

Construction & Operating Permit Rule (10 CSR 20-6.010)

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10 CSR 20-6.010

- (1) General
- (2) Continuing Authority
- (3) Antidegradation
- (4) Construction Permits
- (5) Supervised Authority
- (6) Operating Permits
- (7) Terms & Conditions
- (8) Prohibitions
- (9) Renewal & Expiration
- (10) Permit Transferable
- (11) Closure
- (12) Reserved
- (13) General Operating Permits
- (14) Variances

(1) Permits-General

- Cost of Compliance
 - Required under RSMO 644.145.2 the adoption of procedures
- Integrated Planning
 - Language being updated to allow additional flexibility and not as prescriptive
- Electronic Reporting
 - Electronic submittal of DMRs, permit applications, compliance reports, annual reports, operational monitoring, etc.

(2) Continuing Authority

- Addition of not for profits (393s)
- Definition of Availability
 - Waiver from higher level
 - Cost of Connection > 120% Cost to upgrade
 - Distance (>2,000')
- How to obtain Level 2 Authority from CWC
 - Capital Improvements Plan
 - Public Hearing held by the utility
 - Public notice the request

(3) Antidegradation

- Application requirements
 - Geohydrological Evaluation for new dischargers
 - Evaluation of no-discharge systems
 - Significant degradation: submit social economic conditions discussion
 - Appeal preliminary determination

(4) Facility Plans and Eng. Reports

- Antidegradation Review
- No discharge feasibility assessment
- Economic evaluation including alternatives analysis (e.g. subsurface application, or connect to regional authority)

(5) Construction Permits

- Complete Application
 - Electronic submittal + 1 paper copy
- H.B. 92 and other exemptions from Construction Permitting
- [Small] Pilot Projects
- Sewer Extension General Permit
 - MOGC has been in effect since April 2015

<http://dnr.mo.gov/env/wpp/permits/issued/docs/GC00000.pdf>

(5) Construction Permits (con't)

- Default 2 year Construction Permits
- Statement of Work Completed
 - Removal of Letters of Approval
 - SOWC form,
<http://dnr.mo.gov/forms/780-2155-f.pdf>

Proposed Construction Permit Applicability

These facilities need to get a construction permit, unless exempted or waived:

- All domestic wastewater (both private and POTW)
- All surface, subsurface wastewater irrigation
- All State Revolving Fund projects
- All nondomestic discharges
- All modifications except minor modifications (defined later)
- All new and innovative technologies
- All required by department
 - Enforcement action
 - Other programs

Proposed Construction Permit Exemptions

- The following activities are exempt from Construction Permitting; however the activities must still follow appropriate standards in 10 CSR 20-4 through 10 CSR 20-8:
 - Sludge drying equipment
 - Stormwater
 - Pretreatment facilities connecting to a POTW
 - “Like for like” replacement
 - Aeration equipment (such as from coarse bubble to fine bubble)
 - Outfall relocation at an existing facility

Proposed Construction Permit Exemptions

- Technologies evaluated by other programs, ie:
 - Landfill leachate treatment systems and stormwater retention ponds for Solid Waste Management Program
 - Air Strippers or technologies evaluated as part of corrective action under Hazardous Waste Programs
- Dechlorination
 - For facilities that have already constructed a chlorination system but did not construct a dechlorination unit until faced with Total Residual Chlorine effluent limits
 - Usually small facilities installing a tablet feeder

Proposed Construction Permit Exemptions

- Minor Modifications: Modifications that may change equipment or operations, but does not affect capacity and may improve treatment
 - Internal piping changes
 - pH adjustment
 - Addition of storage tanks
 - Headworks & grit removal equipment
 - Administrative buildings
 - Fences & Access Roads
 - Flow measuring devices, both cleaning and installation
 - Electrical/Control System Installation or Changes
 - Mixing Equipment

Proposed Construction Permit Application

- 10 CSR 20-6.010(4)(D) Clean-up and Expansion to meet the requirements in 10 CSR 20-8
 - Fee
 - Signed forms from Engineer & Continuing Authority
 - Antidegradation
 - Facility Plan/Engineering Report
 - Summary of Design
 - Geohydrological Evaluation
 - Plans and Specifications
 - Process flow diagrams or schematic
 - Map

(6) Supervised Authority

- Sewer Extension Authority established in existing rule
 - 9 existing communities
- Treatment Plant Authority established by statute
- Reevaluate Authority at Operating Permit Renewal every 5 years
- Details what needs submitted for a new program and what needs at the renewal
- Webpage: <http://dnr.mo.gov/env/wpp/permits/sewer-extension.htm>

(7-11) Operating Permits

- Details what is a complete application
- Corrects conflict between statute and existing rule for general permits
- Update connection language to match operating permits and references back to Continuing Authority
- For long expired operating permits, ability to request an updated application and sampling data
- Transferring permits added language from federal rules for expired permits

(12) Closure of Treatment Facilities

- Lagoon & Mechanical Closure
- Closure Plan required to be submitted & approved before closing
- Plans need to include discussion of: sludge removal, concrete removal, site grading and vegetative cover

Questions