



Missouri Department of
NATURAL RESOURCES

Eric R. Greitens, Governor

dnr.mo.gov

Carol S. Comer, Director

APR 02 2018

City of Lebanon
P.O. Box 111
Lebanon, MO 65536

Subject: Public Notice for Proposed State Operating Permit for Lebanon Wastewater Treatment Facility

Dear Permittee:

The enclosed public notice pertains to your proposed State Operating Permit.

Federal regulations required issuance of this public notice to inform interested persons of the agency's intent to issue an operating permit to discharge, and allows a 30-day period for comment. This public notice package should be posted on a bulletin board at your place of business. If response to the public notice indicates significant interest, a public hearing or adjudicatory hearing may be held. Based on comments received, or the results of a hearing, the proposed permit will be modified and issued or possibly denied.

Any questions you may have should be sent to the address indicated on the enclosed public notice.

Sincerely,

WATER PROTECTION PROGRAM

Chris Wieberg
Director

CW/jz

Enclosure



MISSOURI DEPARTMENT OF NATURAL RESOURCES

PUBLIC NOTICE

DRAFT MISSOURI STATE OPERATING PERMIT

DATE: April 06, 2018

In accordance with the state Clean Water Law, Chapter 644, RSMo, Missouri Clean Water Commission regulation 10 CSR 20-6.010, and the Federal Clean Water Act, the applicants listed herein have applied for authorization to either discharge to waters of the state, or to operate a no-discharge wastewater treatment facility. The proposed permits for these operations are consistent with applicable water quality standards, effluent standards and/or treatment requirements or suitable timetables to meet these requirements (see 10 CSR 20-7.015 and 7.031). All permits will be issued for a period of five years unless noted otherwise in the Public Notice for that discharge.

On the basis of preliminary staff review and the application of applicable standards and regulations, the Missouri Department of Natural Resources, as administrative agent for the Missouri Clean Water Commission, proposes to issue a permit(s) subject to certain effluent limitations, schedules, and special conditions. The proposed determinations are tentative pending public comment.

Persons wishing to comment on the proposed permit conditions are invited to submit them in writing to: Department of Natural Resources, Water Protection Program, P.O. Box 176, Jefferson City, MO 65102, ATTN: NPDES Operating Permits /Permit Comments. **Please include the permit number in all comment letters.**

Comments should be confined to the issues relating to the proposed action and permit(s) and the effect on water quality. The Department may not consider as relevant comments or objections to a permit based on issues outside the authority of the Missouri Clean Water Commission, (see Curdt v. Mo. Clean Water Commission, 586 S.W.2d 58 Mo. App. 1979).

All comments must be received or postmarked by 5:00 p.m. on May 07, 2018. The Department will consider all written comments, including emails, faxes and letters, in the formulation of all final determinations regarding the applications. Email comments will be accepted at the following address: publicnoticenpdes@dnr.mo.gov. If response to this notice indicates significant public interest, a public meeting or hearing may be held after due notice for the purpose of receiving public comment on the proposed permit or determination. Public hearings and/or issuance of the permit will be conducted or processed according to 10 CSR 20-6.020.

Copies of all draft permits and other information including copies of applicable regulations are available for inspection and copying at the Department's website: <http://www.dnr.mo.gov/env/wpp/permits/permit-pn.htm>, or at the Department of Natural Resources, Water Protection Program, P.O. Box 176, Jefferson City, MO 65102, between the hours of 8:00 a.m. and 5:00 p.m., Monday through Friday.

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES
MISSOURI CLEAN WATER COMMISSION



MISSOURI STATE OPERATING PERMIT

In compliance with the Missouri Clean Water Law, (Chapter 644 R.S. Mo. as amended, hereinafter the Law), and the Federal Water Pollution Control Act (Public Law 92-500, 92nd Congress) is amended.

Permit No.: MO-0089010

City of Lebanon
P.O. Box 111, Lebanon MO 65536

Continuing Authority:
Address:

Same as above
Same as above

Facility Name:
Facility Address:

Lebanon WWTF
1727 Main, Lebanon MO 65536

Legal Description:
UTM Coordinates:

See Page 2
See Page 2

Receiving Stream:
First Classified Stream and ID:
USGS Basin & Sub-watershed No.:

See Page 2
See Page 2
See Page 2

is authorized to discharge from the facility described herein, in accordance with the effluent limitations and monitoring requirements as set forth herein:

FACILITY DESCRIPTION

See Page 2

This permit authorizes only wastewater discharges under the Missouri Clean Water Law and the National Pollutant Discharge Elimination System; it does not apply to other regulated areas. This permit may be appealed in accordance with Section 621.250 RSMo, Section 640.013 RSMo and Section 644.051.6 of the Law.

Effective Date

Edward B. Galbraith, Director, Division of Environmental Quality

Expiration Date

Chris Wieberg, Director, Water Protection Program

FACILITY DESCRIPTION (continued):

Outfall #001 – POTW – SIC #4952

The use or operation of this facility shall be by or under the supervision of a Certified "A" Operator.

Coarse and fine screening/Influent pump station /Grit removal /Two oxidation ditches/ Aeration basin/Final clarifiers/ Tertiary sand filters/ Ultraviolet disinfection/ Flow Measurement/Sludge dewatering/Sludge is land applied.

Design population equivalent is 20,000.

Design flow is 2.6 million gallons per day.

Actual flow is 2.3 million gallons per day.

Design sludge production is 420 dry tons/year.

Legal Description:	Sec. 02, T34N, R16W, Laclede County
UTM Coordinates:	X=530831, Y=4173143
Receiving Stream:	Dry Auglaize Creek (P) (losing)
First Classified Stream and ID:	Dry Auglaize Creek (P) (1145) (losing)
USGS Basin & Sub-watershed No.:	(10290109-0303)

Permitted Feature SM1 – Instream Monitoring

Instream monitoring location – Upstream – 50 Yards Upstream of Outfall #001

Legal Description:	Sec. 02, T34N, R16W, Laclede County
UTM Coordinates:	X=530823, Y=4173133
Receiving Stream:	Dry Auglaize Creek (P) (losing)
First Classified Stream and ID:	Dry Auglaize Creek (P) (1145) (losing)
USGS Basin & Sub-watershed No.:	(10290109-0303)

Permitted Feature SM2 – Instream Monitoring

Instream monitoring location – Downstream – bridge over Pacific Drive

Legal Description:	Sec. 30, T35N, R15W, Laclede County
UTM Coordinates:	X=533229, Y=4177398
Receiving Stream:	Dry Auglaize Creek (P) (losing)
First Classified Stream and ID:	Dry Auglaize Creek (P) (1145) (losing)
USGS Basin & Sub-watershed No.:	(10290109-0303)

OUTFALL #001	TABLE A-1. INTERIM EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS	PAGE NUMBER 3 of 13		
		PERMIT NUMBER MO-0089010		

The permittee is authorized to discharge from outfall(s) with serial number(s) as specified in the application for this permit. The interim effluent limitations shall become effective on Effective Date and remain in effect through Effective date + 2 years – 1 day. Such discharges shall be controlled, limited and monitored by the permittee as specified below:

EFFLUENT PARAMETER(S)	UNITS	INTERIM EFFLUENT LIMITATIONS			MONITORING REQUIREMENTS	
		DAILY MAXIMUM	WEEKLY AVERAGE	MONTHLY AVERAGE	MEASUREMENT FREQUENCY	SAMPLE TYPE
Flow	MGD	*		*	once/weekday***	24 hr. total
Biochemical Oxygen Demand ₅	mg/L		15	10	once/month	composite**
Total Suspended Solids	mg/L		20	15	once/month	composite**
<i>E. coli</i> (Note 1, Page 5)	#/100mL	126		*	once/week	grab
Ammonia as N (Apr 1 – Sep 30) (Oct 1 – Mar 31)	mg/L	4.0 10.3		1.6 3.7	twice/week	grab
Oil & Grease	mg/L	*		*	once/month	grab
Total Recoverable, Selenium	µg/L	*		*	once/month	grab
Bis (2-ethylhexyl) Pthalate	µg/L	10.1		6.3	once/month	grab
Zinc, Total Recoverable	µg/L	*		*	once/month	grab
Copper, Total Recoverable	µg/L	31.8		14.6	once/month	grab

MONITORING REPORTS SHALL BE SUBMITTED MONTHLY; THE FIRST REPORT IS DUE MONTH 28, 20XX. THERE SHALL BE NO DISCHARGE OF FLOATING SOLIDS OR VISIBLE FOAM IN OTHER THAN TRACE AMOUNTS.

Total Phosphorus	mg/L	*		*	once/quarter*****	grab
Total Nitrogen	mg/L	*		*	once/quarter*****	grab

MONITORING REPORTS SHALL BE SUBMITTED QUARTERLY; THE FIRST REPORT IS DUE MONTH 28, 20XX.

EFFLUENT PARAMETER(S)	UNITS	MINIMUM		MAXIMUM	MEASUREMENT FREQUENCY	SAMPLE TYPE
pH – Units ****	SU	6.0		9.0	once/month	grab

MONITORING REPORTS SHALL BE SUBMITTED MONTHLY; THE FIRST REPORT IS DUE MONTH 28, 20XX.

EFFLUENT PARAMETER(S)	UNITS	DAILY MINIMUM		MONTHLY AVERAGE MINIMUM	MEASUREMENT FREQUENCY	SAMPLE TYPE
Biochemical Oxygen Demand ₅ – Percent Removal (Note 2, Page 5)	%			85	once/quarter*****	calculated
Total Suspended Solids – Percent Removal (Note 2, Page 5)	%			85	once/quarter*****	calculated

MONITORING REPORTS SHALL BE SUBMITTED QUARTERLY; THE FIRST REPORT IS DUE MONTH 28, 20XX.

- * Monitoring requirement only.
- ** A 24-hour composite sample is composed of 48 aliquots (subsamples) collected at 30 minute intervals by an automatic sampling device.
- *** Once each weekday means: Monday, Tuesday, Wednesday, Thursday, and Friday.
- **** pH is measured in pH units and is not to be averaged.
- ***** See table on Page 5 for quarterly sampling requirements.

OUTFALL #001	TABLE A-2. FINAL EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS	PAGE NUMBER 4 of 13		
		PERMIT NUMBER MO-0089010		

The permittee is authorized to discharge from outfall(s) with serial number(s) as specified in the application for this permit. The final effluent limitations shall become effective on Effective Date + 2 year and remain in effect until expiration of the permit. Such discharges shall be controlled, limited and monitored by the permittee as specified below:

EFFLUENT PARAMETER(S)	UNITS	FINAL EFFLUENT LIMITATIONS			MONITORING REQUIREMENTS	
		DAILY MAXIMUM	WEEKLY AVERAGE	MONTHLY AVERAGE	MEASUREMENT FREQUENCY	SAMPLE TYPE
Flow	MGD	*		*	once/weekday***	24 hr. total
Biochemical Oxygen Demand ₅	mg/L		15	10	once/month	composite**
Total Suspended Solids	mg/L		20	15	once/month	composite**
<i>E. coli</i> (Note 1, Page 5)	#/100mL	126		*	once/week	grab
Ammonia as N (Apr 1 – Sep 30) (Oct 1 – Mar 31)	mg/L	4.0 10.3		1.5 2.9	twice/week	grab
Oil & Grease	mg/L	*		*	once/month	grab
Total Recoverable, Selenium	µg/L	*		*	once/month	grab
Bis (2-ethylhexyl) Pthalate	µg/L	10.1		6.3	once/month	grab
Zinc, Total Recoverable	µg/L	*		*	once/month	grab
Copper, Total Recoverable	µg/L	31.8		9.9	once/month	grab

MONITORING REPORTS SHALL BE SUBMITTED MONTHLY; THE FIRST REPORT IS DUE MONTH 28, 20XX. THERE SHALL BE NO DISCHARGE OF FLOATING SOLIDS OR VISIBLE FOAM IN OTHER THAN TRACE AMOUNTS.

Total Phosphorus	mg/L	*		*	once/quarter*****	grab
Total Nitrogen	mg/L	*		*	once/quarter*****	grab

MONITORING REPORTS SHALL BE SUBMITTED QUARTERLY; THE FIRST REPORT IS DUE MONTH 28, 20XX.

EFFLUENT PARAMETER(S)	UNITS	MINIMUM		MAXIMUM	MEASUREMENT FREQUENCY	SAMPLE TYPE
pH – Units ****	SU	6.0		9.0	once/month	grab

MONITORING REPORTS SHALL BE SUBMITTED MONTHLY; THE FIRST REPORT IS DUE MONTH 28, 20XX.

EFFLUENT PARAMETER(S)	UNITS	DAILY MINIMUM		MONTHLY AVERAGE MINIMUM	MEASUREMENT FREQUENCY	SAMPLE TYPE
Biochemical Oxygen Demand ₅ – Percent Removal (Note 2, Page 5)	%			85	once/quarter*****	calculated
Total Suspended Solids – Percent Removal (Note 2, Page 5)	%			85	once/quarter*****	calculated

MONITORING REPORTS SHALL BE SUBMITTED QUARTERLY; THE FIRST REPORT IS DUE MONTH 28, 20XX.

* Monitoring requirement only.

** A 24-hour composite sample is composed of 48 aliquots (subsamples) collected at 30 minute intervals by an automatic sampling device.

*** Once each weekday means: Monday, Tuesday, Wednesday, Thursday, and Friday.

**** pH is measured in pH units and is not to be averaged.

***** See table on page 5 for quarterly sampling requirements.

Quarterly Minimum Sampling Requirements			
Quarter	Months	Total Nitrogen, Total Phosphorus, Removal Efficiency	Report is Due
First	January, February, March	Sample at least once during any month of the quarter	April 28 th
Second	April, May, June	Sample at least once during any month of the quarter	July 28 th
Third	July, August, September	Sample at least once during any month of the quarter	October 28 th
Fourth	October, November, December	Sample at least once during any month of the quarter	January 28 th

Note 1 –Effluent limits of 126 #/100 mL daily maximum and monitoring only for monthly average for *E. coli* are applicable year round due to losing stream designation. No more than 10% of samples over the course of a calendar year shall exceed the 126 #/100 mL daily maximum.

Note 2 – Influent sampling is not required when the facility does not discharge effluent during the reporting period. Samples are to be collected prior to any treatment process. Percent Removal is calculated by the following formula: $[(\text{Influent} - \text{Effluent}) / \text{Influent}] \times 100\% = \text{Percent Removal}$. The Monthly Average Minimum Percent Removal is to be reported as the average of all daily calculated removal efficiencies. Influent samples are to be collected as a 24-hour composite sample, composed of 48 aliquots (subsamples) collected at 30 minute intervals by an automatic sampling device.

OUTFALL #001	TABLE A-3. WHOLE EFFLUENT TOXICITY FINAL EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS				PAGE NUMBER 5 of 13	
	FINAL EFFLUENT LIMITATIONS			MONITORING REQUIREMENTS		PERMIT NUMBER MO-0089010
EFFLUENT PARAMETER(S)	UNITS	DAILY MAXIMUM	WEEKLY AVERAGE	MONTHLY AVERAGE	MEASUREMENT FREQUENCY	SAMPLE TYPE
Acute Whole Effluent Toxicity (Note 3)	TU _a	*			once/year	composite**
MONITORING REPORTS SHALL BE SUBMITTED <u>ANNUALLY</u> ; THE FIRST REPORT IS DUE <u>MONTH 28, 20XX</u> .						
Chronic Whole Effluent Toxicity (Note 4)	TU _c	*			once/year	composite**
WET TEST REPORTS SHALL BE SUBMITTED <u>ANNUALLY</u> ; THE FIRST REPORT IS DUE <u>MONTH 28, 20XX</u> .						

* Monitoring requirement only.

** A 24-hour composite sample is composed of 48 aliquots (subsamples) collected at 30 minute intervals by an automatic sampling device.

Note 3 –See Special Condition #26 for additional requirements.

Note 4 – See Special Condition #25 for additional requirements.

**PERMITTED
FEATURE
SM1**

**TABLE B-1.
INSTREAM MONITORING REQUIREMENTS**

PAGE NUMBER 6 of 13

PERMIT NUMBER MO-0089010

The monitoring requirements shall become effective on Effective Date and remain in effect until expiration of the permit. The stream shall be monitored by the permittee as specified below:

PARAMETER(S)	UNITS	MONITORING REQUIREMENTS				
		DAILY MAXIMUM		MONTHLY AVERAGE	MEASUREMENT FREQUENCY	SAMPLE TYPE
Total Phosphorus	mg/L	*		*	once/quarter*****	grab
Total Nitrogen	mg/L	*		*	once/quarter*****	grab
Ammonia as N	mg/L	*		*	once/quarter*****	grab

PARAMETER(S)	UNITS	DAILY MINIMUM		MONTHLY AVERAGE MINIMUM	MEASUREMENT FREQUENCY	SAMPLE TYPE
Dissolved Oxygen	mg/L	*		*	once/quarter*****	grab

MONITORING REPORTS SHALL BE SUBMITTED QUARTERLY; THE FIRST REPORT IS DUE MONTH 28, 20XX.

