

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, 92<sup>nd</sup> Congress) as amended,

Permit No. MO-0123960

Owner: Henry H. Hassani  
Address: 6526 Verde Ridge Road, Rancho Palos Verdes, CA 90275

Continuing Authority: Same as above  
Address: Same as above

Facility Name: Rockwood Creek Mobile Home Village  
Facility Address: 6300 S.E. Rockwood Creek Road, Cameron, MO 64429

Legal Description: NE ¼, SW ¼, NW ¼, Sec. 26, T58N, R30W, DeKalb County  
UTM Coordinates: X=393775.689, Y=4407775.168

Receiving Stream: Tributary to Wamsley Creek (U)  
First Classified Stream and ID: Wamsley Creek (C) (00505)  
USGS Basin & Sub-watershed No.: (10280101-0708)

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 – Mobile Home Park – SIC #6515/#4952

**No Certified Operator Required**

Primary 45 lots - Three-cell lagoon /sludge is retained in lagoon. Ancillary 15 lots - Septic tanks/single-cell holding basin with effluent transported to primary cell of the three-cell lagoon by vacuum truck/septage removed by contract hauler.  
Design population equivalent is 187.5.  
Design flow is 18,750 gallons per day.  
Actual flow is 13,500 gallons per day.  
Design sludge production is 5.0 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.

March 13, 2012  
Effective Date

Sara Parker Pauley, Director, Department of Natural Resources

March 12, 2017  
Expiration Date

Dorothy Franklin, Director, Kansas City Regional Office

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS					PAGE NUMBER 2 of 5	
					PERMIT NUMBER MO-0123960	
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 through <u>December 30, 2013</u> . 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/quarter**	24 hr. estimate
Biochemical Oxygen Demand <sub>5</sub>	mg/L		65	45	once/quarter**	grab
Total Suspended Solids	mg/L		110	70	once/quarter**	grab
<i>Escherichia coli</i> ( <i>E. coli</i> ) (Note 1)	#/100 ml	*		*	once/quarter**	grab
pH – Units	SU	***		***	once/quarter**	grab
Ammonia as N	mg/L	*		*	once/quarter**	grab
Temperature (effluent)	°C	*		*	once/quarter**	grab
MONITORING REPORTS SHALL BE SUBMITTED <u>QUARTERLY</u> ; THE FIRST REPORT IS DUE <u>JULY 28, 2012</u> . THERE SHALL BE NO DISCHARGE OF FLOATING SOLIDS OR VISIBLE FOAM IN OTHER THAN TRACE AMOUNTS.						
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 <u>December 31, 2013</u> , 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/quarter**	24 hr. estimate
Biochemical Oxygen Demand <sub>5</sub>	mg/L		65	45	once/quarter**	grab
Total Suspended Solids	mg/L		110	70	once/quarter**	grab
<i>Escherichia coli</i> ( <i>E. coli</i> ) (Note 1)	#/100 ml	*		1134	once/quarter**	grab
pH – Units	SU	***		***	once/quarter**	grab
Ammonia as N	mg/L	*		*	once/quarter**	grab
Temperature (effluent)	°C	*		*	once/quarter**	grab
MONITORING REPORTS SHALL BE SUBMITTED <u>QUARTERLY</u> ; THE FIRST REPORT IS DUE <u>APRIL 28, 2014</u> . THERE SHALL BE NO DISCHARGE OF FLOATING SOLIDS OR VISIBLE FOAM IN OTHER THAN TRACE AMOUNTS.						
<b>B. STANDARD CONDITIONS</b>						
IN ADDITION TO SPECIFIED CONDITIONS STATED HEREIN, THIS PERMIT IS SUBJECT TO THE ATTACHED <u>Parts I &amp; III</u> STANDARD CONDITIONS DATED <u>October 1, 1980 and August 15, 1994</u> , AND HEREBY INCORPORATED AS THOUGH FULLY SET FORTH HEREIN.						

**A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS (continued)**

- \* Monitoring requirement only.
- \*\* See table below for quarterly sampling.
- \*\*\* pH is measured in pH units and is not to be averaged. The pH is to be maintained at or above 6.5 pH units.

Sample discharge at least once for the months of:	Report is due:
January, February, or March (1st Quarter)	April 28
April, May, or June (2nd Quarter)	July 28
July, August, or September (3rd Quarter)	October 28
October, November, or December (4th Quarter)	January 28

Note 1 – Interim and 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.

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

5. 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.

6. Report as no-discharge when a discharge does not occur during the monitoring period.

C. SPECIAL CONDITIONS (continued)

7. It is a violation of the Missouri Clean Water Law to fail to pay fees associated with this permit (644.055 RSMo).
8. Bypasses are not authorized at this facility and are subject to 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 Kansas City Regional Office.
9. A least one gate, constructed of materials comparable to the fence, must be provided to access the lagoon and provide for maintenance and mowing. The gate shall remain locked except when opened by the permittee to perform maintenance or mowing.
10. At least one sign shall appear on the fence on each side of each facility. Minimum wording shall be "SEWAGE TREATMENT FACILITY – KEEP OUT", in letters at least 2 inches high.
11. 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.
12. The inner and outer berm slopes shall not be steeper than three to one (3:1). Inner berm slopes shall not be flatter than four to one (4:1). Consideration may be given to steeper inner slopes provided special attention is given to stabilizing the slope with rip-rap, concrete, or other rigid materials.
13. The berms of storage basins shall be mowed and kept free of any trees, muskrat dens, or other potential sources of damage to the berms.
14. An all-weather access road shall be provided from a public right-of-way to the treatment facility.
15. The discharge from the lagoon system 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 stream.
16. A minimum of two (2) feet freeboard must be maintained in the lagoon cell.
17. The facility shall ensure that adequate provisions are provided to prevent surface water intrusion in to the lagoon and to divert storm water runoff around the lagoon and protect embankments from erosion.
18. It is a violation of the Missouri Clean Water Law and this permit for any discharge to occur from the single-cell holding basin serving the lots on the south side. Any discharge from this basin is considered a bypass and shall be reported as required under Special Condition #8. The operator shall maintain an effluent transfer log which shall include the date and the amount, in gallons, of the effluent transferred from the holding basin to the primary cell of the three-cell lagoon. The log, or a copy of it, shall be made available to the Department upon request.

D. SCHEDULE OF COMPLIANCE – E Coli.

1. The permittee must attain compliance with the final effluent limits as soon as possible, but no later than December 31, 2013.
2. Within one year of issuance of this permit, the permittee shall report progress made in attaining compliance with the final effluent limits.
3. Within two years of issuance of this permit, the permittee shall submit a report detailing progress made in attaining compliance with the final effluent limits.
4. If the permittee fails to meet any of the interim dates above, the permittee shall notify the Department in writing of the reason for non-compliance no later than 14 days following each interim date.
5. Upon completion of construction, the permittee shall submit a Statement of Work Complete signed by the owner and a Professional Engineer that is registered in the state of Missouri. (Only required if construction is required.)

#### 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. This permit authorizes only the activities described in this permit.

**MISSOURI DEPARTMENT OF NATURAL RESOURCES**  
**FACT SHEET**  
**FOR THE PURPOSE OF RENEWAL OF**  
**MO-0123960**  
**ROCKWOOD CREEK MOBILE HOME VILLAGE**

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 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;  - Permit with widespread public interest.

**Part I – Facility Information**

Facility Type: Mobile Home Park  
 Facility SIC Code(s): #6515/#4952

Facility Description: The wastewater treatment at the mobile home park is a little complicated. According to the files there are 8 lots served by individual septic tanks with subsurface absorption fields and there are 15 lots on the south side that have individual septic tanks with the effluent piped to a single-cell "holding" basin. This basin was allowed to remain because it serves lots below the elevation of the three-cell lagoon with the stipulation that it is not allowed to discharge to waters of the state and the wastewater in the holding basin is to be removed with a vacuum truck and transported to the primary cell of three-cell lagoon. The three-cell lagoon serves the 45 lots to the north, and with the addition of the wastewater from the holding basin, there is a total of 60 lots contributing to the three-cell lagoon. The septage should be removed from the septic tanks as routine maintenance for the lots served by septic tanks while the sludge is retained in the lagoon. The design population equivalent is 187.5. The design flow is 18,750 gallons per day with an actual flow of 13,500 gallons per day using small system design criteria and the number of connections available. The design sludge production is 5.0 dry tons per year.

