



City Council Meeting Agenda
Monday, May 4, 2026 – 6:30 p.m.
City Hall, 200 South Osage, Sedalia MO

MAYOR: TRAVES WILLIAMS

MAYOR PRO-TEM: TINA BOGGESS

- A. CALL TO ORDER** – Mayor Williams – Council Chambers
- B. LEGISLATIVE PRAYER & PLEDGE OF ALLEGIANCE**
- C. ROLL CALL**
- D. SERVICE AWARDS**
 - 1. Cherie Frederickson – Sanitation – Administrative Assistant – 40 Years of Service
 - 2. David Purl – WPC – Utility Operator I – 5 Years of Service
- E. RETIREMENT AWARDS**
 - 1. Traves Williams – Mowing – Equipment Op II – 20 years 7 months of service
 - 2. Gary Reynolds – Police – Senior Building Service Worker – 31 years 7 months of service
 - 3. Loretta Nye – Police – Records Technician – 29 years 5 ½ months of service
- F. SPECIAL AWARDS**
 - 1. Presentation – Industrial Wastewater Pre-Treatment Awards – NuCor Steel LLC, Stanley Black & Decker, Inc. and Maxion Wheels
- I. APPROVAL OF PREVIOUS SESSION MINUTES**
 - A.** Council Meeting – April 20, 2026
- II. REPORT OF SPECIAL BOARDS, COMMISSIONS AND COMMITTEES** – None
- III. UNFINISHED BUSINESS**
 - 1. Veto by Mayor Williams of Bill No. 2026-51, Ordinance No. 12439 – Approving and Accepting an Agreement for solid waste disposal services for the City of Sedalia. (See Attached Documentation for further explanation)
- IV. ROLL CALL OF STANDING COMMITTEES**
 - A. FINANCE / ADMINISTRATION** – Chairwoman Tina Boggess; Vice Chairwoman Cheryl Ames
 - 1. Discussion – serving of alcohol at Liberty Park Stadium during Sedalia Steamers Games
 - B. PUBLIC WORKS** – Chairwoman Michelle Franklin; Vice Chairman David Covington
 - 1. Presentation – Updates to Pretreatment Ordinance
 - 2. Pretreatment Updates
 - Council Discussion led by Chairwoman Franklin
 - BILL NO. 2025-56** Call for Ordinance Amending Sections 60-100 through 60-166 of the Code of Ordinances of the City of Sedalia, Missouri related to sewer use regulations – Mayor Williams
 - 3. Permit – Industrial User Hauled Wastewater Discharge – Mid States Specialty Eggs, LLC
 - Council Discussion led by Chairwoman Franklin

BILL NO. 2026-57 Call for Ordinance Authorizing issuance of an Industrial User Hauled Wastewater Discharge permit to Mid States Specialty Eggs, LLC – Mayor Williams

4. Vehicle Purchase – Utilities Department – Chevrolet Silverado 4500 – \$108,000.00

Council Discussion led by Chairwoman Franklin

BILL NO. 2026-58 Call for Ordinance Authorizing the purchase of a vehicle for the Utilities Department – Mayor Williams

5. Grant Application – Department of Health and Senior Services, Office of Dental Health Grant – \$16,634.00

Council Discussion led by Chairwoman Franklin

R 2165 Call for Resolution Authorizing the submission of a Department of Health and Senior Services, Office of Dental Health Grant Application – Mayor Williams

6. Grant Application – West Central Missouri Solid Waste Management District F – Installation of Electrical Connection for Glass Pulverizer – \$30,9210.00 (\$26,282.85 Grant & \$4,638.15 City)

Council Discussion led by Chairwoman Franklin

R 2166 Call for Resolution Authorizing the submission of a West Central Missouri Solid Waste Management District F Grant Application – Mayor Williams

7. Repealing Ordinance Number 12392 – Sidewalk replacement – various locations project

Council Discussion led by Chairwoman Franklin

BILL NO. 2026-59 Call for Ordinance Repealing Ordinance Number 12392 Relating to the sidewalk Replacement – various locations project – Mayor Williams

