

Missouri
Department of
Natural Resources

DRAFT SALINE CREEK TMDL
PUBLIC COMMENTS

Public Notice
Oct. 27 – Nov. 26, 2000

**Saline Creek
WBID #2190**

Jefferson County, Mo.

Missouri Department of Natural Resources
Water Protection Program
PO Box 176
Jefferson City, MO 65102-0176
800-361-4827 / 573-751-1300



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NOV 28 2000
WPCP

November 22, 2000

Ms. Sharon Clifford, TMDL Unit Chief
Missouri Department of Natural Resources
Water Pollution Control Program
Planning Section
P.O. Box 176
Jefferson City, Missouri 65201-0176

Dear Ms Clifford:

On behalf of the Missouri Chapter of the American Fisheries Society (MOAFS), I am writing to provide comments on two of the Total Maximum Daily Load draft plans currently out for public review. They are the Eleven Point River near Willow Springs in Howell County and Saline Creek near Arnold in Jefferson County.

Eleven Point River near Willow Springs in Howell County

I have a minor correction for section #2, the Anti-Degradation Policy, last paragraph. It is my understanding that the Eleven Point River is part of the *U.S. Forest Service's* National Scenic River System, but was not specifically designated as part of the National Wild and Scenic River System. You are already aware that it is not part of the National Park Service's Ozark National Scenic Riverway. The point is only an issue of semantics since, as per the Clean Water Commission's rules at 10 CSR 20-7.031(1)(O) and 20-7.015(6)(A), it appears that all congressionally designated rivers are afforded special protection against any degradation in water quality.

I wholly support the Missouri Department of Natural Resources' (MDNR) efforts with this plan. I realize these criteria are designed to protect instream aquatic life but I wonder about degradation of spring water quality. Because the upper Eleven Point is a losing stream, and we know it is a major recharge for Greer Spring, what efforts, if any, are directed at monitoring chlorine levels in the spring? Perhaps this has been documented in the past, but I feel if we know the ultimate destination of this "losing water" we should pay continual attention to the spring.

Saline Creek near Arnold in Jefferson County

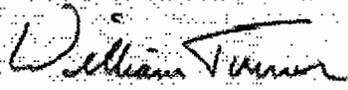
Though supportive of working with local sewage treatment plant officials, MOAFS cannot condone or support the discharging of sewage treatment effluent, which does not meet state standards into waters of the state. Nor can we support discharging this sub-standard effluent into a larger stream to increase the dilution of said effluent. MOAFS strongly encourages MDNR to use every means possible to help bring the Ron Rog treatment plant (on Saline

Ms. Sharon Clifford
November 22, 2000
Page 2

Creek in Jefferson County) effluent discharge into compliance with state standards. MOAFS does not support the option listed in the draft TMDL in which the discharge point is moved from Saline Creek to the Meramec River, unless treatment plant effluent discharge is proven to meet state standards.

Thank you for your consideration of these comments and your continued efforts toward the improvement of Missouri's water resources. If you have any questions, please contact me at (660) 530-5500.

Sincerely,

A handwritten signature in cursive script, appearing to read "William Turner". The signature is written in dark ink on a light-colored background.

Bill Turner, President
Missouri Chapter of the American Fisheries Society
31692 Teebo Road
Sedalia, MO 65301

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

Roger B. Wilson

Missouri Governor • Stephen M. Mahfood, Director

DIVISION OF ENVIRONMENTAL QUALITY

P.O. Box 176 Jefferson City, MO 65102-0176

December 8, 2000

Mr. Bill Turner, President
MO Chapter of the American Fisheries Society
31692 Teebo Road
Sedalia, MO 65301

Dear Mr. Turner:

Thank you for reviewing these TMDLs and taking the time to comment.

Eleven Point River TMDL:

First, "National Wild and Scenic River" was changed to "National Scenic River," per AFS's observation. Second, chlorine is very volatile and there will not be any left in the water column when the water emerges at Greer Spring, which is 30 miles from Willow Springs.

Saline Creek TMDL:

Any discharge to the Meramec River will be in compliance with state standards.

Again, thank you for your comments. The American Fisheries Society's interest in the TMDL process and concern for the health of Missouri's water resources is appreciated. If you have other questions or wish to discuss this further, please contact Anne Peery of the Planning Section at (573) 526-1426.