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

Application Date: 05/16/11  
 Expiration Date: 09/21/11  
 Last Inspection: 08/17/06  - In Compliance;  - Non-Compliance

**OUTFALL(S) TABLE:**

OUTFALL	DESIGN FLOW (CFS)	TREATMENT LEVEL	EFFLUENT TYPE	DISTANCE TO CLASSIFIED SEGMENT (MI)
#001	0.029	equivalent to secondary	domestic wastewater	~ 0.4

Outfall #001: Legal Description: NE ¼, SW ¼, NW ¼, Sec. 26, T58N, R30W, DeKalb County  
 UTM Coordinates: X=393775.689, Y=4407775.168  
 Receiving Stream: Tributary to Wamsley Creek (U)  
 First Classified Stream and ID: Wamsley Creek (C) (00505)  
 USGS Basin & Sub-watershed No.: (10280101-0708)

Receiving Water Body's Water Quality & Facility Performance History: No Low Flow Studies or Stream Surveys have been completed for this facility. According to submitted discharge monitoring reports, the facility has not discharged since it was put into operation. It was observed at the last inspection that the three-cell lagoon was operating as a single-cell lagoon because the second and

third cells were not receiving any effluent. There was woody vegetation growing on the berms and also within the second and third cells. Erosion was observed along the berms in the primary cell. Duckweed, trash and a dead opossum were observed in the lagoon. The lagoon was fenced but the gates were not secured. The holding basin was erroneously identified as an unpermitted lagoon at the inspection. It needed to be mowed and there was no fence around it. There is no response to the inspection in the file.

Comments: The design flow is 18,750 gallons per day. For the purposes of this permit, the design population equivalent is based on a flow of 100 gallons per capita per day, as described in Regulation 10 CSR 20-9.020(1)(D) Population Equivalent (P.E.). Therefore, the design population equivalent is 187.5. During construction permit review, the facility was designed with the assumption of 75 gallons per capita per day, which translates to a design population equivalent of 250. The change in design population equivalent from 250 to 187.5 does not reduce the allowable capacity of the facility (the facility can still treat a design flow of 18,750 gallons per day); it simply clarifies the basis for the design population equivalent and brings consistency with other permits.

It should be noted that a discharge occurring from the holding basin is considered a bypass and is not allowed. The files indicate that wastewater in the holding cell is to be pumped by a vacuum truck and taken to the primary cell of the three-cell lagoon to prevent discharging. The permit is requiring that the operator keep a log of the amount of wastewater transferred from the holding cell to the lagoon.

The third cell of the three-cell lagoon has not filled, even with the above average rainfall of the past few years. All cells of a lagoon should have water in the bottom two feet for protection of the clay liner otherwise the clay liner may dry out and allow wastewater to leak into and contaminate the ground water. The vegetation present in the third cell should be removed and the clay liner re-worked, compacted, and tested for acceptable percolation prior to being filled to the minimum level. The design of the lagoon shows there are gate valves between each cell to control the flow of the wastewater. Each cell also has an emergency overflow pipe to protect the berms from washing out.

**Part II – Operator Certification Requirements**

- 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 listed seven (7) categories. Each category lists effluent limitations for specific parameters, which are presented and discussed in each outfall’s Effluent Limitation 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 1<sup>st</sup> 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**
Tributary to Wamsley Creek	U	N/A	General Criteria	10280101	Central Plains/ Grand / Chariton
Wamsley Creek	C	00505	LWW, AQL, SCR***		

\* - 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

\*\*\* - UAAs were conducted in 2005, 2006, and 2007with WBC designation removed and SCR designation assigned.

N/A – Not Applicable.

**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**

**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 an 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 §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 (e.g. 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 or are stored in the lagoon.

**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.

**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.

- Not Applicable - A RPA was not conducted for this facility.