C. PUBLIC SAFETY – Chairman Jack Robinson; Vice Chairman David Covington – No Report

D. COMMUNITY DEVELOPMENT – Chairwoman Cheryl Ames; Vice Chairman Spencer Redford

1. Approve Records Destruction Request – Code Enforcement

V. OTHER BUSINESS

A. APPOINTMENTS – None

B. LIQUOR LICENSES

Renewals:

*Jessica Degen dba El Rodeo Mexican, 1400 South Limit, Suite 1, Liquor by the Drink & Sunday Sales – \$750.00

*Garrett Volker dba Volker’s, 1021 South Limit, Liquor by the Drink & Sunday Sales – \$750.00

VI. MISCELLANEOUS ITEMS FROM MAYOR, CITY COUNCIL AND CITY ADMINISTRATOR

VII. GOOD AND WELFARE - “During the Good and Welfare section of our meeting agenda, residents of Sedalia are invited to directly address the City Council. Participants must sign up in advance using the form provided in the Municipal Building lobby prior to the start of the meeting. The sign-up form requires a name, address, telephone number, and the subject of the comment. Comments must pertain to items on the agenda unless a formal request to speak on a non-agenda item has been submitted in writing at least two business days prior to the meeting.

Each speaker will be allotted three minutes to present their remarks. Statements must be addressed to the Council as a body, not to individual members, and must not include personal attacks or criticisms of specific city employees by name. Formal complaints regarding staff must be submitted in writing to the City Clerk. The Council Chamber is a limited public forum, and decorum is expected at all times. Conduct such as disruptions, excessive noise, standing or blocking views, or approaching the dais without permission is prohibited.

All remarks will be recorded into the public record. While this is not a time for debate or direct engagement with Council members, your comments are an important part of civic participation. We ask that all contributions remain respectful, relevant to the community, and in accordance with Ordinance No. 12255. By entering the Council Chamber, all visitors acknowledge, accept, and agree to abide by these guidelines.

Thank you for helping us maintain a constructive and respectful environment as we work together to improve Sedalia.”

VIII. Closed Door Meeting – Motion and Second to move into closed door meeting in the upstairs conference Room pursuant to Subsections 1 (Legal Advice), 2 (Real Estate), 3 (Personnel) and 12 (Negotiated Contracts) of Section 610.021 RSMo.

A. Roll Call Vote for Closed Door Meeting

B. Discussion of closed items

C. Vote on matters, if necessary (require a Roll Call Vote)

D. Motion and Second with Roll Call Vote to adjourn closed door meeting and return to open meeting

IX. ADJOURN MEETING

A. Motion and second to adjourn meeting

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The City Council reserves the right to discuss any other topics that are broached during the course of this meeting.

IF YOU HAVE SPECIAL NEEDS, WHICH REQUIRE ACCOMMODATION, PLEASE NOTIFY THE CITY CLERK’S OFFICE AT 827-3000. ACCOMMODATIONS WILL BE MADE FOR YOUR NEEDS

POSTED ON MAY 1, 2026, AT 3:30 P.M. AT THE SEDALIA MUNICIPAL BUILDING, BOONSLICK REGIONAL LIBRARY, SEDALIA PUBLIC LIBRARY AND ON THE CITY’S WEBSITE AT WWW.SEDALIA.COM



OFFICE OF THE CITY ADMINISTRATOR

To: Honorable Mayor Traves Williams, Mayor Pro Tem Tina Boggess & City Council Members
From: Matthew Wirt, City Administrator
Re: Agenda items for City Council meeting on Monday, May 4th 6:30 p.m.

