	
COPPER	12	ug/l			8.14	ug/l			17	200.8R5.4	
LEAD	<4.9	ug/l			<4.9	ug/l			13	200.7R5.4	
MERCURY	<.2	ug/l			<.2	ug/l			13	245.1R3.01	
NICKEL	38	ug/l			19.7	ug/l			13	SM19-3111B	
SELENIUM											
SILVER	<3.6	ug/l			<3.6	ug/l			13	200.8R5.4	
THALLIUM											
ZINC	91	ug/l			50.7	ug/l			6	200.8R5.4	
CYANIDE											
TOTAL PHENOLIC COMPOUNDS											
HARDNESS (as $CaCO_3$)	346	mg/l			225	mg/l			6	SM19-23406	
USE THIS SPACE (OR A SEPARATE SHEET) TO PROVIDE INFORMATION ON OTHER METALS REQUESTED BY THE PERMIT WRITER.											

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PART D – EXPANDED EFFLUENT TESTING DATA (CONTINUED)

40.1 EXPANDED EFFLUENT TESTING DATA (CONTINUED)

Complete Once for Each Outfall Discharging Effluent to Waters of the State.

POLLUTANT	MAXIMUM DAILY DISCHARGE				AVERAGE DAILY DISCHARGE					ANALYTICAL METHOD	ML/MDL
	CONC	UNITS	MASS	UNITS	CONC	UNITS	MASS	UNITS	NO. OF SAMPLES		
VOLATILE ORGANIC COMPOUNDS											
ACROLEIN					<25	ug/l			2	EPA 624	
ACRYLONITRILE					<18	ug/l			2	EPA 624	
BENZENE					<5	ug/l			2	EPA 624	
BROMOFORM					<5	ug/l			2	EPA 624	
CARBON TETRACHLORIDE					<5	ug/l			2	EPA 624	
CHLOROBENZENE					<5	ug/l			2	EPA 624	
CHLORODIBROMO-METHANE					<5	ug/l			2	EPA 624	
CHLOROETHANE					<10	ug/l			2	EPA 624	
2-CHLORO-ETHYLVINYL ETHER					<5	ug/l			2	EPA 624	
CHLOROFORM					<5	ug/l			2	EPA 624	
DICHLOROBROMO-METHANE					<5	ug/l			2	EPA 624	
1,1-DICHLORO-ETHANE					<5	ug/l			2	EPA 624	
1,2-DICHLORO-ETHANE					<5	ug/l			2	EPA 624	
TRANS-1,2-DICHLOROETHYLENE											
1,1-DICHLORO-ETHYLENE											
1,2-DICHLORO-PROPANE					<5	ug/l			2	EPA 624	
1,3-DICHLORO-PROPYLENE											
ETHYLBENZENE					<5	ug/l			2	EPA 624	
METHYL BROMIDE											
METHYL CHLORIDE											
METHYLENE CHLORIDE					<5	ug/l			2	EPA 624	
1,1,2,2-TETRA-CHLOROETHANE					<5	ug/l			2	EPA 624	
TETRACHLORO-ETHANE					<5	ug/l			2	EPA 624	
TOLUENE					<5	ug/l			2	EPA 624	
3,4-BENZO-FLUORANTHENE											
BENZO(GH) PHERYLENE					<10	ug/l			2	EPA 624	
BENZO(K) FLUORANTHENE					<10	ug/l			2	EPA 624	

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PART D – EXPANDED EFFLUENT TESTING DATA (CONTINUED)

40.1 EXPANDED EFFLUENT TESTING DATA (CONTINUED)

Complete Once for Each Outfall Discharging Effluent to Waters of the State.

POLLUTANT	MAXIMUM DAILY DISCHARGE				AVERAGE DAILY DISCHARGE					ANALYTICAL METHOD	ML/MDL
	CONC	UNITS	MASS	UNITS	CONC	UNITS	MASS	UNITS	NO. OF SAMPLES		
BIS (2-CHLOROTHOXY) METHANE					<10	ug/l			2	EPA 625	
BIS (2-CHLOROETHYL) – ETHER					<10	ug/l			2	EPA 625	
BIS (2-ETHYLHEXYL) PHTHALATE					<10	ug/l			2	EPA 625	
4-BROMOPHENYL PHENYL ETHER					<10	ug/l			2	EPA 625	
BUTYL BENZYL PHTHALATE					<10	ug/l			2	EPA 625	
2-CHLORONAPH-THALENE					<10	ug/l			2	EPA 625	
4-CHLORPHENYL PHENYL ETHER					<10	ug/l			2	EPA 625	
CHRYSENE					<10	ug/l			2	EPA 625	
DI-N-BUTYL PHTHALATE					<10	ug/l			2	EPA 625	
DEBENZO (A,H) ANTHRACENE					<10	ug/l			2	EPA 625	
1,2-DICHLORO-BENZENE					<5	ug/l			2	EPA 625	
1,3-DICHLORO-BENZENE					<5	ug/l			2	EPA 625	
1,4-DICHLORO-BENZENE					<5	ug/l			2	EPA 625	
3,3-DICHLORO-BENZIDINE					<10	ug/l			2	EPA 625	
DIETHYL PHTHALATE					<10	ug/l			2	EPA 625	
DIMETHYL PHTHALATE					<10	ug/l			2	EPA 625	
2,4-DINITRO-TOLUENE					<10	ug/l			2	EPA 625	
2,6-DINITRO-TOLUENE					<10	ug/l			2	EPA 625	
1,2-DIPHENYL-HYDRAZINE					<10	ug/l			1	EPA 625	
1,1,1-TRICHLORO-ETHANE					<5	ug/l			2	EPA 625	
1,1,2-TRICHLORO-ETHANE					<5	ug/l			2	EPA 625	
TRICHLORETHYLENE	5	ug/l			5	ug/l			6	EPA 625	
VINYL CHLORIDE	10	ug/l			5.8	ug/l			6	EPA 625	
USE THIS SPACE (OR A SEPARATE SHEET) TO PROVIDE INFORMATION ON OTHER VOLATILE ORGANIC COMPOUNDS REQUESTED BY THE PERMIT WRITER											

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PART D – EXPANDED EFFLUENT TESTING DATA (CONTINUED)

40.1 EXPANDED EFFLUENT TESTING DATA (CONTINUED)

Complete Once for Each Outfall Discharging Effluent to Waters of the State.

POLLUTANT	MAXIMUM DAILY DISCHARGE				AVERAGE DAILY DISCHARGE					ANALYTICAL METHOD	ML/MDL
	CONC	UNITS	MASS	UNITS	CONC	UNITS	MASS	UNITS	NO. OF SAMPLES		
ACID-EXTRACTABLE COMPOUNDS											
P-CHLORO-M-CRESOL											
2-CHLOROPHENOL					<10	ug/l			2	EPA 625	
2,4-DICHLOROPHENOL					<10	ug/l			2	EPA 625	
2,4-DIMETHYLPHENOL					<10	ug/l			2	EPA 625	
4,6-DINITRO-O-CRESOL											
2,4-DINITROPHENOL					<10	ug/l			2	EPA 625	
2-NITROPHENOL					<10	ug/l			2	EPA 625	
4-NITROPHENOL					<10	ug/l			2	EPA 625	
PENTACHLOROPHENOL					<10	ug/l			2	EPA 625	
PHENOL					<10	ug/l			2	EPA 625	
2,4,6-TRICHLOROPHENOL					<10	ug/l			2	EPA 625	
USE THIS SPACE (OR A SEPARATE SHEET) TO PROVIDE INFORMATION ON OTHER ACID-EXTRACTABLE COMPOUNDS REQUESTED BY THE PERMIT WRITER.											

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FACILITY NAME	PERMIT NO.	OUTFALL NO.
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PART D – EXPANDED EFFLUENT TESTING DATA (CONTINUED)

40.1 EXPANDED EFFLUENT TESTING DATA (CONTINUED)

POLLUTANT	MAXIMUM DAILY DISCHARGE				AVERAGE DAILY DISCHARGE					ANALYTICAL METHOD	ML/MDL
	CONC	UNITS	MASS	UNITS	CONC	UNITS	MASS	UNITS	NO. OF SAMPLES		
BASE-NEUTRAL COMPOUNDS											
ACENAPHTHENE					<10	ug/l			2	EPA 625	
ACENAPHTHYLENE					<10	ug/l			2	EPA 625	
ANTHRACENE					<10	ug/l			2	EPA 625	
BENZIDINE					<10	ug/l			2	EPA 625	
BENZO(A)ANTHRACENE					<10	ug/l			2	EPA 625	
BENZO(A)PYRENE					<10	ug/l			2	EPA 625	
FLUORANTHENE					<10	ug/l			2	EPA 625	
FLUORENE					<10	ug/l			2	EPA 625	
HEXACHLOROBENZENE					<10	ug/l			2	EPA 625	
HEXACHLOROCYCLO-PENTADIENE					<10	ug/l			2	EPA 625	
HEXACHLOROETHANE					<10	ug/l			2	EPA 625	
INDENO (1,2,3-CD) PYRENE					<10	ug/l			2	EPA 625	
ISOPHORONE					<10	ug/l			2	EPA 625	
NAPHTHALENE					<10	ug/l			2	EPA 625	
NITROBENZENE					<10	ug/l			2	EPA 625	
N-NITROSODI-PROPYLAMINE					<10	ug/l			2	EPA 625	
N-NITROSODI-METHYLAMINE					<10	ug/l			2	EPA 625	
N-NITROSODI-PHENYLAMINE											
PHENANTHRENE					<10	ug/l			2	EPA 625	
PYRENE					<10	ug/l			2	EPA 625	
1,2,4-TRICHLOROBENZENE					<10	ug/l			2	EPA 625	
USE THIS SPACE (OR SEPARATE SHEET) TO PROVIDE INFORMATION ON OTHER BASE-NEUTRAL COMPOUNDS REQUESTED BY THE PERMIT WRITER.											

END OF PART D

REFER TO THE APPLICATION OVERVIEW TO DETERMINE WHICH OTHER PARTS OF FORM B2 YOU MUST COMPLETE.

MO 780-1805 (09-08)

MAKE ADDITIONAL COPIES OF THIS FORM FOR EACH OUTFALL.		
FACILITY NAME Sullivan Wastewater Treatment Plant	PERMIT NO. MO- 0104736	OUTFALL NO. 2

PART E – TOXICITY TESTING DATA

50. TOXICITY TESTING DATA

Refer to the Supplemental Application Information to determine whether Part E applies to the treatment works.

Publicly owned treatment works, or POTWS, meeting one or more of the following criteria must provide the results of whole effluent toxicity tests for acute or chronic toxicity for each of the facility's discharge points.

A. POTWs with a design flow rate greater than or equal to 1 million gallons per day.

B. POTWs with a pretreatment program (or those that are required to have one under 40 CFR Part 403).

C. POTWs required by the permitting authority to submit data for these parameters

- At a minimum, these results must include quarterly testing for a 12-month period within the past one year using multiple species (minimum of two species), or the results from four tests performed at least annually in the four and one-half years prior to the application, provided the results show no appreciable toxicity, and testing for acute or chronic toxicity, depending on the range of receiving water dilution. Do not include information about combined sewer overflows in this section. All information reported must be based on data collected through analysis conducted using 40 CFR Part 136 methods. In addition, this data must comply with QA/QC requirements of 40 CFR Part 136 and other appropriate QA/QC requirements for standard methods for analytes not addressed by 40 CFR Part 136.
- If EPA methods were not used, report the reason for using alternative methods. If test summaries are available that contain all of the information requested below, they may be submitted in place of Part E. If no biomonitoring data is required, do not complete Part E. Refer to the application overview for directions on which other sections of the form to complete.

50.1 REQUIRED TESTS. INDICATE THE NUMBER OF WHOLE EFFLUENT TOXICITY TESTS CONDUCTED IN THE PAST FOUR AND ONE-HALF YEARS.

CHRONIC	ACUTE
0	4

INDIVIDUAL TEST DATA. Complete the following chart **for the last three whole effluent toxicity tests.** Allow one column per test (where each species constitutes a test). Copy this page if more than three tests are being reported.

