



John B. Coffman  
Acting Public Counsel

State of Missouri

Bob Holden  
Governor

Office of the Public Counsel  
Governor Office Building  
200 Madison, Suite 650  
P.O. Box 7800  
Jefferson City, Missouri 65102

Telephone: 573-751-4857  
Facsimile: 573-751-5562  
Web: <http://www.mo-opc.org>  
Relay Missouri  
1-800-735-2966 TDD  
1-800-735-2466 Voice

June 7, 2002

Mr. Dale H. Roberts  
Secretary/Chief Regulatory Law Judge  
Public Service Commission  
P. O. Box 360  
Jefferson City, MO 65102

Re: **Case NO. WC-2002-155 (Consolidated with SC-2002-160)**

Dear Mr. Roberts:

Enclosed for filing in the above-referenced case please find the original and eight copies of **Motion to Reopen Case for the Taking of Additional Evidence**. Please "file" stamp the extra-enclosed copy and return it to this office.

Thank you for your attention to this matter.

Sincerely,

A handwritten signature in cursive script, appearing to read "M. Ruth O'Neill".

M. Ruth O'Neill  
Assistant Public Counsel

MRO:jb

cc: Counsel of Record



3) Both Mr. Mueller and Mr. Loethen testified at the evidentiary hearing, and Mr. Mueller gave testimony regarding the May 14 site inspection of the Company's sewer operations.

4) If Public Counsel had had access to this letter and attachments at the time of the hearing, this exhibit would have been offered into evidence at that time.

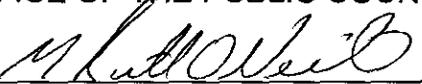
5) This proposed exhibit is relevant to the issues of fact regarding whether the Company is providing safe and adequate sewer service. The letter informs the Company that Missouri DNR has recommended to the Warren County Building Department that it "cease issuing building permits for new homes in Incline Village until the facilities are upgraded and can show compliance with Missouri Clean Water Law."

WHEREFORE, Public Counsel respectfully moves that the Commission allow the attached proposed late-filed exhibit into evidence in this case.

Respectfully submitted,

OFFICE OF THE PUBLIC COUNSEL

By:

  
M. Ruth O'Neill (#49456)  
Assistant Public Counsel  
P O Box 7800  
Jefferson City, MO 65102  
(573) 751-1304  
(573) 751-5562 FAX  
[roneill@ded.state.mo.us](mailto:roneill@ded.state.mo.us)

**CERTIFICATE OF SERVICE**

I hereby certify that copies of the foregoing have been mailed or hand-delivered to the following this 7<sup>th</sup> day of June 2002:

**GENERAL COUNSEL**  
Missouri Public Service Commission  
P O Box 360  
Jefferson City MO 65102

**PAUL S DEFORD**  
Lathrop & Gage  
2345 Grand Boulevard Suite 2500  
Kansas City MO 64108-2684

A handwritten signature in black ink, appearing to read "Paul S. DeFord", is written over a horizontal line.

**PROPOSED  
EXHIBIT  
WC-2002-155**



Bob Holden, Governor • Stephen M. Mahfood, Director

DEPARTMENT OF NATURAL RESOURCES

DIVISION OF ENVIRONMENTAL QUALITY

St. Louis Regional Office  
9200 Watson Road, Suite 201  
(314) 301-7600  
FAX (314) 301-7607

May 31, 2002

CERTIFIED MAIL #7001 0320 0003 6797 6221  
RETURN RECEIPT REQUESTED

Mr. Gary Smith  
Warren County Water & Sewer Company  
1248 Mimosa Court  
Foristell, MO 63348

Dear Mr. Smith:

On May 14, 2002, Mr. Paul Mueller, of this office, conducted an inspection of Warren County Water & Sewer Company's wastewater treatment facilities. At the time of the inspection Mr. Mueller observed violations of the Missouri Clean Water Laws and Regulations. A file review performed in conjunction with the inspection also found violations of Missouri Clean Water Law. Grab samples were collected of the effluent and the results in the enclosed reports show the effluent was not in compliance with the applicable limitations.

Notice of Violation (NOV) #1804 SL is hereby issued for the violations noted by Mr. Mueller in the enclosed report. Please take appropriate corrective action to insure protection of the waters of the state. Until these wastewater treatment plants can show compliance with the Missouri Clean Water Law and Regulations, the Department will cease to issue construction permits for wastewater main extensions. This office has also asked the Warren County Building Department to cease issuing building permits for new home construction in Incline Village until the facilities are upgraded and can show compliance with Missouri Clean Water Law.

