

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES
MISSOURI CLEAN WATER COMMISSION



CONSTRUCTION PERMIT

The Missouri Department of Natural Resources hereby issues a permit to:

MDNR, Division of State Parks
PO Box 176,
Jefferson City, MO 64102

for the construction of (described facilities):

See attached.

Permit Conditions:

See attached.

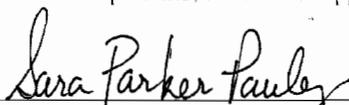
Construction of such proposed facilities shall be in accordance with the provisions of the Missouri Clean Water Law, Chapter 644, RSMo, and regulation promulgated thereunder, or this permit may be revoked by the Department of Natural Resources (Department).

As the Department does not examine structural features of design or the efficiency of mechanical equipment, the issuance of this permit does not include approval of these features.

A representative of the Department may inspect the work covered by this permit during construction. Issuance of a permit to operate by the Department will be contingent on the work substantially adhering to the approved plans and specifications.

This permit applies only to the construction of water pollution control components; it does not apply to other environmentally regulated areas.

December 1, 2015
Effective Date


Sara Parker Pauley, Director, Department of Natural Resources

November 30, 2017
Expiration Date


John Madros, Director, Water Protection Program

CONSTRUCTION PERMIT

I. CONSTRUCTION DESCRIPTION

This project consists of combining all three of the existing lagoon cells into one storage pond followed by a land application field. This facility is designed to handle approximately 13,000 gallons per day of wastewater from April through October.

The outside berms for cell 2 and cell 3 will be raised to match that of cell 1. The floor elevations of each pond will remain unchanged (858 for cell 2 and cell 3; 862 for cell 1); but there will be a smooth transition from the floor of cell 1 to the floors of cells 2 and 3.

The new single cell storage basin will be approximately 238-feet wide by 248-feet long by 9-feet deep in one section and 5-feet deep in the other with 1-foot of freeboard to the emergency overflow and another 1-foot of freeboard to the maximum operating level. The minimum operating level will be 2.6-feet below the emergency overflow (863.4). The lagoon will have a 10-foot berm width.

The existing effluent structure will be raised 4-feet (to 867 at top). The effluent pipe will be replaced and converted to an emergency overflow (draw off at 866). A new 8-inch DIP draw-off pipe from the lagoon will flow to the effluent structure at 863.4. An additional 8-inch SDR-26 PVC pipe will be added to allow gravity flow to the pump station which will be constructed at the southeast corner of the lagoon.

Construction and installation of approximately 344 linear feet (lf) of 6-inch through 8-inch polyvinyl chloride (PVC) Standard Dimension Ratio (SDR)-26 gravity sewer with one manhole, a pump station with one 10 HP vertical turbine pump capable of operating at 206 gallons per minute (gpm) at 115-feet of total dynamic head (TDH), a variable frequency drive unit, 1,044 lf of 4-inch through 6-inch PVC SDR-21 force main and all the necessary appurtenances to make a complete and usable system to transfer effluent to the land application site.

The land application system will be a fixed sprinkler system with 48 evenly spaced sprinklers that will irrigate at 4.3 gallons per minute (gpm) each (206 gpm total). Each sprinkler will have a radius of 45-feet. The site will be approximately 500-feet south of the storage lagoon. The field will be planted with a mixture of cool-season grasses. The system will include 2,415-feet of 1-inch through 3-inch lateral lines and 1,725-feet of 1-inch sprinkler lines.

Sprinklers will be Rainbird model 30WH (SBN-3V) or equal; 11/64" diameter orifice 4.3 gpm at 25 psi.

Vegetation: grass/ hay

Dry weather average annual gpd: 7,622

Seasonal: 13,000 gpd = peak due to lagoon buffer capacity

Off-season: no flow (November through March)

1 in 10 year effluent flow: 13,700 gpd
Design spray irrigation: 24 inch/year, 0.06-inch/hr, 1-inch/day, 3 inch./wk.

Sludge will be removed from the lagoon during construction. See Construction Permit Condition #10.
Future sludge will be stored in the lagoon and removed by a contract hauler.

Site will be fenced.

II. FINDING OF AFFORDABILITY

The Finding of Affordability is not applicable. The department is not required to determine findings of affordability because the permit contains no new conditions or requirements that convey a new cost to the facility. The permittee is replacing a discharging lagoon with a surface land application system in order to achieve compliance with existing permitted effluent limitations in the operating permit issued January 1, 2014. An affordability analysis was completed for the 2014 renewal to address the affordability of the new ammonia limits. New monitoring requirements are being added in the operating permit modification for the land application system, but the elimination of effluent sampling for surface discharge (BOD, TSS, *E. coli*, pH, and ammonia) will off-set the cost of the new monitoring requirements.

III. CONSTRUCTION PERMIT CONDITIONS

The permittee is authorized to construct subject to the following conditions:

1. This construction permit does not authorize discharge.
2. All construction shall be in accordance with the plans and specifications submitted by Shafer, Kline, and Warren Inc. on April 24, 2015, and October 8, 2015.
3. The department must be contacted in writing prior to making any changes to the approved plans and specifications that would directly or indirectly have an impact on the capacity, flow, system layout, or reliability of the proposed wastewater treatment facilities or any design parameter that is addressed by 10 CSR 20-8, in accordance with 10 CSR 20-8.110(8).
4. State and federal law does not permit bypassing of raw wastewater, therefore steps must be taken to ensure that raw wastewater does not discharge during construction. If a sanitary sewer overflow or bypass occurs, report the appropriate information to the department's Kansas City Regional Office per 10 CSR 20-7.015(9)(E)2.
5. This construction permit is invalid for projects required to comply with the requirements contained in 10 CSR 20-4, "Grants and Loans"

6. Protection of drinking water supplies shall be in accordance with 10 CSR 20-8.120(10). "There shall be no physical connections between a public or private potable water supply system and a sewer, or appurtenance thereto which would permit the passage of any wastewater or polluted water into the potable supply. No water pipe shall pass through or come in contact with any part of a sewer manhole."
7. Sewers in relation to water works structures shall meet the requirements of 10 CSR 23-3.010 with respect to minimum distances from public water supply wells or other water supply sources and structures.
 - A. Sewer mains shall be laid at least 10-feet horizontally from any existing or proposed water main. The distances shall be measured edge-to-edge. In cases where it is not practical to maintain a 10-foot separation, the department may allow a deviation on a case-by-case basis, if supported by data from the design engineer. Such a deviation may allow installation of the sewer closer to a water main, provided that the water main is in a separate trench or on an undisturbed earth shelf located on either side of the sewer and at an elevation so the bottom of the water main is at least 18 inches above the top of the sewer. If it is impossible to obtain proper horizontal and vertical separation as described above for sewers, the sewer must be constructed of slip-on or mechanical joint pipe or continuously encased and be pressure tested to 150 pounds per square inch to assure water tightness.
 - B. Manholes should be located at least 10-feet horizontally from any existing or proposed water main.
 - C. Sewers crossing water mains shall be laid to provide a minimum vertical distance of 18-inches between the outside of the water main and the outside of the sewer. This shall be the case where the water main is either above or below the sewer. The crossing shall be arranged so that the sewer joints will be equidistant and as far as possible from the water main joints. Where a water main crosses under a sewer, adequate structural support shall be provided for the sewer to maintain line and grade. When it is impossible to obtain proper vertical separation as stipulated above, one of the following methods must be specified:
 - a. The sewer shall be designed and constructed equal to the water pipe and shall be pressure tested to assure water tightness prior to backfilling; or
 - b. Either the water main or sewer line may be continuously encased or enclosed in a watertight carrier pipe which extends 10-feet on both sides of the crossing, measured perpendicular to the water main. The carrier pipe shall be of materials approved by the department for use in water main construction.
8. In addition to the requirements for a construction permit, 10 CSR 20-6.200 requires land disturbance activities of one acre or more to obtain a Missouri State Operating Permit to discharge stormwater. The permit requires best management practices sufficient to control runoff and sedimentation to protect waters of the state. Land disturbance permits will only be obtained by means of the department's ePermitting system available online at www.dnr.mo.gov/env/wpp/epermit/help.htm. See www.dnr.mo.gov/env/wpp/stormwater/sw-land-disturb-permits.htm for more information.

