

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

Jeremiah W. (Jay) Nixon, Governor • Sara Parker Patley, Director

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FILED

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Mr. August Hoernschemeyer, President
Peaceful Valley Service Co.
3408-B Peaceful Valley Road
Owensville, MO 65066

Missouri Public
Service Commission

RE: Upgrades to Peaceful Valley Lake Estates Wastewater Treatment Facility (MO-0041467)

Dear Mr. Hoernschemeyer:

The Missouri Department of Natural Resources has received a copy of your October 28, 2013 letter to Senator Roy Blunt regarding anticipated upgrades to the Peaceful Valley Lake Estates Wastewater Treatment Facility (MO-0041467). The Department understands your concerns and would like to offer the following to assist you with meeting these requirements.

The challenge of meeting new water quality regulations is not unique to the Peaceful Valley Lake Estates facility. Public and private facilities statewide must parse out scarce resources to address aging, outdated infrastructure and to meet new water quality regulations and requirements. The Department is committed to ensuring these communities and entities are provided sufficient time and opportunity to address compliance with the regulations and their wastewater treatment needs. The removal of ammonia and bacteria from wastewater treatment plant effluent is a requirement of the federal Clean Water Act to ensure compliance with water quality standards and protection downstream aquatic habitat and recreational uses. The requirements of federal and state clean water law are in place to serve the purpose of protecting the quality of Missouri's water for current and future generations. Many other facilities are in the same situation and the Department understands that the expense of meeting regulations and requirements can impose a burden, especially on a small facility.

In May of 2012, the Department completed a survey of the receiving stream that Peaceful Valley Lake Estates Wastewater Treatment Facility discharges to. The report of observations at the outfall state the stream has a strong sulfur odor with sludge deposits and a benthic algae density of greater than 75%. The analysis states that the stream contained thick sludge, a poor invertebrate community, and sphaerotilis (bacteria associated with sewage). The lagoon received little to no aeration and was 100% covered with duckweed as well as had duckweed present in the stream at the outfall. A survey was also conducted 0.1 mile downstream of the outfall. The analysis from this survey states that sludge was still present from the outfall and the stream contains a poor invertebrate community.



Exhibit No. 8
Date 9/23/14 Reporter R. Brewster
File No. SR-2014-0153
WR-2014-0154

Mr. August Hoernschemeyer
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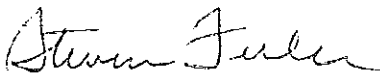
The recently public noticed renewal is yet to be issued and currently has a 3 year schedule to comply with ammonia requirements. If the facility wishes to provide the Department with additional information to justify a longer schedule of compliance for the new permit requirements, staff can review such a request. This should include information such as the median household income of the property owners association, the estimated resulting user rate of future upgrades, outstanding debt the owners association, and provide a list of any major infrastructure or other investments related to environmental projects. If the Department concurs that additional time is allowable under the regulation, the permit could be modified as such, prior to being issued. It is important that this information be provided as soon as possible due to the fact that the permit is currently expired and the renewal has been through the public notice process.

It is important to note that the average lifespan of a wastewater treatment device in Missouri, from an engineering standpoint is commonly 20-30 years. Additionally the Department notes that the facility consistently exceeds its daily design flow by 8,000 gallons per day. Given the facility is roughly 50 years old, undersized for the daily average flow, and unable to comply with the current regulation for ammonia, an upgrade does appear to be necessary.

The Department's Water Protection Program staff will work with your community to develop schedules of compliance that will ensure that the facility will comply with new regulations and requirements are reasonable and achievable. If you have questions or wish to provide additional information, please feel free to contact Ms. Lacey Hirschvogel of my staff at (573) 751-9391, by e-mail at Lacey.Hirschvogel@dnr.mo.gov; or by mail at P.O. Box 176, Jefferson City, MO 65102-0176.

Sincerely,

DIVISION OF ENVIRONMENTAL QUALITY



for Leanne Tippett Mosby
Director

LTM:cwj

c: The Honorable Roy Blunt, Senator
St. Louis Regional Office