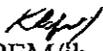
Please respond in writing by June 28, 2002, to Mr. Mueller with a copy of the response to Mr. Curtis Gateley at MO Department of Natural Resources, Water Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176. The response must outline actions taken to correct the violations.

Be advised that enforcement action has been requested from the Water Pollution Control Program's Enforcement Section, which may include assessment of a penalty to compel compliance.

Sincerely,

ST. LOUIS REGIONAL OFFICE

ORIGINAL SIGNED BY  
MOHAMAD ALHALABI, PE,  
Mohamad Alhalabi, P.E.  
Regional Director

  
MA/PEM/jh

Enclosures: Report, NOV, Lab reports

c: Vic Muschler, EPA-CID  
Curtis Gateley, WPCP  
Steve Loethen, Public Service Commission  
Ruth O'Neal, Office of Public Council  
Warren County Office of Environmental Sanitation  
Warren County Planing and Zoning  
Mr. Paul Jeannot  
Mike Dougherty, Alliance Water Resources  
Todd Thomas, Environmental Management Corporation

REPORT OF INSPECTIONS  
Warren County Water & Sewer Company  
Warren County, Missouri  
State Operating Permits MO-0098817 & MO-0100358

On May 14, 2002, Mr. Paul Mueller of the Department of Natural Resources and Steve Loethen of the Public Service Commission conducted inspections of the wastewater treatment facilities at Incline Village, which are owned and operated by Warren County Water & Sewer Company, Mr. Gary Smith, President. The findings of the inspections are listed below.

FINDINGS AND COMMENTS:

Plant #1 MO-0098817

The facility is being operated as an extended aeration treatment plant, which was originally designed as a contact stabilization plant. The treatment plant has a design flow of 40,000 gallons per day and a design population equivalent (PE) of 400.

1. This facility has a valid State Operating Permit, with an expiration date of January 27, 2005.
2. Warren County Water & Sewer Company has not paid the annual fees for 2000 & 2001 for Plant #1. Several certified letters have been sent to you requesting the payment of these fees. Failure to pay annual fees is a violation of Missouri Clean Water Law (Chap. 644, RSMO 1986 Sec. 644.052.1 & 644.076.1).

Two years of the \$3000 annual fees are due, plus penalties for a total owed of \$7320 for Permit #MO-0098817.

3. A review of the discharge monitoring reports (DMRs) submitted for the facility since January 2001 reveals that the facility exceeded the permit limits 11 times.

The permit limit of 30 mg/L for Biochemical Oxygen Demand (BOD) was exceeded with the following readings in January (63 mg/L), February (42 mg/L), April (76 mg/L), and July 2001 (36 mg/L), and in January 2002 (37 mg/L).

The permit limit of 30 mg/L for Total Suspended Solids (TSS or NFR) was exceeded with the following readings in January (59 mg/L), February (63 mg/L), April (114 mg/L), July (44 mg/L), and December 2001 (37 mg/L), and in January 2002 (61 mg/L).

Exceeding Warren County Water & Sewer Company's permit limits is a violation of Missouri Department of Natural Resources Regulation 10 CSR 10-7.015 "Effluent Regulations."

4. The effluent sample collected on the day of the inspection has been analyzed and a copy of the analytical report dated May 22, 2002, is enclosed.

The results in the enclosed report show the effluent was not in compliance with the applicable limitations specified in Clean Water Commission Regulation 10 CSR 20-7.015(8)(B)1 at the time of sampling. Specifically, the BOD was 46 mg/L, exceeding the monthly average limit of 30 mg/L by 53 percent and the Non-Filterable Residue (NFR or TSS) was 37 mg/L, exceeding the monthly average limit of 30 mg/L by 23 percent.

Previous samples collected by the Department in the last six months have also showed non-compliance. On January 22, 2002, a composite sample was collected and the BOD was 97 mg/L, exceeding the monthly average limit of 30 mg/L by 223 percent and the NFR was 84 mg/L, exceeding the monthly average limit of 30 mg/L by 180 percent. On October 15, 2001, a grab sample was collected and the BOD was 39 mg/L, exceeding the monthly average limit of 30 mg/L by 30 percent.

Discharging pollutants in amounts or concentrations exceeding those specified in the regulations is a violation of the Missouri Clean Water Law (Chap. 644, RSMO 1986 Sec. 644.051.1(3) & 644.076.1). Please take appropriate corrective action to insure protection of the waters of the state.