PARAMETER(S)	UNITS	DAILY MINIMUM		DAILY MAXIMUM	MEASUREMENT FREQUENCY	SAMPLE TYPE
pH****	SU	*		*	once/month	grab
PARAMETER(S)	UNITS	DAILY MAXIMUM		MONTHLY AVERAGE	MEASUREMENT FREQUENCY	SAMPLE TYPE
Temperature	mg/L	*		*	once/month	grab

MONITORING REPORTS SHALL BE SUBMITTED MONTHLY; THE FIRST REPORT IS DUE MONTH 28, 20XX.

* Monitoring requirement only.

**** pH is measured in pH units and is not to be averaged.

***** See table below for quarterly sampling

Quarterly Minimum Sampling Requirements			
Quarter	Months	Instream Parameter	Report is Due
First	January, February, March	Sample at least once during any month of the quarter	April 28 th
Second	April, May, June	Sample at least once during any month of the quarter	July 28th
Third	July, August, September	Sample at least once during any month of the quarter	October 28th
Fourth	October, November, December	Sample at least once during any month of the quarter	January 28th

PERMITTED FEATURE SM2	TABLE B-2. INSTREAM MONITORING REQUIREMENTS					PAGE NUMBER 7 of 13
						PERMIT NUMBER MO-0089010
The monitoring requirements shall become effective on <u>Effective Date</u> and remain in effect until expiration of the permit. The stream shall be monitored by the permittee as specified below:						
PARAMETER(S)	UNITS	MONITORING REQUIREMENTS				
		DAILY MAXIMUM		MONTHLY AVERAGE	MEASUREMENT FREQUENCY	SAMPLE TYPE
Hardness, Total	mg/L	*		*	once/quarter*****	grab
Ammonia as N	mg/L	*		*	once/quarter*****	grab
Temperature	mg/L	*		*	once/quarter*****	grab
PARAMETER(S)	UNITS	DAILY MINIMUM		MONTHLY AVERAGE MINIMUM	MEASUREMENT FREQUENCY	SAMPLE TYPE
Dissolved Oxygen	mg/L	*		*	once/quarter*****	grab
PARAMETER(S)	UNITS	DAILY MINIMUM		DAILY MAXIMUM	MEASUREMENT FREQUENCY	SAMPLE TYPE
pH****	SU	*		*	once/quarter*****	grab
MONITORING REPORTS SHALL BE SUBMITTED <u>QUARTERLY</u> ; THE FIRST REPORT IS DUE <u>MONTH 28, 20XX</u> .						

* Monitoring requirement only.

**** pH is measured in pH units and is not to be averaged.

***** See table below for quarterly sampling requirements.

Quarterly Minimum Sampling Requirements				
Quarter	Months	Instream Parameters	Report is Due	
First	January, February, March	Sample at least once during any month of the quarter		April 28 th
Second	April, May, June	Sample at least once during any month of the quarter		July 28th
Third	July, August, September	Sample at least once during any month of the quarter		October 28th
Fourth	October, November, December	Sample at least once during any month of the quarter		January 28th

C. SCHEDULE OF COMPLIANCE

The facility shall attain compliance with final effluent limitations as soon as reasonably achievable or no later than **2 years** of the effective date of this permit.

1. Within six months of the effective date of this permit, the permittee shall report progress made in attaining compliance with the final effluent limits.
2. The permittee shall submit interim progress reports detailing progress made in attaining compliance with the final effluent limits every 12 months from the effective date of this permit.
3. Within **2 years** of the effective date of this permit, the permittee shall attain compliance with the final effluent limits.

Please submit progress reports to the Missouri Department of Natural Resources via the Electronic Discharge Monitoring Report (eDMR) Submission System.

D. STANDARD CONDITIONS

In addition to specified conditions stated herein, this permit is subject to the attached Parts I, II, & III standard conditions dated August 1, 2014, May 1, 2013, and March 1, 2015, and hereby incorporated as though fully set forth herein.

E. SPECIAL CONDITIONS

1. Electronic Discharge Monitoring Report (eDMR) Submission System.

- (a) Discharge Monitoring Reporting Requirements. The permittee must electronically submit compliance monitoring data via the eDMR system. In regards to Standard Conditions Part I, Section B, #7, the eDMR system is currently the only Department approved reporting method for this permit.
- (b) Programmatic Reporting Requirements. The following reports (if required by this permit) must be electronically submitted as an attachment to the eDMR system until such a time when the current or a new system is available to allow direct input of the data:
 - (1) Collection System Maintenance Annual Reports;
 - (2) Schedule of Compliance Progress Reports;
 - (3) Sludge/Biosolids Annual Reports;
 - i. In addition to the annual Sludge/Biosolids report submitted to the Department, the permittee must submit Sludge/Biosolids Annual Reports electronically using EPA's NPDES Electronic Reporting Tool ("NeT") (<https://cdx.epa.gov/>).
 - (4) Municipal Separate Storm Sewer System (MS4) Program Reports;
 - (5) Pretreatment Program Reports;
 - (6) Any additional report required by the permit excluding bypass reporting.
- After such a system has been made available by the Department, required data shall be directly input into the system by the next report due date.
- (c) Other actions. The following shall be submitted electronically after such a system has been made available by the Department:
 - (1) Notices of Termination (NOTs);
 - (2) No Exposure Certifications (NOEs);
 - (3) Bypass reporting, See Special Condition #12 for 24-hr. bypass reporting requirements.
- (d) Electronic Submissions. To access the eDMR system, use the following link in your web browser: https://edmr.dnr.mo.gov/edmr/E2/Shared/Pages/Main_Login.aspx.
- (e) Waivers from Electronic Reporting. The permittee must electronically submit compliance monitoring data and reports unless a waiver is granted by the Department in compliance with 40 CFR Part 127. The permittee may obtain an electronic reporting waiver by first submitting an eDMR Waiver Request Form. <http://dnr.mo.gov/forms/780-2692-f.pdf>. The Department will either approve or deny this electronic reporting waiver request within 120 calendar days. Only permittees with an approved waiver request may submit monitoring data and reports on paper to the Department for the period that the approved electronic reporting waiver is effective.

2. Expanded Effluent Testing:

Permittee must sample and analyze for the pollutants listed in 40 CFR 122.21 Appendix J, Table 2 in addition to Iron and Aluminum. Pursuant to 40 CFR 122.21(j)(4) the permittee shall provide this data with the permit renewal application from a minimum of three samples taken within four and one-half years prior to the date of the permit application. Samples must be representative of the seasonal variation in the discharge from each outfall.

3. The full implementation of this operating permit, which includes implementation of any applicable schedules of compliance, shall constitute compliance with all applicable federal and state statutes and regulations in accordance with §644.051.16, RSMo, and the Clean Water Act (CWA) section 402(k); however, this permit may be reopened and modified, or alternatively revoked and reissued:

- (a) To comply with any applicable effluent standard or limitation issued or approved under Sections 301(b)(2)(C) and (D), 304(b)(2), and 307(a)(2) of the CWA, if the effluent standard or limitation so issued or approved:
 - (1) contains different conditions or is otherwise more stringent than any effluent limitation in the permit; or
 - (2) controls any pollutant not limited in the permit.
- (b) To incorporate an approved pretreatment program pursuant to 40 CFR 403.8(a).

4. All outfalls must be clearly marked in the field. This does not include instream monitoring locations.

5. Permittee will cease discharge by connection to a facility with an area-wide management plan per 10 CSR 20-6.010(3)(B) within 90 days of notice of its availability.

6. Report as no-discharge when a discharge does not occur during the report period. For instream samples, report as "no flow" if no stream flow occurs during the report period.

E. SPECIAL CONDITIONS (continued)

7. Changes in existing pollutants or the addition of new pollutants to the treatment facility

The permittee must provide adequate notice to the Director of the following:

- (a) Any new introduction of pollutants into the POTW from an indirect discharger which would be subject to section 301 or 306 of CWA if it were directly discharging those pollutants; and
- (b) Any substantial change in the volume or character of pollutants being introduced into that POTW by a source introducing pollutants into the POTW at the time of issuance of the permit.
- (c) For purposes of this paragraph, adequate notice shall include information on:
 - (1) the quality and quantity of effluent introduced into the POTW, and
 - (2) any anticipated impact of the change on the quantity or quality of effluent to be discharged from the POTW.

8. Reporting of Non-Detects:

- (a) An analysis conducted by the permittee or their contracted laboratory shall be conducted in such a way that the precision and accuracy of the analyzed result can be enumerated.
- (b) The permittee shall not report a sample result as "Non-Detect" without also reporting the detection limit of the test. Reporting as "Non Detect" without also including the detection limit will be considered failure to report, which is a violation of this permit.
- (c) The permittee shall provide the "Non-Detect" sample result using the less than sign and the minimum detection limit (e.g. <10).
- (d) Where the permit contains a Minimum Level (ML) and the permittee is granted authority in the permit to report zero in lieu of the < ML for a specified parameter (conventional, priority pollutants, metals, etc.), then zero (0) is to be reported for that parameter.
- (e) See Standard Conditions Part I, Section A, #4 regarding proper detection limits used for sample analysis.
- (f) When calculating monthly averages, one-half of the method detection limit (MDL) should be used instead of a zero. Where all data are below the MDL, the "<MDL" shall be reported as indicated in item (c).

9. It is a violation of the Missouri Clean Water Law to fail to pay fees associated with this permit (644.055 RSMo).

10. The permittee shall comply with any applicable requirements listed in 10 CSR 20-9, unless the facility has received written notification that the Department has approved a modification to the requirements. The monitoring frequencies contained in this permit shall not be construed by the permittee as a modification of the monitoring frequencies listed in 10 CSR 20-9. If a modification of the monitoring frequencies listed in 10 CSR 20-9 is needed, the permittee shall submit a written request to the Department for review and, if deemed necessary, approval.

11. The permittee has developed and is currently implementing a program for maintenance and repair of the collection system. The permittee's program is consistent with the US EPA's Guide For Evaluating Capacity, Management, Operation, And Maintenance (CMOM) Programs At Sanitary Sewer Collection Systems (Document number EPA 305-B-05-002). The permittee shall continue to submit semi-annual and annual reports as required by the federal consent decree entered in the matter of The United States et al. v. City of Lebanon Missouri, No. 04-3125-CV-S-RED which was entered on September 2, 2004.

12. Bypasses are not authorized at this facility unless they meet the criteria in 40 CFR 122.41(m). If a bypass occurs, the permittee shall report in accordance to 40 CFR 122.41(m)(3), and with Standard Condition Part I, Section B, subsection 2.b. Bypasses are to be reported to the Southwest Regional Office during normal business hours or by using the online Sanitary Sewer Overflow/Facility Bypass Application located at: <http://dnr.mo.gov/modnrcag/> or the Environmental Emergency Response spill-line at 573-634-2436 outside of normal business hours. Once an electronic reporting system compliant with 40 CFR Part 127, the National Pollutant Discharge Elimination System (NPDES) Electronic Reporting Rule, is available all bypasses must be reported electronically via the new system. Blending, which is the practice of combining a partially-treated wastewater process stream with a fully-treated wastewater process stream prior to discharge, is not considered a form of bypass. If the permittee wishes to utilize blending, the permittee shall file an application to modify this permit to facilitate the inclusion of appropriate monitoring conditions.

13. The facility must be sufficiently secured to restrict entry by children, livestock and unauthorized persons as well as to protect the facility from vandalism.

14. At least one gate must be provided to access the wastewater treatment facility and provide for maintenance and mowing. The gate shall remain closed except when temporarily opened by the permittee to access the facility to perform operational monitoring, sampling, maintenance, or mowing. The gates shall also be temporarily opened for inspections by the Department. The gate shall be closed and locked when the facility is not staffed.

E. SPECIAL CONDITIONS (continued)

15. At least one (1) warning sign shall be placed on each side of the facility enclosure in such positions as to be clearly visible from all directions of approach. There shall also be one (1) sign placed for every five hundred feet (500') (150 m) of the perimeter fence. A sign shall also be placed on each gate. Minimum wording shall be SEWAGE TREATMENT FACILITY—KEEP OUT. Signs shall be made of durable materials with characters at least two inches (2") high and shall be securely fastened to the fence, equipment or other suitable locations.
16. An Operation and Maintenance (O & M) manual shall be maintained by the permittee and made available to the operator. The O & M manual shall include key operating procedures and a brief summary of the operation of the facility.
17. An all-weather access road shall be provided to the treatment facility.
18. The discharge from the wastewater treatment facility shall be conveyed to the receiving stream via a closed pipe or a paved or rip-rapped open channel. Sheet or meandering drainage is not acceptable. The outfall sewer shall be protected against the effects of floodwater, ice or other hazards as to reasonably insure its structural stability and freedom from stoppage. The outfall shall be maintained so that a sample of the effluent can be obtained at a point after the final treatment process and before the discharge mixes with the receiving waters.
19. Land application of biosolids shall be conducted in accordance with Standard Conditions III and a Department approved biosolids management plan. Land application of biosolids during frozen, snow covered, or saturated soil conditions in accordance with the additional requirements specified in WQ426 shall occur only with prior approval from the Department.
20. Pretreatment: The permittee shall implement and enforce its approved pretreatment program in accordance with the requirements of 10 CSR 20-6.100. The approved pretreatment program is hereby incorporated by reference.
 - (a) The permittee shall submit to the Department via the Electronic Discharge Monitoring Report (eDMR) Submission System on or before March 31st of each year a report briefly describing its pretreatment activities during the previous calendar year. At a minimum, the report shall include the following:
 - (1) An updated list of the Permittee's Industrial Users, including their names and addresses, or a list of deletions and additions keyed to a previously submitted list. The Permittee shall provide a brief explanation of each deletion. This list shall identify which Industrial Users are subject to categorical pretreatment Standards and specify which Standards are applicable to each Industrial User. The list shall indicate which Industrial Users are subject to local standards that are more stringent than the categorical Pretreatment Standards. The Permittee shall also list the Industrial Users that are subject only to local Requirements.
 - (2) A summary of the status of Industrial User compliance over the reporting period;
 - (3) A summary of compliance and enforcement activities (including inspections) conducted by the Permittee during the reporting period; and
 - (4) Any other relevant information requested by the Department.
 - (b) Pursuant to 40 CFR 122.44(j)(2)(ii), the permittee shall submit to the Department a written technical evaluation of the need to revise local limits under 40 CFR 403.5(c)(1) by Effective date + 180 days. Please contact the department's pretreatment coordinator for further guidance. Should revision of local limits be deemed necessary, it is recommended that revisions follow the US Environmental Protection Agency's guidance document *Local Limits Development Guidance*. EPA833-R04-002A. July 2004.
21. Within 2 years of the effective date of this permit, the permittee shall update their pretreatment program to incorporate the requirements of 10 CSR 20-6.100, effective October 30, 2012, which adopts the 2005 "Streamlining" revisions to the federal pretreatment rule, 40 CFR 403. This update will include at least an industrial user survey, a re-evaluation of local limits, and a revision to city code to incorporate the revised rules.

E. SPECIAL CONDITIONS (continued)

22. Receiving Water Monitoring Conditions

- (a) In-stream receiving water samples should be taken at the location(s) specified on Page 2 of this permit. In the event that a safe, accessible location is not present at the location(s) listed, a suitable location can be negotiated with the Department. Samples should be taken at least four feet from the bank or from the middle of the stream (whichever is less) and 6-inches below the surface if possible.
- (b) When conducting in-stream monitoring, the permittee shall record observations that include: the time of day, weather conditions, unusual stream characteristics (e.g., septic conditions, algae growth, etc.), the stream segment (e.g., riffle, pool or run) from where the sample was collected. These observations shall be submitted with the sample results.
- (c) Samples shall not be collected from areas with especially turbulent flow, still water or from the stream bank, unless these conditions are representative of the stream reach or no other areas are available for sample collection. Sampling should not be made when significant precipitation has occurred recently. The sampling event should be terminated and rescheduled if any of the following conditions occur:
 - If turbidity in the stream increases notably; or
 - If rainfall over the past two weeks exceeds 2.5 inches or exceeds 1 inch in the last 24 hours
- (d) Always use the correct sampling technique and handling procedure specified for the parameter of interest. Please refer to the latest edition of Standard Methods for the Examination of Water and Wastewater for further discussion of proper sampling techniques. All analyses must be conducted in accordance with an approved EPA method. Meters shall be calibrated immediately (within 1 hour) prior to the sampling event.
- (e) To obtain accurate measurements, Dissolved Oxygen and pH analyses should be performed on-site in the receiving stream where possible. However, due to high flow conditions, access, etc., it may be necessary to collect a sample in a bucket or other container. When this is necessary, care must be taken not to aerate the sample upon collection. If for any reason samples must be collected from an alternate site from the one listed in the permit, the permittee shall report the location with the sample results.
- (f) Dissolved Oxygen measurements are to be taken during the period from one hour prior to sunrise to one and one-half hour after sunrise.
- (g) Please contact the Department if you need additional instructions or assistance.