Unfinished business- Following Council approval of Bill No. 2026-51 on April 20, 2026, Mayor Williams has exercised his authority under Section 77.270, RSMo, to veto Ordinance No. 12439, which approved an agreement for solid waste disposal services with Show-Me Landfill, LLC. The Mayor has submitted his objections in writing, citing concerns related to increased disposal costs, including an estimated \$2 per ton increase and an overall annual impact of approximately \$62,000. Additional concerns outlined include increased fuel consumption associated with longer haul distances, added wear and tear on sanitation vehicles and tires, operational inefficiencies related to travel time and landfill hours, and current equipment limitations within the department. In accordance with state statute, the Mayor's veto message is included in the agenda packet and will be presented to Council at the next regular meeting. At that time, Council is required to vote on the question of whether the ordinance shall pass notwithstanding the Mayor's objections. A two-thirds majority vote of the entire Council (6 of 8 members) is required to override the veto. If the veto is overridden, the ordinance becomes law without the Mayor's signature. If the veto is not overridden, the ordinance fails. This item is presented to ensure a clear, transparent, and lawful process for Council consideration.

Finance/Administration – There is one item for consideration through the Finance/Administration Committee.

1. Matt Perry, President of National Sports Services and a member of the Diamond Baseball League's management team, will be present to discuss whether Council would be willing to consider amending the current ordinance to allow the sale of alcoholic beverages at Liberty Stadium during Diamond League games. Mr. Perry is part of a management group that formed the league. The purpose of this discussion is to provide Council with information and to gauge interest in a potential ordinance change. Council would need to provide direction to staff if they would like any changes to existing ordinances to be drafted and brought back for consideration at a future meeting.

Public Works Committee – There are six items for consideration through the Public Works Committee.

1. Brittany Wilbanks, the City's Pretreatment Coordinator, will provide a presentation to Council using the attached handout as a guide to explain the City's Industrial Pretreatment Program (IPP), including its purpose, regulatory requirements, and operational responsibilities. The IPP is a federally and state-required program designed to protect the City's wastewater treatment system from harmful industrial discharges and ensure compliance with EPA and Missouri Department of Natural Resources standards. The presenta-

tion will outline recent findings from regulatory review, the need to address identified deficiencies, and proposed updates to strengthen enforcement authority, establish cost recovery mechanisms, and modernize the program to reflect current industrial activity and treatment requirements. This discussion is intended to provide Council with a clear understanding of the program prior to consideration of a future ordinance to formally update the City's pretreatment program in accordance with MoDNR requirements.

2. The City Staff is requesting Council approval of required updates to the Industrial Pretreatment Program (IPP) as mandated by the Missouri Department of Natural Resources (MoDNR) and the Environmental Protection Agency (EPA). These updates include modifications to the City's legal authority, local pollutant limits, and enforcement response plan to ensure compliance with current regulatory standards. Council previously endorsed these updates by resolution on November 17, 2025, after which the modifications were submitted to MoDNR and formally approved on December 8, 2025. In accordance with state statute, the proposed changes were distributed to affected industrial users and placed on public notice, with no comments received during the required 30-day comment period. These updates are necessary to address identified program deficiencies and to ensure the City maintains compliance with its wastewater permits. Staff recommends approval of the ordinance to formally adopt the updated pretreatment program.
3. The City is requesting approval to issue an Industrial User Hauled Wastewater Discharge Permit to Mid States Specialty Eggs, LLC (MSSE), which operates an egg washing facility outside the City's jurisdiction. MSSE has requested authorization to transport and discharge industrial wastewater to the City's Publicly Owned Treatment Works (POTW). Based on data collection, site inspection, and coordination with the company, the discharge has been determined to have the potential to impact wastewater treatment operations if not properly controlled. The proposed permit establishes strict conditions, including discharge limits, monitoring requirements, and full cost recovery for treatment, sampling, and administrative oversight. The permit also includes defined fees, including a per-gallon usage rate, minimum load charges, and additional surcharges for high-strength wastewater. Discharge volumes will be limited to a maximum of 30,000 gallons per day and are subject to modification or revocation in the event of noncompliance. This represents the first permit of this type issued by the City and provides a structured, enforceable approach to supporting regional economic activity while ensuring protection of the wastewater treatment system, regulatory compliance, and public health.
4. The Utilities Department is requesting approval of an ordinance authorizing the purchase of one Chevrolet Silverado 4500 truck equipped with a service bed and crane from Heavy Equipment, LLC in the amount of \$108,000.00. This purchase was planned and included in the approved budget as part of the City's fleet replacement and Water Pollution Control strategic planning efforts. The new vehicle will replace an aging 2003 service truck that has become increasingly costly to maintain and presents safety concerns due to the condition of its crane. In addition to replacing aging equipment, this investment will allow the City to bring pump preventative maintenance services in-house, reducing reliance on outside contractors and addressing approximately \$34,850 in annual contracted service costs. The selected unit was obtained through a formal bid process and represents the lowest responsive bid, providing a new, unused vehicle with full factory warranties within

the approved budget. This purchase supports reliable operations, improves safety, and aligns with long-term cost efficiency goals. Staff recommends approval of the ordinance.

5. The Utilities Department is requesting authorization to apply for a Department of Health and Senior Services (DHSS), Office of Dental Health (ODH) grant to fund the replacement of the water plant fluoridation system. The current system is aging, showing signs of corrosion, and requires a manual process for handling hydrofluorosilicic acid that presents operational and safety concerns. If awarded, the grant would reimburse approximately \$16,634.00 to fully replace the system with modern equipment, including improved containment, automated processes, and enhanced safety features for operators. The updated system would also provide more accurate chemical measurement and delivery. Approval of this item allows staff to submit the grant application; any future acceptance of funds or project implementation would be brought back to Council as required. Staff recommends approval to apply.
6. The Public Works Operations Division is requesting authorization to apply for a West Central Missouri Solid Waste Management District Region F grant to support the next phase of the City's glass recycling initiative. In 2025, the City successfully secured grant funding for the initial phase of the project, which included construction of a concrete pad and containment walls to support installation of a commercial glass pulverizer. The current grant application represents the continuation of that effort and seeks funding to complete the electrical installation necessary to power and operate the equipment. The total estimated cost for this phase is \$30,921.00, with anticipated grant funding of \$26,282.85 and a required City match of \$4,638.15. Approval of this item will allow staff to proceed with the grant application; any future acceptance of funds or project implementation will be brought back to Council as required. Staff recommends approval to apply.
7. The Public Works Department is requesting Council approval to formally reject Contract 2026-012 Sidewalk Replacement (Various Locations), which was previously awarded to S & A Equipment and Builders, LLC on January 5, 2026. Since the award of the contract, circumstances have arisen that prevent the project from proceeding as originally planned. The contractor is currently engaged in multiple active projects with the City, including four storm drainage improvement projects and the North Central Neighborhood sidewalk initiative, which has impacted overall scheduling and capacity. In order to ensure the project is completed efficiently and to the City's expectations, staff recommends rejecting the current contract and will return at a later date with a recommendation for a new contract. This approach allows the City to maintain project quality, proper scheduling, and competitive bidding conditions moving forward.

Public Safety Committee – There are no items for consideration through the Public Safety Committee.

Community Development Committee – There is one item for consideration through the Community Development Committee.

1. The Community Development Department is requesting authorization to destroy certain records that have met established retention requirements in accordance with RSMo

109.230(4) and guidelines provided by the Missouri Secretary of State's Office. The records identified include commercial plan sets and blueprints dated prior to 2016, residential plan sets dated prior to 2021, and miscellaneous plan review documents dated prior to 2024. These records have been reviewed and determined to no longer be necessary for current operations and do not possess sufficient administrative, legal, historical, or fiscal value to warrant continued storage. All records will be destroyed in a secure manner consistent with state guidelines. Staff recommends approval of the request.