10. A United States (U.S.) Army Corps of Engineers (COE) permit (404) and a Water Quality Certification (401) issued by the department or permit waiver may be required for the activities described in this permit. This permit is not valid until these requirements are satisfied. If construction activity will disturb any land below the ordinary high water mark of jurisdictional waters of the U.S. then a 404/401 will be required. Since the COE makes determinations on what is jurisdictional, you must contact the COE to determine permitting requirements. You may call the department's Water Protection Program at 573-751-1300 for more information. See www.dnr.mo.gov/env/wpp/401/ for more information.
11. Plans and specifications for this project include an onsite sewage treatment system to serve the ranger house located inside Watkins Mill State Park. That portion of the project has not been reviewed and is not part of this approval. Approval for the septic tank and drainfield system must be obtained from the local administrative authority; in this case Clay County Health Department.
12. Sludge that is removed from the lagoon during construction must be handled in accordance with the current Missouri State Operating Permit, MO0034959. The removal and final deposition of sludge must be approved by the department's Kansas City Regional Office prior to beginning any sludge removal activity.
13. Upon completion of construction;
 - A. Submit the enclosed form Statement of Work Completed to the department in accordance with 10 CSR 20-6.010(5)(D);
 - B. Submit an electronic copy of the as-builts if the project was not constructed in accordance with previously submitted plans and specifications; and
 - C. Submit the modification fee of \$150.00.

IV. REVIEW SUMMARY

1. AMMONIA

The Water Protection Program is providing this notice to inform permittees that EPA's published ammonia criteria for aquatic life protection is lower than the current Missouri criteria. The department has initiated stakeholder discussions on this topic and at this time, there is no firm target date for starting the rulemaking to adopt new standards. More information can be found at <http://dnr.mo.gov/pubs/pub2481.pdf>.

This facility will be installing a no-discharge land application system. Therefore, ammonia effluent limitations are not applicable.

2. CONSTRUCTION PURPOSE

The existing operating permit for this facility was issued January 1, 2014 and includes a schedule of compliance to meet final ammonia effluent limitations by January 1, 2017 of 3.6 mg/L daily maximum and 1.4 mg/L monthly average in the summer, and 7.5 mg/L daily maximum and 2.9 mg/L monthly average in the winter.

Once the discharge is eliminated; ammonia effluent limits will not be applicable.

3. FACILITY DESCRIPTION

The existing facility is a three-cell flow through lagoon with a design flow of 13,000 gallons per day (gpd) and an actual flow of approximately 5,100 gpd. The facility discharges to a tributary to William Creek.

This project consists of combining all of the lagoon cells into one storage pond followed by a pump station and a fixed sprinkler irrigation system.

4. COMPLIANCE PARAMETERS

Final ammonia effluent limitations become effective January 1, 2017. By eliminating the discharge this effluent parameter will be satisfied.

5. REVIEW of MAJOR TREATMENT DESIGN CRITERIA

To minimize construction costs and earthwork requirements, the combined basin will maintain each existing cell's floor elevation. Hence, the final basin will have two different floor elevations with a 3:1 slope to transition between.

Because the sum of the maximum operating depth and sludge allowance in the basin is 7-feet, the clay seal thickness required was at least 15.6-inches with a permeability coefficient of 10^{-7} cm/s.

The design flow is 13,000 gpd. Although this is the seasonal flow and the off-season flow is nothing, the spray irrigation site is designed to accommodate a year-round flow of 13,000 gpd plus the rainfall minus evaporation volume which will accumulate in the lagoon basin. The additional amount of water from the wettest 1 in 10 year averages to approximately 700 gpd. Using year-round flow the 7.7 acre site will allow a land application rate of 24-inches per year. Considering seasonal flow at design flow rate the actual application rate is approximately 16-inches/year. Actual current flow is approximately 5,500 gpd so the designed system has the ability to accommodate an expansion of the campground or other addition of flow.

Storage of wastewater in the lagoon between the minimum and maximum operating depth is approximately 623,170 gallons. This is approximately 45 days of storage at design flow. Winter storage is not an issue since there will be no flow to the lagoon other than precipitation that falls onto the lagoon surface. The lagoon basin must be pumped down to the minimum operating level prior to the winter season.

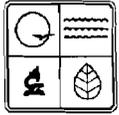
The pump station will be fitted with a 10-HP vertical turbine pump capable of delivering 206 gpm at a TDH of 115-feet. A variable frequency drive will also be installed; this will allow conversion of single phase electric to three phase and enable the pump to be adjusted to the desired operating point.