23. Stormwater Pollution Prevention Plan (SWPPP): A SWPPP must be developed and implemented within 180 days of the effective date of the permit. Through implementation of the SWPPP, the permittee shall minimize the release of pollutants in stormwater from the facility to the waters of the state. The SWPPP shall be developed in consultation with the concepts and methods described in the following document: Developing Your Stormwater Pollution Prevention Plan, A Guide for Industrial Operators, (Document number EPA 833-B-09-002) published by the United States Environmental Protection Agency (USEPA) in February 2009.

- (a) The SWPPP must identify any stormwater outfall from the facility and Best Management Practices (BMPs) used to prevent or reduce the discharge of contaminants in stormwater. The stormwater outfalls shall either be marked in the field or clearly marked on a map and maintained with the SWPPP.
- (b) The SWPPP must include a schedule and procedures for a once per month routine site inspection.
 - i. The monthly routine inspection shall be documented in a brief written report, which shall include:
 - i. The person(s) conducting the inspection.
 - ii. The inspection date and time.
 - iii. Weather information for the day of the inspection.
 - iv. Precipitation information for the entire period since the last inspection.
 - v. Description of the discharges observed, including visual quality of the discharges (sheen, turbid, etc.).
 - vi. Condition of BMPs
 - vii. If BMPs were replaced or repaired.
 - viii. Observations and evaluations of BMP effectiveness.
 - ii. Any deficiency observed during the routine inspection must be corrected within seven (7) days and the actions taken to correct the deficiencies shall be included with the written report.
 - iii. The routine inspection reports must be kept onsite with the SWPPP and maintained for a period of five (5) years.
 - iv. The routine inspection reports shall be made available to Department personnel upon request.
- (c) The SWPPP must include a schedule and procedures for a once per year comprehensive site inspection.
 - (1) The annual comprehensive inspection shall be documented in a written report, which shall include:
 - i. The person(s) conducting the inspection.
 - ii. The inspection date and time.
 - iii. Findings from the areas of your facility that were examined;
 - iv. All observations relating to the implementation of your control measures including:
 1. Previously unidentified discharges from the site,
 2. Previously unidentified pollutants in existing discharges,
 3. Evidence of, or the potential for, pollutants entering the drainage system;

E. SPECIAL CONDITIONS (continued)

4. Evidence of pollutants discharging to receiving waters at all facility outfall(s), and the condition of and around the outfall, and
5. Additional control measures needed to address any conditions requiring corrective action identified during the inspection.
- v. Any required revisions to the SWPPP resulting from the inspection;
- vi. Any incidence of noncompliance observed or a certification stating that the facility is in compliance with Special Condition E.23.

(2) Any deficiency observed during the comprehensive inspection must be corrected within seven (7) days and the actions taken to correct the deficiencies shall be included with the written report.

(3) The comprehensive inspection reports must be kept onsite with the SWPPP and maintained for a period of five (5) years.

(4) The comprehensive inspection reports shall be made available to Department personnel upon request.

(d) The SWPPP must be kept on-site and should not be sent to the Department unless specifically requested.

(e) The SWPPP must be reviewed and updated at a minimum once per permit cycle, as site conditions or control measures change.

24. The permittee shall select, install, use, operate, and maintain the Best Management Practices prescribed in the SWPPP.

(a) Permittee shall adhere to the following minimum Best Management Practices (BMPs):

- (1) Minimize the exposure of industrial material storage areas, loading and unloading areas, dumpsters and other disposal areas, maintenance activities, and fueling operations to rain, snow, snowmelt, and runoff, by locating industrial materials and activities inside or protecting them with storm resistant coverings, if warranted and practicable.
- (2) Provide good housekeeping practices on the site to prevent potential pollution sources from coming into contact with stormwater and provide collection facilities and arrange for proper disposal of waste products, including sludge.
- (3) Implement a maintenance program to ensure that the structural control measures and industrial equipment is kept in good operating condition and to prevent or minimize leaks and other releases of pollutants.
- (4) Prevent or minimize the spillage or leaks of fluids, oil, grease, fuel, etc. from equipment and vehicle maintenance, equipment and vehicle cleaning, or activities.
- (5) Provide sediment and erosion control sufficient to prevent or control sediment loss off of the property. This could include the use of straw bales, silt fences, or sediment basins, if needed.
- (6) Provide stormwater runoff controls to divert, infiltrate, reuse, contain, or otherwise minimize pollutants in the stormwater discharge.
- (7) Enclose or cover storage piles of salt or piles containing salt, used for deicing or other commercial or industrial purposes.
- (8) Provide training to all employees who work in areas where industrial materials or activities are exposed to stormwater, are responsible for stormwater inspections, are members of the Pollution Prevention Team. Training must cover the specific control measures and monitoring, inspection, planning, reporting and documentation requirements of this permit. Training is recommended annually for any applicable staff and whenever a new employee is hired who meets the description above.
- (9) Eliminate and prevent unauthorized non-stormwater discharges at the facility.
- (10) Minimize generation of dust and off-site tracking of raw, final, or waste materials by implementing appropriate control measures.

25. Chronic Whole Effluent Toxicity (WET) tests shall be conducted as follows:

(a) Freshwater Species and Test Methods: Species and short-term test methods for estimating the chronic toxicity of NPDES effluents are found in the most recent edition of *Short-term Methods for Estimating the Chronic Toxicity of Effluents and Receiving Waters to Freshwater Organisms (EPA/821/R-02/013; Table 1A, 40 CFR Part 136)*. The permittee shall concurrently conduct 7-day, static, renewal toxicity tests with the following species:

- o The fathead minnow, *Pimephales promelas* (Survival and Growth Test Method 1000.0).
- o The daphnid, *Ceriodaphnia dubia* (Survival and Reproduction Test Method 1002.0).

(b) Chemical and physical analysis of the upstream control sample and effluent sample shall occur immediately upon being received by the laboratory, prior to any manipulation of the effluent sample beyond preservation methods consistent with federal guidelines for WET testing that are required to stabilize the sample during shipping. Where upstream receiving water is not available or known to be toxic, other approved control water may be used.

(c) Test conditions must meet all test acceptability criteria required by the EPA Method used in the analysis.

(d) The Allowable Effluent Concentration (AEC) is 100%, the dilution series is: 100%, 50%, 25%, 12.5%, and 6.25%.

(e) All chemical and physical analysis of the effluent sample performed in conjunction with the WET test shall be performed at the 100% effluent concentration.

E. SPECIAL CONDITIONS (continued)

(f) The facility must submit a full laboratory report for all toxicity testing. The report must include a quantification of chronic toxic units ($TU_c = 100/IC_{25}$) reported according to the *Methods for Measuring the Chronic Toxicity of Effluents and Receiving Waters to Freshwater and Marine Organisms* chapter on report preparation and test review. The 25 percent Inhibition Effect Concentration (IC_{25}) is the toxic or effluent concentration that would cause 25 percent reduction in mean young per female or in growth for the test populations.

26. Acute Whole Effluent Toxicity (WET) tests shall be conducted as follows:

(g) Freshwater Species and Test Methods: Species and short-term test methods for estimating the acute toxicity of NPDES effluents are found in the most recent edition of *Methods for Measuring the Acute Toxicity of Effluents and Receiving Waters to Freshwater and Marine Organisms* (EPA/821/R-02/012; Table IA, 40 CFR Part 136). The permittee shall concurrently conduct 48-hour, static, non-renewal toxicity tests with the following species:

- o The fathead minnow, *Pimephales promelas* (Acute Toxicity EPA Test Method 2000.0).
- o The daphnid, *Ceriodaphnia dubia* (Acute Toxicity EPA Test Method 2002.0).

(h) Chemical and physical analysis of the upstream control sample and effluent sample shall occur immediately upon being received by the laboratory, prior to any manipulation of the effluent sample beyond preservation methods consistent with federal guidelines for WET testing that are required to stabilize the sample during shipping. Where upstream receiving water is not available or known to be toxic, other approved control water may be used.

(i) Test conditions must meet all test acceptability criteria required by the EPA Method used in the analysis.

(j) The Allowable Effluent Concentration (AEC) for this facility is 100% with the dilution series being: 100%, 50%, 25%, 12.5%, and 6.25%.

(k) All chemical and physical analysis of the effluent sample performed in conjunction with the WET test shall be performed at the 100% effluent concentration.

(l) The facility must submit a full laboratory report for all toxicity testing. The report must include a quantification of acute toxic units ($TU_a = 100/LC_{50}$) reported according to the test methods manual chapter on report preparation and test review. The Lethal Concentration 50 Percent (LC_{50}) is the effluent concentration that would cause death in 50 percent of the test organisms at a specific time.

MISSOURI DEPARTMENT OF NATURAL RESOURCES
FACT SHEET
FOR THE PURPOSE OF RENEWAL
OF
MO-0089010
LEBANON WASTEWATER TREATMENT FACILITY

The Federal Water Pollution Control Act ("Clean Water Act" Section 402 Public Law 92-500 as amended) established the National Pollutant Discharge Elimination System (NPDES) permit program. This program regulates the discharge of pollutants from point sources into the waters of the United States, and the release of stormwater from certain point sources. All such discharges are unlawful without a permit (Section 301 of the "Clean Water Act"). After a permit is obtained, a discharge not in compliance with all permit terms and conditions is unlawful. Missouri State Operating Permits (MSOPs) are issued by the Director of the Missouri Department of Natural Resources (Department) under an approved program, operating in accordance with federal and state laws (Federal "Clean Water Act" and "Missouri Clean Water Law" Section 644 as amended). MSOPs are issued for a period of five (5) years unless otherwise specified.

As per [40 CFR Part 124.8(a)] and [10 CSR 20-6.020(1)(A)2.] a Factsheet shall be prepared to give pertinent information regarding the applicable regulations, rationale for the development of effluent limitations and conditions, and the public participation process for the Missouri State Operating Permit (operating permit) listed below.

A Factsheet is not an enforceable part of an operating permit.

This Factsheet is for a Major

Part I – Facility Information

Facility Type: POTW - SIC #4952

Facility Description: Coarse and Fine Screening/Influent pump station /grit removal /Two Oxidation Ditches/One aeration basin/Four clarifiers/ Tertiary Sand filters/ Ultraviolet disinfection/ Sludge dewatering/Sludge is land applied.

Have any changes occurred at this facility or in the receiving water body that effects effluent limit derivation?
 - No.

Application Date: 07/05/2016
Expiration Date: 01/3/2017

OUTFALL(S) TABLE:

OUTFALL	DESIGN FLOW (CFS)	TREATMENT LEVEL	EFFLUENT TYPE
#001	4.0	Secondary	Domestic

Facility Performance History:

This facility was last inspected on September 21-23, 2015. The conditions of the facility at the time of inspection were found to be satisfactory. The previous five years of discharge monitoring reports have been reviewed for this facility. The facility reported limit exceedances for Bis(2-ethylhexyl) phthalate and pH on 05/31/2017, Copper on 10/31/2016 and 04/30/2015. pH on 12/31/2014. Bis(2-ethylhexyl) phthalate on 09/30/2014. *E. coli* on 05/31/2014, Ammonia on 03/31/2014 and pH and Ammonia on 12/31/2013.

Comments:

The following parameters are new additions to this permit; Selenium monitoring, Total Phosphorus monitoring, Total Nitrogen monitoring, and instream monitoring for hardness. Effluent limits for zinc, and oil and grease have been removed as the facility no longer has the reasonable potential to exceed water quality standards for these parameters therefore they have been replaced with monitoring requirements. These monitoring requirements will be used to determine the continuation of the lack of reasonable potential and the data will be reevaluated during the next renewal process. Acute Whole Effluent Toxicity Testing has been decreased to annual and Chronic Whole Effluent Testing has been added with an annual frequency. Effluent limits have been recalculated for Bis (2-ethylhexyl) phthalate, copper and ammonia using the previous five years of discharge data submitted by the permittee. Sampling frequency for BOD and TSS has been reduced to monthly from twice per week as a reflection of consistent effluent quality and good compliance with these limits. See Part VI of the Fact Sheet for further information regarding the addition and removal of effluent parameters.

Special conditions were updated to include the addition of reporting of Non-detects, updated pretreatment requirements, Stormwater Pollution Prevention Plan development, and eDMR reporting requirements. Also because the receiving stream listed on the previous permit was incorrect, the permit writer has corrected the receiving stream information in this permit. The previous permit did not account for mixing in the receiving stream and the permit writer did take mixing into account because the receiving stream is classified as a class (P) stream. As a result default mixing values have been taken into account for all effluent parameters. Minimum pH limit has been changed to 6.0 SU from 6.5 SU. All calculated effluent limits and reasonable potential analysis have been updated with default mixing considerations.

December 12-14, 2016 an EPA Pretreatment Audit was conducted. The audit states “overall the City of Lebanon, Missouri Approved Pretreatment Program is poorly implemented” Issues continue to exist that were identified in a prior EPA audit in 2007. The city’s Pretreatment program was originally approved on December 19, 1984 by the Missouri DNR. The City’s Sewer Use Ordinance was approved by Missouri DNR on September 17, 1992.

As the Audit has identified the City has failed to incorporate the EPA 2005 Amendments to the General Pretreatment Regulations [40 CFR 403.8, 40 CFR 403.13] a special condition has been added to the permit requiring the city within 2 years of the effective date of the permit to adopt the requirements of 10 CSR 20-6.100, effective October 30, 2012 which adopts the 40 CFR 403 pretreatment requirements by reference.

The previous permit incorporated a Department Approved Sewer Extension Authority. During the renewal process the Department met with the City of Lebanon to reevaluate the authority for continuance in this permit. At that time the City of Lebanon expressed they did not wish to continue their approved sewer extension authority with the renewal of this permit. All conditions relating to the Department Approved Sewer Extension Authority has been removed.

In 2006 the department issued a permit in lieu of a TMDL for Dry Auglaize Creek to correct impairments. While the 2002 303(d) list showed the impairment was caused by “unknown pollutants” the 1998 303(d) list identified BOD and Non-Filterable Residue as the source of impairment. The department believed the 1998 designation is correct. As a result of frequent SSO’s the City of Lebanon is party to a consent decree signed in late 2003 and early 2004 with the EPA. The consent decree required the elimination of bypassing from the collection system and the increase of system capacity. This would allow more of the wastewater to be treated at the facility prior to reaching the receiving waters. The effluent limits established in the permit are protective of the receiving stream. As more of the wastewater is properly treated and bypassing is eliminated water quality should improve.

Part II – Operator Certification Requirements

- This facility is required to have a certified operator.

As per [10 CSR 20-6.010(8) Terms and Conditions of a Permit], the permittee shall operate and maintain facilities to comply with the Missouri Clean Water Law and applicable permit conditions and regulations. Operators or supervisors of operations at regulated wastewater treatment facilities shall be certified in accordance with [10 CSR 20-9.020(2)] and any other applicable state law or regulation. As per [10 CSR 20-9.020(2)(A)], requirements for operation by certified personnel shall apply to all wastewater treatment systems, if applicable, as listed below:

Owned or operated by or for a

- Municipalities
- Federal agency
- County
- Public Sewer District

- State agency
- Private Sewer Company regulated by the Public Service Commission
- Public Water Supply Districts

Each of the above entities are only applicable if they have a Population Equivalent greater than two hundred (200) or fifty (50) or more service connections.

This facility currently requires an operator with an **A** Certification Level. Please see **Appendix - Classification Worksheet**. Modifications made to the wastewater treatment facility may cause the classification to be modified.

Operator's Name: **Craig Perry**
Certification Number: **10188**
Certification Level: **A**

The listing of the operator above only signifies that staff drafting this operating permit have reviewed appropriate Department records and determined that the name listed on the operating permit application has the correct and applicable Certification Level.

Part III– Operational Monitoring

- As per [10 CSR 20-9.010(4))], the facility is required to conduct operational monitoring.

Part IV – Receiving Stream Information

RECEIVING STREAM(S) TABLE: OUTFALL #001

WATER-BODY NAME	CLASS	WBID	DESIGNATED USES [*]	12-DIGIT HUC	DISTANCE TO CLASSIFIED SEGMENT (MI)
Dry Auglaize Creek	P	1145	AQL, IRR, LWW, SCR, WBCB, HHP	10290109-0303	Losing & Classified: 0.0 miles

^{*}As per 10 CSR 20-7.031 Missouri Water Quality Standards, the Department defines the Clean Water Commission's water quality objectives in terms of "water uses to be maintained and the criteria to protect those uses." The receiving stream and 1st classified receiving stream's beneficial water uses to be maintained are in the receiving stream table in accordance with [10 CSR 20-7.031(1)(C)].

Uses which may be found in the receiving streams table, above.

