

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-0109916

Owner: Keck Holdings, LLC
Address: 29720 Highway UU, Warsaw, MO 65355

Continuing Authority: Same as above
Address: Same as above

Facility Name: Reel & Trigger Resort
Facility Address: 29720 Highway UU, Warsaw, MO 65355

Legal Description: NE ¼, SE ¼, Sec. 10, T40N, R23W, Benton County
UTM Coordinates: X = 460624, Y = 4234777

Receiving Stream: Unnamed Tributary to Harry S. Truman Lake (U)
First Classified Stream and ID: Harry S. Truman Lake (L2) (07207)
USGS Basin & Sub-watershed No.: (10290105 – 0507)

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

FACILITY DESCRIPTION

Outfall #001 – Resort – SIC #7011

The use or operation of this facility does not require the services of a certified operator.
Septic Tank/Recirculating Sand Filter/Chlorination/Sludge Disposal is by Contract Hauler
Design population equivalent is 70.
Design flow is 3,500 gallons per day.
Actual flow is 900 gallons per day.
Design sludge production is 0.49 dry tons/year.

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

September 22, 2011
Effective Date

Sara Parker Pauley, Director, Department of Natural Resources

September 21, 2016
Expiration Date

Dorothy Franklin, Acting Director, Kansas City Regional Office

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS					PAGE NUMBER 2 of 6	
					PERMIT NUMBER MO-0109916	
The permittee is authorized to discharge from outfall(s) with serial number(s) as specified in the application for this permit. The interim effluent limitations shall become effective upon issuance and remain in effect until THREE (3) years after the effective date of this permit . Such discharges shall be controlled, limited and monitored by the permittee as specified below:						
OUTFALL NUMBER AND EFFLUENT PARAMETER(S)	UNITS	INTERIM EFFLUENT LIMITATIONS			MONITORING REQUIREMENTS	
		DAILY MAXIMUM	WEEKLY AVERAGE	MONTHLY AVERAGE	MEASUREMENT FREQUENCY	SAMPLE TYPE
<u>Outfall #001</u>						
Flow	MGD	*		*	once/month**	24 hr. estimate
Biochemical Oxygen Demand ₅	mg/L		30	20	once/month**	grab
Total Suspended Solids	mg/L		30	20	once/month**	grab
<i>E. coli</i> (Note 1)	#/100 mL	630		126	once/month**	grab
pH – Units	SU	***		***	once/month**	grab
Ammonia as N	mg/L	*		*	once/month**	grab
Temperature	°C	*		*	once/month**	grab
Total Residual Chlorine (Note 2)	mg/L	1.0		1.0	once/month**	grab
MONITORING REPORTS SHALL BE SUBMITTED <u>MONTHLY</u> ; THE FIRST REPORT IS DUE <u>NOVEMBER 28, 2011</u> . THERE SHALL BE NO DISCHARGE OF FLOATING SOLIDS OR VISIBLE FOAM IN OTHER THAN TRACE AMOUNTS.						
B. STANDARD CONDITIONS						
IN ADDITION TO SPECIFIED CONDITIONS STATED HEREIN, THIS PERMIT IS SUBJECT TO THE ATTACHED <u>Parts I & III</u> STANDARD CONDITIONS DATED <u>October 1, 1980 and August 15, 1994</u> , AND HEREBY INCORPORATED AS THOUGH FULLY SET FORTH HEREIN.						

MO 780-0010 (8/91)

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS (continued)

* Monitoring requirement only.

** Monitor once per month in the months of March through November. Reports are due no later than the 28th of the following month.

*** pH is measured in pH units and is not to be averaged. The pH is limited to the range of 6.5-9.0 pH units.

Note 1 Final limitations and monitoring requirements for *E. coli* are applicable only during the recreational season from April 1 through October 31. The Monthly Average Limit for *E. coli* is expressed as a geometric mean.

Note 2 This permit contains a Total Residual Chlorine (TRC) limit.

- (a) Disinfection is required year-round unless the permit specifically states that “Final limitations and monitoring requirements for *E. coli* are applicable only during the recreational season from April 1 through October 31.” If your permit does not require disinfection during the non-recreational months, do not chlorinate in those months.
- (b) Do not chemically dechlorinate if it is not needed to meet the limits in your permit.
- (c) If no chlorine was used in a given sampling period, an actual analysis is not necessary. Simply report as “0 mg/L” TRC.

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS				PAGE NUMBER 3 of 6		
				PERMIT NUMBER MO-0109916		
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 THREE (3) years from the effective date of this permit and remain in effect until expiration of the permit. Such discharges shall be controlled, limited and monitored by the permittee as specified below:						
OUTFALL NUMBER AND EFFLUENT PARAMETER(S)	UNITS	FINAL EFFLUENT LIMITATIONS			MONITORING REQUIREMENTS	
		DAILY MAXIMUM	WEEKLY AVERAGE	MONTHLY AVERAGE	MEASUREMENT FREQUENCY	SAMPLE TYPE
<u>Outfall #001</u>						
Flow	MGD	*		*	once/month**	24 hr. estimate
Biochemical Oxygen Demand ₅	mg/L		30	20	once/month**	grab
Total Suspended Solids	mg/L		30	20	once/month**	grab
<i>E. coli</i> (Note 1)	#/100 mL	630		126	once/month**	grab
pH – Units	SU	***		***	once/month**	grab
Ammonia as N (April 1 – Sept 30) (Oct 1 – March 31)	mg/L	5.7 7.5		1.3 2.8	once/month**	grab
Temperature	°C	*		*	once/month**	grab
Total Residual Chlorine (Note 3)	mg/L	0.017 (0.13 ML)		0.008 (0.13 ML)	once/month**	grab
MONITORING REPORTS SHALL BE SUBMITTED <u>MONTHLY</u> ; THE FIRST REPORT IS DUE <u>NOVEMBER 28, 2014</u> . THERE SHALL BE NO DISCHARGE OF FLOATING SOLIDS OR VISIBLE FOAM IN OTHER THAN TRACE AMOUNTS.						
B. STANDARD CONDITIONS						
IN ADDITION TO SPECIFIED CONDITIONS STATED HEREIN, THIS PERMIT IS SUBJECT TO THE ATTACHED <u>Parts I & III</u> STANDARD CONDITIONS DATED <u>October 1, 1980 and August 15, 1994</u> , AND HEREBY INCORPORATED AS THOUGH FULLY SET FORTH HEREIN.						

MO 780-0010 (8/91)

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS (continued)

- * Monitoring requirement only.
- ** Monitor once per month in the months of March through November. Reports are due no later than the 28th of the following month.
- *** pH is measured in pH units and is not to be averaged. The pH is limited to the range of 6.5-9.0 pH units.

Note 1 Final limitations and monitoring requirements for *E. coli* are applicable only during the recreational season from April 1 through October 31. The Monthly Average Limit for *E. coli* is expressed as a geometric mean.

Note 3 This permit contains a Total Residual Chlorine (TRC) limit.

- (a) This effluent limit is below the minimum quantification level (ML) of the most common and practical EPA approved CLTRC methods. The department has determined the current acceptable ML for total residual chlorine to be 130 µg/L when using the DPD Colorimetric Method #4500 – CL G. from Standard Methods for the Examination of Waters and Wastewater. 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 0.13mg/L will be considered violations of the permit and values less than the minimum quantification level of 0.13mg/L will be considered to be in compliance with the permit limitation. The minimum quantification level does not authorize the discharge of chlorine in excess of the effluent limits stated in the permit.

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS (continued)

Note 3 (continued)

- (b) Disinfection is required year-round unless the permit specifically states that “Final limitations and monitoring requirements for *E. coli* are applicable only during the recreational season from April 1 through October 31.” If your permit does not require disinfection during the non-recreational months, do not chlorinate in those months.
- (c) Do not chemically dechlorinate if it is not needed to meet the limits in your permit.
- (d) If no chlorine was used in a given sampling period, an actual analysis is not necessary. Simply report as “0 mg/L” TRC.