	MOST RECENT	2ND MOST RECENT	3RD MOST RECENT
A. TEST INFORMATION			
TEST NUMBER	EAS LOG# 1316727	EAS LOG# 1210824	EAS LOG# 1113608
TEST SPECIES AND TEST METHOD NUMBER			
AGE AT INITIATION OF TEST			
OUTFALL NUMBER			
DATES SAMPLE COLLECTED			
DATE TEST STARTED			
DURATION			
B. GIVE TOXICITY TEST METHODS FOLLOWED			
MANUAL TITLE	(See attached laboratory reports)		
EDITION NUMBER AND YEAR OF PUBLICATION			
PAGE NUMBER(S)			
C. GIVE THE SAMPLE COLLECTION METHOD(S) USED. FOR MULTIPLE GRAB SAMPLES, INDICATE THE NUMBER OF GRAB SAMPLES USED.			
24-HOUR COMPOSITE			
GRAB			
D. INDICATE WHERE THE SAMPLE WAS TAKEN IN RELATION TO DISINFECTION. (CHECK ALL THAT APPLY FOR EACH)			
BEFORE DISINFECTION	☐	☐	☐
AFTER DISINFECTION	☑	☑	☑
AFTER DECHLORINATION	☐	☐	☐
E. DESCRIBE THE POINT IN THE TREATMENT PROCESS AT WHICH THE SAMPLE WAS COLLECTED			
SAMPLE WAS COLLECTED	Outfall 2	Outfall 2	Outfall 2
F. FOR EACH TEST, INCLUDE WHETHER THE TEST WAS INTENDED TO ASSESS CHRONIC TOXICITY, ACUTE TOXICITY OR BOTH.			
CHRONIC TOXICITY	☐	☐	☐
ACUTE TOXICITY	☑	☑	☑
G. PROVIDE THE TYPE OF TEST PERFORMED			
STATIC	☐	☐	☐
STATIC STATIC-RENEWAL	☐	☐	☐
FLOW-THROUGH	☐	☐	☐
H. SOURCE OF DILUTION WATER. IF LABORATORY WATER, SPECIFY TYPE; IF RECEIVING WATER, SPECIFY SOURCE			
LABORATORY WATER			
RECEIVING WATER			

MO 780-1805 (09-08)

FACILITY NAME	PERMIT NO.	OUTFALL NO.
Sullivan Wastewater Treatment Plant	MO- 0104736	2

PART E – TOXICITY TESTING DATA (CONTINUED)

50.1 WHOLE EFFLUENT TOXICITY TESTS DATA (CONTINUED) (See attached laboratory reports)

	MOST RECENT	2ND MOST RECENT	3RD MOST RECENT
I. TYPE OF DILUTION WATER, IF SALT WATER, SPECIFY "NATURAL" OR TYPE OF ARTIFICIAL SEA SALTS OR BRINE USED.			
FRESH WATER			
SALT WATER			
J. GIVE THE PERCENTAGE EFFLUENT USED FOR ALL CONCENTRATIONS IN THE TEST SERIES.			
K. PARAMETERS MEASURED DURING THE TEST. (STATE WHETHER PARAMETER MEETS TEST METHOD SPECIFICATIONS)			
pH			
SALINITY			
TEMPERATURE			
AMMONIA			
DISSOLVED OXYGEN			
L. TEST RESULTS			
ACUTE:			
PERCENT IN SURVIVAL IN 100% EFFLUENT			
LC_{50}			
95% C.I.			
CONTROL PERCENT SURVIVAL			
OTHER (DESCRIBE)			
CHRONIC:			
NOEC			
IC_{25}			
CONTROL PERCENT SURVIVAL			
OTHER (DESCRIBE)			
M. QUALITY CONTROL ASSURANCE			
IS REFERENCE TOXICANT DATA AVAILABLE?			
WAS REFERENCE TOXICANT TEST WITHIN ACCEPTABLE BOUNDS?			
WHAT DATE WAS REFERENCED TOXICANT TEST RUN (MM/DD/YYYY)?			
OTHER (DESCRIBE)			

50.2 TOXICITY REDUCTION EVALUATION

Is the treatment works involved in a toxicity reduction evaluation? ☐ Yes ☑ No

If yes, describe:

50.3 SUMMARY OF SUBMITTED BIOMONITORING TEST INFORMATION

If you have submitted biomonitoring test information, or information regarding the cause of toxicity, within the past four and one-half years, provide the dates the information was submitted to the permitting authority and a summary of the results.

Date Submitted (MM/DD/YYYY)

Summary of Results (See Instructions)

END OF PART E

REFER TO THE APPLICATION OVERVIEW TO DETERMINE WHICH OTHER PARTS OF FORM B2 YOU MUST COMPLETE.

MO 780-1805 (09-08)

Environmental Analysis South, Inc.
4000 East Jackson Blvd. • Jackson, MO 63755 • 573-204-8817 • Fax 573-204-8818

REPORT OF ACUTE TOXICITY TESTING
Sullivan Wastewater Treatment Plant
Outfall ~~001~~ 002 (24 hr composite) AEC = 100%
MO-0104736
EAS LOG# 1316727
September 7, 2011 through September 9, 2011

Tests performed by:
John P. Clippard / Chemical Analyst at Environmental Analysis South (EAS)
Kelly J. Ray / Biologist at Environmental Analysis South (EAS)
Sara C. Shields / Lab Supervisor - Chemist at Environmental Analysis South (EAS)
David F. Warren / Lab Director - Chemist at Environmental Analysis South (EAS)

Environmental Analysis South, Inc.
4000 East Jackson Blvd. • Jackson, MO 63755 • 573-204-8817 • Fax 573-204-8818

REPORT OF ACUTE TOXICITY TESTING
Sullivan Wastewater Treatment Plant
Outfall ~~001~~ 007 (24 hr composite) AEC = 100%
MO-0104736
EAS LOG# 1316727
September 7, 2011 through September 9, 2011

1. REPORT SUMMATION:

1.1. Single Dilution Data Summation

	Pimephales promelas Acute Toxicity Test	*Ceriodaphnia dubia* Acute Toxicity Test
Survival in the Effluent at 48 Hours	100%	100%
Survival in the Reconstituted Control (RC) at 48 Hours	100%	100%
Survival in the Upstream Control (UC) at 48 Hours	N/A	N/A
Statistical Results Comparing the Survival Data of the Effluent with the Control (arc sine square root transformation)	Significant Difference at alpha = 0.05 **PASS**	Significant Difference at alpha = 0.05 PASS

* Indicates a significant difference at alpha = 0.5 between effluent and control survival data.

Conclusion: The mortality observed with both species was determined not to be significantly different than that observed in the control sample. Based on these results the outfall passed the whole effluent toxicity test with both indicator species.

Approved by _____
Sara C. Shields, Chemist

Environmental Analysis South, Inc.
4000 East Jackson Blvd. • Jackson, MO 63755 • 573-204-8817 • Fax 573-204-8818

REPORT OF ACUTE TOXICITY TESTING
Sullivan Wastewater Treatment Plant
Outfall ~~001~~ 002 (24 hr composite) AEC = 100%
MO-0104736
EAS LOG# 1316727
September 7, 2011 through September 9, 2011

2. TEST METHOD SUMMARY

2.1. TEST CONDITIONS AND METHODS:

	Ceriodaphnia dubia:	*Pimephales promelas:*
Test duration:	48 hours	48 hours
Temperature:	24 - 26 degree Celsius	24 - 26 degree Celsius
Light quality:	Ambient laboratory illumination	Ambient laboratory illumination
Photoperiod:	16 hour light, 8 hours dark	16 hour light, 8 hours dark
Control Water:	Moderately Hard Reconstituted Water	Moderately Hard Reconstituted Water
Dilution Water:	Upstream Water - If unavailable or toxic, then control water will be used.	Upstream Water - If unavailable or toxic, then control water will be used.
Size of test vessel:	30 milliliters	250 milliliters
Volume of test solution:	15 milliliters	200 milliliters
Age of test organisms:	<24 hours	1 -14 days (all same age)
Number of organisms/test vessel:	5	10
Number of replicates/concentration:	4	4
Number of organisms/concentration:	20	40 for a single dilution test and 20 for a multiple dilution test
Feeding regime:	None (fed prior to test)	None (fed prior to test)
Aeration:	None	None
Test acceptability criterion:	90% or greater survival in controls	90% or greater survival in controls

The methodology used for the chemistry data was taken from the *Standard Methods for the Examination of Water and Wastewater*, 18th edition (1992). The exception was hardness, which was determined using a Hach EDTA titration test kit. The toxicity tests follow guidelines laid out in the permittee's NPDES permit and were conducted according to EPA approved methods (USEPA 2002).

All test organisms were cultured according to EPA approved methods (USEPA 2002). The *Ceriodaphnia dubia* and the *Pimephales promelas* were obtained from C-K Associates Inc. located in Baton Rouge, Louisiana and shipped overnight for use in the whole effluent toxicity test.

Environmental Analysis South, Inc.
4000 East Jackson Blvd. · Jackson, MO 63755 · 573-204-8817 · Fax 573-204-8818

REPORT OF ACUTE TOXICITY TESTING
Sullivan Wastewater Treatment Plant
Outfall ~~001~~ 002 (24 hr composite) AEC = 100%
MO-0104736
EAS LOG# 1316727
September 7, 2011 through September 9, 2011

2.2. REFERENCE TOXICITY TEST:

Environmental Analysis South performs monthly reference toxicity tests. The most recent reference test was initiated on September 7, 2011 using KCL Lot #41713. Following are the results:

2.2.1. ***P. promelas*** - 48 hr. Acute Test – LC_{50} = 1.033 g/l 95%CI (0.714-1.355 g/l)
EAS %CV = 15.4%
National Warning Limits (75th percentile) = 19%CV
National Control Limits (90th percentile) = 33%CV

2.2.2. ***C. dubia*** - 48 hr. Acute Test – LC_{50} = 0.456 g/l 95%CI (0.300-0.612g/l)
EAS %CV = 17.1%
National Warning Limits (75th percentile) = 29%CV
National Control Limits (90th percentile) = 34%CV

2.3. **LITERATURE CITED:**

1. APHA. 1992. *Standard methods for the examination of water and wastewater*, 18th Ed. American Public Health Association, Washington, D.C
2. USEPA. 2002. *Methods for measuring the acute toxicity of effluents and receiving waters to freshwater and marine organisms*, 5th Ed. EPA-821-R-02-012
3. USEPA 2000. *Understanding and Accounting for Method Variability in Whole Effluent Toxicity Applications under the National Pollutant Discharge Elimination System, (Table B-2).* June 2000. EPA 833-R-00-003.

WHOLE EFFLUENT TEST conducted in accordance with US EPA 600/4-90/027
Fifth Edition October 2002

CLIENT NAME:	Sullivan WWTP, Outfall 001, 24 hr composite
NPDES NUMBER:	MO-0104736
TYPE OF METHOD:	single dilution, 48 hrs, PP & CD, AEC=100%
DATE & TIME OF COLLECTION:	09/05/11 0845 hrs - 09/06/11 0855 hrs by Tom Harman
DATE & TIME OF SUBMISSION:	09/07/11 0930 hrs by Fed Ex

Upstream: Winsel Creek
not available

INITIAL OBSERVATIONS	DATE	TIME	ANALYST	QC LOT	QC EXP VALUE	INT EFFL	INT UC	INT RC
LOG NUMBER / ID NUMBER						1316727		4021
pH - SU	09/07/11	0945 hrs	SCS	SB114 (8.8-9.2)	8.87	7.19		7.98
TEMPERATURE °C RECEIVED	09/07/11	0945 hrs	SCS	EAS 106		2		24
SPECIFIC CONDUCTANCE umhos	09/07/11	0945 hrs	SCS	ERA506-010511(401-457)	434	753		258
HARDNESS - ppm	09/07/11	0945 hrs	SCS	ERA P170-507(107-134)	120	260		80
CHLORINE - ppm	09/07/11	0945 hrs	SCS	tap water	+	<0.04		<0.04
DISSOLVED OXYGEN - ppm	09/07/11	0945 hrs	SCS	cal@840		<2		6.9
TOTAL ALKALINITY - ppm	09/07/11	1400 hrs	SCS	ERA506-010511(60.1-71.9	71.2	212		69.8
INITIAL AMMONIA - ppm	09/08/11	1300 hrs	JPC	EAS #1981 (8-12)	9.8	0.354		<0.05
TOTAL DISSOLVED SOLIDS -ppm								

0 HOUR OBSERVATIONS	DATE	TIME	ANALYST	QC LOT	QC EXP VALUE	RC	UC	100%	50%	25%	12.50%	6.25%	X %AEC
pH - SU	09/07/11	1100 hrs	SCS	SB114 (8.8-9.2)	8.87	7.54		7.89					
TEMPERATURE °C	09/07/11	1100 hrs	SCS	EAS 106		24.5		24.5					
SPECIFIC CONDUCTANCE umhos	09/07/11	1100 hrs	SCS	ERA506-010511(401-457)	434	246		760					
DISSOLVED OXYGEN - ppm	09/07/11	1100 hrs	SCS	cal@840		6.8		8.5					

24 HOUR OBSERVATIONS - PP	DATE	TIME	ANALYST	QC LOT	QC EXP VALUE	RC	UC	100%	50%	25%	12.50%	6.25%	X %AEC
pH - SU	09/08/11	1100 hrs	SCS	SB114 (8.8-9.2)	8.83	7.59		7.78					
TEMPERATURE °C	09/08/11	1100 hrs	SCS	EAS 106		25.2		25.2					
SPECIFIC CONDUCTANCE umhos	09/08/11	1100 hrs	SCS	ERA506-010511(401-457)	429	246		762					
DISSOLVED OXYGEN - ppm	09/08/11	1100 hrs	SCS	cal@840		6.4		4.5					
48 HOUR OBSERVATIONS - PP	DATE	TIME	ANALYST	QC LOT	QC EXP VALUE	RC	UC	100%	50%	25%	12.50%	6.25%	X %AEC
pH - SU	09/09/11	1100 hrs	SCS	SB114 (8.8-9.2)	8.87	7.46		7.66					
TEMPERATURE °C	09/09/11	1100 hrs	SCS	EAS 106		24.0		24.0					
SPECIFIC CONDUCTANCE umhos	09/09/11	1100 hrs	SCS	ERA506-010511(401-457)	424	273		790					
DISSOLVED OXYGEN - ppm	09/09/11	1100 hrs	SCS	cal@840		7.3		5.5					
FINAL AMMONIA - ppm				EAS #2375 (8-12)									

24 HOUR OBSERVATIONS - CD	DATE	TIME	ANALYST	QC LOT	QC EXP VALUE	RC	UC	100%	50%	25%	12.50%	6.25%	X %AEC
pH - SU	09/08/11	1100 hrs	SCS	SB114 (8.8-9.2)	8.83	7.83		7.97					
TEMPERATURE °C	09/08/11	1100 hrs	SCS	EAS 106		25.2		25.2					
SPECIFIC CONDUCTANCE umhos	09/08/11	1100 hrs	SCS	ERA506-010511(401-457)	429	245		758					
DISSOLVED OXYGEN - ppm	09/08/11	1100 hrs	SCS	cal@840		7.0		6.6					
48 HOUR OBSERVATIONS - CD	DATE	TIME	ANALYST	QC LOT	QC EXP VALUE	RC	UC	100%	50%	25%	12.50%	6.25%	X %AEC
pH - SU	09/09/11	1100 hrs	SCS	SB114 (8.8-9.2)	8.87	8.08		7.88					
TEMPERATURE °C	09/09/11	1100 hrs	SCS	EAS 106		24.0		24.0					
SPECIFIC CONDUCTANCE umhos	09/09/11	1100 hrs	SCS	ERA506-010511(401-457)	424	259		749					
DISSOLVED OXYGEN - ppm	09/09/11	1100 hrs	SCS	cal@840		7.5		5.8					
FINAL AMMONIA - ppm				EAS #2375 (8-12)									

Approved by: [signature]

Date: 09/12/2011

WHOLE EFFLUENT TEST conducted in accordance with US EPA 600/4-90/027
Fifth Edition October 2002

Sullivan WWTF, Outfall 001, 24 hr composite EAS LOG# 1316727

Date Test Began:	September 7, 2011	Time Test Began:	1100 hrs	Analyst 1:	DFW
Date Test Finished:	September 9, 2011	Time Test Finished:	1100 hrs	Analyst 2:	KJR
				Analyst 3:	SCS

P. promelas (PP) AGE: 8 days HATCH NUMBER: 8116 c-k

	RC	UC	100%	50%	25%	12.50%	6.25%	X% AEC
PERIOD	ALIVE	ALIVE	ALIVE	ALIVE	ALIVE	ALIVE	ALIVE	ALIVE
0 HR-PP	10,10,10,10		10,10,10,10					
24 HR-PP	10,10,10,10		10,10,10,10					
48 HR-PP	10,10,10,10		10,10,10,10					

Ceriodaphnia dubia (CD) AGE: <24 hours HATCH NUMBER: 2376 c-k

	RC	UC	100%	50%	25%	12.50%	6.25%	X% AEC
PERIOD	ALIVE	ALIVE	ALIVE	ALIVE	ALIVE	ALIVE	ALIVE	ALIVE
0 HR-CD	5,5,5,5		5,5,5,5					
24 HR-CD	5,5,5,5		5,5,5,5					
48 HR-CD	5,5,5,5		5,5,5,5					

Approved by: Date: 09/12/2011

Sullivan WWTP, Outfall 001, 24 hr composite EAS#: 1316727

Notes & Comments
Outfall 001 aerated prior to test initiation due low DO reading upon arrival

Prepared by: [signature]

Date: 09/12/2011

SEND 2 Single 100ml CONTAINERS

ENVIRONMENTAL ANALYSIS SOUTH, INC.
4000 East Jackson Blvd
Jackson, MO 63755
Phone: (573) 204-8817 Fax: (573) 204-8818

WHOLE EFFLUENT TOXICITY TESTING
CHAIN OF CUSTODY

CLIENT: City of Sullivan

NPDES PERMIT NUMBER: MO-0104736

EFFLUENT NAME: OUTFALL #2 TO WINSEL CREEK (LEGAL NAME) GRAB ☐ 24 HR COMPOSITE: ☒

COLLECTION DATA: START DATE: 9-5-11 START TIME: 8:45 AM

FINISH DATE: 9-6-11 FINISH TIME: 8.55 AM

ONLY IF RUNNING

UPSTREAM NAME: _____ (LEGAL NAME) (GRAB SAMPLE)

COLLECTION DATA: DATE: _____ TIME: _____

SAMPLER NAME: _____ (PRINT NAME) CARRIER: _____

Disclaimer: Environmental Analysis South, Inc. shall not be held financially liable for invalid whole effluent toxicity test (WET) or shipping charges resulting from the following reasons:

- Sampling & holding time errors (Will results in a setup charge of $100 to the client)
- Commercial carrier delivery problems or errors (Will results in a setup charge of $100 to the client)
- Problems with health or delivery of test organisms by vendor (No setup charge to client)

SAMPLER CHECK LIST

NO HEADSPACE IN BOTTLES ☐
SHIP SAMPLES BY NEXT DAY CARRIER OR DELIVER TO LAB ON 9/7/11 ☐
SAMPLES TO BE HAND DELIVERED TO LABORATORY SAME DAY AS TEST SETUP ☐
SUFFICIENT ICE TO COOL SAMPLES TO A RANGE OF 0 - 6° C WHEN SHIPPING OVERNIGHT ☐

RELINQUISHED BY: Tom Harman DATE: 9-6-11 TIME: 9:09 AM

LABORATORY USE ONLY

EFFLUENT LOG NUMBER: 1316727

RECEIVED TEMPERATURE: 2 °C THERMOMETER ASSIGNED NUMBER: _____

HEADSPACE: YES or NO SAMPLES ICED or DELIVERED SAME DAY AS TEST

UPSTREAM LOG NUMBER: _____

RECEIVED TEMPERATURE: _____ °C THERMOMETER ASSIGNED NUMBER: _____

HEADSPACE: YES or NO SAMPLES ICED or DELIVERED SAME DAY AS TEST

RECEIVED BY: _____ DATE: 9/7/11 TIME: 930 FedEx

MISSOURI DEPARTMENT OF NATURAL RESOURCES
WATER PROTECTION PROGRAM - P.O. BOX 176, JEFFERSON CITY MO, 65102

WHOLE EFFLUENT TOXICITY (WET) TEST REPORT

(TO BE ATTACHED TO WET TESTS FOR SUBMISSION TO THE REGULATORY AUTHORITY)

PART A – TO BE COMPLETED IN FULL BY PERMITTEE

FACILITY NAME Sullivan WWTP	DATE & TIME COLLECTED EFFLUENT 09/05/11 0845-09/06/11 0855 UPSTREAM not available
PERMIT NUMBER MO-0104736	PERMIT OUTFALL NUMBER Outfall # 001
COLLECTOR'S NAME Tom Harman	
RECEIVING STREAM COLLECTION SITE AND DESCRIPTION Winsel Creek--not available	
PERMIT ALLOWABLE EFFLUENT CONCENTRATION (AEC) 100%	EFFLUENT SAMPLE TYPE (CHECK ONE) ☒ 24HR COMPOSITE ☐ GRAB ☐ OTHER
SAMPLE NUMBER EFFLUENT 1316727 UPSTREAM not available	UPSTREAM SAMPLE TYPE (CHECK ONE) ☐ 24HR COMPOSITE ☐ GRAB ☒ OTHER not available
PERMITTED EFFLUENT DAILY MAXIMUM LIMITATION FOR CHLORINE ____ mg/L	PERMITTED EFFLUENT DAILY MAXIMUM LIMITATION FOR AMMONIA ____ mg/L

PART B – TO BE COMPLETED IN FULL BY PERFORMING LABORATORY

PERFORMING LABORATORY Environmental Analysis South, Inc.	TEST TYPE Acute Static Non renewal Test Single Dilution	
FINAL REPORT NUMBER MO_1316727	TEST DURATION 48 hour	
DATE OF LAST REFERENCE TOXICANT TESTING September 7, 2011	TEST METHOD Methods for Measuring the Acute Toxicity of Effluents and Receiving Waters to Freshwater and Marine Organisms	
DATE AND TIME SAMPLES RECEIVED AT LABORATORY 09/07/11 0930 hrs by Fed Ex	TEST START DATE AND TIME 09/07/11 1100 hrs	TEST END DATE AND TIME 09/09/11 1100 hrs
SAMPLE DECHLORINATED PRIOR TO ANALYSIS? ☐ YES ☒ NO EFFLUENT ____ UPSTREAM ____	TEST ORGANISM #1 AND AGE Pimephales promelas 8 days	TEST ORGANISM #2 AND AGE Ceriodaphnia dubia < 24 hours
SAMPLE FILTERED[1] PRIOR TO ANALYSIS? ☐ YES ☒ NO EFFLUENT ____ UPSTREAM ____	90% OR GREATER SURVIVAL IN SYNTHETIC CONTROL? ☒ YES ☐ NO	DILUTION WATER USED TO ACHIEVE AEC none
FILTER MESH SIEVE SIZE[2] None	EFFLUENT ORGANISM #1 % MORTALITY AT AEC 0%	EFFLUENT ORGANISM #2 % MORTALITY AT AEC 0%
SAMPLE AERATED DURING TESTING? ☐ YES ☒ NO	UPSTREAM ORGANISM #1 % MORTALITY RC=0%	UPSTREAM ORGANISM #2 % MORTALITY RC=0 %
pH ADJUSTED? ☐ YES ☒ NO EFFLUENT ____ UPSTREAM ____	TEST RESULT AT AEC FOR ORGANISM #1 ☒ PASS ☐ FAIL	TEST RESULT AT AEC FOR ORGANISM #2 ☒ PASS ☐ FAIL

MINIMUM REQUIRED ANALYTICAL RESULTS FOR THE 100% EFFLUENT SAMPLE

PARAMETER	RESULT	METHOD	WHEN ANALYZED
Temperature °C	2	SM18 2550B stored at 4 degree C until test setup	09/07/11 0945 hrs
pH Standard Units	7.19	SM18 4500-H B	09/07/11 0945 hrs
Conductance µMohs	753	SM18 2510B	09/07/11 0945 hrs
Dissolved Oxygen mg/L	<2	SM18 4500-O G	09/07/11 0945 hrs
Total Residual Chlorine mg/L	<0.04	SM18 4500-Cl G	09/07/11 0945 hrs
Unionized Ammonia mg/L	0.35x0.009<0.010	SM18 4500-NH3 F @ 25 degree C	09/08/11 1300 hrs
*Total Alkalinity mg/L	212	SM18 2320B	09/07/11 1400 hrs
*Total Hardness mg/L	260	SM18 2340 C	09/07/11 0945 hrs

*Recommended by USEPA guidance, not a required analysis.

[1] Samples shall only be filtered if indigenous organisms are present that may be confused with, or attack, the test organisms.
[2] Filters shall have a sieve size of 60 microns or greater.

CONTINUED ON PAGE 2

WHOLE EFFLUENT TOXICITY (WET) TEST REPORT

(TO BE ATTACHED TO WET TESTS FOR SUBMISSION TO THE REGULATORY AUTHORITY)

MINIMUM REQUIRED ANALYTICAL RESULTS FOR THE 100% UPSTREAM SAMPLE[3]

PARAMETER	RESULT	METHOD	WHEN ANALYZED
Temperature °C	24	SM18 2550B stored at 4 degree C until test setup	09/07/11 0945 hrs
pH Standard Units	7.98	SM18 4500-H B	09/07/11 0945 hrs
Conductance µMohs	258	SM18 2510B	09/07/11 0945 hrs
Dissolved Oxygen mg/L	6.9	SM18 4500-O G	09/07/11 0945 hrs
Total Residual Chlorine mg/L	<0.04	SM18 4500-Cl G	09/07/11 0945 hrs
Unionized Ammonia mg/L	<0.05x0.05<0.010	SM18 4500-NH3 F @ 25 degree C	09/08/11 1300 hrs
*Total Alkalinity mg/L	69.8	SM18 2320B	09/07/11 1400 hrs
*Total Hardness mg/L	80	SM18 2340 C	09/07/11 0945 hrs

*Recommended by USEPA guidance, not a required analysis.

PRELIMINARY TEST ACCEPTABILITY MATRIX (FOR USE BY PERMITTEE IN DETERMINING TEST VALIDITY)

PERMIT ALLOWABLE EFFLUENT CONCENTRATION (AEC): As indicated on permit. Test is invalid otherwise.

EFFLUENT SAMPLE TYPE: As indicated on permit. Test is invalid otherwise.

TEST TYPE: Acute Static Non-Renewal Test or other as indicated on permit. Test is invalid otherwise.

TEST DURATION: Forty-eight (48) hours or as indicated on permit. Test is invalid otherwise.

TEST ORGANISMS: As indicated on permit. Test is invalid otherwise.

DILUTION WATER USED TO ACHIEVE AEC: Upstream receiving water required if available.

TEST METHOD: The only acceptable method is the ***most current edition*** of Methods for Measuring the Acute Toxicity of Effluents and Receiving Waters to Freshwater and Marine Organisms, or other as specifically assigned by EPA for determining NPDES compliance. Test is invalid otherwise.

TEST START DATE & TIME: Unless otherwise specified in writing by EPA, if >36 hours lapse between collection and initiation, test is invalid.

FILTER MESH SIEVE SIZE: Unless otherwise specified in writing by EPA, if sieve size is smaller than 60 microns, test is invalid.