10 CSR 20-7.031(1)(C)1.:

AQL = Protection of aquatic life (Current narrative use(s) are defined to ensure the protection and propagation of fish shellfish and wildlife, which is further subcategorized as: **WWH** = Warm Water Habitat; **CDF** = Cold-water fishery (Current narrative use is cold-water habitat); **CLF** = Cool-water fishery (Current narrative use is cool-water habitat); **EAH** = Ephemeral Aquatic Habitat; **MAH** = Modified Aquatic Habitat; **LAH** = Limited Aquatic Habitat. This permit uses AQL effluent limitations in 10 CSR 20-7.031 Table A for all habitat designations unless otherwise specified.)

10 CSR 20-7.031(1)(C)2.: Recreation in and on the water

WBC = Whole Body Contact recreation where the entire body is capable of being submerged;

WBC-A = Whole body contact recreation that supports swimming uses and has public access;

WBC-B = Whole body contact recreation that supports swimming;

SCR = Secondary Contact Recreation (like fishing, wading, and boating).

10 CSR 20-7.031(1)(C)3. to 7.:

HHP (formerly **HHF**) = Human Health Protection as it relates to the consumption of fish;

IRR = Irrigation for use on crops utilized for human or livestock consumption;

LWW = Livestock and wildlife watering (Current narrative use is defined as **LWP** = Livestock and Wildlife Protection);

DWS = Drinking Water Supply;

IND = Industrial water supply

10 CSR 20-7.031(1)(C)8-11.: Wetlands (10 CSR 20-7.031 Table A currently does not have corresponding habitat use criteria for these defined uses)

WSA = Storm- and flood-water storage and attenuation; **WHP** = Habitat for resident and migratory wildlife species;

WRC = Recreational, cultural, educational, scientific, and natural aesthetic values and uses; **WHC** = Hydrologic cycle maintenance.

10 CSR 20-7.031(6): **GRW** = Groundwater

RECEIVING STREAM(S) LOW-FLOW VALUES:

RECEIVING STREAM (C, E, P, P1)	LOW-FLOW VALUES (CFS)		
	1Q10	7Q10	30Q10
Dry Auglaize Creek (P)(Losing)	0.1	0.1	1

MIXING CONSIDERATIONS TABLE:

MIXING ZONE (CFS) [10 CSR 20-7.031(5)(A)4.B.(II)(a)]			ZONE OF INITIAL DILUTION (CFS) [10 CSR 20-7.031(5)(A)4.B.(II)(b)]		
1Q10	7Q10	30Q10	1Q10	7Q10	30Q10
0.025	0.025	0.25	0.0025	0.0025	N/A

RECEIVING STREAM MONITORING REQUIREMENTS:

Facilities with a design flow greater than 100,000 gallons per day are required to sample their effluent quarterly for Total Phosphorus and Total Nitrogen per 10 CSR 20-7.015(9)(D)7. Upstream monitoring for these parameters is necessary to determine background concentrations in order to complete calculations related to future effluent limit derivation where necessary or appropriate.

Permitted Feature SM1. Sampling point is located 50 yards upstream of the outfall. Sampling for Total Phosphorus and Total Nitrogen has been added. The addition of these monitoring requirements will aid in determining background concentrations of the nutrients of this waterbody. Dissolved oxygen, pH, Temperature and Ammonia as N has been continued in this permit.

Permitted Feature SM2. Sampling point is located downstream at the Pacific Drive Bridge over dry Auglaize Creek. This is the same sampling point as listed in the previous permit. The previous permits listed this location as "County Road" The county road referenced is actually named Pacific Dr.

Ammonia as N, pH, Temperature and Dissolved oxygen monitoring requirements are continued from the previous permits. Total hardness has been included as the facility has effluent limits and monitoring requirements for metals. Instream total hardness data will be helpful in determining more accurate site specific conditions for hardness dependent metals.

Receiving Water Body's Water Quality

Dry Auglaize Creek (1145) was originally listed on the 1998 303(d) list for Biochemical Oxygen Demand (BOD and Non-Filterable Residue. Although it was listed on the 2002 list for "unknown pollutant" the department believes the original designation of pollutants was correct. The source of the pollutants is believed to be not the actual discharge from the Lebanon WWTF but the result of frequent SSO's from the lift station outside of the treatment facility.

Comments:

As the source of the pollutants has been determined to be the City of Lebanon's collections system a TMDL was not developed but a Permit in Lieu of TMDL was issued. The original Permit in lieu incorporated instream monitoring both upstream and downstream of the outfall. These instream requirements are being continued in this permit.

Part V – Rationale and Derivation of Effluent Limitations & Permit Conditions

ALTERNATIVE EVALUATIONS FOR NEW FACILITIES:

As per [10 CSR 20-7.015(4)(A)], discharges to losing streams shall be permitted only after other alternatives including land application, discharges to a gaining stream and connection to a regional wastewater treatment facility have been evaluated and determined to be unacceptable for environmental and/or economic reasons.

- The facility does not discharge to a Losing Stream as defined by [10 CSR 20-2.010(36)] & [10 CSR 20-7.031(1)(N)], or is an existing facility.

ANTI-BACKSLIDING:

A provision in the Federal Regulations [CWA §303(d)(4); CWA §402(o); 40 CFR Part 122.44(l)] that requires a reissued permit to be as stringent as the previous permit with some exceptions.

- Limitations in this operating permit for the reissuance of this permit conform to the anti-backsliding provisions of Section 402(o) of the Clean Water Act, and 40 CFR Part 122.44.

- Information is available which was not available at the time of permit issuance (other than revised regulations, guidance, or test methods) and which would have justified the application of a less stringent effluent limitation at the time of permit issuance.

- Ammonia limits have been recalculated. This calculation utilized the previous five years of effluent data reported by the facility for ammonia. As a result new water quality based effluent limits have been recalculated. While daily maximum effluent limits have become less stringent monthly average effluent limits have become more stringent. As these limits are calculated using actual data from the facility effluent limits are protective of water quality standards.

- The minimum for pH has been lowered from 6.5 to 6.0. This is due to the receiving stream being classified as a class P stream. As a result the buffering capacity of the mixing zone is taken into account allowing for a lower minimum pH. Effluent limits are still protective of water quality.
- Oil and Grease limits are being replaced with monitoring only requirements. This is a result of a reasonable potential determination identifying the discharge does not have the potential to cause and instream excursion from water quality standards. Effluent limits are protective of water quality standards.
- Total Recoverable Zinc limits have been replaced with monitoring only requirements as the result of a reasonable potential analysis utilizing the previous five years of discharge monitoring reports. Effluent limits are still protective of water quality.
- BOD and TSS monitoring frequencies have been reduced. This is reflective of consistent effluent quality and over good compliance with these parameters. Effluent limits are still protective of water quality.
- Effluent limits for Bis (2-ethylhexyl phthalate) have been recalculated using the previous five years of data reported on discharge monitoring reports. This has resulted in a less stringent monthly average limit of 6.3 μ g/L. This effluent limit is still protective of water quality. Daily maximum effluent limits are more stringent as a result of this calculation as well.
- Effluent limits for Total Recoverable Copper have been recalculated using data obtained from discharge monitoring reports. This has resulted in effluent limits that are more stringent as a monthly average but less stringent as a daily maximum. As these limits were calculated using actual discharge data these effluent limits are still protective of water quality.
- WET testing requirements were changed from pass/fail to monitoring only for toxic units. This change reflects modifications to Missouri's Effluent Regulation found at 10 CSR 20-7.015. 40 CFR 122.44(d)(1)(ii) requiring the Department to establish effluent limitations to control all parameters which have the reasonable potential to cause or contribute to an excursion above any state water quality standard, including state narrative criteria. The previous permit imposed a pass/fail limitation without collecting sufficient numerical data to conduct an analytical reasonable potential analysis. The permit writer has made a reasonable potential determination which concluded the facility does not have reasonable potential at this time but monitoring is required. Implementation of the toxic unit monitoring requirement will allow the Department to effect numeric criteria in accordance with water quality standards established under §303 of the CWA.
- Acute WET testing has been reduced to once per year from twice per year. This is reflective of the previous five years of Acute WET tests satisfactorily reported as "passed". Effluent limits are still protective of water quality.

- The Department determines that technical mistakes or mistaken interpretations of law were made in issuing the permit under section 402(a)(1)(b).

- **General Criteria.** The previous permit contained a special condition which described a specific set of prohibitions related to general criteria found in 10 CSR 20-7.031(4). In order to comply with 40 CFR 122.44(d)(1), the permit writer has conducted reasonable potential determinations for each general criterion and established numeric effluent limitations where reasonable potential exists. While the removal of the previous permit special condition creates the appearance of backsliding, since this permit establishes numeric limitations where reasonable potential to cause or contribute to an excursion of the general criteria exists the permit maintains sufficient effluent limitations and monitoring requirements in order to protect water quality, this permit is equally protective as compared to the previous permit. Therefore, given this new information, and the fact that the previous permit special condition was not consistent with 40 CFR 122.44(d)(1), an error occurred in the establishment of the general criteria as a special condition of the previous permit. Please see Part VI – Effluent Limits Determination for more information regarding the reasonable potential determinations for each general criterion related to this facility.

ANTIDEGRADATION:

In accordance with Missouri's Water Quality Standard [10 CSR 20-7.031(3)], for domestic wastewater discharge with new, altered, or expanding discharges, the Department is to document by means of Antidegradation Review that the use of a water body's available assimilative capacity is justified. In accordance with Missouri's water quality regulations for antidegradation [10 CSR 20-7.031(3)], degradation may be justified by documenting the socio-economic importance of a discharge after determining the necessity of the discharge. Facilities must submit the antidegradation review request to the Department prior to establishing, altering, or expanding discharges. See <http://dnr.mo.gov/env/wpp/permits/antideg-implementation.htm>

- No degradation proposed and no further review necessary. Facility did not apply for authorization to increase pollutant loading or to add additional pollutants to their discharge.

AREA-WIDE WASTE TREATMENT MANAGEMENT & CONTINUING AUTHORITY:

As per [10 CSR 20-6.010(3)(B)], ... An applicant may utilize a lower preference continuing authority by submitting, as part of the application, a statement waiving preferential status from each existing higher preference authority, providing the waiver does not conflict with any area-wide management plan approved under section 208 of the Federal Clean Water Act or any other regional sewage service and treatment plan approved for higher preference authority by the Department.

BIOSOLIDS & SEWAGE SLUDGE:

Biosolids are solid materials resulting from domestic wastewater treatment that meet federal and state criteria for beneficial uses (i.e. fertilizer). Sewage sludge is solids, semi-solids, or liquid residue generated during the treatment of domestic sewage in a treatment works; including but not limited to, domestic septage; scum or solids removed in primary, secondary, or advanced wastewater treatment process; and a material derived from sewage sludge. Sewage sludge does not include ash generated during the firing of sewage sludge in a sewage sludge incinerator or grit and screening generated during preliminary treatment of domestic sewage in a treatment works. Additional information regarding biosolids and sludge is located at the following web address: <http://extension.missouri.edu/main/DisplayCategory.aspx?C=74>, items WQ422 through WQ449.

- Permittee has a Department approved biosolids management plan, and is authorized to land applies biosolids in accordance with Standard Conditions III.

COMPLIANCE AND ENFORCEMENT:

Enforcement is the action taken by the Water Protection Program (WPP) to bring an entity into compliance with the Missouri Clean Water Law, its implementing regulations, and/or any terms and conditions of an operating permit. The primary purpose of the enforcement activity in the WPP is to resolve violations and return the entity to compliance.

- The facility is not currently under Water Protection Program enforcement action.

ELECTRONIC DISCHARGE MONITORING REPORT (eDMR) SUBMISSION SYSTEM:

The U.S. Environmental Protection Agency (EPA) promulgated a final rule on October 22, 2015, to modernize Clean Water Act reporting for municipalities, industries, and other facilities by converting to an electronic data reporting system. This final rule requires regulated entities and state and federal regulators to use information technology to electronically report data required by the National Pollutant Discharge Elimination System (NPDES) permit program instead of filing paper reports. To comply with the federal rule, the Department is requiring all permittees to begin submitting discharge monitoring data and reports online. In an effort to aid facilities in the reporting of applicable information electronically, the Department has created several new forms including operational control monitoring forms and an I&I location and reduction form. These forms are for optional use and can be found on the Department's website at the following locations:

Operational Monitoring Lagoon: <http://dnr.mo.gov/forms/780-2801-f.pdf>

Operational Monitoring Mechanical: <http://dnr.mo.gov/forms/780-2800-f.pdf>

I&I Report: <http://dnr.mo.gov/forms/780-2690-f.pdf>

Per 40 CFR 127.15 and 127.24, permitted facilities may request a temporary waiver for up to 5 years or a permanent waiver from electronic reporting from the Department. To obtain an electronic reporting waiver, a permittee must first submit an eDMR Waiver Request Form: <http://dnr.mo.gov/forms/780-2692-f.pdf>. A request must be made for each facility. If more than one facility is owned or operated by a single entity, then the entity must submit a separate request for each facility based on its specific circumstances. An approved waiver is non-transferable.

The Department must review and notify the facility within 120 calendar days of receipt if the waiver request has been approved or rejected [40 CFR 124.27(a)]. During the Department review period as well as after a waiver is granted, the facility must continue submitting a hard-copy of any reports required by their permit. The Department will enter data submitted in hard-copy from those facilities allowed to do so and electronically submit the data to the EPA on behalf of the facility.

- The permittee/facility is currently using the eDMR data reporting system.

PRETREATMENT PROGRAM:

The reduction of the amount of pollutants, the elimination of pollutants, or the alteration of the nature of pollutant properties in wastewater prior to or in lieu of discharging or otherwise introducing such pollutants into a Publicly Owned Treatment Works [40 CFR Part 403.3(q)].

Pretreatment programs are required at any POTW (or combination of POTW operated by the same authority) and/or municipality with a total design flow greater than 5.0 MGD and receiving industrial wastes that interfere with or pass through the treatment works or are otherwise subject to the pretreatment standards. Pretreatment programs can also be required at POTWs/municipals with a design flow less than 5.0 MGD if needed to prevent interference with operations or pass through.

Several special conditions pertaining to the permittee's pretreatment program may be included in the permit, and are as follows:

- Implementation and enforcement of the program,
- Annual pretreatment report submittal,
- Submittal of list of industrial users,
- Technical evaluation of need to establish local limitations, and
- Submittal of the results of the evaluation

- This permittee has an approved pretreatment program in accordance with the requirements of [40 CFR Part 403] and [10 CSR 20-6.100] and is expected to implement and enforce its approved program.

REASONABLE POTENTIAL ANALYSIS (RPA):

Federal regulation [40 CFR Part 122.44(d)(1)(i)] requires effluent limitations for all pollutants that are or may be discharged at a level that will cause or have the reasonable potential to cause or contribute to an in-stream excursion above narrative or numeric water quality standard.

In accordance with [40 CFR Part 122.44(d)(1)(iii)] if the permit writer determines that any given pollutant has the reasonable potential to cause, or contribute to an in-stream excursion above the WQS, the permit must contain effluent limits for that pollutant.

- A RPA was conducted on appropriate parameters. Please see **APPENDIX – RPA RESULTS**.

REMOVAL EFFICIENCY:

Removal efficiency is a method by which the Federal Regulations define Secondary Treatment and Equivalent to Secondary Treatment, which applies to Biochemical Oxygen Demand 5-day (BOD₅) and Total Suspended Solids (TSS) for Publicly Owned Treatment Works (POTWs)/municipals.

- Secondary Treatment is 85% removal [40 CFR Part 133.102(a)(3) & (b)(3)].

SANITARY SEWER OVERFLOWS (SSO) AND INFLOW AND INFILTRATION (I&I):

Sanitary Sewer Overflows (SSOs) are defined as untreated sewage releases and are considered bypassing under state regulation [10 CSR 20-2.010(11)] and should not be confused with the federal definition of bypass. SSOs result from a variety of causes including blockages, line breaks, and sewer defects that can either allow wastewater to backup within the collection system during dry weather conditions or allow excess stormwater and groundwater to enter and overload the collection system during wet weather conditions. SSOs can also result from lapses in sewer system operation and maintenance, inadequate sewer design and construction, power failures, and vandalism. SSOs include overflows out of manholes, cleanouts, broken pipes, and other into waters of the state and onto city streets, sidewalks, and other terrestrial locations.

Inflow and Infiltration (I&I) is defined as unwanted intrusion of stormwater or groundwater into a collection system. This can occur from points of direct connection such as sump pumps, roof drain downspouts, foundation drains, and storm drain cross-connections or through cracks, holes, joint failures, faulty line connections, damaged manholes, and other openings in the collection system itself. I&I results from a variety of causes including line breaks, improperly sealed connections, cracks caused by soil erosion/settling, penetration of vegetative roots, and other sewer defects. In addition, excess stormwater and groundwater entering the collection system from line breaks and sewer defects have the potential to negatively impact the treatment facility.