Let's Cross Paths

City of Sedalia

200 S. Osage

Sedalia, MO 65301

(660) 827-3000 www.sedalia.com

To: Matthew Wirt, City Administrator; William Bracken, Utilities Director

From: Brittany Wilbanks, Industrial Pretreatment Coordinator

Cc: Ben Maness, Mid MO-Operations

Date: April 24, 2026

Re: Pretreatment Awards for Local Industries

The City of Sedalia's Pretreatment Program implements regulations designed to protect the City's collection system, wastewater treatment facilities, employees, and the citizens of Sedalia. This program requires industries with wastewater discharges that have the potential to impact these systems to comply with the conditions of an Industrial User Permit.

Permitted users are responsible for monitoring pollutants of concern through routine sampling, submitting quarterly reports, properly operating and maintaining pretreatment equipment, and working collaboratively with the city to achieve our shared goal of protecting public health, infrastructure, and the environment.

I would like to recognize three industries that have demonstrated exceptional commitment to compliance and to safeguarding the City's collection system, treatment facilities, employees, and residents.

These industries are Nucor Steel LLC, Stanley Black & Decker, Inc., and Maxion Wheels. Each of these facilities was nominated for, and received, a Gold Award at the Missouri Water Environment Association conference in March. To earn this distinction, industries must achieve 100 percent compliance with all pollutant limitations, reporting requirements, and other permit conditions established by the City.

On behalf of the city, I would like to sincerely thank these industries for their continued dedication to compliance. This past year presented additional challenges, as permit renewals required increased sampling, reporting, and coordination beyond standard compliance activities. Their efforts, hard work, and commitment to protecting the environment, our community, and the citizens of Sedalia are greatly appreciated.



CITY OF SEDALIA, MISSOURI
CITY COUNCIL MEETING
APRIL 20, 2026

The City has an on-line broadcast of Council Meetings available both live and recorded by going to "Microsoft Teams".

The Council of the City of Sedalia, Missouri duly met on April 20, 2026 at 6:30 p.m. at the Municipal Building in the Council Chambers with Mayor Andrew L. Dawson presiding. Mayor Dawson called the meeting to order and asked for a moment of legislative prayer led by Councilwoman Tina Boggess followed by the Pledge of Allegiance.

ROLL CALL:

Table with 4 columns: Name, Status, Name, Status. Rows include Jack Robinson (Present), Cheryl Ames (Present), Lee Scribner (Present), Tina Boggess (Present), Bob Hiller (Absent), Bob Cross (Present), Rhiannon Foster (Present), Michelle Franklin (Present).

Public Hearing – Designation of Sedalia Public Library a Historic Landmark

Mayor Dawson opened the Public Hearing at 6:32p.m.

John Simmons, with Sedalia Historic Preservation Commission, stated on March 10th the Commission held a meeting where they made a recommendation to approve Sedalia Public Library as a historic landmark. The Sedalia Public Library is significant because it was a gift from industrialist and philanthropist Andrew Carnegie to the citizens of Sedalia in 1899. This was the first in Missouri and was opened in 1901. With the words "Free to All" above its door, terracotta and Carthage stone building features Italian marble floors, fireplaces and beautiful oak woodwork. In 1980, the Sedalia Public Library was added to the National Register of Historic Places. The landmark is recommended on the basis of the integrity of its location, its architecture and its significance to the history of Sedalia.

In the Historic Landmark Process, the Commission has to tie it back to Historic Preservation and Master Plan goals of the City of Sedalia. Goal number seven states the Sedalia Historic Preservation Commission is to develop incentive programs to encourage Preservation landmarks in historic districts and neighborhoods and to invite public input to designate landmark nominees and promote the program.

With no public comments, the Public Hearing closed at 6:35p.m.

SERVICE AWARDS/SPECIAL AWARDS/RETIREMENT AWARDS: None

MINUTES: The Council Meeting minutes of April 6, 2026 were approved on motion by Foster, seconded by Boggess. All Present in Favor. Hiller was absent.

REPORTS OF SPECIAL BOARDS, COMMISSIONS & COMMITTEES:

The Planning and Zoning Commission Minutes dated March 11, 2026 were accepted on motion by Foster, seconded by Ames. All Present in Favor. Hiller was absent.

