



MISSOURI DEPARTMENT OF NATURAL RESOURCES
WATER PROTECTION PROGRAM, WATER POLLUTION CONTROL BRANCH
ANTIDEGRADATION: REGIONALIZATION AND NO-DISCHARGE EVALUATION

REGIONALIZATION AND NO-DISCHARGE EVALUATION

According to the Antidegradation Implementation Procedure Sections I.B. and II.B.1., the feasibility of no-discharge alternatives must be considered. No-discharge alternatives may include connection to a regional treatment facility, surface land application, subsurface land application, and recycle or reuse.

Please refer to the *No-Discharge Alternative Evaluation* fact sheet for examples of information to provide to justify common reasons for not pursuing regionalization or no-discharge land application. If sufficient information is not provided on this form to demonstrate that these alternatives are not feasible, a more detailed evaluation of no-discharge options may have to be submitted.

Additional pages may be attached if more room is needed.

1. FACILITY:

NAME	COUNTY
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2. EVALUATION OF REGIONALIZATION (Complete all applicable reasons why regionalization was not pursued)

2.1 Regionalization Feasibility:

- A. What is the distance to connect to the closest municipality's line or other facility's line?
- B. List facilities contacted about possible regionalization.
- C. Is there any planning or zoning in the area regarding development and services?
- D. Who would have the responsibility to maintain the sewer connection line?
- E. What is the estimated cost for piping and pumps to regionalize?
- F. Explain any engineering challenges with the regionalization connection – topography, rivers, highways, or other issues.
- G. Does a regional facility have the capacity to treat the additional effluent from this project?
- H. Were land owners contacted for rights to an easement? Yes No
- I. Describe the easement issues:

2.2 Summarize why regionalization was not a practicable or economically efficient alternative

3. EVALUATION OF NO-DISCHARGE LAND APPLICATION

Check all applicable reasons why no-discharge land application was not pursued:

3.1 Land Availability and Cost:

A. Is land available for land application? Yes No

If not, explain:

If yes, answer the following:

B. How many acres are required for land application of the effluent?

C. Provide a breakdown of the capital cost for any necessary additional land, piping, pumps, and irrigation equipment?

D. Were long-term costs evaluated and compared for upgrading to a mechanical plant with future Water Quality Standards changes (i.e. mussel ammonia, bacteria, TP, TN) versus cost for a land application system? Yes No

E. Were land owners contacted for rights to an easement? Yes No

F. Describe the easement issues:

3.2 Zoning or Suitability of Site in Proximity to Neighboring Sites or Waterbodies:

A. Was drip or subsurface irrigation evaluated as opposed to surface application? Yes No

B. Does the county ordinance specifically restrict land application, surface and subsurface? Yes No

C. Can a vegetated buffer be installed to reduce necessary buffer distances? Yes No

D. Are there other steps or considerations that can be made?

3.3 Unsuitability of Geology or Soils

A. Is a geohydrologic evaluation, county soils survey map, or other resource showing suitability and application rates included with this application? Yes No

B. Is it cost-effective to bring in additional soils? Yes No

C. Can the application rate be decreased to a suitable rate? Yes No

D. Were subsurface application alternatives (e.g. low pressure pipe, drip) considered? Yes No

E. If collapse potential is a concern, was using a liner or alternative site evaluated? Yes No

3.4 Summarize why no-discharge land application was not a practicable or economically efficient alternative

4. DOCUMENTATION

4.1 Is any other written correspondence or documentation included with this application to provide further justification for not pursuing a no-discharge option or regionalization?

- No
- Yes:
 - A letter from an existing higher preference continuing authority waiving preferential status where service is not available in accordance with 10 CSR 20-6.0 10 (2) or if capacity is not available.
 - A letter from the existing higher preference continuing authority stating that the regional facility has no interest in taking flow from the new or expanded facility.
 - A letter from the regional municipality stating that the project area is outside city limits and annexation would be required.
 - Council meeting minutes.
 - Correspondence with land owners regarding easement rights.
 - Correspondence with land owners regarding land for sale or lease.
 - Letters from the community or a consulting engineer regarding availability, proximity, and location of suitable land and the reasonable cost of such land.
 - Documentation of recent land sales or appraisals.
 - Calculations for sizing a land application system.
 - Detailed cost estimates for a land application system or regionalization including lift stations, piping, easements, liners, and/or connection costs.
 - Geohydrologic evaluation or other soils report.
 - Copy of a county or city ordinance.
 - Verification of funding from State Revolving Fund, which does not fund projects outside city limits.
 - Other: