



Matt Blunt, Governor • Doyle Childers, Director

DEPARTMENT OF NATURAL RESOURCES

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MAY 11 2005

Mr. John A. DeLashmit, P.E.
U.S. Environmental Protection Agency
Region VII
901 North Fifth Street
Kansas City, KS 66101

RE: Permit for Stockton Wastewater Treatment Plant in Lieu of Total Maximum Daily Load for Stockton Branch (WBID 1361)

Dear Mr. DeLashmit:

Stockton Branch near the City of Stockton in Cedar County, Missouri, is on the 2002 303(d) list for Volatile Suspended Solids (VSS). The source of these impairments is listed as the Stockton Wastewater Treatment Plant (WWTP) lagoon, Permit Number MO-0055280. The Missouri Department of Natural Resources (the department) has opted to correct these impairments through permit limits in lieu of a Total Maximum Daily Load (TMDL).

The outfall for Stockton WWTP is in the headwaters of Stockton Branch, near the upstream end of the classified portion. There are no other treatment plants upstream and the land use is largely sparse rural development. The creek upstream of the WWTP effluent appears to be in good condition. Additionally, the upstream VSS in 2003 (as analyzed in the lab) was non-detectable. Therefore, the WWTP is believed to be the sole cause of the VSS impairment. The listing for the impaired reach (first listed in 1998) was based on visual inspections of Stockton Branch during summer low flow conditions in 1988, 1989 and 1993. These inspections reported excessive suspended algae, excessive deposition of solids and reduced diversity of aquatic invertebrates downstream from the City of Stockton's five-cell lagoon system. The city upgraded their wastewater treatment program in 2002. A recent assessment (2002) of Stockton Branch showed improved water quality conditions.

The city's permit, with interim and new limits, was reissued March 10, 2005. The VSS standard (as a narrative of no noticeable downstream objectionable deposits) will be achieved by limiting the effluent to 41/21 mg/L Total Suspended Solids (TSS) daily maximum/monthly average. These limits, which should ensure that stream water quality standards (WQS) would be met, go into effect June 8, 2008. The previous permit limits and the interim limits are 80/60 mg/L for TSS, weekly/monthly average. There is a detailed compliance schedule included in the permit.

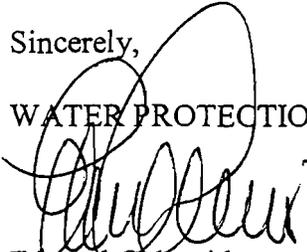
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Enclosed please find the Missouri State Operating Permit for the Stockton WWTP. When the final limits go into effect, and the WWTP meets them, the WQS should be achieved in Stockton Branch. The department has scheduled special VSS studies for 2005 and 2006. Also, ambient stream monitoring has been scheduled for 2009 to determine if the new permit limits have eliminated the impairment and will consist of the following: standard field parameters plus Dissolved Oxygen, Nitrogen, Phosphorus and Carbonaceous Biochemical Oxygen Demand (CBOD). A reopener clause is included in the permit to allow for stricter limits if future monitoring shows WQS violations.

With this letter, the department submits the Stockton WWTP permit to the U.S. EPA for concurrence that the permit will serve in lieu of a TMDL. We appreciate EPA taking prompt action on this. If you have any questions, please contact Ms. Ann Crawford of my staff at (573) 751-5827 or by mail at the Missouri Department of Natural Resources, Water Protection Program, P.O. Box 176, Jefferson City, Missouri 65102.

Sincerely,

WATER PROTECTION PROGRAM



Edward Galbraith
Director

EG:apl

Enclosures

c: Mr. William Bryan, Attorney General's Office