



Missouri Department of dnr.mo.gov

NATURAL RESOURCES

Michael L. Parson, Governor

Dru Buntin, Director

April 27, 2022

CERTIFIED MAIL 7019 0700 0001 2840 9105

Mathis Mobile Home Park
1212 Saint Christopher Street
Columbia, MO 65203

RE: Mathis Mobile Home Park, MO-0099198, Operating Permit Renewal Application

Dear Permittee:

The Missouri Department of Natural Resources' Water Protection Program received an application for renewal of Missouri State Operating Permit MO-0099198 on October 27, 2014. The Department has become aware that the previous owner, Judith M. Richards, of the property located at 4700 North Kirsten Lane passed away. A note on the Certification of Death received by the Department indicates the property is now in the Judith M. Richards Family Trust. In order for the Department to be able to issue the permit in the Trust's name, we need proof of registration of the Trust as a valid legal entity. In Missouri, trusts are typically registered in the probate division of a county circuit court per Section 456.027, RSMo. Please provide proof of registration of the Trust.

Department's regulations require that each application for an operating permit shall identify the person, as that term is defined in Section 644.016(15), RSMo, that is the owner of, operator of, or area-wide management authority for a water contaminant source, point source, wastewater treatment facility, or sewer collection system. This person shall be designated as the continuing authority. The person designated as the continuing authority is responsible for compliance with all permit conditions.

Continuing authorities are listed in preferential order in the regulations, level one (1) through level five (5). A level three (3), four (4), or five (5) applicant may constitute a continuing authority by showing that a level one (1) or two (2) are not available; do not have jurisdiction; are forbidden by state statute or local ordinance from providing service to the person; or that it has met one of the requirements listed in 10 CSR 20-6.010(2)(C)1.-7.

The Boone County Regional Sewer District (BCRSD) and the city of Columbia jointly are the level 2 continuing authority in Boone County. The city of Columbia notified the Department that the Columbia sewer collection system is available for connection for your facility. If the



applicant wants to propose the use of a lower preference continuing authority (Judith M. Richards Family Trust, provided proof of registration is received by the Department) when the higher level authority (city of Columbia) is available, the applicant must submit to the Department by June 13, 2022, one of the following for the Department's review:

- A waiver from the city of Columbia;
- A written statement or a demonstration of non-response from the city of Columbia declining the offer to accept management of the additional wastewater;
- All parts of the legal boundary of the property to be connected are beyond two thousand feet (2000') from the collection system operated by the city of Columbia;
- The proposed connection or adoption charge by the city of Columbia would equal or exceed what is economically feasible for the applicant, which may be in the range of one hundred twenty percent (120%) of the applicant's cost for constructing or operating a wastewater treatment system;
- The proposed service fee on the users of the system by the city of Columbia that is above what is affordable for existing homeowners in that area;
- Terms for connection or adoption by the city of Columbia that would require more than two (2) years to achieve full sewer service; or
- A demonstration that the terms for connection or adoption by the City of Columbia are not viable or feasible to homeowners in the area.

When the Department receives the information from the applicant, the Department will then review the availability of the connection.

For permitted facilities where the Department agrees that the connection is available under the terms of the regulation, the permit application will be considered incomplete and the Department will deny the application. In addition, failure to submit a response by the deadline will result in the permit application being considered incomplete and the Department will deny the application.

If you would like information on possible funding options, please contact the Financial Assistance Center at 573-751-1192 or fac@dnr.mo.gov.

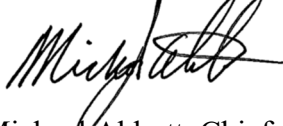
Please be aware the Department developed a new in-house Electronic Discharge Monitoring Report (eDMR) system to replace the third-party E2 eDMR system owned and maintained by EnfoTech. The new eDMR system utilizes the Missouri Gateway for Environmental Management (MoGEM) as the main login mechanism. MoGEM utilizes the U.S. Environmental Protection Agency's (EPA) Shared Cross-Media Electronic Reporting Rule (CROMERR) Services portal for registration and identity verification. Current users of eDMR are required to register as a new user through MoGEM before their next Discharge Monitoring Report is due. Paper applications are no longer utilized.

Additional information and links to the eDMR system may be found at:
<https://dnr.mo.gov/env/wpp/edmr.htm>. Those with questions and comments may email
edmr@dnr.mo.gov or call the eDMR Help Desk at 573-526-2082 or toll free 855-789-3889.

If you have any questions about this letter, the anticipated timing of the process, or would like to discuss the permit application, please feel free to contact Ashley Kneemueller by phone at 573-526-1503, email at ashley.kneemueller@dnr.mo.gov, or by mail at Department of Natural Resources, Water Protection Program, P.O. Box 176, Jefferson City, MO 65102-0176. Thank you.

Sincerely,

WATER PROTECTION PROGRAM



Michael Abbott, Chief
Operating Permits Section

MA:akp

c: Joe Clayton, Department of Natural Resources
Erin Keys, City of Columbia
Tom Ratermann, Boone County Regional Sewer District