

File



1314 North 7th Street
Columbia, MO 65201
p: 573-443-2774
f: 573-499-0489
www.bcrsd.com

November 11, 2021

Scott Adams
Missouri Department of Natural Resources (MDNR)
Water Protection Program
P. O. Box 176
Jefferson City, MO 65102-0176
ATTN: NPDES Operating Permits/Permit Comments
And by e-mail

RE: Draft Missouri State Operating Permit MO-0126624 BCRSD Brookfield Estates WWTP

Dear Mr. Adams:

The Sewer District has the following comments on the above –referenced permit at this time:

CHLORIDE COMMENT

We appreciate the MDNR’s effort to issue this revised permit. However, we believe that the compliance schedule for chloride should remain in the permit unchanged until October 31, 2035. This effluent limitation for chloride will be difficult if not impossible to meet such that it may need to be extended beyond October 31, 2035. The primary reason is that the BCRSD knows of no technology available to remove chloride at the measured concentrations to the final effluent limitations. The BCRSD will continue to search for a process capable of removing chloride in wastewater and if found will incorporate into this WWTP upgrade.

***E. coli.* COMMENT**

The draft permit makes *E. coli* an effluent limitation. The existing permit lists *E. coli* as an effluent limitation on November 1, 2035 with a monthly average of 206 and a weekly average of 1,030 expressed as a geometric mean during the recreation season. The draft permit lists *E. coli* as an effluent limitation with a daily maximum of 126 and no more than 10% of samples over the course of a calendar year exceeding the 126 daily maximum. This limit is applicable year-round. What is the regulatory basis for this limit?

LOSING STREAM COMMENT

Further the permit states that the receiving stream has been designated as a losing stream. What methodology was used in for classifying this stream as a losing stream?

Due to the complexity of this permit and the other issues raised herein, we believe it would be beneficial to meet to discuss this permit before it is finalized. Please let us know when you are available to meet to discuss these issues. Thank you for the opportunity to comment. If you have any questions, please call me at 573-443-2765.

Sincerely,
BOONE COUNTY REGIONAL SEWER DISTRICT



Tom Ratermann
General Manager

- C: **File**
- Cailie Carlile, MDNR by e-mail only
 - Brant Farris, MDNR by e-mail only
 - Leasue Meyers, MDNR by e-mail only
 - Jesse Stephens, Crockett Engineering by e-mail only
 - Marti Rave, IUVO Constructum by e-mail only
 - Virgil Farnen, BCRSD by e-mail only
 - John Whiteside, BCRSD by e-mail only
 - Chris Pieper, BCRSD by e-mail only