

Missouri
Department of
Natural Resources

DRAFT ELEVEN POINT RIVER TMDL
PUBLIC COMMENTS

Public Notice
Oct. 27 - Nov. 26, 2000

**Eleven Point River
WBID # 2604**

Howell 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

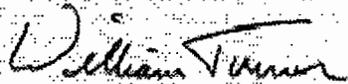
Though supportive of working with local sewage treatment plant officials, MOAFS cannot condone or support the discharging of sewage treatment effluent, which does not meet state standards into waters of the state. Nor can we support discharging this sub-standard effluent into a larger stream to increase 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
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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



Ozark Chapter / Sierra Club

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NOV 28 2000

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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

REF: TMDL for Eleven Point River

Comments:

1. It is noted that the source of the pollutant of record – chlorine – is the Willow Springs WWTP, which until July 1, 1999, was allowed by an NPDES (State Operating) Permit issued by MODNR to discharge chlorine into this classified waterbody. This was in clear violation of Missouri's Water Quality Standards.
2. It is subsequently noted that the Willow Springs WWTP NPDES permit was re-issued on July 18, 1997, and the facility was allowed to continue to violate certain provisions of 10 CSR 20-7-031, Table A, Page 17 and that the MODNR had in the previously issued permit also allowed conditions contrary to law.
3. In sum, this stream segment became degraded or "impaired" due to inappropriate allowances by the MODNR-DEQ-WPCP.
4. While those inappropriate allowances seem to have been corrected beginning July 1, 1999, we are unable to ascertain which entity is required to conduct monitoring for total residual chlorine (although there is a statement that "quarterly monitoring of the effluent reported to DNR..." indicating that the permittee will be conducting self-monitoring, a questionable practice). The TMDL should require monitoring to be conducted by the permittee and MoDNR. MODNR should monitor on a random, unannounced quarterly basis.
5. We have not inspected the Willow Springs WWTP NPDES permit effluent conditions, but Point #8 of the TMDL study seems to indicate that monitoring is to be conducted "quarterly". This is not nearly sufficient; if there were an upset or malfunction of the dechlorination process, all aquatic life would be destroyed by acute levels of the pollutant. Continuous monitoring devices should be installed, with appropriate warning alarms for exceedances.

SUMMARY: This stream became impaired because of laxity in permitting by MODNR. Now, the agency and the permittee need to take extra measures to ensure against further degradation – constant monitoring is strongly indicated.

Sincerely,

Ken Midkiff

CC: Van Cleave, Bookbinder

Thomas Hart Benton Group
Kansas City

Osage Group
Columbia/Jefferson City

Trail of Tears Group
Cape Girardeau

White River Group
Springfield

Eastern Missouri Group
St. Louis



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



MISSOURI DEPARTMENT OF CONSERVATION

Headquarters

2901 West Truman Boulevard, P.O. Box 180, Jefferson City, Missouri 65102-0180
Telephone: 573/751-4115 ♦ Missouri Relay Center: 1-800-735-2966 (TDD)

JERRY M. CONLEY, Director

REPLY TO: Columbia Research Center
1110 S. College Ave.
Columbia, MO 65201
Telephone: 573/882-9880
FAX: 573/882-4517

November 28, 2000

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Donna Menown
Volunteer WQ Monitoring/Stream Team Coordinator
Department of Environmental Quality
Water Pollution Control Program
Missouri Department of Natural Resources
PO Box 176
Jefferson City, MO 65102-0176

Ms. Menown:

The following are comments by Missouri Department of Conservation staff concerning the proposed TMDLs for Little Muddy Creek in Pettis County and the Eleven Point River near Willow Springs in Howell County.

✓ Comments for Little Muddy Creek (previously provided to Ann Peery via email): ^{11/14/00}

-In the report, a mention of a study by MDC from June 1997 to April 1998. In the study by Tom Priesendorf, MDC Fisheries Management Biologist, data was actually collected from April 1997 to April 1998.

-Rich Meade, MDC Fisheries Management Biologist, also collected data in a separate study from Little Muddy Creek. This data was not included in the draft TMDL and the majority of his comments address the value of his data. Mr. Meade's data has since been forwarded by Richard Duchrow to Ann Peery at your office. His comments follow below.

"The TMDL appears to contain information that I was not involved in collecting. The map in the TMDL shows three temperature monitoring sites that I was involved in (sites 6,7 and 9) and two where I was not (sites 8 and 10). I think that Tom Priesendorf worked on data collection at these sites in a separate study. I'm not sure how these data were combined in the draft TMDL.

Regarding temperature, I can verify that the impaired reach includes the stream reach from where the Unnamed Tributary crosses the gravel road in the center of Section 14, downstream to Site 9. I was

COMMISSION

ANITA B. GORMAN
Kansas City

RANDY HERZOG
St. Joseph

RONALD J. STITES
Plattsburg

HOWARD L. WOOD
Bonne Terre

not involved in detailed monitoring below Site 9. Ron Dent supervised Tom Priesendorf's study of this portion of stream. I think the classified and impacted reaches shown are accurate, provided that data from Tom Priesendorf's study support the downstream impacted status.

During my June-December, 1997 temperature monitoring, I documented 3151 individual temperature readings (taken 30 minutes apart) in Little Muddy Creek below its confluence with the Unnamed Tributary. In addition, the 90 F standard was exceeded four times in the Unnamed Tributary.

My additional comments follow:

Under seasonal variation: As noted above, I did document the violation of the 90 F standard in the Unnamed Tributary on three readings in June and one in July, 1997. This is in contrast to what is stated in the TMDL. The 5 F standard was also violated many times during every month of my monitoring. The largest number of violations occurred during November 1997 ...It appears that seasonal variation may be a relevant factor.

Calculation of load capacity---I agree with the use of the 90 F standard for the Unnamed Tributary and the 5 F standard for Little Muddy Creek.

Margin of safety---The compliance point for the 5 F standard in Little Muddy Creek should be just downstream of its confluence with the Unnamed Tributary, should it not? The measurement for this standard should occur below this confluence to document differences and measure the effect of the effluent on Little Muddy Creek. I agree that it should be compared to conditions just above the confluence.

I concur with statements 5-9."

Comments for the Eleven Point River near Willow Springs

The following comments were provided by Dave Mayers, MDC Fisheries Management Biologist:

"... A minor correction, in section #2, Anti-Degradation Policy, last paragraph, the Eleven Point River is part of the National Scenic River not National Wild and Scenic River.

I wholly support DNR's 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 some attention to it."

The Department appreciates the opportunity to comment on these draft TMDL's. If you have any questions please feel free to contact me.

Sincerely,

A handwritten signature in black ink that reads "Leanna Zweig". The signature is written in a cursive style with a large, looped initial "L".

Leanna Zweig
Environmental Services Biologist



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

Ms. Leanna Zweig
Columbia Research Center
1110 South College Avenue
Columbia, MO 65201

Dear Ms. Zweig:

Thank you for forwarding comments on behalf of Missouri Department of Conservation (MDC).

Little Muddy Creek TMDL:

In response to Tom Priesendorf, the MDC study date in the TMDL document has been corrected to read April 1997 to April 1998. See e-mail response enclosed (cc: Leanna Zweig).

Rich Meade's concerns were addressed in an e-mail sent November 17, 2000 (enclosed). During a subsequent phone call Mr. Meade indicated he was satisfied with the response.

Eleven Point River TMDL:

In response to Dave Mayers' comments, first, "National Wild and Scenic River" was changed to "National Scenic River," as per suggestion. Second, chlorine is very volatile so there will not be detectable amounts left in the water column when the water emerges at Greer Spring, which is 30 miles from Willow Springs.

Again, thank you for forwarding these comments. MDC's participation 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

Handwritten signature of John Madras in cursive.

John Madras, Chief
Planning Section

JM:apd

Enclosures

Comment by phone call on Eleven Point River (information taken from Eleven Point River spreadsheet of comments on 7/22/10).

Date: 11/6/2000 [date is an approximation]

Call received by: Anne Peery

Caller: Joe Bender of Springfield, MO, representing Central Electric.

Phone number: None in record.

Comment: Thought the Eleven Point was a cold water fishery so thought DNR was using the incorrect standard for TRC

Response: Eleven Point is Cool Water fishery, not Cold Water fishery. In absence of a Cool Water standard, Warm Water standard was used.

Result: Commenter satisfied.