5. The DMRs do not indicate that all of the required operation testing is being performed.

Clean Water Commission Regulation 10 CSR 20-9.010(5)(B) requires that mechanical plants be monitored daily for the following: *Weather Conditions* - Ambient temperature and precipitation, *Flow* - Influent or Effluent, *pH* - Influent, *Dissolved Oxygen* - Mixed Liquor, and *Settleability* - Mixed Liquor. Also, once per week monitor the *Non-filterable Residue* - Influent and Mixed Liquor.

By conducting these operational parameter tests it will be easier to manage the treatment of wastewater in the facility.

6. Mr. Smith reported that there were more than 200 service connections on the Treatment Plant #1 collection system.

Clean Water Commission Regulation 10 CSR 20-8.020(11) establishes a population equivalent (PE) of 3.7 individuals per service connection for single family residences. Based on 200 service connections for Treatment Plant #1, the facility is treating wastewater for over 700 individuals. The facility is only designed for a PE of 400 and is therefore exceeding the design capacity by approximately 75 percent.

7. Sludge was observed below the outfall.

If the wastewater treatment plant is operated properly it should be retaining the sludge. The sludge could be being flushed out from high flows when lift stations are pumping to

the facility; the installation of a flow equalization tank may help to reduce the flushing of solids from the plant.

8. The bar screen in the aeration chamber was clogged with debris.

If the bar screen is not kept clean, the collection system effluent line could become clogged. If it is not, maintained large objects could pass by and cause problems in the plant.

9. Both air pumps were operational and their operation was alternated to provide equal usage.

10. ~~The first chamber of the aeration tanks did not have free flow to the other aeration chamber, resulting in too high of levels when lift stations pumped to the tank.~~

The wall between the two chambers should be enlarged to increase flow between the chambers.

11. The contents of the aeration chamber were gray with crisp white foam.

~~A light color to the aeration chamber is an indication of low biologic activity and could mean that the activated sludge was very young or that the sludge was not being properly wasted. Mr. Smith reported that he had recently had a septic hauler pump solids out of the plant; it is possible that too much solids were removed. Adjustments to the process must be made on the bases of the operational tests, which are not being properly conducted.~~

You may wish to contact the Missouri Rural Water Association at 573-474-6990 or the Department's Office of Environmental Assistance Office at 1-800-360-4827. These agencies have trained personnel that can give you technical assistance in the plant operation.

12. The clarifier was designed to have a mechanical moving sludge return; the mechanical sludge return has not operated for some time. Sludge is being removed by manually moving a plastic pipe along the bottom of the clarifier.

~~If the original sludge return is not going to be repaired it should be removed and a couple of stationary sludge lifts should be installed. The clarifier must be kept as still as possible to allow for the proper settling of sludge and the formation of a sludge blanket.~~

13. The facility does not have a sludge holding tank.

Successful operation of an activated sludge plant requires the proper solids concentration in the aerator. To maintain the proper concentration, the solids (sludge) need to be periodically wasted about five percent per week in the summer to a sludge holding tank.

14. The facility does not have a flow equalization tank.

Flow equalization can reduce the variations in organic and hydraulic loading at any wastewater treatment plant. It should be provided where large diurnal variations are expected.

15. No flow-measuring device was found at the facility.

State Regulation 10 CSR 20.8-140(8)(G) states: 'Flow measurement facilities shall be provided at all plants.'

Plant #2 MO-0100358

The facility is being operated as an extended aeration treatment plant, which was originally designed as a contact stabilization plant. A lift station at the head of the plant pumps wastewater to the head of the plant. The treatment plant has a design flow of 40,000 gallons per day and a design population equivalent of 400.

16. The State Operating Permit for this facility expired on March 30, 2000. The application for renewal of the permit was received, but because the yearly permit fees have not been paid the permit application is incomplete; the permit is being held pending the payment of fees.

~~Failure to submit a timely and complete application is a violation of Missouri Clean Water Law (Chapter 644 RSMo 1986) Section 644.051.9 and 644.076.1 and Missouri Clean Water Commission Regulation 10 CSR 20-6.010(5)(C).~~

~~The facility is therefore discharging to the waters of the state without a valid permit to discharge. Missouri Clean Water Law (Chapter 644 RSMo 1986) Section 644.051.2 and 644.076.1. Missouri Clean Water Commission Regulation 10 CSR 20-6.010(1)(A) & (5)(A) requires all facilities that are a water contaminant source to have a Missouri State Operating Permit.~~

17. Warren County Water & Sewer Company has not paid the annual fees for 2001 & 2002. Several certified letters have been sent to you requesting the payment of these fees. Failure to pay annual fees is a violation of Missouri Clean Water Law (Chap. 644, RSMO 1986 Sec. 644.052.1 & 644.076.1).