Missouri RSMo §644.026.1.(13) mandates that the Department issue permits for discharges of water contaminants into the waters of this state, and also for the operation of sewer systems. Such permit conditions shall ensure compliance with all requirements as established by sections 644.006 to 644.141. Standard Conditions Part I, referenced in the permit, contains provisions requiring proper operation and maintenance of all facilities and systems of treatment and control. Missouri RSMo §644.026.1.(15) instructs the Department to require proper maintenance and operation of treatment facilities and sewer systems and proper disposal of residual waste from all such facilities. To ensure that public health and the environment are protected, any noncompliance which may endanger public health or the environment must be reported to the Department within 24 hours of the time the permittee becomes aware of the noncompliance. Standard Conditions Part I, referenced in the permit, contains the reporting requirements for the permittee when bypasses and upsets occur. The permit also contains requirements for permittees to develop and implement a program

for maintenance and repair of the collection system. The permit requires that the permittee submit an annual report to the Department for the previous calendar year that contains a summary of efforts taken by the permittee to locate and eliminate sources of excess I & I, a summary of general maintenance and repairs to the collection system, and a summary of any planned maintenance and repairs to the collection system for the upcoming calendar year.

- At this time, the Department recommends the US EPA's Guide for Evaluating Capacity, Management, Operation and Maintenance (CMOM) Programs at Sanitary Sewer Collection Systems (Document # EPA 305-B-05-002) or the Departments' CMOM Model located at <http://dnr.mo.gov/env/wpp/permits/docs/cmom-template.doc>. For additional information regarding the Departments' CMOM Model, see the CMOM Plan Model Guidance document at <http://dnr.mo.gov/pubs/pub2574.htm>. The CMOM identifies some of the criteria used to evaluate a collection system's management, operation, and maintenance and was intended for use by the EPA, state, regulated community, and/or third party entities. The CMOM is applicable to small, medium, and large systems; both public and privately owned; and both regional and satellite collection systems. The CMOM does not substitute for the Clean Water Act, the Missouri Clean Water Law, and both federal and state regulations, as it is not a regulation.

SCHEDULE OF COMPLIANCE (SOC):

Per 644.051.4 RSMo, a permit may be issued with a Schedule of Compliance (SOC) to provide time for a facility to come into compliance with new state or federal effluent regulations, water quality standards, or other requirements. Such a schedule is not allowed if the facility is already in compliance with the new requirement, or if prohibited by other statute or regulation. A SOC includes an enforceable sequence of interim requirements (actions, operations, or milestone events) leading to compliance with the Missouri Clean Water Law, its implementing regulations, and/or the terms and conditions of an operating permit. *See also* Section 502(17) of the Clean Water Act, and 40 CFR §122.2. For new effluent limitations, the permit includes interim monitoring for the specific parameter to demonstrate the facility is not already in compliance with the new requirement. Per 40 CFR § 122.47(a)(1) and 10 CSR 20-7.031(11), compliance must occur as soon as possible. If the permit provides a schedule for meeting new water quality based effluent limits, a SOC must include an enforceable, final effluent limitation in the permit even if the SOC extends beyond the life of the permit.

A SOC is not allowed:

- For effluent limitations based on technology-based standards established in accordance with federal requirements, if the deadline for compliance established in federal regulations has passed. 40 CFR § 125.3.
- For a newly constructed facility in most cases. Newly constructed facilities must meet applicable effluent limitations when discharge begins, because the facility has installed the appropriate control technology as specified in a permit or antidegradation review. A SOC is allowed for a new water quality based effluent limit that was not included in a previously public noticed permit or antidegradation review, which may occur if a regulation changes during construction.
- To develop a TMDL, UAA, or other study associated with development of a site specific criterion. A facility is not prohibited from conducting these activities, but a SOC may not be granted for conducting these activities.

In order to provide guidance to Permit Writers in developing SOCs, and attain a greater level of consistency, on April 9, 2015 the Department issued an updated policy on development of SOCs. This policy provides guidance to Permit Writers on the standard time frames for schedules for common activities, and guidance on factors that may modify the length of the schedule such as a Cost Analysis for Compliance.

- The time given for effluent limitations of this permit listed under Interim Effluent Limitation and Final Effluent Limitations were established in accordance with [10 CSR 20-7.031(11)]. The facility has been given a schedule of compliance to meet final effluent limits for Ammonia as N. This facility employs an Oxidation Ditch for treatment of effluent. This technology is generally accepted as having the ability to treat ammonia that is present in wastewater to levels lower than the current final effluent limits in this permit. As this facility has demonstrated the ability to treat ammonia at times to a level that is compliant with final effluent limits in this permit through discharge monitoring reports a two (2) year schedule of compliance has been determined to provide adequate time to identify what operational changes can be made at the treatment facility to consistently meet the final effluent limits.

- The (2) two year schedule of compliance allowed for this facility will provide adequate time to identify any potential industrial contributions to the wastewater treatment collection system and evaluate inflow and infiltration to determine if metals (particularly Total Recoverable Copper) are being introduced into the system from I&I, and to determine what the sources of metals are and how to address metals residuals in the wastewater treatment facility.

SEWER EXTENSION AUTHORITY SUPERVISED PROGRAM:

In accordance with [10 CSR 20-6.010(6)(A)], the Department may grant approval of a permittee's Sewer Extension Authority Supervised Program. These approved permittees regulate and approve construction of sanitary sewers and pump stations, which are tributary to this wastewater treatment facility. The permittee shall act as the continuing authority for the operation, maintenance, and modernization of the constructed collection system. See <http://dnr.mo.gov/env/wpp/permits/sewer-extension.htm>.

- The permittee does not have a Department approved Sewer Extension Authority Supervised Program. While the previous permit implemented a Sewer Extension Authority Supervised Program this will not be continued at this renewal. The City of Lebanon has chosen to not pursue reauthorization of this program during this renewal.

STORMWATER POLLUTION PREVENTION PLAN (SWPPP):

In accordance with 40 CFR 122.44(k) *Best Management Practices (BMPs)* to control or abate the discharge of pollutants when: (1) Authorized under section 304(e) of the Clean Water Act (CWA) for the control of toxic pollutants and hazardous substances from ancillary industrial activities; (2) Authorized under section 402(p) of the CWA for the control of stormwater discharges; (3) Numeric effluent limitations are infeasible; or (4) the practices are reasonably necessary to achieve effluent limitations and standards or to carry out the purposes and intent of the CWA.

In accordance with the EPA's *Developing Your Stormwater Pollution Prevention Plan, A Guide for Industrial Operators*, (Document number EPA 833-B-09-002) [published by the United States Environmental Protection Agency (USEPA) in February 2009], BMPs are measures or practices used to reduce the amount of pollution entering (regarding this operating permit) waters of the state. BMPs may take the form of a process, activity, or physical structure.

Additionally in accordance with the Stormwater Management, a SWPPP is a series of steps and activities to (1) identify sources of pollution or contamination, and (2) select and carry out actions which prevent or control the pollution of stormwater discharges. The purpose of a SWPPP is to comply with all applicable stormwater regulations by creating an adaptive management plan to control and mitigate stream pollution from stormwater runoff. Developing a SWPPP provides opportunities to employ appropriate BMPs to minimize the risk of pollutants being discharged during storm events. The following paragraph outlines the general steps the permittee should take to determine which BMPs will work to achieve the benchmark values or limits in the permit. This section is not intended to be all encompassing or restrict the use of any physical BMP or operational and maintenance procedure assisting in pollution control. Additional steps or revisions to the SWPPP may be required to meet the requirements of the permit.

Areas which should be included in the SWPPP are identified in 40 CFR 122.26(b)(14). Once the potential sources of stormwater pollution have been identified, a plan should be formulated to best control the amount of pollutant being released and discharged by each activity or source. This should include, but is not limited to, minimizing exposure to stormwater, good housekeeping measures, proper facility and equipment maintenance, spill prevention and response, vehicle traffic control, and proper materials handling. Once a plan has been developed the facility will employ the control measures determined to be adequate to achieve the benchmark values discussed above. The facility will conduct monitoring and inspections of the BMPs to ensure they are working properly and re-evaluate any BMP not achieving compliance with permitting requirements. For example, if sample results from an outfall show values of TSS above the benchmark value, the BMP being employed is deficient in controlling stormwater pollution. Corrective action should be taken to repair, improve, or replace the failing BMP. This internal evaluation is required at least once per month but should be continued more frequently if BMPs continue to fail. If failures do occur, continue this trial and error process until appropriate BMPs have been established.

For new, altered, or expanded stormwater discharges, the SWPPP shall identify reasonable and effective BMPs while accounting for environmental impacts of varying control methods. The antidegradation analysis must document why no discharge or no exposure options are not feasible. The selection and documentation of appropriate control measures shall serve as an alternative analysis of technology and fulfill the requirements of antidegradation [10 CSR 20-7.031(3)]. For further guidance, consult the antidegradation implementation procedure (<http://dnr.mo.gov/env/wpp/docs/AIP050212.pdf>).

Alternative Analysis (AA) evaluation of the BMPs is a structured evaluation of BMPs that are reasonable and cost effective. The AA evaluation should include practices that are designed to be: 1) non-degrading; 2) less degrading; or 3) degrading water quality. The glossary of AIP defines these three terms. The chosen BMP will be the most reasonable and effective management strategy while ensuring the highest statutory and regulatory requirements are achieved and the highest quality water attainable for the facility is discharged. The AA evaluation must demonstrate why "no discharge" or "no exposure" is not a feasible alternative at the facility. This structured analysis of BMPs serves as the antidegradation review, fulfilling the requirements of 10 CSR 20-7.031(3) Water Quality Standards and *Antidegradation Implementation Procedure* (AIP), Section II.B.

If parameter-specific numeric exceedances continue to occur and the permittee feels there are no practicable or cost-effective BMPs which will sufficiently reduce a pollutant concentration in the discharge to the benchmark values established in the permit, the permittee can submit a request to re-evaluate the benchmark values. This request needs to include 1) a detailed explanation of why the facility is unable to comply with the permit conditions and unable to establish BMPs to achieve the benchmark values; 2) financial data of the company and documentation of cost associated with BMPs for review and 3) the SWPPP, which should contain adequate documentation of BMPs employed, failed BMPs, corrective actions, and all other required information. This will allow the Department to conduct a cost analysis on control measures and actions taken by the facility to determine cost-effectiveness of BMPs. The request shall be submitted in the form of an operating permit modification; the application is found at: <http://dnr.mo.gov/forms/index.html>.

- 10 CSR 20-6.200 and 40 CFR 122.26 includes treatment works treating domestic sewage or any other sewage sludge or wastewater treatment device or system, used in the storage treatment, recycling, and reclamation of municipal or domestic sewage, including land dedicated to the disposal of sewage sludge that is located within the confines of the facility, with a design flow of 1.0 mgd or more, or are required to have an approved pretreatment program under 40 CFR part 403, as an industrial activity in which permit coverage is required.

In lieu of requiring sampling in the site-specific permit, the facility is required to develop and implement a Stormwater Pollution Prevention Plan (SWPPP). A facility can apply for conditional exclusion for “no exposure” of industrial activities and materials to stormwater by submitting a permit modification via Form B2 (<http://dnr.mo.gov/forms/780-1805-f.pdf>) appropriate application filing fees and a completed NPDES Form 3510-11 – No Exposure Certification for Exclusion from NPDES Stormwater Permitting (https://www3.epa.gov/npdes/pubs/tr.sgp2008_appendixk.pdf) to the Department’s Water Protection Program, Operating Permits Section. Upon approval of the No Exposure Certification, the permit will be modified and the Special Condition to develop and implement a SWPPP will be removed. This information will be reevaluated at the time of renewal.

- A SWPPP shall be developed and implemented for each site and shall incorporate required practices identified by the Department with jurisdiction, incorporate erosion control practices specific to site conditions, and provide for maintenance and adherence to the plan.

VARIANCE:

As per the Missouri Clean Water Law § 644.061.4, variances shall be granted for such period of time and under such terms and conditions as shall be specified by the commission in its order. The variance may be extended by affirmative action of the commission. In no event shall the variance be granted for a period of time greater than is reasonably necessary for complying with the Missouri Clean Water Law §§644.006 to 644.141 or any standard, rule or regulation promulgated pursuant to Missouri Clean Water Law §§644.006 to 644.141.

- This operating permit is not drafted under premises of a petition for variance.

WASTELOAD ALLOCATIONS (WLA) FOR LIMITS:

As per [10 CSR 20-2.010(78)], the amount of pollutant each discharger is allowed by the Department to release into a given stream after the Department has determined total amount of pollutant that may be discharged into that stream without endangering its water quality.

- Wasteload allocations were calculated where applicable using water quality criteria or water quality model results and the dilution equation below:

$$Ce = \frac{(Qe + Qs)C - (Qs \times Cs)}{(Qe)} \quad (\text{EPA/505/2-90-001, Section 4.5.5})$$

Where C = downstream concentration C_e = effluent concentration
 C_s = upstream concentration Q_e = effluent flow
 O_s = upstream flow

Chronic wasteload allocations were determined using applicable chronic water quality criteria (CCC: criteria continuous concentration) and stream volume of flow at the edge of the mixing zone (MZ). Acute wasteload allocations were determined using applicable water quality criteria (CMC: criteria maximum concentration) and stream volume of flow at the edge of the zone of initial dilution (ZID).

Water quality based maximum daily and average monthly effluent limitations were calculated using methods and procedures outlined in USEPA's "Technical Support Document For Water Quality-based Toxics Control" (EPA-505.2-90-001).

Number of Samples “n”:

Additionally, in accordance with the TSD for water quality-based permitting, effluent quality is determined by the underlying distribution of daily values, which is determined by the Long Term Average (LTA) associated with a particular Wasteload Allocation (WLA) and by the Coefficient of Variation (CV) of the effluent concentrations. Increasing or decreasing the monitoring frequency does not affect this underlying distribution or treatment performance, which should be, at a minimum, be targeted to comply with the values dictated by the WLA. Therefore, it is recommended that the actual planned frequency of monitoring normally be used to determine the value of "n" for calculating the AML. However, in situations where monitoring frequency is once per month or less, a higher value for "n" must be assumed for AML derivation purposes. Thus, the statistical procedure being employed using an assumed number of samples is "n = 4" at a minimum. For Total Ammonia as Nitrogen, "n = 30" is used.

WLA MODELING:

There are two general types of effluent limitations, technology-based effluent limits (TBELs) and water quality based effluent limits (WQBELs). If TBELs do not provide adequate protection for the receiving waters, then WQBEL must be used.

- A WLA study was either not submitted or determined not applicable by Department staff.

WATER QUALITY STANDARDS:

Per [10 CSR 20-7.031(4)], General Criteria shall be applicable to all waters of the state at all times including mixing zones. Additionally, [40 CFR 122.44(d)(1)] directs the Department to establish in each NPDES permit to include conditions to achieve water quality established under Section 303 of the Clean Water Act, including State narrative criteria for water quality.

WHOLE EFFLUENT TOXICITY (WET) TEST:

- The permittee is required to conduct WET test for this facility.

A WET test is a quantifiable method of determining if a discharge from a facility may be causing toxicity to aquatic life by itself, in combination with or through synergistic responses when mixed with receiving stream water.

Under the federal Clean Water Act (CWA) §101(a)(3), requiring WET testing is reasonably appropriate for site-specific Missouri State Operating Permits for discharges to waters of the state issued under the National Pollutant Discharge Elimination System (NPDES). WET testing is also required by 40 CFR 122.44(d)(1). WET testing ensures that the provisions in the 10 CSR 20-6.010(8)(A)7. and the Water Quality Standards 10 CSR 20-7.031(4)(D),(F),(G),(I)2.A & B are being met. Under [10 CSR 20-6.010(8)(A)4], the Department may require other terms and conditions that it deems necessary to assure compliance with the Clean Water Act and related regulations of the Missouri Clean Water Commission. In addition the following MCWL apply: §§§644.051.3 requires the Department to set permit conditions that comply with the MCWL and CWA; 644.051.4 specifically references toxicity as an item we must consider in writing permits (along with water quality-based effluent limits, pretreatment, etc...); and 644.051.5 is the basic authority to require testing conditions. WET test will be required by facilities meeting the following criteria:

- Facility is a designated Major.
- Facility continuously or routinely exceeds its design flow.
- Facility that exceeds its design population equivalent (PE) for BOD₅ whether or not its design flow is being exceeded.
- Facility (whether primarily domestic or industrial) that alters its production process throughout the year.
- Facility handles large quantities of toxic substances, or substances that are toxic in large amounts.
- Facility has Water Quality-based Effluent Limitations for toxic substances (other than NH₃)
- Facility is a municipality with a Design Flow \geq 22,500 gpd.
- Other – please justify.