Sincerely,

WATER POLLUTION CONTROL PROGRAM



John Madras, Chief
Planning Section

JM:apd



MERAMEC RIVER RECREATION ASSOCIATION

Meramec Greenway A Not For Profit Corporation
1878 South Loesson Road St. Louis, MO 63104
814-822-9904

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November 22, 2000

Planning Section
Water Pollution Control Program
P.O. Box 176
Jefferson City, MO 65102

Dear Sir:

Reference is made to the TMDL analysis for Saline Creek in Jefferson County in which comments have been solicited via your public notice. BOD and ammonia are contaminants listed as impairing the waters of Saline Creek, a tributary of the Meramec River. The TMDL proposes that the discharge from the Ron Rog and Highway 141 Sewage Treatment Plants be removed from the Saline Creek watershed. The Northeast Public Sewer District, which operates the treatment plants, has options on the specific method of compliance with the TMDL, including the piping of the effluent directly to the Meramec River.

The Meramec River Recreation Association (MRRA), the coordinating body of the Meramec Greenway, strongly opposes the discharge of sewage that does not comply with Missouri standards into either Saline Creek or the Meramec River. We are especially concerned that piping effluent directly to the Meramec River is essentially dodging the issue rather than moving in a direction toward an ultimate desired resolution. The Northeast Public Sewer District presently has an opportunity to achieve the desired goals by participating with the Metropolitan St. Louis Sewer District and their new regional treatment plant.

The MRRA is the coordinating organization of the 108 mile Meramec Greenway, and consists of representatives from state, county and local governments along the lower Meramec River, as well as citizen members. Since our establishment in 1975 by the Governor, the organization has worked to restore the Meramec River so it once again can provide natural beauty, recreation and natural resource education to the people of our region. Foremost among the accomplishments of the past twenty-five years has been the improvement to the water quality of the Meramec and its tributaries. This, of course, is the essential foundation upon which the entire recovery of the river depends.

MEMBERS

Missouri Department Of Natural Resources	Jefferson County	Arnold	Eureka	Wildwood	Missouri Botanical Garden Shaw Arboretum
	Franklin County	Fenton	Pacific	Valley Park	Washington University
Missouri Department Of Conservation	St. Louis County	Sunset Hills	Kirkwood	Citizen Members	Tyson Research Center

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The MRRA has traditionally worked in cooperation with organizations such as the Northeast Public Sewer District on Greenway issues, and will continue to do so. We must, however, urge that they seek a real resolution to the discharge of sub-standard effluent in the Meramec watershed, and solicit your continued strong enforcement to assure good water quality standards. We cannot support simply relocating the discharge point from Saline Creek to the Meramec River.

Sincerely,

A handwritten signature in black ink, appearing to read "Ben Knox". The signature is written in a cursive style with a large initial "B" and a stylized "K".

Ben Knox
Executive Director

cc: Pam Kettler, Chairperson



Roger B. Wilson
Governor • Stephen M. Mahfood, Director

DEPARTMENT OF NATURAL RESOURCES

DIVISION OF ENVIRONMENTAL QUALITY

P.O. Box 176 Jefferson City, MO 65102-0176

December 8, 2000

Mr. Ben Knox, Executive Director
Meramec River Recreation Association
1675 South Mason Road
St. Louis, MO 63131

Dear Mr. Knox:

Thank you for reviewing the Saline Creek TMDL and taking the time to comment.

In response to the comments provided by the Meramec River Recreation Association (MRRA), any discharge to the Meramec River will be in compliance with state standards. The Meramec River has a much larger assimilative capacity than Saline Creek and will improve the water quality situation in the short term. In the longer term, this discharge to the Meramec will continue to be permitted as an interim facility. At some point it will be effectively treated at a regional facility and discharged directly to the Mississippi River.

Again, thank you for your comments. The MRRA's participation in the TMDL process and concern for the health of the Meramec River is appreciated. If you have other questions or wish to discuss this further, please contact Anne Peery of the Planning Section at (573) 526-1426.

Sincerely,

WATER POLLUTION CONTROL PROGRAM

A handwritten signature in cursive script that reads "John Madras".

