

MEMORANDUM

From: Steve Loethen
Missouri Public Service Commission
Water and Sewer Department

Date: September 30, 2008

Regarding: NOV letter to Mill Creek Sewer (Case No. SR-2005-0116)

On September 10, 2008, I visited Mill Creek waste water treatment plant with Tim Allgier from TAC, the contract operator for Mill Creek Sewer. The purpose of my visit was to investigate an NOV that was issued by the DNR St. Louis regional office resulting from an inspection performed on July 29, 2008. I will address the Recommendations and Requirements line items as numbered in the NOV letter attached.

1. By September 20, 2008, complete and return the enclosed operation permit renewal forms to the St. Louis Office.

Tim Allgier stated that he filled out the operation permit renewal form, had Joe Afshari sign it and sent it to DNR. I contacted Andy Applebaum with DNR and he stated that he did receive the renewal form.

2. As soon as possible, contact Catherine Engelmeyer of the Water Pollution Branch-Fiscal management Unit at 573-751-6723, regarding the payment fees.

When I called DNR on this issue I was put in contact with Sherry Belle and she stated Mill Creek has sent in \$3000 which was used for past due fees. The Company still owes \$2650; \$2500 for the permit renewal and \$150 for late fees.

3. As soon as possible, lower the sludge blanket in the clarifier by diverting sludge into the sludge holding tank and lower the percentage of solids in the aeration chamber's mixed liquor, as necessary.

The sludge blanket was within normal operating levels at the time of my investigation.

4. Unclog the partially clogged skimmer pipe and readjust its intake height in the clarifier if necessary.

It is common to have a skimmer clogged which is a reason for an operator to visit the plant periodically, to fix these things. The skimmer was working properly during my investigation.

5. Remove the plants from the treatment facility structures and clean the components as necessary.

Plants commonly grow in and around treatment plants and should be controlled. I did not see any excessive plant growth during my investigation.

6. Take the appropriate measures to anchor the lower sections of the enclosure fence so that unauthorized persons cannot enter the premises via those points.

I saw a few places that had a little damage that were fixed by TAC. I saw no place in which an unauthorized person could gain entry. The fence was in very good condition at the time of my investigation.

7. By September 30, 2008, re-install the downed warning signs on the enclosure fence or other appropriate points and install other, new appropriately worded signs, as discussed above, to ensure that they are placed so as to be viewed from all directions of approach. A sign needs to be installed on the enclosure fence gate as well.

There were adequate signs on the enclosure at the time of my investigation.

8. By September 30, 2008, tighten and re-attach, as necessary, the loose barbed wire strands atop the facility's enclosure fence.

The barbed wire strands were reattached at the time of my investigation.

9. By September 30, 2008, post a sign, as discussed above, at or very near outfall #2 identifying its location.

There was a sign identifying the outfall location at the time of my investigation.

10. Take the appropriate measures to eliminate or control the burrowing animals under the treatment plant's concrete pad and fill in the burrows.

The holes were filled in and had already been re-dug by the burrowing animals at the time of my investigation. Mr. Allgier stated that he will keep working on this issue and has contacted the Conservation Department on how to control them. I have dealt with burrowing animals around treatment facilities when I was an operator and they are hard to control. I gave Mr. Allgier some tips on trapping and other methods of control that I found effective.

Conclusion: Most of items 3-10 are operational issues and are not DNR violations. They are common problems that are addressed during regular visits to the facilities. I visit the plant several times a year and it has generally always looked good under the operations of TAC.

The major issue that needs to be addressed is that the Company still owes DNR permitting fees of \$2650 and should pay that as soon as possible or be subject to more late fees.