40 CFR 122.41(M) - BYPASSES:

The federal Clean Water Act (CWA), Section 402 prohibits wastewater dischargers from "bypassing" untreated or partially treated sewage (wastewater) beyond the headworks. A bypass is defined as an intentional diversion of waste streams from any portion of a treatment facility, [40 CFR 122.41(m)(1)(i)]. Additionally, Missouri regulation 10 CSR 20-7.015(9)(G) states a bypass means the intentional diversion of waste streams from any portion of a treatment facility, except in the case of blending, to waters of the state. Only under exceptional and specified limitations do the federal regulations allow for a facility to bypass some or all of the flow from its treatment process. Bypasses are prohibited by the CWA unless a permittee can meet all of the criteria listed in 40 CFR 122.41(m)(4)(i)(A), (B), & (C). Any bypasses from this facility are subject to the reporting required in 40 CFR 122.41(l)(6) and per Missouri's Standard Conditions I, Section B, part 2.b. Additionally, Anticipated Bypasses include bypasses from peak flow basins or similar devices designed for peak wet weather flows.

- This facility does not anticipate bypassing. Although the facility does have a history of Sanitary Sewer Overflows prior to the headwork's these are being addressed through this permit in lieu of TMDL and a Consent Decree between The City of Lebanon and EPA. The facility does not anticipate bypassing within the treatment facility.

303(d) LIST & TOTAL MAXIMUM DAILY LOAD (TMDL):

Section 303(d) of the federal Clean Water Act requires that each state identify waters that are not meeting water quality standards and for which adequate water pollution controls have not been required. Water quality standards protect such beneficial uses of water as whole body contact (such as swimming), maintaining fish and other aquatic life, and providing drinking water for people, livestock and wildlife. The 303(d) list helps state and federal agencies keep track of waters that are impaired but not addressed by normal water pollution control programs.

A TMDL is a calculation of the maximum amount of a given pollutant that a body of water can absorb before its water quality is affected. If a water body is determined to be impaired as listed on the 303(d) list, then a watershed management plan will be developed that shall include the TMDL calculation

- This facility discharges to a stream with an EPA approved TMDL. The EPA has approved a Permit in Lieu of TMDL to address issues in the stream as the source of the impairment has been determined to be sanitary sewer overflows from the City of Lebanon's collections system.

DRAFT

Part VI – Effluent Limits Determination

APPLICABLE DESIGNATIONS OF WATERS OF THE STATE:

As per Missouri's Effluent Regulations [10 CSR 20-7.015], the waters of the state are divided into the below listed seven (7) categories. Each category lists effluent limitations for specific parameters, which are presented in each outfall's Effluent Limitation Table and further discussed in the Derivation & Discussion of Limits section.

<input type="checkbox"/> Missouri or Mississippi River [10 CSR 20-7.015(2)]	<input type="checkbox"/> Special Streams [10 CSR 20-7.015(6)]
<input type="checkbox"/> Lakes or Reservoirs [10 CSR 20-7.015(3)]	<input type="checkbox"/> Subsurface Waters [10 CSR 20-7.015(7)]
<input checked="" type="checkbox"/> Losing Streams [10 CSR 20-7.015(4)]	<input type="checkbox"/> All Other Waters [10 CSR 20-7.015(8)]
<input type="checkbox"/> Metropolitan No-Discharge Streams [10 CSR 20-7.015(5)]	

OUTFALL #001 – MAIN FACILITY OUTFALL

Effluent limitations derived and established in the below Effluent Limitations Table are based on current operations of the facility. Future permit action due to facility modification may contain new operating permit terms and conditions that supersede the terms and conditions, including effluent limitations, of this operating permit.

EFFLUENT LIMITATIONS TABLE:

PARAMETER	Unit	Basis for Limits	Daily Maximum	Weekly Average	Monthly Average	Previous Permit Limit	Sampling Frequency	Reporting Frequency	Sample Type ***
Flow	MGD	1	*		*	*/*	1/week-days	monthly	T
BOD ₅	mg/L	1		15	10	15/10	1/month	monthly	C
TSS	mg/L	1		20	15	20/15	1/month	monthly	C
<i>Escherichia coli</i> **	#/100mL	1, 3	126		*	126/126	1/week	monthly	G
Ammonia as N (Apr 1 – Sep 30)	mg/L	2, 3	4.0		1.5	3.1/1.6	2/week	monthly	G
Ammonia as N (Oct 1 – Mar 31)	mg/L	2, 3	10.3		2.9	7.5/3.7	2/week	monthly	G
Oil & Grease	mg/L	1, 3	*		*	15/10	1/month	monthly	G
Selenium, Total Recoverable	µg/L	2, 3	*		*	***	1/month	monthly	G
Bis (2-ethylhexyl phthalate)	µg/L	2, 3	19.1		6.3	14/5.9	1/month	monthly	G
Zinc, Total Recoverable	µg/L	2, 3	*		*	215/111	1/month	monthly	G
Copper, Total Recoverable	µg/L	1, 2	31.8		14.4	31.8/ 14.6	1/month	monthly	G
Total Nitrogen	mg/L	1	*		*	***	1/quarter	quarterly	G
Total Phosphorus	mg/L	1	*		*	***	1/quarter	quarterly	G
Acute Whole Effluent Toxicity	TUa	1, 9	*			Pass/ Fail	1/year	annually	C
Chronic Whole Effluent Toxicity	TUc	1, 9	*			***	1/year	annually	C
PARAMETER	Unit	Basis for Limits	Minimum		Maximum	Previous Permit Limit	Sampling Frequency	Reporting Frequency	Sample Type
pH	SU	1	6.0		9.0	6.5/9.0	1/month	monthly	G
PARAMETER	Unit	Basis for Limits	Daily Minimum		Monthly Avg Min	Previous Permit Limit	Sampling Frequency	Reporting Frequency	Sample Type
BOD ₅ Percent Removal	%	1			85	85	1/quarter	quarterly	M
TSS Percent Removal	%	1			85	85	1/quarter	quarterly	M

* - Monitoring requirement only.

** - No more than 10% of samples over the course of the calendar year shall exceed 126 #/100 mL daily maximum

*** - Parameter not previously established in previous state operating permit.

*** - C = 24-hour composite

G = Grab

T = 24-hr. total

E = 24-hr. estimate

M = Measured/calculated

Basis for Limitations Codes:

1. State or Federal Regulation/Law	5. Antidegradation Policy	9. WET Test Policy
2. Water Quality Standard (includes RPA)	6. Water Quality Model	10. Multiple Discharger Variance
3. Water Quality Based Effluent Limits	7. Best Professional Judgment	
4. Antidegradation Review	8. TMDL or Permit in lieu of TMDL	

OUTFALL #001 – DERIVATION AND DISCUSSION OF LIMITS:

- **Flow.** In accordance with [40 CFR Part 122.44(j)(1)(ii)] the volume of effluent discharged from each outfall is needed to assure compliance with permitted effluent limitations. If the permittee is unable to obtain effluent flow, then it is the responsibility of the permittee to inform the Department, which may require the submittal of an operating permit modification.
- **Biochemical Oxygen Demand (BOD₅).**

- Effluent limitations have been retained from previous state operating permit, please see the **APPLICABLE DESIGNATION OF WATERS OF THE STATE** sub-section of the Effluent Limits Determination.
- **Total Suspended Solids (TSS).**

- Effluent limitations have been retained from previous state operating permit, please see the **APPLICABLE DESIGNATION OF WATERS OF THE STATE** sub-section of the Effluent Limits Determination.
- ***Escherichia coli (E. coli).*** Discharges to losing streams shall not exceed 126 per 100 mL as a Daily Maximum at any time, as per 10 CSR 20-7.031(5)(C). Monitoring only for a monthly average. No more than 10% of samples over the course of the calendar year shall exceed 126 #'100 mL daily maximum as per 10 CSR 20-7.015(9)(B)1.G.
- **Total Ammonia Nitrogen.** Early Life Stages Present Total Ammonia Nitrogen criteria apply [10 CSR 20-7.031(5)(B)7.C. & Table B3]. Background total ammonia nitrogen = 0.01 mg/L.

Season	Temp (C)	pH (SU)	Total Ammonia Nitrogen CCC (mg/L)	Total Ammonia Nitrogen CMC (mg/L)
Summer	26	7.8	1.5	12.1
Winter	6	7.8	3.1	12.1

Summer: April 1 – September 30

Chronic WLA: $C_e = ((4.0 + 0.25)1.5 - (0.25 * 0.01))/4.0$
 $C_e = 1.59 \text{ mg/L}$

Acute WLA: $C_e = ((4.0 + 0.0025)12.1 - (0.0025 * 0.01))/4.0$
 $C_e = 12.1 \text{ mg/L}$

$LTA_c = 1.59 \text{ mg/L (0.767)} = 1.22 \text{ mg/L}$ [CV = 0.64, 99th Percentile, 30 day avg.]
 $LTA_a = 12.1 \text{ mg/L (0.304)} = 3.68 \text{ mg/L}$ [CV = 0.64, 99th Percentile]

Use most protective number of LTA_c or LTA_a.

MDL = 1.22 mg/L (3.29) = 4.0 mg/L [CV = 0.64, 99th Percentile]
 AML = 1.22 mg/L (1.20) = 1.5 mg/L [CV = 0.64, 95th Percentile, n = 30]

Winter: October 1 – March 31

Chronic WLA: $C_e = ((4.0 + 0.25)3.1 - (0.25 * 0.01))/4.0$
 $C_e = 3.29 \text{ mg/L}$

Acute WLA: $C_e = ((4.0 + 0.0025)12.1 - (0.0025 * 0.01))/4.0$
 $C_e = 12.11 \text{ mg/L}$

$LTA_c = 3.29 \text{ mg/L (0.687)} = 2.26 \text{ mg/L}$ [CV = 0.93, 99th Percentile, 30 day avg.]
 $LTA_a = 12.11 \text{ mg/L (0.219)} = 2.65 \text{ mg/L}$ [CV = 0.93, 99th Percentile]

Use most protective number of LTA_c or LTA_a.

MDL = 2.26 mg/L (4.57) = 10.3 mg/L [CV = 0.93, 99th Percentile]
 AML = 2.26 mg/L (1.30) = 2.9 mg/L [CV = 0.93, 95th Percentile, n = 30]

- **Oil & Grease.** A reasonable potential determination has been conducted for oil and grease. The previous five years of oil and grease levels have been reviewed. As a result it has been determined that this facility does not have a reasonable potential to cause and instream excursion from water quality standards for oil and grease. Limits have been replaced with monitoring only for this permit in order to determine the continuation of an absence of reasonable potential.
- **Total Phosphorus and Total Nitrogen.** Monitoring required for facilities greater than 100,000 gpd design flow per 10 CSR 20-7.015(9)(D)7. Total Nitrogen shall be determined by testing for Total Kjeldahl Nitrogen (TKN) and Nitrate + Nitrite and reporting the sum of the results (reported as N). Nitrate + Nitrite can be analyzed together or separately.
- **pH.** –6.0-9.0 SU. pH limitations [10 CSR 20-7.015] are protective of the water quality standard [10 CSR 20-7.031(5)(E)], due to the buffering capacity of the mixing zone.
- **Bis(2-ethylhexyl) phthalate.** Human Health and Fish Consumption CCC = 5.9 $\mu\text{g}/\text{L}$, CMC = N/A

Chronic WLA: $C_e = ((4.0 + 0.25) 5.9 - (0.25 * 0.0)) / 4.0$

$$C_e = 6.3$$

AML=WLA=6.3 $\mu\text{g}/\text{L}$

MDL = 6.3 (1.61) = 10.1 $\mu\text{g}/\text{L}$ [CV = 0.37, Maximum = 99th Percentile, Average = 95th Percentile, n = 4]

- **Biochemical Oxygen Demand (BOD₅) Percent Removal.** In accordance with 40 CFR Part 133.102(a)(3) & (b)(3), removal efficiency is a method by which the Federal Regulations define Secondary Treatment and Equivalent to Secondary Treatment, which applies to Biochemical Oxygen Demand 5-day (BOD₅) and Total Suspended Solids (TSS) for Publicly Owned Treatment Works (POTWs)/municipals. This facility is required to meet 85% removal efficiency for BOD₅.
- **Total Suspended Solids (TSS) Percent Removal.** In accordance with 40 CFR Part 133.105(a)(3) & (b)(3), removal efficiency is a method by which the Federal Regulations define Secondary Treatment and Equivalent to Secondary Treatment, which applies to Biochemical Oxygen Demand 5-day (BOD₅) and Total Suspended Solids (TSS) for Publicly Owned Treatment Works (POTWs)/municipals. This facility is required to meet 85% removal efficiency for TSS.

Metals

Effluent limitations for total recoverable metals were developed using methods and procedures outlined in the “Technical Support Document for Water Quality-based Toxic Controls” (EPA/505/2-90-001) and “The Metals Translator: Guidance For Calculating a Total Recoverable Permit Limit from a Dissolved Criterion” (EPA 823-B-96-007). General warm-water fishery criteria apply and a water hardness of 198 mg/L is used in the conversion below.

METAL	CONVERSION FACTORS	
	ACUTE	CHRONIC
Copper	0.81	0.81

Conversion factors for Copper are hardness dependent. Values calculated using equation found in Section 1.3 of EPA 823-B-96-007 and hardness = 198 mg/L.

- **Copper, Total Recoverable.** Protection of Aquatic Life Chronic Criteria = 16.1 $\mu\text{g}/\text{L}$, Acute Criteria = 25.6 $\mu\text{g}/\text{L}$.
Upstream concentration 2.5 $\mu\text{g}/\text{L}$

$$CMC = e^{(0.9422 * \ln(198) - 1.7003)} * 0.960 = 25.6 \mu\text{g}/\text{L}$$

$$CCC = e^{(0.8545 * \ln(198) - 1.702)} * 0.960 = 16.1 \mu\text{g}/\text{L}$$

In July 2010, Water Protection Program Staff reviewed and approved the copper translator report that Geosyntec Consultants prepared on behalf of the City of Lebanon Wastewater Treatment Plant. The report presented data for dissolved and total copper and water hardness that was collected from Dry Auglaize Creek 0.25 miles downstream of the facility's main outfall. The number and frequency of the samples are appropriate and conform to the quality assurance project plan (QAPP). The resultant site-specific translator [0.81 = Cu dissolved/Cu total as a geometric mean] is adequate and protective of water quality in Dry Auglaize Creek. The default translator that is found in state Water Quality Standards Regulations is 0.960.

$$\text{Chronic} = 16.1 / 0.81 = 19.8 \mu\text{g}/\text{L}$$

$$\text{Acute} = 25.6 / 0.81 = 31.57 \mu\text{g}/\text{L}$$

$$\text{Chronic WLA: } C_e = ((4.0 + 0.25) 19.8 - (0.25 * 0.0)) / 4.0$$

$$C_e = 21.05 \mu\text{g}/\text{L}$$

Acute WLA: $C_e = ((4.0 + 0.025) 31.57 - (0.025 * 0.0))/4.0$
 $C_e = 31.77 \mu\text{g/L}$

$LTA_c = 21.05 (0.161) = 3.38 \mu\text{g/L}$ [CV = 2.63, 99th Percentile]
 $LTA_a = 31.77 (0.099) = 3.1 \mu\text{g/L}$ [CV = 2.63, 99th Percentile]

Use most protective number of LTA_c or LTA_a .

$MDL = 3.1 (10.09) = 31.8 \mu\text{g/L}$ [CV = 2.63, 99th Percentile]
 $AML = 3.1 (3.15) = 9.9 \mu\text{g/L}$ [CV = 2.63, 95th Percentile, n = 58]

- **Zinc, Total Recoverable.** No reasonable potential to exceed water quality standards for Zinc has been determined. Monitoring only in this permit to determine no reasonable potential continues to exist.
- **Selenium, Total Recoverable.** The water quality standard to protect for the Aquatic Life designated use of the receiving stream is 5 $\mu\text{g/L}$. Review of the expanded effluent testing results submitted by the permittee show selenium levels of 16 $\mu\text{g/L}$, 20 $\mu\text{g/L}$ and 20 $\mu\text{g/L}$ observed. As these reported levels exceed the aquatic life criteria monitoring requirements have been included in this permit. At the time of the next permit renewal the reported selenium levels will be evaluated during which a reasonable potential analysis may be conducted with an adequate number of data points.

Whole Effluent Toxicity

- **Acute Whole Effluent Toxicity.** Monitoring requirement only. Monitoring is required to determine if reasonable potential exists for this facility's discharge to exceed water quality standards.

Acute and/or Chronic Allowable Effluent Concentrations (AECs) for facilities that discharge to Waters of the State lacking designated uses, Class C, Class P (with default Mixing Considerations), or Lakes [10 CSR 20-7.031(5)(A)4.B.(IV)(b)] are 100%, 50%, 25%, 12.5%, & 6.25%.

- **Chronic Whole Effluent Toxicity.** Monitoring requirement only. Monitoring is required to determine if reasonable potential exists for this facility's discharge to exceed water quality standards

Acute and/or Chronic Allowable Effluent Concentrations (AECs) for facilities that discharge to Waters of the State lacking designated uses, Class C, Class P (with default Mixing Considerations), or Lakes [10 CSR 20-7.031(5)(A)4.B.(IV)(b)] are 100%, 50%, 25%, 12.5%, & 6.25%.