**REMOVAL EFFICIENCY:**

Removal efficiency is a method by which the Federal Regulations define Secondary Treatment and Equivalent to Secondary Treatment, which applies to Biochemical Oxygen Demand 5-day (BOD<sub>5</sub>) 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, they are considered bypassing under state regulation [10 CSR 20-2.010(11)] and should not be confused with the federal definition of bypass. SSOs 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, SSOs 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 meeting the final effluent limitations for Escherichia coli (*E. coli*) as listed under Interim Effluent Limitation and Final Effluent Limitations was established in accordance with [10 CSR 20-7.015(9)(H)2].

**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 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.

- 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), §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):**

§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 assimilate 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 a 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 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	S
BOD <sub>5</sub>	mg/L	1/4		65	45	No	S
TSS	mg/L	1/4		110	70	No	S
pH	SU	1/4	≥ 6.5		≥ 6.5	Yes	6.0 – 9.0
Ammonia as N	mg/L	2/5	*		*	No	S
Temperature (effluent)	°C	2/5	*		*	No	S
<i>Escherichia coli</i> (E. coli) Interim	***	1	*		*	Yes	**
<i>Escherichia coli</i> (E. coli) Final	***	1	*		1134	Yes	*

\* - Monitoring requirement only.  
 \*\* - Parameter was not established in previous state operating permit.  
 \*\*\* - # of colonies/100mL; the Monthly and Weekly Average for *E. coli* is a geometric mean.  
 N/A – Not applicable  
 S – Same as previous 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. 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 (BOD<sub>5</sub>).** 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. [10 CSR 20-7.015(8)(A)3.D.(II)(a)]
- **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. [10 CSR 20-7.015(8)(A)3.D.(II)(a)]
- **pH.** Effluent limitations have been modified to reflect the change in the Code of State Regulations. pH is measured in standard pH units and is not to be averaged. The pH is to be maintained at or above 6.5 pH units. [10 CSR 20-7.015(8)(A)3.B.]
- **Total Ammonia Nitrogen.** Monitoring requirement to determine whether a “reasonable potential” to exceed the water quality standard exists. [10 CSR 20-7.031(4)(B)7]
- **Temperature.** Monitoring requirement due to the toxicity of Ammonia varies by temperature. [10 CSR 20-7.031(4)(B)7]
- **Escherichia coli (E. coli).** Monthly average of 1,134 colonies per 100 ml as a geometric mean during the recreational season (April 1 – October 31), to protect Secondary Contact Recreation designated use of the receiving stream, as per [10 CSR 20-7.031(4)(C)]. Monitoring for Daily Maximum to determine effluent variability for development of future effluent limit.
- **Minimum Sampling and Reporting Frequency Requirements.** Sampling and reporting frequency requirements have been retained from the previous permit.

## **Part VI - Finding of Affordability**

Pursuant to Section 644.145, RSMo, the Department is required to determine whether a permit or decision is affordable and makes a finding of affordability for certain permitting and enforcement decisions. This requirement applies to discharges from combined or separate sanitary sewer systems or publically-owned treatment works.

- Not Applicable - The Department is not required to determine findings of affordability because the facility is not a **combined or separate sanitary sewer system for a publically-owned treatment works**.

## **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 February 3, 2012 to March 5, 2012. 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:** JANUARY 3, 2012

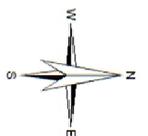
### **COMPLETED BY:**

Terrie Burch, Environmental Specialist  
Kansas City Regional Office  
NPDES Permit Unit  
816-622-7047  
[terrie.burch@dnr.mo.gov](mailto:terrie.burch@dnr.mo.gov)

## Part VII – Appendices

### APPENDIX A – FACILITY LOCATION MAP:

# MO-0123960 Rockwood Creek Mobile Home Village



MO-0123960  
 NE ¼, SW ¼, NW ¼, Sec. 26, T58N, R30W, DeKalb County  
 X = 393775, 689, Y = 4407775, 168  
 Tributary to Wansley Creek (U)  
 1st Class: Wansley Creek (C) (00505)  
 Huc12: (10280101-0708)  
 EDU: Central Plains/Grand/Chariton