6. OPERATING PERMIT MODIFICATION

Form B, Application for Operating Permit, was submitted June 13, 2014. A notice of permit pending was issued for MO-0034959 on October 24, 2014, to reflect modifications as a result of proposed construction. One comment letter was received with eight comments; the comments have been resolved to the satisfaction of the commenter.

Upon construction completion submit a Statement of Work Completed and modification fee of \$150.00. The operating permit will be modified upon receipt of the Statement of Work Completed, and fee.

Andrew Appelbaum, P.E.
Engineering Section
andy.appelbaum@dnr.mo.gov



MISSOURI DEPARTMENT OF NATURAL RESOURCES
 WATER PROTECTION PROGRAM
APPLICATION FOR CONSTRUCTION PERMIT
WASTEWATER TREATMENT FACILITY

REC
 JUN-13 2014
 AP 8-1
 6/14/14
 612037
 6/14/14

FOR DEPARTMENT USE ONLY	
APP NO	CP NO
FEE RECEIVED \$150.00	CHECK NO 29752
DATE RECEIVED 6/13/14	SB

APPLICATION OVERVIEW
 The Application for Construction Permit – Wastewater Treatment Facility form has been developed in a modular format and consists of Part A and B. **All applicants must complete Part A.** Part B should be completed for applicants who currently land-apply wastewater or propose land application for wastewater treatment. **Please read the accompanying instructions before completing this form. Submittal of an incomplete application may result in the application being returned.**

PART A – BASIC INFORMATION

1.0 APPLICATION INFORMATION (Note – If any of the questions in this section are answered NO, this application may be considered incomplete and returned.)

- 1.1 Is this a Federal/State funded project? YES N/A Funding Agency: DNR Project #: X1410-01
 - 1.2 Has the Missouri Department of Natural Resources approved the proposed project's antidegradation review?
 YES Date of Approval: _____
 Attached is the No Degradation Evaluation Conclusion of Antidegradation Review form
 - 1.3 Has the department approved the proposed project's facility plan*?
 YES Date of Approval: _____ NO N/A (If Not Applicable, complete No. 1.4.)
 - 1.4 [Complete only if answered Not Applicable on No. 1.3.] Is a copy of the engineering report* for wastewater treatment facilities with a design flow less than 22,500 gpd included with this application?
 YES NO
 - 1.5 Is a copy of the appropriate plans* and specifications* included with this application?
 YES Denote which form is submitted: Hard copy Electronic copy (See instructions.) NO
 - 1.6 Is a summary of design* included with this application? YES NO
 - 1.7 Has the appropriate operating permit application (A, B, or B2) been submitted to the department?
 YES Date of submittal: _____
 Enclosed is the appropriate operating permit application submittal. Denote which form: A B B2
 N/A Please explain: _____
 - 1.8 Is the facility currently under enforcement with the department or the Environmental Protection Agency? YES NO
 - 1.9 Is the appropriate fee included with this application? YES NO (See instructions for appropriate fee.)
- * Must be affixed with a Missouri registered professional engineer's seal, signature and date.

2.0 PROJECT INFORMATION

2.1 NAME OF PROJECT
 Wastewater Treatment System - Watkins Woolen Mill State Park and State Historic Site

2.2 PROJECT DESCRIPTION
 The park is served a by 3-cell lagoon that is not expected to meet forthcoming NPDES permit limits. The most recent permit expired in July, 2013. The project consists of combining all cells into one storage pond followed by a land application field. The outside berms for cell 2 and 3 will be raised to match that of cell 1. The floor elevation of each pond will remain unchanged, but there will be a smooth transition from the cell 1 to the cell 2&3 floor. For the case that unsuitable soil is encountered, a nearby borrow site was designated. The existing effluent structure will be raised 4 feet. The effluent pipe will be replaced and converted to an emergency overflow. An additional pipe will be added to allow gravity flow to the pump station, which will be constructed at the southeast corner of the lagoon. A new transformer will be placed adjacent to the pump station. The forcemain will parallel the drive from the lagoon to the campground road and will be cross to the land application field. The land application system will consist of a fixed sprinkler system.

2.3 SLUDGE HANDLING, USE AND DISPOSAL DESCRIPTION
 Sludge will be removed during construction. Future sludge will be stored in the lagoon and removed by a contract hauler.

2.4 DESIGN INFORMATION
 A. Current population: 130 ; Design population: 130
 B. Actual Flow: 5,100 gpd; Design Average Flow: 13,000 gpd;
 Actual Peak Daily Flow: 11,155 gpd; Design Maximum Daily Flow: 13,000 gpd

2.5 ADDITIONAL INFORMATION
 A. Is a topographic map attached? YES NO
 B. Is a process flow diagram attached? YES NO

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3.0 WASTEWATER TREATMENT FACILITY

NAME MDNR Watkins Mill State Park	TELEPHONE NUMBER WITH AREA CODE (816) 580-3387	E-MAIL ADDRESS michael.beckett@dnr.mo.gov
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ADDRESS (PHYSICAL) Watkins Mill SP & HS, 26600 Park Rd N	CITY Lawson	STATE MO	ZIP CODE 64062-8939	COUNTY Clay
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Wastewater Treatment Facility: Mo- 0034959 (Outfall 1 Of 1)

3.1 Legal Description: 1/4, SW 1/4, NW 1/4, Sec. 22, T 53N, R 30W
(Use additional pages if construction of more than one outfall is proposed.)

3.2 UTM Coordinates Easting (X): +2923275 Northing (Y): -09415519
For Universal Transverse Mercator (UTM), Zone 15 North referenced to North American Datum 1983 (NAD83)

3.3 Name of receiving streams: **Unnamed tributary to Williams Creek**

4.0 PROJECT OWNER

NAME MDNR - Missouri State Parks	TELEPHONE NUMBER WITH AREA CODE (573) 522-6390	E-MAIL ADDRESS jon.fitch@dnr.mo.gov
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ADDRESS P.O. Box 176	CITY Jefferson City	STATE MO	ZIP CODE 65102-0176
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5.0 CONTINUING AUTHORITY: Permanent organization that will serve as the continuing authority for the operation, maintenance and modernization of the wastewater collection system.

NAME MDNR - Missouri State Parks	TELEPHONE NUMBER WITH AREA CODE (573) 522-6390	E-MAIL ADDRESS jon.fitch@dnr.mo.gov
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ADDRESS P.O. Box 176	CITY Jefferson City	STATE MO	ZIP CODE 65102-0176
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5.1 A letter from the continuing authority, if different than the owner, is included with this application. YES NO N/A

5.2 COMPLETE THE FOLLOWING IF THE CONTINUING AUTHORITY IS A MISSOURI PUBLIC SERVICE COMMISSION REGULATED ENTITY.

A. Is a copy of the certificate of convenience and necessity included with this application? YES NO

5.3 COMPLETE THE FOLLOWING IF THE CONTINUING AUTHORITY IS A PROPERTY OWNERS ASSOCIATION.

A. Is a copy of the as-filed restrictions and covenants included with this application? YES NO

B. Is a copy of the as-filed warranty deed, quitclaim deed or other legal instrument which transfers ownership of the land for the wastewater treatment facility to the association included with this application? YES NO

C. Is a copy of the as-filed legal instrument (typically the plat) that provides the association with valid easements for all sewers included with this application? YES NO

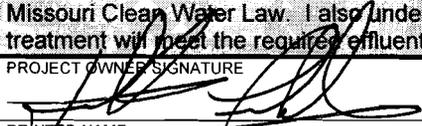
D. Is a copy of the Missouri Secretary of State's nonprofit corporation certificate included with this application? YES NO

6.0 ENGINEER

ENGINEER NAME / COMPANY NAME Elke Boyd / SKW	TELEPHONE NUMBER WITH AREA CODE (573) 234-2648	E-MAIL ADDRESS eboyd@skw-inc.com
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ADDRESS 3200 Penn terrace, Suite 100	CITY Columbia	STATE MO	ZIP CODE 65202
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7.0 PROJECT OWNER: I hereby certify that I am familiar with the information contained in this application and to the best of my knowledge and belief such information is true, complete, and accurate, and if granted this permit, I agree to abide by the Missouri Clean Water Law and all rules, regulations, orders, and decisions, subject to any legitimate appeal available to applicant under Missouri Clean Water Law. I also understand the issuance of the construction permit does not guarantee the proposed wastewater treatment will meet the required effluent limitations of the issued Missouri State Operating Permit for this facility.