Sampling Frequency Justification:

pH, BOD and TSS sampling frequencies have been changed to monthly to be reflective of consistent effluent quality and good compliance with these limits. Ammonia limits have been retained at twice week due to the recalculation of effluent limits, the twice per week frequency will allow for more adequate evaluation of the facilities compliance with the new limits. All other parameters have retained their previously established monitoring frequencies and have been determined to be sufficient. Weekly sampling is required for *E. coli*, per 10 CSR 20-7.015(9)(D)6.A

WET Test Sampling Frequency Justification. WET Testing schedules and intervals are established in accordance with the Department's Permit Manual; Section 5.2 *Effluent Limits / WET Testing for Compliance Bio-monitoring*. It is recommended that WET testing be conducted during the period of lowest stream flow.

Acute Whole Effluent Toxicity

- **No less than ONCE/YEAR:**

- Facility is designated as a Major facility or has a design flow $\geq 1.0 \text{ MGD}$.
- Facility incorporates a pretreatment program.
- Facility has Water Quality-based effluent limitations for toxic substances (other than NH_3).

Chronic Whole Effluent Toxicity

- **No less than ONCE/YEAR:**

- Facility incorporates a pretreatment program and dilution of the receiving stream is less than 100:1.

Sampling Type Justification:

As per 10 CSR 20-7.015, BOD₅, TSS, and WET test samples collected for mechanical plants shall be a 24 hour composite sample. Grab samples, however, must be collected for pH, Ammonia as N, *E. coli*, Oil & Grease, Total Recoverable Zinc, Total Recoverable Copper, Total Recoverable Selenium, Bis (2-ethylhexyl phthalate), Total Nitrogen and Total Phosphorus. This is due to the holding time restriction for *E. coli*, the volatility of Ammonia and the fact that pH cannot be preserved and must be sampled in the field. As Ammonia, Oil & Grease, Total Recoverable Zinc, Total Recoverable Copper, Total Recoverable Selenium Total Nitrogen and Total Phosphorus samples must be immediately preserved, these samples are to be collected as a grab.

PERMITTED FEATURE SM1 – INSTREAM MONITORING (UPSTREAM)

The monitoring requirements established in the below Monitoring Requirements Table are based on current operations of the facility. Future permit action due to facility modification may contain new operating permit terms and conditions that supersede the terms and conditions, including the monitoring requirements listed in this table..

MONITORING REQUIREMENTS TABLE:

PARAMETER	Unit	Basis for Limits	Daily Maximum	Weekly Average	Monthly Average	Previous Permit Limit	Sampling Frequency	Reporting Frequency	Sample Type ***
Total Nitrogen	mg/L	7	*		*	***	Quarter	quarterly	G
Total Phosphorus	mg/L	7	*		*	***	Quarter	quarterly	G
Ammonia as N	mg/L	8	*		*	*/*	Quarter	quarterly	G
Dissolved Oxygen	mg/L	8	*		*	*/*	Quarter	quarterly	G
pH	SU	8	*		*	*/r	Month	Monthly	G
Temperature	mg/L	8	*		*	*/*	Month	Monthly	G

* - Monitoring requirement only.

*** - Parameter not previously established in previous state operating permit.

**** - C = 24-hour composite

G = Grab

M = Measured /calculated

Basis for Limitations Codes:

1. State or Federal Regulation/Law	4. Antidegradation Review	7. Best Professional Judgment
2. Water Quality Standard (includes RPA)	5. Antidegradation Policy	8. TMDL or Permit in lieu of TMDL
3. Water Quality Based Effluent Limits	6. Water Quality Model	9. WET Test Policy

PERMITTED FEATURE SM1 – DERIVATION AND DISCUSSION OF MONITORING REQUIREMENTS:

- Total Phosphorus and Total Nitrogen.** Facilities with a design flow greater than 100,000 gallons per day are required to sample their effluent quarterly for Total Phosphorus and Total Nitrogen per 10 CSR 20-7.015(9)(D)7. Upstream monitoring for these parameters is necessary to determine background stream concentrations in order to complete calculations that determine instream nutrient loading.
- Ammonia as N, Dissolved Oxygen, pH, Temperature:** These parameters were included in the original Permit in Lieu of TMDL in order to monitor the water quality of the receiving stream upstream and downstream of the outfall. They are being continued in this permit

Sampling Frequency Justification:

The sampling and reporting frequency for Total Phosphorus and Total Nitrogen has been established to match the required sampling frequency of these parameters in the effluent.

Sampling Type Justification

As Total Phosphorus and Total Nitrogen samples must be immediately preserved; these samples are to be collected as a grab.

PERMITTED FEATURE SM2 – INSTREAM MONITORING (DOWNSTREAM)

The monitoring requirements established in the below Monitoring Requirements Table are based on current operations of the facility. Future permit action due to facility modification may contain new operating permit terms and conditions that supersede the terms and conditions, including the monitoring requirements listed in this table.

MONITORING REQUIREMENTS TABLE:

PARAMETER	Unit	Basis for Limits	Daily Maximum	Weekly Average	Monthly Average	Previous Permit Limit	Sampling Frequency	Reporting Frequency	Sample Type ****
Total Hardness	mg/L	1, 3	*		*	***	Quarter	quarterly	G
Ammonia as N	mg/L	8	*		*	*/*	Quarter	quarterly	G
Temperature	°C	8	*		*	*/*	Quarter	quarterly	G
Dissolved Oxygen	mg/L	8	*		*	*/*	Quarter	quarterly	G
pH	SU	8	*		*	*/*	Quarter	quarterly	G

* - Monitoring requirement only.

*** - Parameter not previously established in previous state operating permit.

**** - C = 24-hour composite

G = Grab

M = Measured /calculated

Basis for Limitations Codes:

1. State or Federal Regulation/Law	4. Antidegradation Review	7. Best Professional Judgment
2. Water Quality Standard (includes RPA)	5. Antidegradation Policy	8. TMDL or Permit in Lieu of TMDL
3. Water Quality Based Effluent Limits	6. Water Quality Model	9. WET Test Policy

PERMITTED FEATURE SM2 – DERIVATION AND DISCUSSION OF MONITORING REQUIREMENTS:

- **Total Hardness.** Monitoring only requirement as the metals parameters contained in the permit are hardness based. This data will be used in the next permit renewal.
- **Ammonia as N, Dissolved Oxygen, pH, Temperature:** These parameters were included in the original Permit in Lieu of TMDL in order to monitor the water quality of the receiving stream upstream and downstream of the outfall. They are being continued in this permit

Sampling Frequency Justification:

The sampling and reporting frequency for Total Hardness has been established to provide an adequate amount of data points to calculate hardness dependent effluent limits during the next renewal. Quarterly frequency will provide a seasonal variation and up to 25 data points during a five year permit cycle. Ammonia, temperature, dissolved oxygen, and pH have retained their sampling frequency from the previous permit as the previously established frequency provides adequate amount of data to identify stream conditions.

Sampling Type Justification:

As Total Hardness and Ammonia as N samples must be immediately preserved; these samples are to be collected as a grab. Grab samples shall be collected for Temperature, Dissolved Oxygen and pH as these cannot be preserved and must be sampled in the field

OUTFALL #001 – GENERAL CRITERIA CONSIDERATIONS:

In accordance with 40 CFR 122.44(d)(1), effluent limitations shall be placed into the permit for those pollutants which have been determined to cause, have the reasonable potential to cause, or contribute to an excursion above any State water quality standard, including State narrative criteria for water quality. The rule further states that pollutants which have been determined to cause, have the reasonable potential to cause, or contribute to an excursion above a narrative criterion within an applicable State water quality standard, the permit shall contain a numeric effluent limitation to protect that narrative criterion. In order to comply with this regulation, the permit writer will complete reasonable potential determinations on whether the discharge will violate any of the general criteria listed in 10 CSR 20-7.031(4). These specific requirements are listed below followed by derivation and discussion (the lettering matches that of the rule itself, under 10 CSR 20-7.031(4)). It should also be noted that Section 644.076.1, RSMo as well as Section D – Administrative Requirements of Standard Conditions Part I of this permit states that it shall be unlawful for any person to cause or permit any discharge of water contaminants from any water contaminant or point source located in Missouri that is in violation of sections 644.006 to 644.141 of the Missouri Clean Water Law or any standard, rule or regulation promulgated by the commission.

(A) Waters shall be free from substances in sufficient amounts to cause the formation of putrescent, unsightly or harmful bottom deposits or prevent full maintenance of beneficial uses. The discharge from this facility is made up of treated domestic wastewater. Based upon review of the recent Report of Compliance Inspection dated September 21-23, 2015, no evidence of an excursion of this criterion has been observed by the Department in the past and the facility has not disclosed any other information related to the characteristics of the discharge on their permit application which has the potential to cause or contribute to an excursion of this narrative criterion. Additionally, this facility utilizes secondary treatment technology and is currently in

compliance with effluent limitations that are more stringent than treatment technology based effluent limits established in 40 CFR 133 and there has been no indication to the Department that the stream has had issues maintaining beneficial uses as a result of this discharge. Based on the information reviewed during the drafting of this permit, these final effluent limitations appear to have protected against the excursion of this criterion in the past. Therefore, the discharge does not have the reasonable potential to cause or contribute to an excursion of this criterion.

- (B) Waters shall be free from oil, scum and floating debris in sufficient amounts to be unsightly or prevent full maintenance of beneficial uses. Please see (A) above as justification is the same.
- (C) Waters shall be free from substances in sufficient amounts to cause unsightly color or turbidity, offensive odor or prevent full maintenance of beneficial uses. Please see (A) above as justification is the same.
- (D) Waters shall be free from substances or conditions in sufficient amounts to result in toxicity to human, animal or aquatic life. This permit contains final effluent limitations which are protective of both acute and chronic toxicity for various pollutants that are either expected to be discharged by domestic wastewater facilities or that were disclosed by this facility on the application for permit coverage. Based on the information reviewed during the drafting of this permit, it has been determined if the facility meets final effluent limitations established in this permit, there is no reasonable potential for the discharge to cause an excursion of this criterion.
- (E) There shall be no significant human health hazard from incidental contact with the water. Please see (D) above as justification is the same.
- (F) There shall be no acute toxicity to livestock or wildlife watering. Please see (D) above as justification is the same.
- (G) Waters shall be free from physical, chemical or hydrologic changes that would impair the natural biological community. Please see (A) above as justification is the same.
- (H) Waters shall be free from used tires, car bodies, appliances, demolition debris, used vehicles or equipment and solid waste as defined in Missouri's Solid Waste Law, section 260.200, RSMo, except as the use of such materials is specifically permitted pursuant to section 260.200-260.247. The discharge from this facility is made up of treated domestic wastewater. No evidence of an excursion of this criterion has been observed by the Department in the past and the facility has not disclosed any other information related to the characteristics of the discharge on their permit application which has the potential to cause or contribute to an excursion of this narrative criterion. Additionally, any solid wastes received or produced at this facility are wholly contained in appropriate storage facilities, are not discharged, and are disposed of offsite. This discharge is subject to Standard Conditions Part III, which contains requirements for the management and disposal of sludge to prevent its discharge. Therefore, this discharge does not have reasonable potential to cause or contribute to an excursion of this criterion.

Part VII – Cost Analysis for Compliance

Pursuant to Section 644.145, RSMo, when issuing permits under this chapter that incorporate a new requirement for discharges from publicly owned combined or separate sanitary or storm sewer systems or publicly owned treatment works, or when enforcing provisions of this chapter or the Federal Water Pollution Control Act, 33 U.S.C. 1251 et seq., pertaining to any portion of a publicly owned combined or separate sanitary or storm sewer system or [publicly owned] treatment works, the Department of Natural Resources shall make a “finding of affordability” on the costs to be incurred and the impact of any rate changes on ratepayers upon which to base such permits and decisions, to the extent allowable under this chapter and the Federal Water Pollution Control Act. This process is completed through a cost analysis for compliance. Permits that do not include new requirements may be deemed affordable.

- The Department is required to determine “findings of affordability” because the permit applies to a combined or separate sanitary sewer system for a publicly-owned treatment works.

Cost Analysis for Compliance - The Department has made a reasonable search for empirical data indicating the permit is affordable. The search consisted of a review of Department records that might contain economic data on the community, a review of information provided by the applicant as part of the application, and public comments received in response to public notices of this draft permit. If the empirical cost data was used by the permit writer, this data may consist of median household income, any other ongoing projects that the Department has knowledge, and other demographic financial information that the community provided as contemplated by Section 644.145.3. See **Appendix – Cost Analysis for Compliance**

Part VIII – Administrative Requirements

On the basis of preliminary staff review and the application of applicable standards and regulations, the Department, as administrative agent for the Missouri Clean Water Commission, proposes to issue a permit(s) subject to certain effluent limitations, schedules, and special conditions contained herein and within the operating permit. The proposed determinations are tentative pending public comment.

PERMIT SYNCHRONIZATION:

The Department of Natural Resources is currently undergoing a synchronization process for operating permits. Permits are normally issued on a five-year term, but to achieve synchronization many permits will need to be issued for less than the full five years allowed by regulation. The intent is that all permits within a watershed will move through the Watershed Based Management (WBM) cycle together will all expire in the same fiscal year. This will allow further streamlining by placing multiple permits within a smaller geographic area on public notice simultaneously, thereby reducing repeated administrative efforts. This will also allow the Department to explore a watershed based permitting effort at some point in the future. Renewal applications must continue to be submitted within 180 days of expiration, however, in instances where effluent data from the previous renewal is less than 4 years old, that data may be re-submitted to meet the requirements of the renewal application. If the permit provides a schedule of compliance for meeting new water quality based effluent limits beyond the expiration date of the permit, the time remaining in the schedule of compliance will be allotted in the renewed permit. With permit synchronization, this permit will expire in the 4th Quarter of calendar year 2021.

PUBLIC NOTICE:

The Department shall give public notice that a draft permit has been prepared and its issuance is pending. Additionally, public notice will be issued if a public hearing is to be held because of a significant degree of interest in and water quality concerns related to a draft permit. No public notice is required when a request for a permit modification or termination is denied; however, the requester and permittee must be notified of the denial in writing. The Department must issue public notice of a pending operating permit or of a new or reissued statewide general permit. The public comment period is the length of time not less than 30 days following the date of the public notice which interested persons may submit written comments about the proposed permit. For persons wanting to submit comments regarding this proposed operating permit, then please refer to the Public Notice page located at the front of this draft operating permit. The Public Notice page gives direction on how and where to submit appropriate comments.

- The Public Notice period for this operating permit is tentatively scheduled to begin in March 2018 or is in process.