Two years of the \$3000 annual fees is due, plus penalties for a total owed of \$6960 for Permit #MO-0100358.

18. A review of the DMRs submitted for the facility, since January 2001, reveals that the facility exceeded the permit limits 12 times.

The permit limit of 20 mg/L for BOD was exceeded with the following readings in January (38 mg/L), April (56 mg/L), and November 2001 (39 mg/L), and in January 2002 (39 mg/L) and February 2002 (23 mg/L).

The permit limit of 20 mg/L for TSS was exceeded with the following readings in January (28 mg/L), April (135 mg/L), May (60 mg/L), July (58 mg/L), September (30 mg/L) and November 2001 (57 mg/L), and in January 2002 (40 mg/L).

19. The effluent sample collected on the day of the inspection has been analyzed and a copy of the analytical report dated May 22, 2002, is enclosed.

The results in the enclosed report show the effluent was not in compliance with the applicable limitations specified in Clean Water Commission Regulation 10 CSR 20-7.015(8)(B)1 at the time of sampling. Specifically, the BOD was 34 mg/L, exceeding the monthly average limit of 20 mg/L by 70 percent.

Previous samples collected by the Department have also showed non-compliance. On February 7, 2002 the BOD was 25 mg/L, exceeding the monthly average limit of 20 mg/L and the NFR was 27 mg/L, exceeding the monthly average limit of 20 mg/L.

Discharging pollutants in amounts or concentrations exceeding those specified in the regulations is a violation of the Missouri Clean Water Law (Chap. 644, RSMO 1986 Sec. 644.051.1(3) & 644.076.1). Please take appropriate corrective action to insure protection of the waters of the state.

20. The DMRs do not indicate that all of the required operation testing is being performed.

Clean Water Commission Regulation 10 CSR 20-9.010(5)(B) requires that mechanical plants be monitored daily for the following: *Weather Conditions* - Ambient temperature and precipitation, *Flow* - Influent or Effluent, *pH* - Influent, *Dissolved Oxygen* - Mixed Liquor, and *Settleability* - Mixed Liquor. Also, once per week monitor the *Non-filterable Residue* - Influent and Mixed Liquor.

By conducting these operational parameter tests it will be easier to manage the treatment of wastewater in the facility.

21. Clean Water Commission Regulation 10 CSR 20-8.020(11) establishes a population equivalent (PE) of 3.7 individuals per service connection for single family residences. Based on 170 service connections for Treatment Plant #2, the facility is treating wastewater for over 620 individuals. The facility is only designed for a PE of 400 and is exceeding the design capacity by approximately 55 percent.

22. Grease was observed floating in the lake below the outfall.

Wastewater plants should have baffles in place to prevent the discharge of grease and floating solids. Baffles should be inspected to insure proper function. A baffle could be added to the solids settling tank to aid in the retention of solids.

23. Only one blower motor was installed and operational at the facility.

Clean Water Commission Regulation 10 CSR 20-8.020(13) requires extended aeration treatment facilities to have duplicate blowers installed and operational. This deficiency was noted in the August 8, 2000 report; failure to maintain a wastewater treatment facility is a violation of Missouri Clean Water Law (Chap. 644, RSMO 1986 Sec. 644.051.1(3) & 644.076.1).

24. The contents of the aeration chamber were gray with crisp white foam.

A light color to the aeration chamber is an indication of low biologic activity and could mean that the activated sludge was very young or that the sludge was not being properly wasted. Mr. Smith reported that he had recently had a septic hauler pump solids out of the plant; it is possible that too much solids were removed. Adjustments to the process must be made on the bases of the operational tests, which are not being properly conducted.

25. The facility does not have a sludge holding tank.

Successful operation of an activated sludge plant requires the proper solids concentration in the aerator. To maintain the proper concentration, the solids (sludge) need to be periodically wasted about five percent per week in the summer to a sludge holding tank.

26. No flow-measuring device was found at the facility.

State Regulation 10 CSR 20.8-140(8)(G) states: 'Flow measurement facilities shall be provided at all plants.'