John Madras, Chief
Planning Section

JM:apd

Nor Public Sewer District

400 Biltmore, Suite 414
Fenton, MO 63026
(314) 343-5090 • FAX (314) 343-7904

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22 November, 2000

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Planning Section
Water Pollution Control Section
P. O. Box 176
Jefferson City, Missouri 65102

WPCP

Re: Public Notice of Draft Total Maximum Daily Load Analysis
Saline Creek near Arnold in Jefferson County, Missouri

Dear Sir or Madam:

The Northeast Public Sewer District is in receipt of your 27 October 2000 notice soliciting comments concerning the Draft Total Maximum Daily Load Analysis and also the downloaded document. The District herewith provides the following comments regarding the document:

1. The calculations presented on page 4 of the document describe that 5.395 is the constant used to convert milligrams per liter to pounds per day. Should the constant be 8.34?
2. Appendix C depicts sampling data describing location, flow rate, water temperature, dissolved oxygen concentration, etc. The data was taken primarily in year 1992, with limited data made in year 1995. Has more recent data been collected?
3. In year 1999 the District engineering staff met a number of times with representatives from the Metropolitan St. Louis Sewer District (MSD) and their consultants to explore the possibility of conveying the Saline Creek Watershed sewage flows to MSD's anticipated Lower Meramec River Regional Treatment Plant. The expected District costs to implement this project are prohibitive at this time.

The District has recently acquired a \pm 26 acre land tract, through condemnation, adjacent to the Ron Rog Treatment Plant. The District is in the process of finalizing a report to be submitted to the Department of Natural Resources that will identify the development of new treatment facilities and an outfall sewer to the Meramec River. The report will address the facility expansion in two (2) phases. The first phase will describe the construction of a flow equalization basin, sludge basins, primary treatment equipment and pumping facilities with the second phase consisting of advanced treatment components and the placement of the outfall sewer.

22 November, 2000

The District trusts that the new NPDES Permits will provide adequate time to design the outfall sewer, acquire necessary easements and construct the sewer.

Should you have any questions or comments regarding this subject, please advise.

Very truly yours,

NORTHEAST PUBLIC SEWER DISTRICT


R. Allen Welshon, P.E.
Executive Director



Roger B. Wilson
~~XXXXXXXX~~ Governor • Stephen M. Mahfood, Director

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

DIVISION OF ENVIRONMENTAL QUALITY
P.O. Box 176 Jefferson City, MO 65102-0176

December 8, 2000

Mr. R. Allen Welshon, P.E.
Northeast Public Sewer District
400 Biltmore, Suite 414
Fenton, MO 63026

Dear Mr. Welshon:

Thank you for reviewing the Saline Creek TMDL and taking the time to comment.

The following responses correspond by number with the comments provided by Northeast Public Sewer District (NEPSD).

1. The constant 5.395 is used when the flow is in cubic feet per second (cfs). The constant 8.34 is used when the flow is in million gallons per day (MGD). Input for the majority of the models we use is in cfs, so we multiply MGD by 1.55 to convert to cfs before we do our modeling.
2. No more recent data has been collected.
3. The department appreciates the NEPSD efforts to pipe discharges from interim facilities in the Saline Creek watershed to the Meramec River. Ultimately, this wastewater will be treated at regional facilities and discharged directly to the Mississippi River. The District will be allowed sufficient time to come into compliance with this TMDL based requirement pursuant to 10 CSR 20-7.031(10).

Again, thank you for your comments and for participating in the TMDL process. If you have other questions or wish to discuss this further, please contact Anne Peery of the Planning Section at (573) 526-1426 or by e-mail at nrpeera@mail.dnr.state.mo.us.

Sincerely,

WATER POLLUTION CONTROL PROGRAM



John Madras, Chief
Planning Section

JM:apd



Ozark Chapter / Sierra Club

Ken Midkiff, Director
Ozark Chapter/Sierra Club
1007 N. College Ave., Ste. #1
Columbia, MO 65201-4794

Planning Section, MoDNR-DEQ-WPCP
ATTN: Sharon Clifford

November 25, 2000
VIA FAX

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REF: TMDL Saline Creek

Comments:

1. MoDNR has known for several years that the WWTPs (Ron Rog and Hwy 141) were negatively impacting this stream; a settlement decree was finally put in place in 1997; but to this date degradation continues.
2. While the "Implementation Plans" state that "DNR will require all effluent from [the WWTPs] being discharged into Saline Creek to be removed from the watershed", there is no indication when this requirement will become effective. The TMDL – and by reference the NPDES permits – should provide a date certain for this occurrence.
3. We are somewhat concerned by the statement that the "six small permitted wastewater discharges... in the upper parts of the Saline or Sugar Creek watersheds... [are] believed to reach the study area...". How is such belief documented? We strongly suspect that there is a cumulative effect: The six small discharges in conjunction with the larger WWTPs all contribute to the pollutants that are impairing this stream.
4. Finally, while moving the discharges out of the Saline Creek watershed will likely accomplish the objective of restoring the health of the waterbody, it is uncertain if simply moving the discharges to the Meramec River achieves much. Moving pollutants from one waterbody to another may simply result in impairment of the new receiving waterbody.

SUMMARY: We view the waste load allocation and implementation plans of this TMDL as unacceptable for the reasons listed in Points 2-4 above.

Sincerely,



Ken Midkiff

CC: Van Cleve, Bookbinder



Roger B. Wilson
~~XXXXXXXX~~ Governor • Stephen M. Mahfood, Director

DEPARTMENT OF NATURAL RESOURCES

DIVISION OF ENVIRONMENTAL QUALITY

P.O. Box 176 Jefferson City, MO 65102-0176

December 8, 2000

Mr. Ken Midkiff, Director
Ozark Chapter/Sierra Club
1007 North College Avenue, Suite #1
Columbia, MO 65201-4794

Dear Mr. Midkiff:

Thank you for reviewing these TMDLs and taking the time to comment.

The following responses correspond by number with the comments provided by Sierra Club.

Little Muddy Creek TMDL:

1. The source of the temperature impairment is Tyson Foods, Inc.
2. It is correct that the permit issued to Tyson did not contain the Missouri Water Quality Standards (WQS) for temperature.
3. The interim permit allowed two years for Tyson to come into compliance.
4. Clean Water Commission rules allow every facility time to come into compliance with new water-quality-based permit requirements. Please see 10 CSR 20-7.031(10).
5. Tyson will be obliged to meet this requirement. Tyson, however, may use economic arguments to request relief according to some facets of regulation.

Summary: The limits for temperature in the revised draft permit are consistent with the Missouri WQS.

Eleven Point River TMDL:

1. The Willow Springs WWTP permit required effluent disinfection, but not dechlorination.
2. As of July 1, 1999, a monthly average and daily maximum of 0.01 mg/L Total Residual Chlorine (TRC) must be maintained according to the permit. The permit also requires quarterly monitoring of TRC in the effluent.
3. DNR endeavors to learn (and improve) from past experiences.

Mr. Ken Midkiff
Page 2
December 8, 2000

4. Following standard operating procedures, each facility conducts its own monitoring, usually reported quarterly. While DMR (daily monitoring reports) violations carry consequences, DNR does (as Sierra Club suggests) conduct random, unannounced monitoring of various permitted facilities throughout the state.
5. At this time, DNR does not believe that continuous automated monitoring equipment is sufficiently developed and available for use in these situations. As technology continues to improve, such monitoring will become feasible and will be utilized. At this point DNR will not require more frequent monitoring.

Saline Creek TMDL:

1. By Clean Water Commission order, required ammonia limits will be met by December 31, 2000.
2. When the permits are reopened and revised according to the TMDL, compliance schedules will be included.
3. The monitoring to be conducted after the discharge is removed from the watershed should reveal if these "six small discharges" are negatively impacting Saline Creek. The long-term plan is to connect all of these discharges to trunk sewers that connect to treatment facilities on the Mississippi River.
4. The Meramec River has much larger assimilative capacity and will improve the water quality situation in the short term. In the longer term, this discharge to the Meramec will continue to be permitted as an interim facility. At some point, it will be effectively treated at a regional facility and discharged directly to the Mississippi River.

Again, thank you for your comments. Sierra Club's interest in the TMDL process and concern for the health of Missouri's water resources is appreciated. If you have other questions or wish to discuss this further, please contact Anne Peery of the Planning Section at (573) 526-1426.

Sincerely,

WATER POLLUTION CONTROL PROGRAM



John Madras, Chief
Planning Section

JM:apd