ROLL CALL OF STANDING COMMITTEES:

FINANCE / ADMINISTRATION – Chairwoman Tina Boggess; Vice Chairwoman Rhiannon M. Foster

Financial Update: Finance Director Jessica Pyle stated that Sales tax is down Fiscal Year to Date by \$60,000.00. There was a store that did not report so that revenue could be made up next month when they report it. Use Taxes are down Fiscal Year to Date \$100,000.00 over last Fiscal Year to Date. About \$25,000.00 could be made up in the next month. Marijuana Taxes are higher by \$10,000.00. In Net, the City is down \$150,000.00 compared to last year. An increase of 3% was budgeted and there is a budget variance of \$200,000.00 for the first month of this Fiscal Year.

PUBLIC WORKS – Chairwoman Michelle Franklin; Vice Chairwoman Tina Boggess

- City staff solicited bids for the lease of hay ground at cemetery properties and received a recommendation from staff and Calvary Cemetery Association following the bid opening. Based on prior experience, Les Thierfelder is recommended as the lessee due to a proven track record of timely hay removal, property care, and coordination to avoid conflicts with cemetery operations.

BILL NO. 2026-50, ORDINANCE NO. 12438 – AN ORDINANCE AUTHORIZING LEASE AGREEMENTS FOR HAY PRODUCTION AT CROWN HILL AND CALVARY CEMETERIES was read once by title.

2nd Reading – Motion by Cross, 2nd by Foster. All Present in Favor. Hiller was absent.

Final Passage – Motion by Cross, 2nd by Foster. All Present in Favor. Hiller was absent.

Roll Call Vote: Voting “Yes” were Robinson, Ames, Scribner, Boggess, Cross, Foster and Franklin. No one voted “No”. Hiller was absent.

- The City solicited bids for solid waste disposal services and received responses from GFL Environmental and Show-Me Landfill. While GFL submitted the lower bid at \$31.00 per ton compared to Show-Me Landfill at \$33.00 per ton, staff and the Public Works Council Committee evaluated additional factors including hauling distance, fuel costs, operational efficiency, and landfill conditions. Operational concerns at the GFL facility, including rough haul roads, inefficient turnaround times, and dumping conditions, were identified as ongoing issues. Staff conducted a one-week test hauling to Show-Me Landfill and found improved conditions, more efficient operations, and greater reliability, despite an increase in fuel usage during the test period. After considering total cost, equipment wear, operational efficiency, and long-term service reliability, the Public Works Council Committee recommends awarding the solid waste disposal contract to Show-Me Landfill.

BILL NO. 2026-51, ORDINANCE NO. 12439 – AN ORDINANCE APPROVING AND ACCEPTING AN AGREEMENT FOR SOLID WASTE DISPOSAL SERVICES FOR THE CITY OF SEDALIA was read once by title.

2nd Reading – Motion by Foster, 2nd by Boggess. All Present in Favor. Hiller was absent.

Final Passage – Motion by Foster, 2nd by Boggess. All Present in Favor. Hiller was absent.

Roll Call Vote: Voting “Yes” were Robinson, Ames, Scribner, Boggess, Cross, Foster and Franklin. No one voted “No”. Hiller was absent.

- City staff is requesting authorization to submit an application for the Safe Streets and Roads for All grant. The proposed project would focus on study and design concepts for the Winchester corridor from 10th Street to Broadway, which was identified as a priority through the Safe Streets for All public engagement process based on community input regarding safety concerns.

RESOLUTION NO. 2163 – A RESOLUTION AUTHORIZING THE SUBMISSION OF A SAFE STREETS AND ROADS FOR ALL GRANT APPLICATION was read once by title and approved on motion by Foster, seconded by Boggess. All Present in Favor. Hiller was absent.