Plant #2 - Lift Station

27. The lift station did not have the proper alarm systems nor were emergency telephone numbers posted.

Clean Water Commission Regulation 10 CSR 20-8.020(11)(C)10. requires that the alarm system to be activated in cases of power failure, pump failure, or any cause of high water. Audio-visual alarms with self-contained power supply shall be provided as a minimum. Further, the regulation requires that a sign be posted that lists telephone numbers to call when the alarm is activated.

Shady Oaks Lift Station

28. Only one pump was operational at the lift station.

Missouri Clean Water Commission Regulation 10 CSR 20-8.130(4)(C) requires that two pumps be provided at lift stations.

29. The lift station did not have emergency telephone numbers posted.

Clean Water Commission Regulation 10 CSR 20-8.020(11)(C)10. requires that a sign be posted that lists telephone numbers to call when the alarm is activated.

30. The electrical conduit leading from the submersible pump to the control panel was separated.

This condition can lead to moisture and dirt getting to the electrical components, which can result in the deterioration and increased maintenance of the electrical system.

31. A 2" by 4" board was present against some of the piping in the lift station.

This indicates a problem with the piping. This temporary fix should be repaired properly to insure that a failure of the piping doesn't occur.

Boat Dock Lift Station

32. The lift station was equipped with two pumps that appeared to be working properly.

33. The lift station did not have emergency telephone numbers posted.

Clean Water Commission Regulation 10 CSR 20-8.020(11)(C)10. requires that a sign be posted that lists telephone numbers to call when the alarm is activated.

34. The electrical conduit leading from the submersible pump to the control panel was separated.

This condition can lead to moisture and dirt getting to the electrical components, which can result in the deterioration and increased maintenance of the electrical system.

Golf Course Lift Station

35. Not inspected

COMPLIANCE REQUIREMENTS:

1. **Immediately** pay fees and penalties owed. Currently the amount due is \$14,280, but the penalties increase monthly for the current fees. With penalties owed contact Ms. Sheila Lage at 573-751-2386.
2. **By June 28, 2002**, replace the missing blower at Plant #2 and keep two blowers operational at the facility.
3. **By June 28, 2002**, replace the missing pump at the Shady Oaks Lift Station and keep two pumps operational at the facility.
4. **By June 28, 2002**, have working alarms at all lift stations.
5. At the Shady Oaks Lift Station make necessary permanent repairs so that a 2 x 4 board is not needed to support the piping.
6. Repair electrical conduits at the lift station to ensure the electrical components are weatherproof.

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7. Post emergency contact phone numbers at all lift stations.
8. Operate the wastewater treatment plants to prevent the discharge of solids and floating grease.
9. Conduct the required operation parameters and submit the results with Warren County Water & Sewer Company's DMRs.
10. Keep the bar screen in Plant #1 clean.
11. Increase the flow between the first aeration tank and the main aeration tank in the treatment plants.

12. Repair the airlifts in clarifiers at both plants.
13. Post emergency contact phone numbers at all lift stations.

Initiate plans to upgrade the facilities:

Please note that these facilities discharge to a full body contact lake and Missouri Clean Water Commission Regulation 10 CSR 20-7.010(3) requires that such discharges meet BOD and NFR limits of 20 mg/L and fecal limits, which requires disinfection. Any upgrades to the facilities will be required to meet these limits.

14. **By October 1, 2002**, submit to this office a preliminary engineering report for the expansion of the wastewater treatment system. The report should incorporate at a minimum increased capacity, flow measurement, sludge holding, disinfection and flow equalization.
15. **By January 1, 2003**, submit an application for a construction permit, with the appropriate application fee to this office. The application must be accompanied with plans and specification certified by an engineer registered in the State of Missouri.
16. **Within one year**, after the construction permit is issued, have completed the upgrades of the wastewater collection and treatment systems.