C. SPECIAL CONDITIONS

1. This permit may be reopened and modified, or alternatively revoked and reissued, to:
 - (a) Comply with any applicable effluent standard or limitation issued or approved under Sections 301(b)(2)(C) and (D), 304(b)(2), and 307(a) (2) of the Clean Water Act, if the effluent standard or limitation so issued or approved:
 - (1) contains different conditions or is otherwise more stringent than any effluent limitation in the permit; or
 - (2) controls any pollutant not limited in the permit.
 - (b) Incorporate new or modified effluent limitations or other conditions, if the result of a waste load allocation study, toxicity test or other information indicates changes are necessary to assure compliance with Missouri’s Water Quality Standards.
 - (c) Incorporate new or modified effluent limitations or other conditions if, as the result of a watershed analysis, a Total Maximum Daily Load (TMDL) limitation is developed for the receiving waters which are currently included in Missouri’s list of waters of the state not fully achieving the state’s water quality standards, also called the 303(d) list.
The permit as modified or reissued under this paragraph shall also contain any other requirements of the Clean Water Act then applicable.
2. All outfalls must be clearly marked in the field.
3. Permittee will cease discharge by connection to a facility with an area-wide management plan per 10 CSR 20-6.010(3)(B) within 90 days of notice of its availability.
4. Changes in Discharges of Toxic Substances

The permittee shall notify the Director as soon as it knows or has reason to believe:
 - (a) That any activity has occurred or will occur which would result in the discharge of any toxic pollutant which is not limited in the permit, if that discharge will exceed the highest of the following "notification levels:"
 - (1) One hundred micrograms per liter (100 µg/L);
 - (2) Two hundred micrograms per liter (200 µg/L) for acrolein and acrylonitrile; five hundred micrograms per liter (500 µg/L) for 2,5 dinitrophenol and for 2-methyl-4, 6-dinitrophenol; and one milligram per liter (1 mg/L) for antimony;
 - (3) Five (5) times the maximum concentration value reported for the pollutant in the permit application;
 - (4) The level established in Part A of the permit by the Director.
 - (b) That they have begun or expect to begin to use or manufacture as an intermediate or final product or byproduct any toxic pollutant, which was not reported in the permit application.
5. Report as no-discharge when a discharge does not occur during the report period.
6. Water Quality Standards
 - (a) Discharges to waters of the state shall not cause a violation of water quality standards rule under 10 CSR 20-7.031, including both specific and general criteria.
 - (b) General Criteria. The following general water quality criteria shall be applicable to all waters of the state at all times including mixing zones. No water contaminant, by itself or in combination with other substances, shall prevent the waters of the state from meeting the following conditions:
 - (1) Waters shall be free from substances in sufficient amounts to cause the formation of putrescent, unsightly or harmful bottom deposits or prevent full maintenance of beneficial uses;
 - (2) Waters shall be free from oil, scum and floating debris in sufficient amounts to be unsightly or prevent full maintenance of beneficial uses;
 - (3) Waters shall be free from substances in sufficient amounts to cause unsightly color or turbidity, offensive odor or prevent full maintenance of beneficial uses;

C. SPECIAL CONDITIONS (continued)

- (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.

D. SCHEDULE OF COMPLIANCE – Total Residual Chlorine & Ammonia as N

1. The final daily maximum and monthly average Ammonia as N and Total Residual Chlorine limits shall become effective three (3) years after the issue date of the permit. The Effluent Regulation, 10 CSR 20-7.031(10) allows the permittee up to three (3) years from the issuance date of this permit to comply with new or revised National Pollutant Discharge Elimination System (NPDES) or Missouri operating permit limitations based on criteria in the Clean Water Commission Regulations. It states that such compliance “shall be achieved with all deliberate speed and no later than three (3) years from the date of issuance of the permit.” Therefore modification to the facilities must be made if required to meet the final effluent limits of this permit.
2. If modifications to the facility are required to meet the final effluent limits of this permit, the permittee shall submit to the department a facility plan (or engineering report) by **June 22, 2012**, for changes to the Reel and Trigger Resort wastewater treatment facility so the discharge from the facility will meet the final effluent limits.
3. Within **six months** of department approval of the facility plan, the permittee will then submit to the department engineering plans, technical specifications, and a construction permit application, for changes to the Reel and Trigger Resort wastewater treatment facility so the discharge from the facility will meet the final effluent limits.
4. If completion of construction will be more than 1 year, the permittee shall submit interim progress reports every 12 months from **September 22, 2011**.
5. If the permittee determines that modifications to the facility are not needed to meet the final effluent limits of this permit for Ammonia as N only, the permittee shall submit a letter to the department by **June 22, 2012** stating that modifications are not needed for the Reel and Trigger Resort wastewater treatment facility to meet the final effluent limitations for Total Residual Chlorine.
6. The Reel and Trigger Resort wastewater treatment facility will meet final effluent limits by **September 22, 2014**.