- The City is requesting approval of Change Orders No. 5 and No. 6 for the Washington Avenue Bridge repair project with Double Arch Construction, LLC. Change Order No. 5 reflects a request to extend the project completion date to June 27, 2026, to account for delays related to permitting, weather, material availability, and field conditions. Change Order No. 6 includes \$26,399.40 for necessary column replacements identified during construction. The column replacement work addresses unforeseen deterioration discovered in the

field. The contractor also noted that additional corrosion may be uncovered as sandblasting is completed, and if identified, those areas will be properly repaired prior to final coating.

BILL NO. 2026-52, ORDINANCE NO. 12440 – AN ORDINANCE APPROVING AND ACCEPTING CHANGE ORDER NUMBERS FIVE AND SIX FOR WASHINGTON AVENUE BRIDGE REPAIRS was read once by title.

2nd Reading – Motion by Foster, 2nd by Ames. All Present in Favor. Hiller was absent.

Final Passage – Motion by Foster, 2nd by Ames. All Present in Favor. Hiller was absent.

Roll Call Vote: Voting “Yes” were Robinson, Ames, Scribner, Boggess, Cross, Foster and Franklin. No one voted “No”. Hiller was absent.

PUBLIC SAFETY – Chairman Lee Scribner; Vice Chairman Jack Robinson – No Report

COMMUNITY DEVELOPMENT – Chairwoman Rhiannon M. Foster; Vice Chairwoman Cheryl Ames

- Following the required public hearing, Council now will consider designation of the Sedalia Public Library (Carnegie Library) as a local historic landmark. The nomination has been reviewed by the Sedalia Historic Preservation Commission and the Planning and Zoning Commission, with both bodies recommending approval based on the building’s historical significance, architectural integrity, and long-standing role in the community. The library, constructed in 1901 as Missouri’s first Carnegie library, remains largely intact with significant original architectural features preserved and has been listed on the National Register of Historic Places since 1980.

RESOLUTION NO. 2164 – A RESOLUTION NOMINATING THE SITE OF THE SEDALIA PUBLIC LIBRARY (CARNEGIE LIBRARY) AS A HISTORIC LANDMARK was read once by title and approved on motion by Foster, seconded by Cross. All Present in Favor. Hiller was absent.

- The Paul Bruhn Historic Revitalization Grant is a federally funded program administered through the National Park Service that provides financial assistance for the preservation and rehabilitation of historic properties. The City of Sedalia serves as the local administrator of these funds, working with property owners and the Sedalia Historic Preservation Commission to identify and prioritize eligible projects. These grants require a private match from the property owner and utilize City staff time for program administration. The first application is for property located at 219 South Ohio. This project includes roof repair and replacement with a total project cost of \$74,900, of which \$57,673 is funded through the grant and \$17,227 is provided by the property owner. The second application is for property located at 308 West Main. This project includes roofing replacement, second floor window replacement, storefront improvements, and masonry tuckpointing with a total project cost of \$83,545, of which \$66,958 is funded through the grant and \$16,587 is provided by the property owner. The third application is for property located at 322 South Ohio (Trust Building). This request replaces a previously approved agreement for stonework repairs, as the property owner has requested the grant be redirected toward roof replacement due to the roof reaching the end of its useful life. The total project cost is \$96,000, of which \$73,920 is funded through the grant and \$22,080 is provided by the property owner, with no direct City funding required beyond staff administration.

BILL NO. 2026-53, ORDINANCE NO. 12441 – AN ORDINANCE AUTHORIZING A PAUL BRUHN GRANT SUB-RECIPIENT GRANT AGREEMENT FOR STRUCTURAL REPAIRS AT 219 SOUTH OHIO was read once by title.

2nd Reading – Motion by Foster, 2nd by Cross. All Present in Favor. Hiller was absent.

Final Passage – Motion by Foster, 2nd by Ames. All Present in Favor. Hiller was absent.

Roll Call Vote: Voting “Yes” were Robinson, Ames, Scribner, Boggess, Cross, Foster and Franklin. No one voted “No”. Hiller was absent.