90% OR GREATER SURVIVAL IN LABORATORY CONTROL(S) (Y/N): If NO, test is invalid.

PARAMETER	RESULT	NOTES	WHEN ANALYZED
Temperature °C	0 - 6	Unless received by the laboratory on the same day as collected, values outside this range invalidate the test.	Upon receipt

[3] Where no upstream control is available, enter results from laboratory or synthetic control.

Environmental Analysis South, Inc.

4000 East Jackson Blvd. • Jackson, MO 63755 • 573-204-8817 • Fax 573-204-8818

REPORT OF ACUTE TOXICITY TESTING
Sullivan WWTP
Outfall 002 (24 hr composite), AEC=100%
MO-0104736
EAS LOG# 1210824
September 2, 2010 through September 4, 2010

Tests performed by:
John P. Clippard / Chemical Analyst at Environmental Analysis South (EAS)
Kelly J. Ray / Biologist at Environmental Analysis South (EAS)
Sara C. Shields / Lab Supervisor - Chemist at Environmental Analysis South (EAS)
David F. Warren / Lab Director - Chemist at Environmental Analysis South (EAS)

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REPORT OF ACUTE TOXICITY TESTING
Sullivan WWTP
Outfall 002 (24 hr composite), AEC=100%
MO-0104736
EAS LOG# 1210824
September 2, 2010 through September 4, 2010

1. REPORT SUMMATION:

1.1. Single Dilution Data Summation

	Pimephales promelas **Acute Toxicity Test**	***Ceriodaphnia dubia*** **Acute Toxicity Test**
Survival in the Effluent at 48 Hours	95%	100%
Survival in the Reconstituted Control (RC) at 48 Hours	100%	100%
Survival in the Upstream Control (UC) at 48 Hours	N/A	N/A
Statistical Results Comparing the Survival Data of the Effluent with the Control (arc sine square root transformation)	No Significant Difference at alpha = 0.05 **PASS**	No Significant Difference at alpha = 0.05 **PASS**

* Indicates a significant difference at alpha = 0.5 between effluent and control survival data.

Conclusion: The mortality observed with both species was determined not to be significantly different than that observed in the control sample. Based on these results the outfall passed the whole effluent toxicity test with both indicator species.

Approved by _____
Sara C. Shields, Chemist

Environmental Analysis South, Inc.

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Tom Harman
City of Sullivan
Water & Sewer Department
248 E. Springfield
Sullivan, MO 63080

PAGE NO.: 1
REPORT NO.: 110084
DATE : 09/13/10
P.O. NO.:

REPORT OF ANALYSIS

SUBJECT: Testing in accordance with "Methods for Measuring the Acute Toxicity of Effluents to Freshwater and Marine Organisms (Fourth Edition), EPA/600/4-90-027, U.S. Environmental Protection Agency Monitoring & Support Laboratory.

LOG NUMBER	SAMPLE DESCRIPTION	RESULTS OF ANALYSIS	UNITS OF MEASURE	METHOD NUMBER	NOTE
1210824	Outfall #002 SAMPLE DATE: 09/01/10				
	Technician Charges	3	man-hrs.		
	48 Hour - 1 dil/4 reps	1	test		

RESPECTFULLY SUBMITTED

D. F. WARREN

Environmental Analysis South, Inc.

4000 East Jackson Blvd. • Jackson, MO 63755 • 573-204-8817 • Fax 573-204-8818

Tom Harman
City of Sullivan
Water & Sewer Department
248 E. Springfield
Sullivan, MO 63080

PAGE NO.: 1
REPORT NO.: 110180
DATE : 09/24/10
P.O. NO.:

REPORT OF ANALYSIS

SUBJECT: Analysis of water/wastewater/waste samples in accordance with EPA 600; Methods for Chemical Analysis of Water and Wastes, 1983. All sludges are reported on a dry basis, except for organic analyses which are on a as-received basis.

LOG NUMBER	SAMPLE DESCRIPTION	RESULTS OF ANALYSIS	UNITS OF MEASURE	METHOD NUMBER	NOTE
1210825	Effluent Grab SAMPLE DATE: 09/01/10				
	Acid Base Neutral Extractables	1	each	625	(A)
	Pesticide & PCB	1	each	EPA 608	(A)
	Volatile Organics	1	each		(A)
	Shipping Charges	15	dollars		

FOOTNOTES

(A) See Attached Report

RESPECTFULLY SUBMITTED

D. F. WARREN

WHOLE EFFLUENT TOXICITY (WET) TEST REPORT

(TO BE ATTACHED TO WET TESTS FOR SUBMISSION TO THE REGULATORY AUTHORITY)

MINIMUM REQUIRED ANALYTICAL RESULTS FOR THE 100% UPSTREAM SAMPLE[3]

PARAMETER	RESULT	METHOD	WHEN ANALYZED
Temperature °C	25	SM18 2550B stored at 4 degree C until test setup	01/13/10 0945 hrs
pH Standard Units	8.02	SM18 4500-H B	01/13/10 0945 hrs
Conductance µMohs	238	SM18 2510B	01/13/10 0945 hrs
Dissolved Oxygen mg/L	9.0	SM18 4500-O G	01/13/10 0945 hrs
Total Residual Chlorine mg/L	<0.04	SM18 4500-Cl G	01/13/10 0945 hrs
Unionized Ammonia mg/L	<0.05x0.05<0.010	SM18 4500-NH3 F @ 25 degree C	01/13/10 1500 hrs
*Total Alkalinity mg/L	57.7	SM18 2320B	01/13/10 1300 hrs
*Total Hardness mg/L	80	SM18 2340 C	01/13/10 0945 hrs

*Recommended by USEPA guidance, not a required analysis.

PRELIMINARY TEST ACCEPTABILITY MATRIX (FOR USE BY PERMITTEE IN DETERMINING TEST VALIDITY)

PERMIT ALLOWABLE EFFLUENT CONCENTRATION (AEC): As indicated on permit. Test is invalid otherwise.

EFFLUENT SAMPLE TYPE: As indicated on permit. Test is invalid otherwise.

TEST TYPE: Acute Static Non-Renewal Test or other as indicated on permit. Test is invalid otherwise.

TEST DURATION: Forty-eight (48) hours or as indicated on permit. Test is invalid otherwise.

TEST ORGANISMS: As indicated on permit. Test is invalid otherwise.

DILUTION WATER USED TO ACHIEVE AEC: Upstream receiving water required if available.

TEST METHOD: The only acceptable method is the ***most current edition*** of Methods for Measuring the Acute Toxicity of Effluents and Receiving Waters to Freshwater and Marine Organisms, or other as specifically assigned by EPA for determining NPDES compliance. Test is invalid otherwise.

TEST START DATE & TIME: Unless otherwise specified in writing by EPA, if >36 hours lapse between collection and initiation, test is invalid.

FILTER MESH SIEVE SIZE: Unless otherwise specified in writing by EPA, if sieve size is smaller than 60 microns, test is invalid.

90% OR GREATER SURVIVAL IN LABORATORY CONTROL(S) (Y/N): If NO, test is invalid.

PARAMETER	RESULT	NOTES	WHEN ANALYZED
Temperature °C	0 - 6	Unless received by the laboratory on the same day as collected, values outside this range invalidate the test.	Upon receipt

[3] Where no upstream control is available, enter results from laboratory or synthetic control.

Environmental Analysis South, Inc.
4000 East Jackson Blvd. • Jackson, MO 63755 • 573-204-8817 • Fax 573-204-8818

REPORT OF ACUTE TOXICITY TESTING
Sullivan WWTP
Outfall 002 (24 hr composite), AEC=100%
MO-0104736
EAS LOG# 1210824
September 2, 2010 through September 4, 2010

2. TEST METHOD SUMMARY

2.1. TEST CONDITIONS AND METHODS:

	Ceriodaphnia dubia:	***Pimephales promelas:***
Test duration:	48 hours	48 hours
Temperature:	24 - 26 degree Celsius	24 - 26 degree Celsius
Light quality:	Ambient laboratory illumination	Ambient laboratory illumination
Photoperiod:	16 hour light, 8 hours dark	16 hour light, 8 hours dark
Control Water:	Moderately Hard Reconstituted Water	Moderately Hard Reconstituted Water
Dilution Water:	Upstream Water - If unavailable or toxic, then control water will be used.	Upstream Water - If unavailable or toxic, then control water will be used.
Size of test vessel:	30 milliliters	250 milliliters
Volume of test solution:	15 milliliters	200 milliliters
Age of test organisms:	<24 hours	1 -14 days (all same age)
Number of organisms/test vessel:	5	10
Number of replicates/concentration:	4	4
Number of organisms/concentration:	20	40 for a single dilution test and 20 for a multiple dilution test
Feeding regime:	None (fed prior to test)	None (fed prior to test)
Aeration:	None	None
Test acceptability criterion:	90% or greater survival in controls	90% or greater survival in controls

The methodology used for the chemistry data was taken from the *Standard Methods for the Examination of Water and Wastewater*, 18th edition (1992). The exception was hardness, which was determined using a Hach EDTA titration test kit. The toxicity tests follow guidelines laid out in the permittee's NPDES permit and were conducted according to EPA approved methods (USEPA 2002).

All test organisms were cultured according to EPA approved methods (USEPA 2002). The *Ceriodaphnia dubia* and the *Pimephales promelas* were obtained from C-K Associates Inc. located in Baton Rouge, Louisiana and shipped overnight for use in the whole effluent toxicity test.

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REPORT OF ACUTE TOXICITY TESTING
Sullivan WWTP
Outfall 002 (24 hr composite), AEC=100%
MO-0104736
EAS LOG# 1210824
September 2, 2010 through September 4, 2010

2.2. REFERENCE TOXICITY TEST:

Environmental Analysis South performs monthly reference toxicity tests. The most recent reference test was initiated on September 2, 2010 using KCL Lot #41713. Following are the results:

2.2.1. ***P. promelas*** - 48 hr. Acute Test – LC_{50} = 1.134 g/l 95%CI (0.856-1.411 g/l)
EAS %CV = 12.2%
National Warning Limits (75th percentile) = 19%CV
National Control Limits (90th percentile) = 33%CV

2.2.2. ***C. dubia*** - 48 hr. Acute Test – LC_{50} = 0.459 g/l 95%CI (0.260-0.657g/l)
EAS %CV = 21.6%
National Warning Limits (75th percentile) = 29%CV
National Control Limits (90th percentile) = 34%CV

2.3. **LITERATURE CITED:**

1. APHA. 1992. *Standard methods for the examination of water and wastewater*, 18th Ed. American Public Health Association, Washington, D.C
2. USEPA. 2002. *Methods for measuring the acute toxicity of effluents and receiving waters to freshwater and marine organisms*, 5th Ed. EPA-821-R-02-012
3. USEPA 2000. *Understanding and Accounting for Method Variability in Whole Effluent Toxicity Applications under the National Pollutant Discharge Elimination System, (Table B-2).* June 2000. EPA 833-R-00-003.

WHOLE EFFLUENT TEST conducted in accordance with US EPA 600/4-90/027
Fifth Edition October 2002

CLIENT NAME:	Sullivan WWTP, Outfall 002, 24 hr composite
NPDES NUMBER:	MO-0104736
TYPE OF METHOD:	single dilution, 48 hrs, PP & CD, AEC=100%
DATE & TIME OF COLLECTION:	08/31/10 0730 hrs - 09/01/10 0730 hrs by Joe Larrison
DATE & TIME OF SUBMISSION:	09/02/10 0850 hrs by Fed Ex

Upstream: Winsel Creek--No Flow

INITIAL OBSERVATIONS	DATE	TIME	ANALYST	QC LOT	QC EXP VALUE	INT EFFL	INT UC	INT RC
LOG NUMBER / ID NUMBER						1210824		3096
pH - SU	09/02/10	0900 hrs	SCS	SB114 (8.8-9.2)	8.82	7.34		8.09
TEMPERATURE °C RECEIVED	09/02/10	0900 hrs	SCS	EAS 106		4		25
SPECIFIC CONDUCTANCE umhos	09/02/10	0900 hrs	SCS	ERA P176-506(514-570)	539	876		256
HARDNESS - ppm	09/02/10	0900 hrs	SCS	ERA P170-507(107-134)	120	220		80
CHLORINE - ppm	09/02/10	0900 hrs	SCS	tap water	+	<0.04		<0.04
DISSOLVED OXYGEN - ppm	09/02/10	0900 hrs	SCS	cal@840		6.3		7.9
TOTAL ALKALINITY - ppm	09/08/10	1345 hrs	SCS	ERA P180-506(49.8-58.8)	53.4	178		59.4
INITIAL AMMONIA - ppm	09/09/10	1000 hrs	JPC	EAS #1981 (8-12)	10.3	1.25		<0.05
TOTAL DISSOLVED SOLIDS -ppm								

0 HOUR OBSERVATIONS	DATE	TIME	ANALYST	QC LOT	QC EXP VALUE	RC	UC	100%	50%	25%	12.50%	6.25%	X %AEC
pH - SU	09/02/10	1100 hrs	SCS	SB114 (8.8-9.2)	8.82	7.73		6.90					
TEMPERATURE °C	09/02/10	1100 hrs	SCS	EAS 106		25		25					
SPECIFIC CONDUCTANCE umhos	09/02/10	1100 hrs	SCS	ERA P176-506(514-570)	539	258		896					
DISSOLVED OXYGEN - ppm	09/02/10	1100 hrs	SCS	cal@840		8.3		8.2					