PROJECT OWNER SIGNATURE 

PRINTED NAME Jon Fitch	DATE 6/5/2014
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TITLE OR CORPORATE POSITION Design Engineer	TELEPHONE NUMBER WITH AREA CODE (573) 522-6390	E-MAIL ADDRESS jon.fitch@dnr.mo.gov
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Mail completed copy to: MISSOURI DEPARTMENT OF NATURAL RESOURCES
WATER PROTECTION PROGRAM
P.O. BOX 176
JEFFERSON CITY, MO 65102-0176

END OF PART A.
REFER TO THE APPLICATION OVERVIEW TO DETERMINE WHETHER PART B NEEDS TO BE COMPLETE.

PART B – LAND APPLICATION ONLY

(Submit only if the proposed construction project includes land application of wastewater.)

8.0 FACILITY INFORMATION

8.1 Type of wastewater to be irrigated: Domestic State/National Park Seasonal business
 Municipal Municipal with a pretreatment program or significant industrial users
 Other (explain) _____

8.2 Months when the business or enterprise will operate or generate wastewater:
 12 months per year Part of the year (list months): 4-10

8.3 This system is designed for:
 No-discharge.
 Partial irrigation when feasible and discharge rest of time.
 Irrigation during recreational season, April – October, and discharge during November – March.
 Other (explain) _____.

9.0 STORAGE BASINS

9.1 Number of storage basins: 1 (Use additional pages if greater than three basins.)

9.2 Type of basins: Steel Concrete Fiberglass Earthen Earthen with membrane liner

9.3 Storage basin dimensions at inside top of berm (feet). Report freeboard as feet from top of berm to emergency spillway or overflow pipe.

Basin #1:	Length <u>238</u>	Width <u>248</u>	Depth <u>9</u>	Freeboard <u>1</u>	Berm Width <u>10</u>	% Slope <u>3:1</u>
Basin #2:	Length _____	Width _____	Depth _____	Freeboard _____	Berm Width _____	% Slope _____
Basin #3:	Length _____	Width _____	Depth _____	Freeboard _____	Berm Width _____	% Slope _____

9.4 Storage Basin operating levels (report as feet below emergency overflow level).

Basin #1:	Maximum operating water level <u>1</u> ft	Minimum operating water level <u>6</u> ft
Basin #2:	Maximum operating water level _____ ft	Minimum operating water level _____ ft
Basin #3:	Maximum operating water level _____ ft	Minimum operating water level _____ ft

9.5 Design depth of sludge in storage basins.

Basin #1: 2 ft Basin #2: _____ ft Basin #3: _____ ft

9.6 Existing sludge depth, if the basins are currently in operation.

Basin #1: 1.2 ft Basin #2: 0.6 ft Basin #3: 0.6 ft Note: All sludge will be removed

9.7 Total design sludge storage: 938 dry tons and _____ cubic feet 84,100 cf

10.0 LAND APPLICATION SYSTEM

10.1 Number of irrigation sites 1 Total Acres 8.9 Maximum % field slopes 16

Location:	<u>NE</u> ¼, <u>NW</u> ¼, <u>SW</u> ¼, <u>22</u> Sec. <u>53N</u> T <u>30W</u> R <u>Clay</u> County <u>5.9</u> Acres
Location:	_____ ¼, _____ ¼, _____ ¼, _____ Sec. _____ T _____ R _____ County _____ Acres
Location:	_____ ¼, _____ ¼, _____ ¼, _____ Sec. _____ T _____ R _____ County _____ Acres

(Use additional pages if greater than three irrigation sites.)

10.2 Type of vegetation: Grass hay Pasture Timber Row crops
 Other (describe) _____

10.3 Wastewater flow (dry weather) gallons per day: Average annual 7,622 Seasonal 13,000 Off-season 0

10.4 Land application rate (design flow including 1-in-10 year storm water flows):

Design:	<u>24</u> inches/year	<u>0.06</u> inches/hour	<u>1</u> inches/day	<u>3</u> inches/week
Actual:	<u>24</u> inches/year	<u>0.06</u> inches/hour	<u>1</u> inches/day	<u>3</u> inches/week

10.5 Total irrigation per year (gallons): Design 3,100,000 Actual: _____ gal 2,550,000

10.6 Actual months used for irrigation (check all that apply): all months, as needed and appropriate

Jan Feb Mar Apr May Jun Jul Aug Sep Oct Nov Dec

10.7 Land application rate is based on:

Hydraulic Loading Other (describe) _____
 Nutrient Management Plan (N&P) If N&P is selected, is the plan included? YES NO