



STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

Matt Blunt, Governor • Doyle Childers, Director

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NOV 30 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 Kansas City, Rocky Branch Wastewater Treatment Plant (WWTP) in Lieu of Total Maximum Daily Load (TMDL) for Rocky Branch (WBID 3326)

Dear Mr. DeLashmit:

Rocky Branch near Kansas City, in Clay County, Missouri, is on the 2002 303(d) list for Biochemical Oxygen Demand (BOD). The source of this impairment is listed as the Rocky Branch WWTP, Permit Number MO-0048305. The Missouri Department of Natural Resources (the department) has opted to correct these impairments through permit limits in lieu of a TMDL.

The outfall for the WWTP discharges to Rocky Branch. The impaired segment begins below the outfall. There are no other point source discharges upstream and the land use is rural with increasing new development. The creek upstream of the WWTP effluent appears to be in good condition. Six of eight samples collected in 2001 showed impaired Dissolved Oxygen (DO) levels in the stream below the WWTP. The city completed construction of a new WWTP in September, 2005. Recent daily monitoring reports for Rocky Branch show the effluent now meets the more stringent advanced treatment limits. In-stream monitoring for DO and ammonia shows the stream meets water quality standards (WQS) below the WWTP.

The construction of the wastewater improvements is complete with exception of the sludge digester and the new plant is discharging to Rocky Branch. The city's permit was modified in 2005 to allow discharge from the new facility, and placed on public notice on September 30, 2005. The previous permit limits were 30 mg/L BOD/30 mg/L Total Suspended Solids (TSS), with no ammonia limits. The new plant's effluent limits are 10/15 mg/L BOD (monthly and weekly average); 15/25 TSS (monthly and weekly), and ammonia limits of 1.2/2.4 mg/L (monthly, weekly in summer) and 2.3/4.6 mg/L (monthly/weekly in winter). BOD, TSS, and ammonia limits for the peak flow basin emergency outfall are set at 15 mg/L, 20 mg/L and 3 mg/L respectively. These limits, now in effect, should ensure that stream WQS are met.

Mr. John A. DeLashmit, P.E.

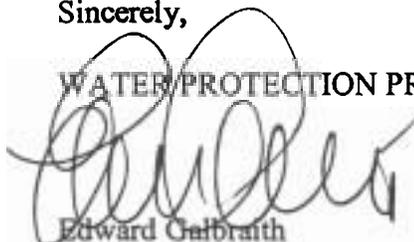
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Enclosed please find the Missouri State Operating Permit for the Rocky Branch WWTP. This permit has been modified to require the more stringent limits cited above, annual WET tests, and in-stream monitoring by the WWTP staff. The department has scheduled ambient stream monitoring for 2006 to ensure the stream continues to meet WQS. 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 Rocky Branch 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 Mr. Philip Schroeder at (573) 751-6770 or by mail at Missouri Department of Natural Resources, Water Protection Program, P.O. Box 176, Jefferson City, Missouri 65102-0176.

Sincerely,

WATER PROTECTION PROGRAM



Edward Galbraith

Director

EG:mcl

Enclosure

c: Mr. William Bryan, Attorney General's Office
Mr. Daniel R. Schuette, Director DEQ
Mr. Earl Pabst, Deputy Director, DEQ
Missouri Clean Water Commission