24 HOUR OBSERVATIONS - PP	DATE	TIME	ANALYST	QC LOT	QC EXP VALUE	RC	UC	100%	50%	25%	12.50%	6.25%	X %AEC
pH - SU	09/03/10	1100 hrs	SCS	SB114 (8.8-9.2)	8.82	8.39		8.28					
TEMPERATURE °C	09/03/10	1100 hrs	SCS	EAS 106		25		25					
SPECIFIC CONDUCTANCE umhos	09/03/10	1100 hrs	SCS	ERA P176-506(514-570)	567	268		904					
DISSOLVED OXYGEN - ppm	09/03/10	1100 hrs	SCS	cal@840		7.6		7.6					
48 HOUR OBSERVATIONS - PP	DATE	TIME	ANALYST	QC LOT	QC EXP VALUE	RC	UC	100%	50%	25%	12.50%	6.25%	X %AEC
pH - SU	09/04/10	1100 hrs	SCS	SB114 (8.8-9.2)	8.84	8.19		8.47					
TEMPERATURE °C	09/04/10	1100 hrs	SCS	EAS 106		25		25					
SPECIFIC CONDUCTANCE umhos	09/04/10	1100 hrs	SCS	ERA P176-506(514-570)	552	289		884					
DISSOLVED OXYGEN - ppm	09/04/10	1100 hrs	SCS	cal@840		7.1		6.7					
FINAL AMMONIA - ppm				EAS #2375 (8-12)									

24 HOUR OBSERVATIONS - CD	DATE	TIME	ANALYST	QC LOT	QC EXP VALUE	RC	UC	100%	50%	25%	12.50%	6.25%	X %AEC
pH - SU	09/03/10	1100 hrs	SCS	SB114 (8.8-9.2)	8.39	8.60		8.57					
TEMPERATURE °C	09/03/10	1100 hrs	SCS	EAS 106		25		25					
SPECIFIC CONDUCTANCE umhos	09/03/10	1100 hrs	SCS	ERA P176-506(514-570)	567	289		876					
DISSOLVED OXYGEN - ppm	09/03/10	1100 hrs	SCS	cal@840		8.1		8.1					
48 HOUR OBSERVATIONS - CD	DATE	TIME	ANALYST	QC LOT	QC EXP VALUE	RC	UC	100%	50%	25%	12.50%	6.25%	X %AEC
pH - SU	09/04/10	1100 hrs	SCS	SB114 (8.8-9.2)	8.84	8.29		8.52					
TEMPERATURE °C	09/04/10	1100 hrs	SCS	EAS 106		25		25					
SPECIFIC CONDUCTANCE umhos	09/04/10	1100 hrs	SCS	ERA P176-506(514-570)	552	310		844					
DISSOLVED OXYGEN - ppm	09/04/10	1100 hrs	SCS	cal@840		7.3		7.4					
FINAL AMMONIA - ppm				EAS #2375 (8-12)									

Date: 09/09/2010

WHOLE EFFLUENT TEST conducted in accordance with US EPA 600/4-90/027
Fifth Edition October 2002

Sullivan WWTP, Outfall 002, 24 hr composite **EAS LOG# 1210824**

Date Test Began:	September 2, 2010	**Time Test Began:**	1100 hrs	**Analyst 1:**	DFW
				Analyst 2:	KJR
Date Test Finished:	September 4, 2010	**Time Test Finished:**	1100 hrs	**Analyst 3:**	SCS

P. promelas (PP) **AGE:** 7 **days** **HATCH NUMBER:** 8380 c-k

	RC	UC	100%	50%	25%	12.50%	6.25%	X% AEC
PERIOD	**ALIVE**	**ALIVE**	**ALIVE**	**ALIVE**	**ALIVE**	**ALIVE**	**ALIVE**	**ALIVE**
0 HR-PP	10,10,10,10		10,10,10,10					
24 HR-PP	10,10,10,10		10,10,10,10					
48 HR-PP	10,10,10,10		10,10,10,8					

Ceriodaphnia dubia (CD) **AGE:** <24 **hours** **HATCH NUMBER:**

	RC	UC	100%	50%	25%	12.50%	6.25%	X% AEC
PERIOD	**ALIVE**	**ALIVE**	**ALIVE**	**ALIVE**	**ALIVE**	**ALIVE**	**ALIVE**	**ALIVE**
0 HR-CD	5,5,5,5		5,5,5,5					
24 HR-CD	5,5,5,5		5,5,5,5					
48 HR-CD	5,5,5,5		5,5,5,5					

Approved by: [signature] Date: 09/09/2010

Sullivan WWTP, Outfall 002, 24 hr composite EAS#: 1210824

Notes & Comments

Prepared by: [signature]

Date: 09/09/2015

Single 1002

ENVIRONMENTAL ANALYSIS SOUTH, INC.
4000 East Jackson Blvd
Jackson, MO 63755
Phone: (573) 204-8817 Fax: (573) 204-8818

WHOLE EFFLUENT TOXICITY TESTING
CHAIN OF CUSTODY

CLIENT: City of Sullivan

NPDES PERMIT NUMBER: MO-0104736

EFFLUENT NAME: OUTFALL 002 (LEGAL NAME) GRAB ☐ 24 HR COMPOSITE ☑

COLLECTION DATA: START DATE: 8-31-10 START TIME: 7:30 AM

FINISH DATE: 9-1-10 FINISH TIME: 7:30

UPSTREAM NAME: WENZEL CREEK NO FLOW (LEGAL NAME) (GRAB SAMPLE)

COLLECTION DATA: DATE: 9-1-10 TIME: 7:30

SAMPLER NAME: JOE LARRISON (PRINT NAME) CARRIER: _____

Disclaimer: Environmental Analysis South, Inc. shall not be held financially liable for invalid whole effluent toxicity test (WET) or shipping charges resulting from the following reasons:

- Sampling & holding time errors (Will results in a setup charge of $100 to the client)
- Commercial carrier delivery problems or errors (Will results in a setup charge of $100 to the client)
- Problems with health or delivery of test organisms by vendor (No setup charge to client)

SAMPLER CHECK LIST

NO HEADSPACE IN BOTTLES ☐
SHIP SAMPLES BY NEXT DAY CARRIER OR DELIVER TO LAB ON 9 / 1 / 10 ☐
SAMPLES TO BE HAND DELIVERED TO LABORATORY SAME DAY AS TEST SETUP ☐
SUFFICIENT ICE TO COOL SAMPLES TO A RANGE OF 0 - 6° C WHEN SHIPPING OVERNIGHT ☐

RELINQUISHED BY: _____ DATE: _____ TIME: _____

LABORATORY USE ONLY

EFFLUENT LOG NUMBER: 1210824

RECEIVED TEMPERATURE: 4 °C THERMOMETER ASSIGNED NUMBER: _____

HEADSPACE: YES or NO SAMPLES ICED or DELIVERED SAME DAY AS TEST

UPSTREAM LOG NUMBER: _____

RECEIVED TEMPERATURE: _____ °C THERMOMETER ASSIGNED NUMBER: _____

HEADSPACE: YES or NO SAMPLES ICED or DELIVERED SAME DAY AS TEST

RECEIVED BY: [signature] DATE: 9/2/10 TIME: 850

FedEx

MISSOURI DEPARTMENT OF NATURAL RESOURCES
WATER PROTECTION PROGRAM - P.O. BOX 176, JEFFERSON CITY MO, 65102

WHOLE EFFLUENT TOXICITY (WET) TEST REPORT

(TO BE ATTACHED TO WET TESTS FOR SUBMISSION TO THE REGULATORY AUTHORITY)

PART A – TO BE COMPLETED IN FULL BY PERMITTEE

FACILITY NAME Sullivan WWTP	DATE & TIME COLLECTED EFFLUENT 08/31/10 0730-09/01/10 0730 UPSTREAM no flow
PERMIT NUMBER MO-0104736	PERMIT OUTFALL NUMBER Outfall # 002
COLLECTOR'S NAME Joe Larrison	
RECEIVING STREAM COLLECTION SITE AND DESCRIPTION Winsel Creek--No Flow	
PERMIT ALLOWABLE EFFLUENT CONCENTRATION (AEC) 100%	EFFLUENT SAMPLE TYPE (CHECK ONE) ☒ 24HR COMPOSITE ☐ GRAB ☐ OTHER
SAMPLE NUMBER EFFLUENT 1210824 UPSTREAM no flow	UPSTREAM SAMPLE TYPE (CHECK ONE) ☐ 24HR COMPOSITE ☐ GRAB ☒ OTHER no flow
PERMITTED EFFLUENT DAILY MAXIMUM LIMITATION FOR CHLORINE _____ mg/L	PERMITTED EFFLUENT DAILY MAXIMUM LIMITATION FOR AMMONIA _____ mg/L

PART B – TO BE COMPLETED IN FULL BY PERFORMING LABORATORY

PERFORMING LABORATORY Environmental Analysis South, Inc.	TEST TYPE Acute Static Non renewal Test Single Dilution	
FINAL REPORT NUMBER MO_1210824	TEST DURATION 48 hour	
DATE OF LAST REFERENCE TOXICANT TESTING September 2, 2010	TEST METHOD Methods for Measuring the Acute Toxicity of Effluents and Receiving Waters to Freshwater and Marine Organisms	
DATE AND TIME SAMPLES RECEIVED AT LABORATORY 09/02/10 0850 hrs by Fed Ex	TEST START DATE AND TIME 09/02/10 1100 hrs	TEST END DATE AND TIME 09/04/10 1100 hrs
SAMPLE DECHLORINATED PRIOR TO ANALYSIS? ☐ YES ☒ NO EFFLUENT _____ UPSTREAM _____	TEST ORGANISM #1 AND AGE Pimephales promelas 7 days	TEST ORGANISM #2 AND AGE Ceriodaphnia dubia < 24 hours
SAMPLE FILTERED[1] PRIOR TO ANALYSIS? ☐ YES ☒ NO EFFLUENT _____ UPSTREAM _____	90% OR GREATER SURVIVAL IN SYNTHETIC CONTROL? ☒ YES ☐ NO	DILUTION WATER USED TO ACHIEVE AEC none
FILTER MESH SIEVE SIZE[2] None	EFFLUENT ORGANISM #1 % MORTALITY AT AEC 5 %	EFFLUENT ORGANISM #2 % MORTALITY AT AEC 0 %
SAMPLE AERATED DURING TESTING? ☐ YES ☒ NO	UPSTREAM ORGANISM #1 % MORTALITY RC=0 %	UPSTREAM ORGANISM #2 % MORTALITY RC=0 %
pH ADJUSTED? ☐ YES ☒ NO EFFLUENT _____ UPSTREAM _____	TEST RESULT AT AEC FOR ORGANISM #1 ☒ PASS ☐ FAIL	TEST RESULT AT AEC FOR ORGANISM #2 ☒ PASS ☐ FAIL

MINIMUM REQUIRED ANALYTICAL RESULTS FOR THE 100% EFFLUENT SAMPLE

PARAMETER	RESULT	METHOD	WHEN ANALYZED
Temperature °C	3	SM18 2550B stored at 4 degree C until test setup	09/02/10 0900 hrs
pH Standard Units	7.34	SM18 4500-H B	09/02/10 0900 hrs
Conductance µMohs	876	SM18 2510B	09/02/10 0900 hrs
Dissolved Oxygen mg/L	6.3	SM18 4500-O G	09/02/10 0900 hrs
Total Residual Chlorine mg/L	<0.04	SM18 4500-Cl G	09/02/10 0900 hrs
Unionized Ammonia mg/L	1.25x0.01=0.012	SM18 4500-NH3 F @ 25 degree C	09/09/10 1000 hrs
*Total Alkalinity mg/L	178	SM18 2320B	09/08/10 1345 hrs
*Total Hardness mg/L	220	SM18 2340 C	09/02/10 0900 hrs

*Recommended by USEPA guidance, not a required analysis.

[1] Samples shall only be filtered if indigenous organisms are present that may be confused with, or attack, the test organisms.

[2] Filters shall have a sieve size of 60 microns or greater.

CONTINUED ON PAGE 2

WHOLE EFFLUENT TOXICITY (WET) TEST REPORT

(TO BE ATTACHED TO WET TESTS FOR SUBMISSION TO THE REGULATORY AUTHORITY)

MINIMUM REQUIRED ANALYTICAL RESULTS FOR THE 100% UPSTREAM SAMPLE[3]

PARAMETER	RESULT	METHOD	WHEN ANALYZED
Temperature °C	25	SM18 2550B stored at 4 degree C until test setup	09/02/10 0900 hrs
pH Standard Units	8.09	SM18 4500-H B	09/02/10 0900 hrs
Conductance µMohs	256	SM18 2510B	09/02/10 0900 hrs
Dissolved Oxygen mg/L	7.9	SM18 4500-O G	09/02/10 0900 hrs
Total Residual Chlorine mg/L	<0.04	SM18 4500-Cl G	09/02/10 0900 hrs
Unionized Ammonia mg/L	<0.05x0.07<0.010	SM18 4500-NH3 F @ 25 degree C	09/09/10 1000 hrs
*Total Alkalinity mg/L	59.4	SM18 2320B	09/08/10 1345 hrs
*Total Hardness mg/L	80	SM18 2340 C	09/02/10 0900 hrs

*Recommended by USEPA guidance, not a required analysis.