PERMIT TRANSFER

This permit may be transferred to a new owner by submitting an “Application for Transfer of Operating Permit” signed by the seller and buyer of the facility, along with the appropriate modification fee.

PERMIT RENEWAL REQUIREMENTS

Unless this permit is terminated, the permittee shall submit an application for the renewal of this permit no later than six (6) months prior to the permit’s expiration date. Failure to apply for renewal may result in termination of this permit and enforcement action to compel compliance with this condition and the Missouri Clean Water Law.

TERMINATION

In order to terminate this permit, the permittee shall notify the department by submitting Form J, included with the State Operating Permit. The permittee shall complete Form J and mail it to the department at the address noted in the cover letter of this permit. Proper closure of any storage structure is required prior to permit termination. A closure plan shall be submitted to the department and approved prior to initiating closure activities.

DUTY OF COMPLIANCE

The permittee shall comply with all conditions of this permit. Any noncompliance with this permit constitutes a violation of Chapter 644, Missouri Clean Water Law, and 10 CSR 20-6. Noncompliance may result in enforcement action, termination of this authorization, or denial of the permittee's request for renewal.

**Missouri Department of Natural Resources
 FACT SHEET
 FOR THE PURPOSE OF RENEWAL
 OF
 MO-0109916
 REEL & TRIGGER RESORT**

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 storm water 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 , Minor , Industrial Facility ; Variance ;
 Master General Permit ; General Permit Covered Facility ; and/or permit with widespread public interest .

Part I – Facility Information

Facility Type: NON-POTW, Resort
 Facility SIC Code(s): 7011

Facility Description:

Septic Tank/Recirculating Sand Filter/Chlorination/Sludge Disposal by Contract Hauler

Have any changes occurred at this facility or in the receiving water body that effects effluent limit derivation?
 - No.

Application Date: 3/3/2011
 Expiration Date: 9/21/2011
 Last Inspection: 4/24/2008 In Compliance ; Non-Compliance

This inspection placed the facility out of compliance due to the outfall not being marked. A site visit by Drew Hodgdon and Terrie Burch of the Kansas City Regional Office on 5/17/2011 showed that the outfall had since been marked.

OUTFALL(S) TABLE:

OUTFALL	DESIGN FLOW (MGD)	TREATMENT LEVEL	EFFLUENT TYPE	DISTANCE TO CLASSIFIED SEGMENT (MI)
#001	0.0035	Secondary	Domestic	0.10

Outfall #001

Legal Description: NE ¼, SE ¼, Sec. 10, T40N, R23W, Benton County
 UTM Coordinates: X = 460624, Y = 4234776
 Receiving Stream: Unnamed Tributary to Harry S. Truman Lake (U)
 First Classified Stream and ID: Harry S. Truman Lake (L2) (07207)
 USGS Basin & Sub-watershed No.: (10290105 – 060030)

Receiving Water Body's Water Quality & Facility Performance History:

Discharge monitoring reports from the previous permit cycle were reviewed and it was found that this facility exceeded Fecal Coliform effluent limitations once in 2008 and once in 2009.

Comments:

The Reel & Trigger Resort consists of ten single-bedroom cabins, three two-bedroom cabins, and one three-bedroom lodge. The resort caters to hunters and fishermen; therefore, occupancy is expected from March through November. The design population equivalence is 70 but the actual population equivalence varies with the recreational season with peak occupancy during April and May. The flow through this facility varies with occupancy; therefore, the actual flow of 900 GPD listed on page 1 of the current permit renewal reflects an average of reported flows during the previous permit cycle. The facility owner has the filters cleaned out quarterly or as needed and sludge is removed annually by a contract hauler.

The owner of this facility has requested that they be allowed to continue to collect grab samples for BOD and TSS rather than a 24-hour composite or a modified composite as is normally required of mechanical plants. The facility receives an average flow of less than 1,000 gallons per day. Due to the nature of this type of treatment process and the small flow, the detention time within the recirculation tank is expected to be long enough that the effluent should remain consistent within a twenty-four hour period. As such, the request to continue collecting grab samples has been granted.