INSPECTED BY:

  
Paul E. Mueller  
Environmental Specialist  
St. Louis Regional Office

APPROVED BY:

  
Kurt Riebeling  
Water Section Chief  
St. Louis Regional Office

PEM/KR/jh



MISSOURI DEPARTMENT OF NATURAL RESOURCES  
 DIVISION OF ENVIRONMENTAL QUALITY  
**NOTICE OF VIOLATION**

P.O. BOX 176  
 JEFFERSON CITY MO 65102

VIOLATION NUMBER	
NO.	1804 SL

DATE AND TIME ISSUED: May 31, 2002  AM  PM

SOURCE (NAME, ADDRESS, PERMIT NUMBER, LOCATION)  
Warren County Water & Sewer  
1248 Mimosa Court  
Foristell, MO 63348  
#MO-0098817 & MO-0100358

MAILING ADDRESS <u>Same as above</u>	CITY	STATE	ZIP CODE
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NAME OF OWNER OR MANAGER <u>Mr. Gary Smith</u>	TITLE OF OWNER OR MANAGER
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LAW, REGULATION OR PERMIT VIOLATED  
Missouri Clean Water Law (Chap. 644, RSMo 1986, Sec 644.051.1(3),  
644.051.9, 644.052.1 & 644.076.1).  
Clean Water Commission Regulations 10 CSR 10-7.015, 10 CSR 20-8.020(11)(C)10,  
10 CSR 20-8.130(4)(C), and 10 CSR 20-9.010(5)(B)&(C).

NATURE OF VIOLATION	DATE(S):	TIME(S):
<u>Failed to pay permit fees.</u>		
<u>Exceeding permit discharge limits.</u>		
<u>Failed to submit a complete Operating Permit application.</u>		
<u>Discharging without a valid permit.</u>		
<u>Failed to have duplicate pumps and alarm at lift stations.</u>		
<u>Failed to maintain wastewater treatment facilities.</u>		

SIGNATURE (PERSON RECEIVING NOTICE) <u>By Certified Mail</u>	SIGNATURE (PERSON ISSUING NOTICE)  Paul E. Mueller
TITLE OR POSITION	TITLE OR POSITION <u>Environmental Specialist/SLRO-CRSO</u>

STATE OF MISSOURI  
DEPARTMENT OF NATURAL RESOURCES

Bob Holden, Governor • Stephen M. Mahfood, Director

ENVIRONMENTAL SERVICES PROGRAM

RESULTS OF SAMPLE ANALYSES

MAY 24 2002

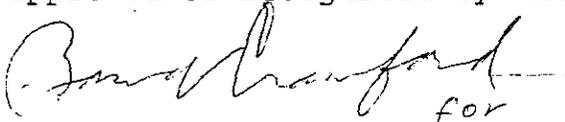
Sample Number: 0212960  
Lab Number: 02-D1359

Reported To: PAUL E MUELLER  
Affiliation: SLRO  
LDPR/Job-Project: QEINS/  
Report Date: 5/22/02  
Date Collected: 5/14/02  
Date Received: 5/14/02

Sample Collected by: PAUL E MUELLER, SLRO  
Facility Identification: MO0098817  
Sampling Location: WARREN COUNTY WATER & SEWER  
Sample Description: GRAB SAMPLE, OUTFALL, PLANT #1  
County: WARREN

Analysis Performed	Results	Analyzed	Method
Non-Filterable Residue	46 mg/L	5/20/02	160.2
Biochemical Oxygen Demand	37 mg/L	5/20/02	405.1

The analysis of this sample was performed in accordance with procedures approved or recognized by the U.S. Environmental Protection Agency.

  
for

Earl Pabst, Program Director  
Environmental Services Program  
Air and Land Protection Division

c: CURTIS GATELEY, WPC

STATE OF MISSOURI  
DEPARTMENT OF NATURAL RESOURCES

Bob Holden, Governor • Stephen M. Mahfood, Director

ENVIRONMENTAL SERVICES PROGRAM

RESULTS OF SAMPLE ANALYSES

Sample Number: 0212961  
Lab Number: 02-D1360

Reported To: PAUL E MUELLER  
Affiliation: SLRO  
LDPR/Job-Project: QEINS/  
Report Date: 5/22/02  
Date Collected: 5/14/02  
Date Received: 5/14/02

Sample Collected by: PAUL E MUELLER, SLRO  
Facility Identification: MO0100358  
Sampling Location: WARREN COUNTY WATER & SEWER  
Sample Description: GRAB SAMPLE, OUTFALL, PLANT #2  
County: WARREN

Analysis Performed	Results	Analyzed	Method
Non-Filterable Residue	19 mg/L	5/20/02	160.2
Biochemical Oxygen Demand	34 mg/L	5/20/02	405.1

The analysis of this sample was performed in accordance with procedures approved or recognized by the U.S. Environmental Protection Agency.

*Earl Pabst*  
for

Earl Pabst, Program Director  
Environmental Services Program  
Air and Land Protection Division

c: CURTIS GATELEY, WPC