PRELIMINARY TEST ACCEPTABILITY MATRIX (FOR USE BY PERMITTEE IN DETERMINING TEST VALIDITY)

PERMIT ALLOWABLE EFFLUENT CONCENTRATION (AEC): As indicated on permit. Test is invalid otherwise.

EFFLUENT SAMPLE TYPE: As indicated on permit. Test is invalid otherwise.

TEST TYPE: Acute Static Non-Renewal Test or other as indicated on permit. Test is invalid otherwise.

TEST DURATION: Forty-eight (48) hours or as indicated on permit. Test is invalid otherwise.

TEST ORGANISMS: As indicated on permit. Test is invalid otherwise.

DILUTION WATER USED TO ACHIEVE AEC: Upstream receiving water required if available.

TEST METHOD: The only acceptable method is the ***most current edition*** of Methods for Measuring the Acute Toxicity of Effluents and Receiving Waters to Freshwater and Marine Organisms, or other as specifically assigned by EPA for determining NPDES compliance. Test is invalid otherwise.

TEST START DATE & TIME: Unless otherwise specified in writing by EPA, if >36 hours lapse between collection and initiation, test is invalid.

FILTER MESH SIEVE SIZE: Unless otherwise specified in writing by EPA, if sieve size is smaller than 60 microns, test is invalid.

90% OR GREATER SURVIVAL IN LABORATORY CONTROL(S) (Y/N): If NO, test is invalid.

PARAMETER	RESULT	NOTES	WHEN ANALYZED
Temperature °C	0 - 6	Unless received by the laboratory on the same day as collected, values outside this range invalidate the test.	Upon receipt

[3] Where no upstream control is available, enter results from laboratory or synthetic control.

Environmental Analysis South, Inc.

4000 East Jackson Blvd. • Jackson, MO 63755 • 573-204-8817 • Fax 573-204-8818

REPORT OF ACUTE TOXICITY TESTING
Sullivan WWTP
Outfall 001 (24 hr composite) AEC = 100%
MO-0104736
EAS LOG#1113608
January 13, 2010 through January 15, 2010

Tests performed by:
John P. Clippard / Chemical Analyst at Environmental Analysis South (EAS)
Kelly J. Ray / Biologist at Environmental Analysis South (EAS)
Sara C. Shields / Lab Supervisor - Chemist at Environmental Analysis South (EAS)
David F. Warren / Lab Director - Chemist at Environmental Analysis South (EAS)

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REPORT OF ACUTE TOXICITY TESTING
Sullivan WWTP
Outfall 001 (24 hr composite) AEC = 100%
MO-0104736
EAS LOG#1113608
January 13, 2010 through January 15, 2010

1. REPORT SUMMATION:

1.1. Multiple Dilution Data Summation

Test Solution	*Pimephales promelas* Acute Toxicity Test 48 Hour Survival	*Ceriodaphnia dubia* Acute Toxicity Test 48 Hour Survival
Reconstituted Control (RC)	100%	100%
Upstream Control (UC)	N/A	N/A
6.25% Effluent	100%	100%
12.5% Effluent	100%	85%
25% Effluent	100%	100%
50% Effluent	100%	100%
100% Effluent	10%*	5%*
Estimated 48 Hour LC_{50} Value	73.5%	70.7% (67.1%-74.6%)
To Pass: 1. Effluent - LC50 must be >100% and 2. All concentrations = or < AEC must not have significant difference to control in survival.	1. No 2. No	1. No 2. No
Result of Toxicity Test	FAIL	FAIL

* Indicates a significant difference at alpha = 0.5 between effluent and control survival data.

Conclusion:

Pimephales promelas 48 hour WET results: LC 50=73.5% using Trimmed Spearman-Karber
NOAEC = 50% by Steel's Many-One Rank Test

Ceriodaphnia dubia 48 hour WET results: LC50 =70.7% using Trimmed Spearman-Karber
NOAEC = 50% by Steel's Many-One Rank Test

Based on these results, the whole effluent toxicity test failed with both species.

Approved by _____
Sara C. Shields, Chemist

Environmental Analysis South, Inc.
4000 East Jackson Blvd. • Jackson, MO 63755 • 573-204-8817 • Fax 573-204-8818

REPORT OF ACUTE TOXICITY TESTING
Sullivan WWTP
Outfall 001 (24 hr composite) AEC = 100%
MO-0104736
EAS LOG#1113608
January 13, 2010 through January 15, 2010

2. TEST METHOD SUMMARY

2.1. TEST CONDITIONS AND METHODS:

	Ceriodaphnia dubia:	*Pimephales promelas:*
Test duration:	48 hours	48 hours
Temperature:	24 - 26 degree Celsius	24 - 26 degree Celsius
Light quality:	Ambient laboratory illumination	Ambient laboratory illumination
Photoperiod:	16 hour light, 8 hours dark	16 hour light, 8 hours dark
Control Water:	Moderately Hard Reconstituted Water	Moderately Hard Reconstituted Water
Dilution Water:	Upstream Water - If unavailable or toxic, then control water will be used.	Upstream Water - If unavailable or toxic, then control water will be used.
Size of test vessel:	30 milliliters	250 milliliters
Volume of test solution:	15 milliliters	200 milliliters
Age of test organisms:	<24 hours	1 -14 days (all same age)
Number of organisms/test vessel:	5	10
Number of replicates/concentration:	4	2
Number of organisms/concentration:	20	40 for a single dilution test and 20 for a multiple dilution test
Feeding regime:	None (fed prior to test)	None (fed prior to test)
Aeration:	None	None
Test acceptability criterion:	90% or greater survival in controls	90% or greater survival in controls

The methodology used for the chemistry data was taken from the *Standard Methods for the Examination of Water and Wastewater*, 18th edition (1992). The exception was hardness, which was determined using a Hach EDTA titration test kit. The toxicity tests follow guidelines laid out in the permittee's NPDES permit and were conducted according to EPA approved methods (USEPA 2002).

All test organisms were cultured according to EPA approved methods (USEPA 2002). The *Ceriodaphnia dubia* and the *Pimephales promelas* were obtained from ARO (Aquatic Research Organisms) located in Hampton, New Hampshire and shipped overnight for use in the whole effluent toxicity test.

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REPORT OF ACUTE TOXICITY TESTING
Sullivan WWTP
Outfall 001 (24 hr composite) AEC = 100%
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EAS LOG#1113608
January 13, 2010 through January 15, 2010

2.2. REFERENCE TOXICITY TEST:

Environmental Analysis South performs monthly reference toxicity tests. The most recent reference test was initiated on January 6, 2010 using KCL Lot #41713. Following are the results:

2.2.1. ***P. promelas*** - 48 hr. Acute Test – LC_{50} = 1.071 g/l 95%CI (0.794-1.347 g/l)
EAS %CV = 12.9%
National Warning Limits (75th percentile) = 19%CV
National Control Limits (90th percentile) = 33%CV

2.2.2. ***C. dubia*** - 48 hr. Acute Test – LC_{50} = 0.465 g/l 95%CI (0.271-0.659g/l)
EAS %CV = 20.9%
National Warning Limits (75th percentile) = 29%CV
National Control Limits (90th percentile) = 34%CV

2.3. LITERATURE CITED:

1. APHA. 1992. *Standard methods for the examination of water and wastewater*, 18th Ed. American Public Health Association, Washington, D.C
2. USEPA. 2002. *Methods for measuring the acute toxicity of effluents and receiving waters to freshwater and marine organisms*, 5th Ed. EPA-821-R-02-012
3. USEPA 2000. *Understanding and Accounting for Method Variability in Whole Effluent Toxicity Applications under the National Pollutant Discharge Elimination System, (Table B-2).* June 2000. EPA 833-R-00-003.

WHOLE EFFLUENT TEST conducted in accordance with US EPA 600/4-90/027
Fifth Edition October 2002

CLIENT NAME:	Sullivan WWTP, Outfall 001, 24 hr composite
NPDES NUMBER:	MO-0104736
TYPE OF METHOD:	multiple dilution, 48 hrs, PP & CD, AEC=100%
DATE & TIME OF COLLECTION:	01/11/10 0740 hrs - 01/12/10 0745 hrs by Joe Larrison
DATE & TIME OF SUBMISSION:	01/13/10 0930 hrs by Fed Ex

Upstream: Winsel Creek
Not collected due to prior toxicity

INITIAL OBSERVATIONS	DATE	TIME	ANALYST	QC LOT	QC EXP VALUE	INT EFFL	INT UC	INT RC
LOG NUMBER / ID NUMBER						1113608		3079
pH - SU	01/13/10	0945 hrs	SCS	SB114 (8.8-9.2)	8.92	7.45		8.02
TEMPERATURE °C RECEIVED	01/13/10	0945 hrs	SCS	EAS 106		6		25
SPECIFIC CONDUCTANCE umhos	01/13/10	0945 hrs	SCS	ERA P176-506(488-596)	584	882		238
HARDNESS - ppm	01/13/10	0945 hrs	SCS	ERA P170-507(107-134)	120	300		80
CHLORINE - ppm	01/13/10	0945 hrs	SCS	tap water	+	<0.04		<0.04
DISSOLVED OXYGEN - ppm	01/13/10	0945 hrs	SCS	cal@840		9.3		9
TOTAL ALKALINITY - ppm	01/13/10	1300 hrs	SCS	ERAP176-506(40.8-54.2)	48.4	238		57.7
INITIAL AMMONIA - ppm	01/13/10	1500 hrs	JPC	EAS #2375 (8-12)	11.3	15.6		<0.05
TOTAL DISSOLVED SOLIDS -ppm								

0 HOUR OBSERVATIONS	DATE	TIME	ANALYST	QC LOT	QC EXP VALUE	RC	UC	100%	50%	25%	12.50%	6.25%	X %AEC
pH - SU	01/13/10	1100 hrs	SCS	SB114 (8.8-9.2)	8.92	7.92		7.18	7.34	7.47	7.47	7.93	
TEMPERATURE °C	01/13/10	1100 hrs	SCS	EAS 106		25		25	25	25	25	25	
SPECIFIC CONDUCTANCE umhos	01/13/10	1100 hrs	SCS	ERA P176-506(488-596)	584	257		885	545	399	317	284	
DISSOLVED OXYGEN - ppm	01/13/10	1100 hrs	SCS	cal@840		10.8		8.8	10.4	9.8	10.1	9.6	

24 HOUR OBSERVATIONS - PP	DATE	TIME	ANALYST	QC LOT	QC EXP VALUE	RC	UC	100%	50%	25%	12.50%	6.25%	X %AEC
pH - SU	01/14/10	1100 hrs	SCS	SB114 (8.8-9.2)	9.09	7.92		8.10	8.02	7.92	7.87	7.97	
TEMPERATURE °C	01/14/10	1100 hrs	SCS	EAS 106		25		25	25	25	25	25	
SPECIFIC CONDUCTANCE umhos	01/14/10	1100 hrs	SCS	ERA P176-506(488-596)	592	275		877	548	397	322	282	
DISSOLVED OXYGEN - ppm	01/14/10	1100 hrs	SCS	cal@840		7.6		7.2	8	8.4	8.5	8	
48 HOUR OBSERVATIONS - PP	DATE	TIME	ANALYST	QC LOT	QC EXP VALUE	RC	UC	100%	50%	25%	12.50%	6.25%	X %AEC
pH - SU	01/15/10	1100 hrs	SCS	SB114 (8.8-9.2)	9.01	7.93		834.00	8.24	8.00	7.98	7.99	
TEMPERATURE °C	01/15/10	1100 hrs	SCS	EAS 106		25		25	25	25	25	25	
SPECIFIC CONDUCTANCE umhos	01/15/10	1100 hrs	SCS	ERA P176-506(488-596)	596	291		912	572	414	334	305	
DISSOLVED OXYGEN - ppm	01/15/10	1100 hrs	SCS	cal@840		6.3		5.7	5.8	5.7	5.6	5.6	
FINAL AMMONIA - ppm				EAS #2375 (8-12)									

24 HOUR OBSERVATIONS - CD	DATE	TIME	ANALYST	QC LOT	QC EXP VALUE	RC	UC	100%	50%	25%	12.50%	6.25%	X %AEC
pH - SU	01/14/10	1100 hrs	SCS	SB114 (8.8-9.2)	9.09	8.04		8.28	8.16	7.98	7.97	8.06	
TEMPERATURE °C	01/14/10	1100 hrs	SCS	EAS 106		25		25	25	25	25	25	
SPECIFIC CONDUCTANCE umhos	01/14/10	1100 hrs	SCS	ERA P176-506(488-596)	592	270		947	589	426	350	310	
DISSOLVED OXYGEN - ppm	01/14/10	1100 hrs	SCS	cal@840		10.4		9.3	9.4	9.3	9.3	9.4	
48 HOUR OBSERVATIONS - CD	DATE	TIME	ANALYST	QC LOT	QC EXP VALUE	RC	UC	100%	50%	25%	12.50%	6.25%	X %AEC
pH - SU	01/15/10	1100 hrs	SCS	SB114 (8.8-9.2)	9.01	8.79		8.57	8.41	8.37	8.37	8.42	
TEMPERATURE °C	01/15/10	1100 hrs	SCS	EAS 106		25		25	25	25	25	25	
SPECIFIC CONDUCTANCE umhos	01/15/10	1100 hrs	SCS	ERA P176-506(488-596)	596	309		930	582	428	355	326	
DISSOLVED OXYGEN - ppm	01/15/10	1100 hrs	SCS	cal@840		8.6		8.6	8.7	8.5	8.7	8.3	
FINAL AMMONIA - ppm				EAS #2375 (8-12)									