Part II – Operator Certification Requirements

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

Check boxes below that are applicable to the facility;

- Owned or operated by or for:
 - Municipalities
 - Public Sewer District:
 - County
 - Public Water Supply Districts:
 - Private sewer company regulated by the Public Service Commission:
 - State or Federal agencies:

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

Not Applicable ; This facility is not required to have a certified operator.

Part III – Receiving Stream Information

APPLICABLE DESIGNATIONS OF WATERS OF THE STATE:

As per Missouri's Effluent Regulations [10 CSR 20-7.015], the waters of the state are divided into the below listed seven (7) categories. Each category 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.

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

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

RECEIVING STREAM(S) TABLE:

WATERBODY NAME	CLASS	WBID	DESIGNATED USES*	8-DIGIT HUC	EDU**
Unnamed Tributary to Truman Lake	U	N/A	General Criteria	10290105	Ozark/ Osage
H.S. Truman Lake	L2	07207	LWW, AQL, SCR, DWS, WBC-A		

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

** - Ecological Drainage Unit

*** - UAA has not been conducted.

RECEIVING STREAM(S) LOW-FLOW VALUES TABLE:

RECEIVING STREAM (U, C, P)	LOW-FLOW VALUES (CFS)		
	1Q10	7Q10	30Q10
Unnamed Trib. to Truman Lake (U)	0	0	0

MIXING CONSIDERATIONS:

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

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

RECEIVING STREAM MONITORING REQUIREMENTS:

No receiving water monitoring requirements recommended at this time.

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

ALTERNATIVE EVALUATIONS FOR NEW FACILITIES:

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

Not Applicable .

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

ANTI-BACKSLIDING:

A provision in the Federal Regulations [CWA §303(d)(4); CWA §402(c); 40 CFR Part 122.44(I)] that requires a reissued permit to be as stringent as the previous permit with some exceptions.

- All limits in this operating permit are at least as protective as those previously established; therefore, backsliding does not apply.

ANTIDegradation:

In accordance with Missouri’s Water Quality Standard [10 CSR 20-7.031(2)], 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.

- Renewal no degradation proposed and no further review necessary.

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://dnr.mo.gov/env/wpp/pub/index.html>, items WQ422 through WQ449.

- 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.

Not Applicable ;

The permittee/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

Not Applicable ;

The permittee, at this time, is not required to have a Pretreatment Program or does not have an approved pretreatment 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)(iii)] if the permit writer determines that any give 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.

Applicable ;

A RPA was conducted on appropriate parameters. Please see **APPENDIX #1 – 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 (BOD₅) and Total Suspended Solids (TSS) for Publicly Owned Treatment Works (POTWs)/municipals.

Not Applicable ;

Influent monitoring is not being required to determine percent removal.

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

Sanitary Sewer Overflows (SSOs) are defined as an untreated or partially treated sewage release are considered bypassing under state regulation [10 CSR 20-2.010(11)] and should not be confused with the federal definition of bypass. SSO's have a variety of causes including blockages, line breaks, and sewer defects that allow excess storm water and ground water to (1) enter and overload the collection system, and (2) overload the treatment facility. Additionally, SSO's can be also be caused by lapses in sewer system operation and maintenance, inadequate sewer design and construction, power failures, and vandalism. SSOs also include overflows out of manholes and onto city streets, sidewalks, and other terrestrial locations.

Additionally, Missouri RSMo §644.026.1 mandates that the Department require proper maintenance and operation of treatment facilities and sewer systems and proper disposal of residual waste from all such facilities.

- Not applicable. This facility is not required to develop or implement a program for maintenance and repair of the collection system; however, it is a violation of Missouri State Environmental Laws and Regulations to allow untreated wastewater to discharge to waters of the state.

SCHEDULE OF COMPLIANCE (SOC):

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

Applicable ;

The 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(10)].

STORM WATER 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 storm water 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 Storm Water 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 storm water discharges.

Not Applicable ;

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

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.

Not Applicable ;

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.

Applicable ;

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

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

Where C = downstream concentration
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.