DATE OF FACT SHEET: 01/28/2018

COMPLETED BY:

**SHAWN MASSEY, ENVIRONMENTAL SPECIALIST
MISSOURI DEPARTMENT OF NATURAL RESOURCES
WATER PROTECTION PROGRAM
OPERATING PERMITS SECTION - DOMESTIC WASTEWATER UNIT
(573) 751-1399
Shawn.massey@dnr.mo.gov**

Appendices

APPENDIX - CLASSIFICATION WORKSHEET:

ITEM	POINTS POSSIBLE	POINTS ASSIGNED
Maximum Population Equivalent (P.E.) served (Max 10 pts.)	1 pt./10,000 PE or major fraction thereof.	2
Maximum: 10 pt Design Flow (avg. day) or peak month; use greater (Max 10 pts.)	1 pt. / MGD or major fraction thereof.	2
EFFLUENT DISCHARGE RECEIVING WATER SENSITIVITY		
Missouri or Mississippi River	0	
All other stream discharges except to losing streams and stream reaches supporting whole body contact	1	
Discharge to lake or reservoir outside of designated whole body contact recreational area	2	
Discharge to losing stream, or stream, lake or reservoir area supporting whole body contact recreation	3	3
PRELIMINARY TREATMENT - Headworks		
Screening and/or comminution	3	
Grit removal	3	3
Plant pumping of main flow (lift station at the headworks)	3	3
PRIMARY TREATMENT		
Primary clarifiers	5	
Combined sedimentation/digestion	5	5
Chemical addition (except chlorine, enzymes)	4	
REQUIRED LABORATORY CONTROL – performed by plant personnel (highest level only)		
Push – button or visual methods for simple test such as pH, Settleable solids	3	
Additional procedures such as DO, COD, BOD, titrations, solids, volatile content	5	
More advanced determinations such as BOD seeding procedures, fecal coliform, nutrients, total oils, phenols, etc.	7	7
Highly sophisticated instrumentation, such as atomic absorption and gas chromatograph	10	
ALTERNATIVE FATE OF EFFLUENT		
Direct reuse or recycle of effluent	6	
Land Disposal – low rate	3	
High rate	5	
Overland flow	4	
Total from page ONE (1)	----	25

APPENDIX - CLASSIFICATION WORKSHEET (CONTINUED):

ITEM	POINTS POSSIBLE	POINTS ASSIGNED
VARIATION IN RAW WASTE (highest level only) (DMR exceedances and Design Flow exceedances)		
Variation do not exceed those normally or typically expected	0	
Recurring deviations or excessive variations of 100 to 200 % in strength and/or flow	2	
Recurring deviations or excessive variations of more than 200 % in strength and/or flow	4	
Raw wastes subject to toxic waste discharge	6	6
SECONDARY TREATMENT		
Trickling filter and other fixed film media with secondary clarifiers	10	
Activated sludge with secondary clarifiers (including extended aeration and oxidation ditches)	15	15
Stabilization ponds without aeration	5	
Aerated lagoon	8	
Advanced Waste Treatment Polishing Pond	2	
Chemical/physical – without secondary	15	
Chemical/physical – following secondary	10	10
Biological or chemical/biological	12	
Carbon regeneration	4	
DISINFECTION		
Chlorination or comparable	5	
Dechlorination	2	
On-site generation of disinfectant (except UV light)	5	
UV light	4	4
SOLIDS HANDLING - SLUDGE		
Solids Handling Thickening	5	
Anaerobic digestion	10	
Aerobic digestion	6	
Evaporative sludge drying	2	
Mechanical dewatering	8	8
Solids reduction (incineration, wet oxidation)	12	
Land application	6	6
Total from page TWO (2)	---	49
Total from page ONE (1)	---	25
Grand Total	---	74

- A: 71 points and greater
- B: 51 points – 70 points
- C: 26 points – 50 points
- D: 0 points – 25 points

APPENDIX – RPA RESULTS:

Parameter	CMC*	RWC Acute*	CCC*	RWC Chronic*	n**	Range max/min	CV***	MF	RP Yes/No
Total Ammonia as Nitrogen (Summer) mg/L	12.1	6.63	1.5	6.24	28.00	3.1/0.24	0.64	2.14	YES
Total Ammonia as Nitrogen (Winter) mg/L	12.1	35.77	3.1	33.70	24.00	12/0.43	0.93	2.98	YES
Copper, Total Recoverable	31.6	456.53	19.8	432.53	58.00	160/2.9	2.6	2.87	YES
Bis(2-ethylhexyl) phthalate	NA	NA	5.9	14.9	58	17/0.5	0.4	0.877	YES

N/A – Not Applicable

* - Units are ($\mu\text{g}/\text{L}$) unless otherwise noted.

** - If the number of samples is 10 or greater, then the CV value must be used in the WQBEL for the applicable constituent. If the number of samples is < 10, then the default CV value must be used in the WQBEL for the applicable constituent.

*** - Coefficient of Variation (CV) is calculated by dividing the Standard Deviation of the sample set by the Mean of the same sample set.

RWC – Receiving Water Concentration. It is the concentration of a toxicant or the parameter toxicity in the receiving water after mixing (if applicable).

n – Is the number of samples.

MF – Multiplying Factor. 99% Confidence Level and 99% Probability Basis.

RP – Reasonable Potential. It is where an effluent is projected or calculated to cause an excursion above a water quality standard based on a number of factors including, as a minimum, the four factors listed in 40 CFR 122.44(d)(1)(ii).

Reasonable Potential Analysis is conducted as per (TSD, EPA/505/2-90-001, Section 3.3.2). A more detailed version including calculations of this RPA is available upon request.

APPENDIX – COST ANALYSIS FOR COMPLIANCE:

**Missouri Department of Natural Resources
Water Protection Program
Cost Analysis for Compliance
(In accordance with RSMo 644.145)**

**Lebanon WWTF, Permit Renewal
City of Lebanon
Missouri State Operating Permit #MO-0089010**

Section 644.145 RSMo requires the Department of Natural Resources (DNR) to make a “finding of affordability” when “issuing permits under” or “enforcing provisions of” state or federal clean water laws “pertaining to any portion of a combined or separate sanitary sewer system for publicly-owned treatment works.”

This cost analysis is based on data available to the Department as provided by the permittee and data obtained from readily available sources. For the most accurate analysis, it is essential that the permittee provides the Department with current information about the City’s financial and socioeconomic situation. The financial questionnaire available to permittees on the DNR website (<http://dnr.mo.gov/forms/780-2511-f.pdf>) should have been submitted with the permit renewal application. If it was not received with the renewal application, the Department sent a request to complete it with the welcome letter.

The Department is required to issue a permit with final effluent limits in accordance with 644.051.1.(1) RSMo, 644.051.1.(2) RSMo, and the Clean Water Act. The practical result of this analysis is to incorporate a compliance schedule into the permit in order to mitigate adverse impact to distressed populations resulting from new costs for the wastewater treatment facility.

Residential Connections:	5,323
Other (including industrial) Connections:	930
Total Connections for this facility:	6,253

New Permit Requirements:

The permit requires compliance with new monitoring requirements for Total Recoverable Selenium, Chronic WET testing, hardness monitoring, total nitrogen and total phosphorus. Acute WET testing has been decreased to annual frequency. Annual Chronic WET testing has been added. This permit also includes the addition of the requirement to develop a Storm Water Pollution Prevention Plan.

Anticipated Costs Associated with Complying with the New Requirements:

The following table outlines the estimated costs of the new permit requirements listed above:

New Requirement	Frequency	Estimated Cost	Estimated Annual Costs
Total Phosphorus sampling	Quarterly	\$24	\$96
Total Phosphorus sampling (instream)	Quarterly	\$24	\$96
Total Nitrogen sampling	Quarterly	\$73	\$292
Total Nitrogen sampling (instream)	Quarterly	\$73	\$292
Total Recoverable Selenium	Monthly	\$45	\$540
Hardness	Quarterly	\$47	\$188
Chronic WET test	Annual	\$1550	\$1550
SWPPP	Costs estimated for 5 years	\$10,000	\$2,000
		TOTAL	\$5,054

This estimated, annual cost, if financed through user fees, may cost each household an extra \$0.07¹ per month. A community sets their user rates based on several factors. The percentage of the current user rate that is available to cover new debt is unknown to the Department.

(1) A community’s financial capability and ability to raise or secure necessary funding;

The current monthly user rate is \$21.01. Due to the minimal cost associated with this new permit requirement, the Department anticipates the City of Lebanon has the means to raise \$5054 annually.

(2) Affordability of pollution control options for the individuals or households at or below the median household income level of the community;

Estimated Costs for New Permit Requirements:

Median Household Income (MHI) for the City of Lebanon:	<u>\$31,379</u>
Estimated total annual cost:	<u>\$5054</u>
Estimated monthly cost per household:	<u>\$0.07</u>
Estimated monthly cost per household as a percent of MHI ² :	<u>0.003%</u>
Estimated resulting user rate per household per month:	<u>\$21.08</u>
Estimated resulting user rate as a percent of MHI ³ :	<u>0.81%</u>

(3) An evaluation of the overall costs and environmental benefits of the control technologies;

Nutrient Monitoring

Nutrients are mineral compounds that are required for organisms to grow and thrive. Of the six (6) elemental macronutrients, Nitrogen and Phosphorus are generally not readily available and limit growth of organisms. Excess nitrogen and phosphorus will cause a shift in the ecosystem's food web. Once excess nitrogen and phosphorus are introduced into a waterbody, some species' populations will dramatically increase, while other populations will not be able to sustain life. Competition and productivity are two factors in which nutrients can alter aquatic ecosystems and the designated uses of a waterbody. For example, designated uses, such as drinking water sources and recreational uses become impaired when algal blooms take over a waterbody. These blooms can cause foul tastes and odors in the drinking water, unsightly appearance, and fish mortality in the waterbody. Some algae also produce toxins that may cause serious adverse health conditions such as liver damage, tumor promotion, paralysis, and kidney damage. The monitoring requirements for Nitrogen and Phosphorus have been added to the permit to provide data regarding the health of the receiving stream's aquatic life. A healthy ecosystem is beneficial as it provides reduced impacts on human and aquatic health as well as recreational opportunities.

Stormwater Pollution Prevention Plan

Stormwater runoff is water from rain or snowmelt that does not immediately infiltrate into the ground and flows over or through natural or man-made storage or conveyance systems. When undeveloped areas are converted to land uses with impervious surfaces such as buildings, parking lots, and roads, the natural hydrology of the land is altered and can result in increased surface runoff rates, volumes, and pollutant loads. Stormwater runoff picks up industrial pollutants and typically discharges them directly into nearby waterbodies or indirectly via storm sewer systems. Runoff from areas where industrial activities occur can contain toxic pollutants (e.g., heavy metals and organic chemicals) and other pollutants such as trash, debris, and oil and grease, when facility practices allow exposure of industrial materials to stormwater. This increased flow and pollutant load can impair waterbodies, degrade biological habitats, pollute drinking water sources, and cause flooding and hydrologic changes to the receiving water, such as channel erosion. Industrial facilities typically perform a portion of their activities in outdoor areas exposed to the elements. This may include activities such as material storage and handling, vehicle fueling and maintenance, shipping and receiving, and salt storage, all of which can result in pollutants being exposed to precipitation and capable of being carried off in stormwater runoff. Also, facilities may have performed industrial activities outdoors in the past and materials from those activities still remain exposed to precipitation. In addition, accidental spills and leaks, improper waste disposal, and illicit connections to storm sewers may also lead to exposure of pollutants to stormwater.

A SWPPP is a written document that identifies the industrial activities conducted at the site, including any structural control practices, which the industrial facility operator will implement to prevent pollutants from making their way into stormwater runoff. The SWPPP also must include descriptions of other relevant information, such as the physical features of the facility, and procedures for spill prevention, conducting inspections, and training of employees. The SWPPP is intended to be a "living" document, updated as necessary, such that when industrial activities or stormwater control practices are modified or replaced, the SWPPP is similarly revised to reflect these changes.

Whole Effluent Toxicity (WET) test

The WET Test is a quantifiable method of determining if discharge from a facility may be causing toxicity to aquatic life by itself or in combination with receiving stream water. WET tests are required under 10 CSR 20-6.010(8)(A)4 to be performed by specialists properly trained in conducting the test according to 40 CFR 136. This test will help ensure that the existing permit limits are providing adequate protection for aquatic life.

(4) Inclusion of ongoing costs of operating and maintaining the existing wastewater collection and treatment system, including payments on outstanding debts for wastewater collection and treatment systems when calculating projected rates:

The community did not provide the Department with information, nor could it be found through readily available data.

(5) An inclusion of ways to reduce economic impacts on distressed populations in the community, including but not limited to low and fixed income populations. This requirement includes but is not limited to:

- (a) Allowing adequate time in implementation schedules to mitigate potential adverse impacts on distressed populations resulting from the costs of the improvements and taking into consideration local community economic considerations.
- (b) Allowing for reasonable accommodations for regulated entities when inflexible standards and fines would impose a disproportionate financial hardship in light of the environmental benefits to be gained.

Socioeconomic Data⁴⁻¹²: The following table characterizes the current overall socioeconomic condition of the community as compared to the overall socioeconomic condition of the State of Missouri. The following information was compiled using the latest U.S. Census data.

Indicator No.	Select a Community, from the Dropdown List →	Lebanon City	Missouri State	United States
1	Population (2015)	14,637	6,045,448	316,515,021
2	Percent Change in Population (2000-2015)	20.4%	8.0%	12.5%
3	2015 Median Household Income (in 2016 Dollar)	\$31,379	\$48,582	\$54,569
4	Percent Change in Median Household Income (2000-2015)	-18.4%	-7.8%	-9.8%
5	Median Age (2015)	37.8	38.2	37.6
6	Change in Median Age in Years (2000-2015)	1.8	2.1	2.3
7	Unemployment Rate (2015)	9.9%	7.5%	8.3%
8	Percent of Population Below Poverty Level (2015)	25.6%	15.6%	15.5%
9	Percent of Household Received Food Stamps (2015)	21.9%	13.5%	13.2%
10	(Primary) County Where the Community Is Located	Laclede County		

(6) An assessment of other community investments and operating costs relating to environmental improvements and public health protection;

The community did not report any other investments relating to environmental improvements.

(7) An assessment of factors set forth in the United States Environmental Protection Agency's guidance, including but not limited to the "Combined Sewer Overflow Guidance for Financial Capability Assessment and Schedule Development" that may ease the cost burdens of implementing wet weather control plans, including but not limited to small system considerations, the attainability of water quality standards, and the development of wet weather standards;

The new sampling requirements associated with this permit will not impose a financial burden on the community, nor will the new requirements require the City of Lebanon to seek funding from an outside source.

(8) An assessment of any other relevant local community economic condition.

The community did not report any other relevant local economic conditions.

Conclusion and Finding

As a result of new regulations, the Department is proposing modifications to the current operating permit that may require the permittee to increase monitoring. The Department identified the actions for which cost analysis for compliance is required under Section 644.145 RSMo.

The Department estimates the cost for new monitoring requirements for Total Recoverable Selenium, Chronic WET testing, hardness monitoring, total nitrogen and total phosphorus. Increased Acute WET testing Annual Chronic WET and developing a Storm Water Pollution Prevention Plan is \$5,054 per year. Should these additional costs be financed through user fees, it may require an increase in user fees 0.003% of the community's MHI.

The Department considered the eight (8) criteria presented in subsection 644.145, RSMo when evaluating the cost associated with the relevant actions. Taking into consideration these criteria, this analysis examined whether the above referenced permit modifications affects the ability of an individual customer or household to pay a utility bill without undue hardship or unreasonable sacrifice in the essential lifestyle or spending patterns of the individual or household. As a result of reviewing the above criteria, the Department hereby finds that the action described above may result in a low burden with regard to the community's overall financial capability and a low financial impact for most individual customers/households; therefore, the new permit requirements are affordable.

References:

1. $((5054/6,253)/12 \text{ months}) = \0.07
2. $(0.07/(31,379/12))^*100\% = 0.003\%$
3. $(21.08/(31,379/12))^*100\% = 0.81\%$
4. U.S. Census Bureau. 2011-2015 American Community Survey 5-Year Estimates, Table B01003: Total Population - Universe: Total Population.
http://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_15_5YR_B01003&prodType=table.
5. U.S. Census Bureau (2002) 2000 Census of Population and Housing, Summary Social, Economic, and Housing Characteristics, PHC-1-1 Part 1. United States Summary, Table 1. Age and Sex: 2000, Washington, DC.
<https://www.census.gov/prod/cen2000/phc-1-1-pt1.pdf>. U.S. Census Bureau (2002) 2000 Census of Population and Housing, Summary Population and Housing Characteristics, PHC-1-27, Missouri, Table 2. Age and Sex: 2000, Washington, DC.
<http://www.census.gov/prod/cen2000/phc-2-27-pt1.pdf>.
6. U.S. Census Bureau. 2011-2015 American Community Survey 5-Year Estimates, Table B19013: Median Household Income in the Past 12 Months (in 2015 Inflation-Adjusted Dollars).
http://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_15_5YR_B19013&prodType=table.
7. U.S. Census Bureau (2003) 2000 Census of Population and Housing, Summary Social, Economic, and Housing Characteristics, PHC-2-1 Part 1. United States Summary, Table 5. Work Status and Income in 1999: 2000, Washington, DC.
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8. U.S. Department of Labor Bureau of Labor Statistics (2016) Consumer Price Index - All Urban Consumers, U.S. City Average, All items, 1982-84=100. http://data.bls.gov/timeseries/CUUR0000SA0?data_tool=Xgtable. U.S. Department of Labor Bureau of Labor Statistics (2016) Consumer Price Index - All Urban Consumers, All items, 1982-84=100, Midwest Urban Areas. http://data.bls.gov/timeseries/CUUR0300SA0?data_tool=Xgtable.
9. U.S. Census Bureau. 2011-2015 American Community Survey 5-Year Estimates, Table B01002: Median Age by Sex - Universe: Total population.
http://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_15_5YR_B01002&prodType=table.
10. U.S. Census Bureau (2002) 2000 Census of Population and Housing, Summary Social, Economic, and Housing Characteristics, PHC-1-1 Part 1. United States Summary, Table 1. Age and Sex: 2000, Washington, DC.
<https://www.census.gov/prod/cen2000/phc-1-1-pt1.pdf>. U.S. Census Bureau (2002) 2000 Census of Population and Housing, Summary Population and Housing Characteristics, PHC-1-27, Missouri, Table 2. Age and Sex: 2000, Washington, DC.
<http://www.census.gov/prod/cen2000/phc-2-27-pt1.pdf>.
11. U.S. Census Bureau. 2011-2015 American Community Survey 5-Year Estimates, B23025: Employment Status for the Population 16 Years and Over - Universe: Population 16 years and Over.
http://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_15_5YR_B23025&prodType=table.
12. U.S. Census Bureau. 2011-2015 American Community Survey 5-Year Estimates, Table B22003: Receipt of Food Stamps/SNAP in the Past 12 Months by Poverty Status in the Past 12 Months for Households - Universe: Households.
http://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_15_5YR_B22003&prodType=table.