Approved by: [signature]

Date: 01/19/2010

WHOLE EFFLUENT TEST conducted in accordance with US EPA 600/4-90/027
Fifth Edition October 2002

Sullivan WWTP, Outfall 001, 24 hr composite **EAS LOG# 1113608**

Date Test Began:	January 13, 2010	**Time Test Began:**	1100 hrs	**Analyst 1:**	DFW
				Analyst 2:	KJR
Date Test Finished:	January 15, 2010	**Time Test Finished:**	1100 hrs	**Analyst 3:**	SCS

P. promelas (PP) **AGE:** 13 **days** **HATCH NUMBER:** 122709fh aro

	RC	UC	100%	50%	25%	12.50%	6.25%	X% AEC
PERIOD	**ALIVE**	**ALIVE**	**ALIVE**	**ALIVE**	**ALIVE**	**ALIVE**	**ALIVE**	**ALIVE**
0 HR-PP	10,10		10,10	10,10	10,10	10,10	10,10	
24 HR-PP	10,10		10,7	10,10	10,10	10,10	10,10	
48 HR-PP	10,10		2,0	10,10	10,10	10,10	10,10	

Ceriodaphnia dubia (CD) **AGE:** <24 **hours** **HATCH NUMBER:** 011210cd aro

	RC	UC	100%	50%	25%	12.50%	6.25%	X% AEC
PERIOD	**ALIVE**	**ALIVE**	**ALIVE**	**ALIVE**	**ALIVE**	**ALIVE**	**ALIVE**	**ALIVE**
0 HR-CD	5,5,5,5		5,5,5,5	5,5,5,5	5,5,5,5	5,5,5,5	5,5,5,5	
24 HR-CD	5,5,5,5		5,5,5,5	5,5,5,5	5,5,5,5	5,4,4,4	5,5,5,5	
48 HR-CD	5,5,5,5		0,0,1,0	5,5,5,5	5,5,5,5	5,4,4,4	5,5,5,5	

Approved by: [signature] Date: 01/19/2010

Sullivan WWTP, Outfall 001, 24 hr composite EAS#: 1113608

Notes & Comments

Prepared by: A Shields

Date: 01/19/2010

multiple

ENVIRONMENTAL ANALYSIS SOUTH, INC.
4000 East Jackson Blvd
Jackson, MO 63755
Phone: (573) 204-8817 Fax: (573) 204-8818

WHOLE EFFLUENT TOXICITY TESTING
CHAIN OF CUSTODY

CLIENT: City of Sullivan

NPDES PERMIT NUMBER: MO-0104736

EFFLUENT NAME: SWWTP # 2 (LEGAL NAME) GRAB ☐ 24 HR COMPOSITE ☑

COLLECTION DATA: START DATE: 1-11-10 START TIME: 7:40

FINISH DATE: 1-12-10 FINISH TIME: 7:40

UPSTREAM NAME: _____ (LEGAL NAME) (GRAB SAMPLE)

COLLECTION DATA: DATE: 1-12-10 TIME: 7:45

SAMPLER NAME: JOE LARRISON (PRINT NAME) CARRIER: FED EX

Disclaimer: Environmental Analysis South, Inc. shall not be held financially liable for invalid whole effluent toxicity test (WET) or shipping charges resulting from the following reasons:

- Sampling & holding time errors (Will results in a setup charge of $100 to the client)
- Commercial carrier delivery problems or errors (Will results in a setup charge of $100 to the client)
- Problems with health or delivery of test organisms by vendor (No setup charge to client)

SAMPLER CHECK LIST

NO HEADSPACE IN BOTTLES ☐
SHIP SAMPLES BY NEXT DAY CARRIER OR DELIVER TO LAB ON 1/13/2010 ☐
SAMPLES TO BE HAND DELIVERED TO LABORATORY SAME DAY AS TEST SETUP ☐
SUFFICIENT ICE TO COOL SAMPLES TO A RANGE OF 0 - 6° C WHEN SHIPPING OVERNIGHT ☐

RELINQUISHED BY: _____ DATE: _____ TIME: _____

LABORATORY USE ONLY

EFFLUENT LOG NUMBER: # 1113608

RECEIVED TEMPERATURE: 6 °C THERMOMETER ASSIGNED NUMBER: _____

HEADSPACE: YES or NO SAMPLES ICED or DELIVERED SAME DAY AS TEST

UPSTREAM LOG NUMBER: _____

RECEIVED TEMPERATURE: _____ °C THERMOMETER ASSIGNED NUMBER: _____

HEADSPACE: YES or NO SAMPLES ICED or DELIVERED SAME DAY AS TEST

RECEIVED BY: _____ DATE: 1/13/10 TIME: 930 FedEx

MAKE ADDITIONAL COPIES OF THIS FORM FOR EACH OUTFALL.

FACILITY NAME	PERMIT NO.	OUTFALL NO.
Sullivan Wastewater Treatment Plant	MO- 0104736	2

PART F – INDUSTRIAL USER DISCHARGES AND RCRA/CERCLA WASTES

60. INDUSTRIAL USER DISCHARGES AND RCRA/CERCLA WASTES

Refer to the Supplemental Application Information to determine whether Part F applies to the treatment works.

All treatment works receiving discharges from significant industrial users or which receive RCRA, CERCLA, or other remedial wastes must complete this form.

GENERAL INFORMATION

60.1 PRETREATMENT PROGRAM

Does the treatment works have, or is it subject to, an approved pretreatment program?

☑ Yes ☐ No

60.2 NUMBER OF NON-CATEGORICAL SIGNIFICANT INDUSTRIAL USERS, or SIUs AND CATEGORICAL INDUSTRIAL USERS, or CIUs. PROVIDE THE NUMBER OF EACH OF THE FOLLOWING TYPES OF INDUSTRIAL USERS THAT DISCHARGE TO THE TREATMENT WORKS.

A. Number of Non-Categorical SIUs	B. Number of CIUs
2	1

60.3 SIGNIFICANT INDUSTIRAL USER INFORMATION

Supply the following information for each SIU. If more than one SIU discharges to the treatment works, provide the information requested for each. Submit additional pages as necessary.

NAME

The Eaton Funeral Home, Inc.

MAILING ADDRESS	CITY	STATE	ZIP
347 N. Clark Street	Sullivan	MO	63080

60.4 INDUSTRIAL PROCESSES

DESCRIBE ALL OF THE INDUSTRIAL PROCESSES THAT AFFECT OR CONTRIBUTE TO THE SIU's DISCHARGE.

Embalming

60.5 PRINCIPAL PRODUCT(S) AND RAW MATERIAL (S)

Describe all of the principle processes and raw materials that affect or contribute to the SIU's discharge.

PRINCIPAL PRODUCT(S)

Embalming Fluids and Bio-Fluids

RAW MATERIAL(S)

Alcohol, Aldehyde, Glycol and Triazole

60.6 FLOW RATE

A. PROCESS WASTEWATER FLOW RATE. Indicate the average daily volume of process wastewater discharged into the collection system in gallons per day, or gpd, and whether the discharge is continuous or intermittent.

100 gpd ☐ Continuous ☑ Intermittent

B. NON-PROCESS WASTEWATER FLOW RATE. Indicate the average daily volume of non-process wastewater discharged into the collection system in gallons per day, or gpd, and whether the discharge is continuous or intermittent.

C.

300 gpd ☐ Continuous ☐ Intermittent

60.7 PRETREATMENT STANDARDS

Indicate whether the SIU is subject to the following

A.	Local Limits	☐ Yes	☑ No
B.	Categorical Pretreatment Standards	☐ Yes	☑ No

If subject to categorical pretreatment standards, which category and subcategory?

60.8 PROBLEMS AT THE TREATMENT WORKS ATTRIBUTED TO WASTE DISCHARGED BY THE SIU

Has the SIU caused or contributed to any problems (e.g., upsets, interference) at the treatment works in the past three years?

☐ Yes ☑ No If Yes, describe each episode

MAKE ADDITIONAL COPIES OF THIS FORM FOR EACH OUTFALL.

FACILITY NAME	PERMIT NO.	OUTFALL NO.
Sullivan Wastewater Treatment Plant	MO- 0104736	2

PART F – INDUSTRIAL USER DISCHARGES AND RCRA/CERCLA WASTES

60. INDUSTRIAL USER DISCHARGES AND RCRA/CERCLA WASTES

Refer to the Supplemental Application Information to determine whether Part F applies to the treatment works.

All treatment works receiving discharges from significant industrial users or which receive RCRA, CERCLA, or other remedial wastes must complete this form.

GENERAL INFORMATION

60.1 PRETREATMENT PROGRAM

Does the treatment works have, or is it subject to, an approved pretreatment program?

☑ Yes ☐ No

60.2 NUMBER OF NON-CATEGORICAL SIGNIFICANT INDUSTRIAL USERS, or SIUs AND CATEGORICAL INDUSTRIAL USERS, or CIUs. PROVIDE THE NUMBER OF EACH OF THE FOLLOWING TYPES OF INDUSTRIAL USERS THAT DISCHARGE TO THE TREATMENT WORKS.

A. Number of Non-Categorical SIUs	B. Number of CIUs
2	1

60.3 SIGNIFICANT INDUSTIRAL USER INFORMATION

Supply the following information for each SIU. If more than one SIU discharges to the treatment works, provide the information requested for each. Submit additional pages as necessary.

NAME

TRW Remediation Site

MAILING ADDRESS	CITY	STATE	ZIP
12025 Tech Center Drive	Livonia	MI	48150

60.4 INDUSTRIAL PROCESSES

DESCRIBE ALL OF THE INDUSTRIAL PROCESSES THAT AFFECT OR CONTRIBUTE TO THE SIU's DISCHARGE.

Air Stripping of Trichloroethylene contaminated ground water

60.5 PRINCIPAL PRODUCT(S) AND RAW MATERIAL (S)

Describe all of the principle processes and raw materials that affect or contribute to the SIU's discharge.

PRINCIPAL PRODUCT(S)

Dispersant to clean air stripper

RAW MATERIAL(S)

Phosphoric Acid and Potassium Hydroxide

60.6 FLOW RATE

A. PROCESS WASTEWATER FLOW RATE. Indicate the average daily volume of process wastewater discharged into the collection system in gallons per day, or gpd, and whether the discharge is continuous or intermittent.

2000 gpd ☑ Continuous ☐ Intermittent

B. NON-PROCESS WASTEWATER FLOW RATE. Indicate the average daily volume of non-process wastewater discharged into the collection system in gallons per day, or gpd, and whether the discharge is continuous or intermittent.

C.

0 gpd ☐ Continuous ☐ Intermittent

60.7 PRETREATMENT STANDARDS

Indicate whether the SIU is subject to the following

A.	Local Limits	☑ Yes	☐ No
B.	Categorical Pretreatment Standards	☐ Yes	☑ No

If subject to categorical pretreatment standards, which category and subcategory?

60.8 PROBLEMS AT THE TREATMENT WORKS ATTRIBUTED TO WASTE DISCHARGED BY THE SIU

Has the SIU caused or contributed to any problems (e.g., upsets, interference) at the treatment works in the past three years?

☐ Yes ☑ No If Yes, describe each episode

MAKE ADDITIONAL COPIES OF THIS FORM FOR EACH OUTFALL.

FACILITY NAME	PERMIT NO.	OUTFALL NO.
Sullivan Wastewater Treatment Plant	MO- 0104736	2

PART F – INDUSTRIAL USER DISCHARGES AND RCRA/CERCLA WASTES

60. INDUSTRIAL USER DISCHARGES AND RCRA/CERCLA WASTES

Refer to the Supplemental Application Information to determine whether Part F applies to the treatment works.

All treatment works receiving discharges from significant industrial users or which receive RCRA, CERCLA, or other remedial wastes must complete this form.

GENERAL INFORMATION

60.1 PRETREATMENT PROGRAM

Does the treatment works have, or is it subject to, an approved pretreatment program?

☑ Yes ☐ No

60.2 NUMBER OF NON-CATEGORICAL SIGNIFICANT INDUSTRIAL USERS, or SIUs AND CATEGORICAL INDUSTRIAL USERS, or CIUs. PROVIDE THE NUMBER OF EACH OF THE FOLLOWING TYPES OF INDUSTRIAL USERS THAT DISCHARGE TO THE TREATMENT WORKS.

A. Number of Non-Categorical SIUs	B. Number of CIUs
2	1

60.3 SIGNIFICANT INDUSTIRAL USER INFORMATION

Supply the following information for each SIU. If more than one SIU discharges to the treatment works, provide the information requested for each. Submit additional pages as necessary.