Not Applicable ;

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

WATER QUALITY STANDARDS:

Per [10 CSR 20-7.031(3)], 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:

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

Applicable ;

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(3)(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 all facilities meeting the following criteria:

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

Not Applicable ;

At this time, the permittee is not required to conduct WET test for this facility.

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, which includes blending, 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 20-2.010(11) defines a bypass as the diversion of wastewater from any portion of wastewater treatment facility or sewer system 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.

- Not Applicable, this facility does not bypass.

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

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

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

Not Applicable ;

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

Part V – Effluent Limits Determination

Outfall #001 – Main Facility Outfall

EFFLUENT LIMITATIONS TABLE:

PARAMETER	UNIT	BASIS FOR LIMITS	DAILY MAXIMUM	WEEKLY AVERAGE	MONTHLY AVERAGE	MODIFIED	PREVIOUS PERMIT LIMITATIONS
FLOW	MGD	1	*		*	NO	SAME
BOD ₅	MG/L	1		30	20	NO	SAME
TSS	MG/L	1		30	20	NO	SAME
pH	SU	1	6.5 – 9.0		6.5 – 9.0	YES	6.0 – 9.0
AMMONIA AS N (APRIL 1 – SEPT 30)	MG/L	2, 3, 5	5.7		1.3	YES	*
AMMONIA AS N (OCT 1 – MARCH 31)	MG/L	2, 3, 5	7.5		2.8	YES	*
ESCHERICHIA COLI	***	1, 2	630		126	YES	FECAL COLIFORM
CHLORINE, TOTAL RESIDUAL	MG/L	1, 2, 3	0.017 (0.13 ML)		0.008 (0.13 ML)	YES	1.0
TEMPERATURE	°C	5, 9	*		*	NO	SAME
MONITORING FREQUENCY	Please see Minimum Sampling and Reporting Frequency Requirements in the Derivation and Discussion Section below.						

* - Monitoring requirement only.

** - For DO the Daily Maximum is a Daily Minimum and the Monthly Average is a Monthly Average Minimum.

*** - # of colonies/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 | 7. Antidegradation Policy |
| 2. Water Quality Standard (includes RPA) | 8. Water Quality Model |
| 3. Water Quality Based Effluent Limits | 9. Best Professional Judgment |
| 4. Lagoon Policy | 10. TMDL or Permit in lieu of TMDL |
| 5. Ammonia Policy | 11. WET Test Policy |
| 6. Dissolved Oxygen Policy | 12. Antidegradation Review |

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 (BOD₅).** Effluent limitations from the previous state operating permit have been reassessed and verified that they are still protective of the receiving stream’s Water Quality. Therefore, effluent limitations have been retained from previous state operating permit, please see the **APPLICABLE DESIGNATION OF WATERS OF THE STATE** sub-section of the **Receiving Stream Information.**
- **Total Suspended Solids (TSS).** Effluent limitations from the previous state operating permit have been reassessed and verified that they are still protective of the receiving stream’s Water Quality. Therefore, effluent limitations have been retained from previous state operating permit, please see the **APPLICABLE DESIGNATION OF WATERS OF THE STATE** sub-section of the **Receiving Stream Information.**
- **pH.** pH shall be maintained within the range of 6.5 – 9.0 standard pH units, please see the **APPLICABLE DESIGNATION OF WATERS OF THE STATE** sub-section of the **Receiving Stream Information.**
- **Escherichia coli (E. coli).** Monthly average of 126 per 100 ml as a geometric mean and Daily Maximum of 630 during the recreational season (April 1 – October 31), to protect Whole Body Contact Recreation (A) designated use of the receiving stream, as per 10 CSR 20-7.031(4)(C). Daily Maximum effluent variability will be evaluated in development of a future effluent limit. An effluent limit for both monthly average and daily maximum is required by 40 CFR 122.45(d).

- **Total Ammonia Nitrogen.** Early Life Stages Present Total Ammonia Nitrogen criteria apply [10 CSR 20-7.031(4)(B)7.C. & Table B3] default pH 7.8 SU Background total ammonia nitrogen = 0.01 mg/L (Default). Design flow is 3,500 GPD = 0.0054 cfs.

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: $C_e = ((0.0054 + 0.0)1.5 - (0.0 * 0.01))/0.0054$
 $C_e = 1.5 \text{ mg/L}$

Acute WLA: $C_e = ((0.0054 + 0.0)12.1 - (0.0 * 0.01))/0.0054$
 $C_e = 12.1 \text{ mg/L}$

$LTA_c = 1.5 \text{ mg/L} (0.569) = \mathbf{0.85 \text{ mg/L}}$

[CV = 1.431, 99th Percentile, 30 day avg.]

$LTA_a = 12.1 \text{ mg/L} (0.150) = 1.815 \text{ mg/L}$

[CV = 1.431, 99th Percentile]

Use most protective number of LTA_c or LTA_a .

$MDL = 0.85 \text{ mg/L} (6.67) = 5.7 \text{ mg/L}$

[CV = 1.431, 99th Percentile]

$AML = 0.85 \text{ mg/L} (1.48) = 1.3 \text{ mg/L}$

[CV = 1.431, 95th Percentile, n =30]

Winter: October 1 – March 31

Chronic WLA: $C_e = ((0.0054 + 0.0)3.1 - (0.0 * 0.01))/0.0054$
 $C_e = 3.1 \text{ mg/L}$

Acute WLA: $C_e = ((0.0054 + 0.0)12.1 - (0.0 * 0.01))/0.0054$
 $C_e = 12.1 \text{ mg/L}$

$LTA_c = 3.1 \text{ mg/L} (0.780) = \mathbf{2.4 \text{ mg/L}}$

[CV = 0.6, 99th Percentile, 30 day avg.]

$LTA_a = 12.1 \text{ mg/L} (0.321) = 3.9 \text{ mg/L}$

[CV = 0.6, 99th Percentile]

Use most protective number of LTA_c or LTA_a .

$MDL = 2.4 \text{ mg/L} (3.11) = 7.5 \text{ mg/L}$

[CV = 0.6, 99th Percentile]

$AML = 2.4 \text{ mg/L} (1.19) = 2.8 \text{ mg/L}$

[CV = 0.6, 95th Percentile, n =30]

- **Total Residual Chlorine (TRC).** Warm-water Protection of Aquatic Life CCC = 10 µg/L, CMC = 19 µg/L [10 CSR 20-7.031, Table A]. Background TRC = 0.0 µg/L. Design flow is 3, 500 GPD = 0.0054 cfs.

Chronic WLA: $C_e = ((0.0054 + 0.0)10 - (0.0 * 0.0))/0.0054$
 $C_e = 10 \text{ µg/L}$

Acute WLA: $C_e = ((0.0054 + 0.0)19 - (0.0 * 0.0))/0.0054$
 $C_e = 19 \text{ µg/L}$

$LTA_c = 10 (0.527) = \mathbf{5.3 \text{ µg/L}}$

[CV = 0.6, 99th Percentile]

$LTA_a = 19 (0.321) = 6.1 \text{ µg/L}$

[CV = 0.6, 99th Percentile]

Use most protective number of LTA_c or LTA_a .

$MDL = 5.3 (3.11) = 16.5 \text{ µg/L}$

[CV = 0.6, 99th Percentile]

$AML = 5.3 (1.55) = 8.2 \text{ µg/L}$

[CV = 0.6, 95th Percentile, n = 4]

- **Minimum Sampling and Reporting Frequency Requirements.** The previous permit for this facility required monthly monitoring during the months of January, April, May, June, July, August, September, and October. Monitoring frequency will remain at monthly in the current permit renewal; however, sampling shall be conducted from March through November to correspond with the times that the resort maintains occupancy. Sampling in January will no longer be required.

Part VI – 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.

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 July 29, 2011 to August 29, 2011. No responses received or responses to the Public Notice of this operating permit do not warrant the modification of effluent limits and/or the terms and conditions of this permit.

DATE OF FACT SHEET: MAY 23, 2011

COMPLETED BY:

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Part VII – Appendices

APPENDIX #1 – 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	45.94	1.5	45.9	22	10/0.09	1.431	4.594	Yes

N/A – Not Applicable

* - Units are (µg/L) unless otherwise noted.

** - If the number of samples is greater than 10, then the 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.

Due to the sampling frequency specified in the previous permit, not enough data points were submitted to achieve proper statistical power for a winter RPA for ammonia. However, given the existing data and the limited assimilative capacity of the Unnamed Tributary to HS Truman Lake, potential to exceed water quality standards is assumed. As such, winter ammonia limits were assessed using the default CV of 0.6.