NAME

Huggins Metal Finishing - Sullivan Precision Metal Finishing

MAILING ADDRESS	CITY	STATE	ZIP
995 North Service Road West	Sullivan	MO	63080

60.4 INDUSTRIAL PROCESSES

DESCRIBE ALL OF THE INDUSTRIAL PROCESSES THAT AFFECT OR CONTRIBUTE TO THE SIU's DISCHARGE.

Chimical processing of aluminum, titanium, through anodize and conversion coat.

60.5 PRINCIPAL PRODUCT(S) AND RAW MATERIAL (S)

Describe all of the principle processes and raw materials that affect or contribute to the SIU's discharge.

PRINCIPAL PRODUCT(S)

Chrome Plating, Paints, Solvents, Pentatrants

RAW MATERIAL(S)

Nitric Acid, Sulfuric Acid, Chromium Based Products

60.6 FLOW RATE

A. PROCESS WASTEWATER FLOW RATE. Indicate the average daily volume of process wastewater discharged into the collection system in gallons per day, or gpd, and whether the discharge is continuous or intermittent.

54,700 gpd ☐ Continuous ☑ Intermittent

B. NON-PROCESS WASTEWATER FLOW RATE. Indicate the average daily volume of non-process wastewater discharged into the collection system in gallons per day, or gpd, and whether the discharge is continuous or intermittent.

C.

700 gpd ☑ Continuous ☐ Intermittent

60.7 PRETREATMENT STANDARDS

Indicate whether the SIU is subject to the following

A.	Local Limits	☑ Yes	☐ No
B.	Categorical Pretreatment Standards	☑ Yes	☐ No

If subject to categorical pretreatment standards, which category and subcategory?

Metal Finishing Aerospace

60.8 PROBLEMS AT THE TREATMENT WORKS ATTRIBUTED TO WASTE DISCHARGED BY THE SIU

Has the SIU caused or contributed to any problems (e.g., upsets, interference) at the treatment works in the past three years?

☐ Yes ☑ No If Yes, describe each episode

MAKE ADDITIONAL COPIES OF THIS FORM FOR EACH OUTFALL.

FACILITY NAME	PERMIT NO.	OUTFALL NO.
Sullivan Mo. Wastewater Treatment Plant	MO- 0104736	2

PART F – INDUSTRIAL USER DISCHARGES AND RCRA/CERCLA WASTES (CONTINUED)

60.9 RCRA HAZARDOUS WASTE RECEIVED BY TRUCK, RAIL, OR DEDICATED PIPELINE

RCRA WASTE. Does the treatment works receive or has it in the past three years received RCRA hazardous waste by truck, rail or dedicated pipe?
☐ Yes ☑ No

WASTE TRANSPORT. Method by which RCRA waste is received. (Check all that apply)
☐ Truck ☐ Rail ☐ Dedicated Pipe

WASTE DESCRIPTION. Give EPA hazardous waste number and amount (volume or mass, specify units).

EPA HAZARDOUS WASTE NUMBER	AMOUNT	UNITS

60.10 CERCLA, OR SUPERFUND, WASTEWATER, RCRA REMEDIATION/CORRECTIVE ACTION WASTEWATER AND OTHER REMEDIAL ACTIVITY WASTEWATER

REMEDIATION WASTE. Does the treatment works currently (or has it been notified that it will) receive waste from remedial activities?
☑ Yes ☐ No Provide a list of sites and the requested information for each current and future site.

60.11 WASTE ORIGIN

Describe the site and type of facility at which the CERCLA/RCRA/or other remedial waste originates (or is expected to originate in the next five years).

TRW site air strips well water at old plant site and disposes of treated water into the sewer. Have individual wastewater permit.

60.12 POLLUTANTS

List the hazardous constituents that are received (or are expected to be received). Included data on volume and concentration, if known. (Attach additional sheets if necessary)

60.13 WASTE TREATMENT

A. Is this waste treated (or will it be treated) prior to entering the treatment works?
☑ Yes ☐ No

If Yes, describe the treatment (provide information about the removal efficiency):

Air stripping of Trichloroethylene from well water. No hazards remaining.

B. Is the discharge (or will the discharge be) continuous or intermittent?
☑ Continuous ☐ Intermittent

If intermittent, describe the discharge schedule:

END OF PART F

REFER TO THE APPLICATION OVERVIEW TO DETERMINE WHICH OTHER PARTS OF FORM B2 YOU MUST COMPLETE.

MO 780-1805 (09-08)

INSTRUCTIONS FOR COMPLETING FORM B2
APPLICATION FOR CONSTRUCTION OR OPERATING PERMITS FOR FACILITIES WHICH RECEIVE BASICALLY DOMESTIC WASTE AND HAVE A DESIGN FLOW MORE THAN 100,000 GALLONS PER DAY

(Facilities less than or equal to 100,000 gallons per day of domestic waste must use FORM B.)
(Facilities that receive wastes other than domestic must fill out FORM A and other forms as appropriate.)

PART A – BASIC APPLICATION INFORMATION

1. Check which parameter is applicable. **Do not check more than one item.** Construction and operating permit refer to permits issued by the Department of Natural Resources, Water Protection Program, Water Pollution Branch.

   Effective Sept. 1, 2008, a facility will be required to use ***Missouri's Antidegradation Rule and Implementation Procedure***. For more information, this document is available at www.dnr.mo.gov/env/wpp/docs/aip-cwc-appr-050708.pdf. This procedure will be applicable to new and expanded wastewater facilities and requires the proposed discharge to a water body to undergo a level of Antidegradation Review that documents the use of a water body's available assimilative capacity is justified.

1.1 Self – explanatory.

1.2 An operating permit and antidegradation review public notice requires a Water Quality/Antidegradation Review Sheet to be submitted with the application (No fee required).

CONSTRUCTION PERMIT FEES (Include fee with application.)

$750 for a sewage treatment facility with a design flow of less than 500,000 gallons per day.
$2,200 for sewage treatment facility with a design flow of 500,000 gallons per day or more.

DOMESTIC OPERATING PERMIT FEES (Annual operating permit fees are based on flow.)

Annual fee/Design flow	Annual fee/Design flow
$3,000.....30,000 gpd to1 mgd	$3,500.....>1 million gallons per day

New domestic wastewater treatment facilities must submit the annual fee with the original application.

If the application is for a site-specific permit re-issuance, send no fees. You will be invoiced separately by the department on the anniversary date of the original permit. Permit fees must be current for the department to reissue the operating permit. Late fees of two percent per month are charged and added to outstanding annual fees.

PUBLIC SEWER SYSTEM OPERATING PERMIT FEES (City, Public Sewer District, Public Water District, or other publicly owned treatment works). Annual fee is based on number of service connections. The table of fees is in 10 CSR 20-6.011 and is available at www.sos.mo.gov/adrules/csr/current/10csr/10c20-6a.pdf. New Public Sewer System facilities should not submit any fee as the department will invoice the permittee.

OPERATING PERMIT MODIFICATIONS, including transfers, are subject to the following fees:

a. Municipals - $200 each.
b. All others – 25 percent of annual fee.

Note: Facility name or address changes where owner, operator and continuing authority remain the same are not considered transfers.

2. Name of Facility – Include the name by which this facility is locally known. Example: Southwest Sewage Treatment Plant, Country Club Mobile Home Park, etc. Provide the street address or location of the facility. If the facility lacks a street name or route number, provide the names of the closest intersection, highway, country road, etc.

2.1 Self – explanatory.

2.2 Global Positioning System, or GPS, is a satellite-based navigation system. The department prefers that a GPS receiver is used and the displayed coordinates submitted. If access to a GPS receiver is not available, use a mapping system to approximate the coordinates; the department's mapping system is available at www.dnr.mo.gov/internetmapviewer/.

3. Owner – Provide the legal name and address of the owner.

3.1 Prior to submitting a permit to public notice, the Department of Natural Resources shall provide the permit applicant 10 days to review the draft permit for nonsubstantive drafting errors. In the interest of expediting permit issuance, permit applicants may waive the opportunity to review draft permits prior to public notice. Check Yes to review the draft permit prior to public notice. Check No to waive the process and expedite the permit.

4. Continuing Authority – Provide the permanent organization, which will serve as the continuing authority for the operation, maintenance and modernization of the facility. The regulatory requirement regarding continuing authority is available at www.sos.mo.gov/adrules/csr/current/10csr/10c20-6a.pdf or contact the appropriate Department of Natural Resources Regional Office.

5. Operator – Provide the name, certificate number and telephone number of the operator of the facility.

6. Provide the name, title and work telephone number of a person who is thoroughly familiar with the operation of the facility and with the facts reported in this application and who can be contacted by the department, if necessary.

7.1 Provide a brief description of the wastewater treatment facilities.

7.2 A topographic map is available on the Web at www.dnr.mo.gov/internetmapviewer/ or from the Department of Natural Resources' Division of Geology and Land Survey in Rolla, Missouri at 573-368-2125.

7.3 Self – explanatory.

7.4 For Standard Industrial Codes, visit www.osha.gov/pls/imis/sicsearch.html and for the North American Industry Classification System, visit www.census.gov/naics or contact the appropriate Department of Natural Resources Regional Office.

7.5 – 8.1 Self – explanatory.

9.1 A copy of 10 CSR 25 is available at www.sos.mo.gov/adrules/csr/current/10csr/10csr.asp#10-25.

9.2 – 9.9 Self – explanatory.

INSTRUCTIONS FOR COMPLETING FORM B2
APPLICATION FOR CONSTRUCTION OR OPERATING PERMITS FOR FACILITIES WHICH RECEIVE BASICALLY DOMESTIC WASTE AND HAVE A DESIGN FLOW MORE THAN 100,000 GALLONS PER DAY
(Continued)

9.10 Refer to University of Missouri Extension Environmental Quality publications about biosolids - numbers WQ420-426. Available on the Web at http://extension.missouri.edu/explore/envqual/. Additionally, the federal sludge regulations are available through the U.S. Government Printing Office at www.gpoaccess.gov/cfr/index.html.

10. Provide the name and address of the first downstream landowner, different from that of the permitted facility, through whose property the discharge will flow. For discharges that leave the permitted facility and flow under a road or highway, or along the right-of-way, the downstream property owner is the landowner that the discharge flows to after leaving the right-of-way.

11. – 11.3 Self – explanatory.

PART B – ADDITIONAL APPLICATION INFORMATION

20. – 20.3 Self – explanatory.

20.4 Global Positioning System, or GPS, is a satellite-based navigation system. The department prefers that a GPS receiver is used at the outfall pipe and the displayed coordinates submitted. If access to a GPS receiver is not available, use a mapping system to approximate the coordinates; the department's mapping system is available at www.dnr.mo.gov/internetmapviewer/.

20.5 – 20.7 Self – explanatory.

PART C – CERTIFICATION

30. Signature – All applications must be signed as follows and the signatures must be original:

a. For a corporation, by an officer having responsibility for the overall operation of the regulated facility or activity or for environmental matters.

b. For a partnership or sole proprietorship, by a general partner or the proprietor.

c. For a municipal, state, federal or other public facility, by either a principal executive officer or by an individual having overall responsibility for environmental matters at the facility.

PART D – EXPANDED EFFLUENT TESTING DATA

40.1 Self – explanatory. ML/MDL means minimum limit or minimum detection limit.

PART E – TOXICITY TESTING DATA

50.1 – 50.3 Self – explanatory.

PART F – INDUSTRIAL USER DISCHARGES AND RCRA/CERCLA WASTES

60. Federal regulations are available through the U.S. Government Printing Office at www.gpoaccess.gov/cfr/index.html.

60.1 Self – explanatory

60.2 A non-categorical significant industrial user is an industrial user that is not a CIU and meets one or more of the following:

i. Discharges an average of 25,000 gallons per day or more of process wastewater to the treatment works (with certain exclusions).

ii. Contributes a process waste stream that makes up five percent or more of the average dry weather hydraulic or organic capacity of the treatment plant.

iii. Is designated as an SIU by the control authority.

60.3 – 60.13 Self – explanatory.

PART G – COMBINED SEWER SYSTEMS

70. – 70.10 Self – explanatory.

This completed form, along with the applicable permit fees, should be submitted to the appropriate Department of Natural Resources Office (See end of Part C). Submittal of an incomplete application may result in the application being returned. Map of regional offices with addresses and phone numbers are available on the Web at www.dnr.mo.gov/regions/ro-map.pdf. If there are any questions concerning this form, please contact the appropriate Regional Office or the Department of Natural Resources, Water Protection Program, Water Pollution Branch, NPDES Permits and Engineering Section at 573-751-6825.

LOCAL LIMIT REVIEW
SULLIVAN WASTE WATER TREATMENT PLANT
MO - 0104736
OCTOBER 1, 2012

At this time it does not appear necessary to revise the local limits for our permit. The POTW in reference to pollutants of concern has received a notice of violation for ammonia and a letter of warning for copper since starting up our plant. Neither of these issues were caused by any of the industrial users to the system. The ammonia was due to dewatering the lagoon during the lagoon closure and associated sludge removal. The copper is being investigated currently. We are looking into what our background level is in the drinking water, possible increases due to degradation of the copper lines in the distribution system, levels in the influent compared with expected removal rates of the plant, etc. This could also just have been an anomaly in that we have been within range since the plant went online in 2009. We hope to have an answer by the time the next annual report is due for the pretreatment program.