APPENDIX #2 – FACILITY AERIAL VIEW

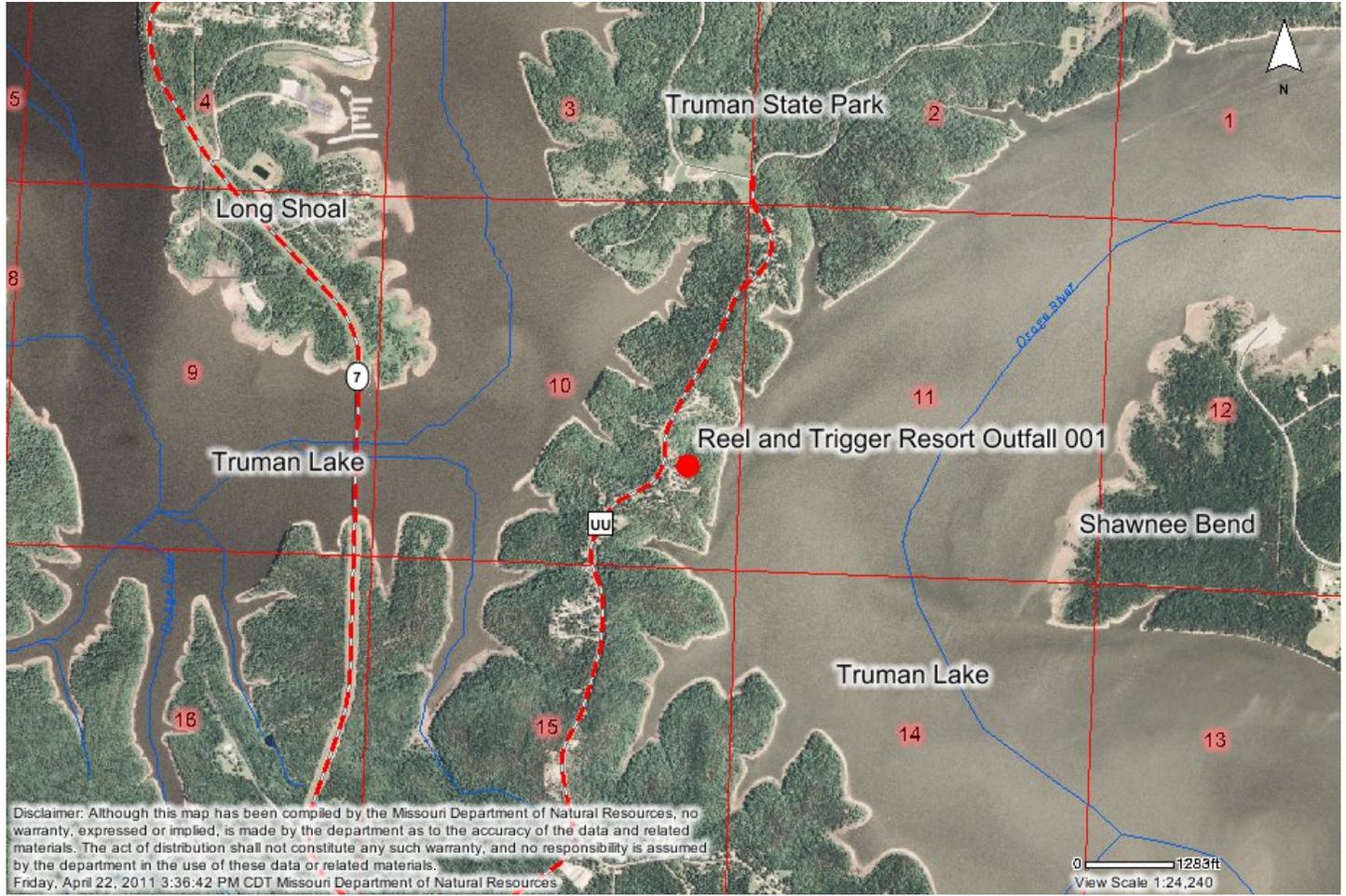


Figure 1. Aerial view of general vicinity of Reel & Trigger Resort showing proximity to H.S. Truman State Park, Highways 7 and UU, and other public use areas.