BILL NO. 2026-54, ORDINANCE NO. 12442 – AN ORDINANCE AUTHORIZING A PAUL BRUHN GRANT SUB-RECIPIENT GRANT AGREEMENT FOR STRUCTURAL REPAIRS AT 308 WEST MAIN STREET was read once by title.

2nd Reading – Motion by Foster, 2nd by Scribner. All Present in Favor. Hiller was absent.

Final Passage – Motion by Foster, 2nd by Boggess. All Present in Favor. Hiller was absent.
Roll Call Vote: Voting “Yes” were Robinson, Ames, Scribner, Boggess, Cross, Foster and Franklin. No one voted “No”. Hiller was absent.

BILL NO. 2026-55, ORDINANCE NO. 12443 – AN ORDINANCE AUTHORIZING A PAUL BRUHN GRANT SUB-RECIPIENT GRANT AGREEMENT FOR STRUCTURAL REPAIRS AT 322 SOUTH OHIO – TRUST BUILDING was read once by title.

2nd Reading – Motion by Foster, 2nd by Cross. All Present in Favor. Hiller was absent.

Final Passage – Motion by Foster, 2nd by Boggess. All Present in Favor. Hiller was absent.

Roll Call Vote: Voting “Yes” were Robinson, Ames, Scribner, Boggess, Cross, Foster and Franklin. No one voted “No”. Hiller was absent.

APPOINTMENTS: None

ACCEPTANCE OF RESIGNATIONS: Motion by Foster, seconded by Boggess to accept the following resignations. All Present in Favor. Hiller was absent.

- *Adam Porter – Sedalia Park Board – Effective Immediately
- *Cassie Brown – Bothwell Regional Health Center – Effective Immediately
- * Tolbert Rowe – Planning and Zoning Commission – Effective Immediately

BIDS:

- Solid Waste Disposal – March 31 ,2026
- Hay Production Cemetery Properties – April 7, 2026

LIQUOR LICENSES:

The following renewal Liquor License was read and approved on motion by Foster, seconded by Boggess. All Present in Favor. Hiller was absent.

*Cathy Geotz dba Break Time #3083, 808 East Broadway, Packaged Liquor

Council Meeting adjourned sine die.

PLAQUE PRESENTATIONS:

City Administrator Matthew Wirt presented outgoing Mayor Andrew Dawson with a plaque and read the following: “The City has had the honor of having Andrew Dawson as their esteemed Mayor for four years. The community will continue to prosper due to the accomplishments Mr. Dawson has achieved. The City will be forever grateful and wish Mr. Dawson fortune on all his future endeavors.”

City Administrator Matthew Wirt presented a plaque to outgoing 4th Ward Councilwoman Rhiannon Foster stating it was in honor of Ms. Foster’s service to the City of Sedalia as Councilmember of the 4th Ward. Ms. Foster’s dedication to serving the City and those she represented has been exemplary.

The newly elected City Council Members were called forward and given the Oath of Office by Jason S. Myers, City Clerk, and were presented Certificates of Election and then took their seats at the dias.

Jack Robinson, 1st Ward Councilman
Cheryl Ames, 1st Ward Councilman
Tina Boggess, 2nd Ward Councilman
David Covington, 3rd Ward Councilman
Spencer Redford, 4th Ward Councilman

Newly elected Mayor, Traves Williams, was then called forward and given the Oath of Office by Jason S. Myers, City Clerk and presented a Certificate of Election. Mayor Williams took his seat at the dias and called the meeting to order.

ROLL CALL:

Jack Robinson	Present	David Covington	Present
Cheryl Ames	Present	Bob Cross	Present
Lee Scribner	Present	Spencer Redford	Present
Tina Boggess	Present	Michelle Franklin	Present

MAYOR PRO-TEM:

Motion by Cross, seconded by Ames to nominate Councilwoman Boggess for Mayor Pro-Tem. Roll Call Vote: Voting "Yes" were Robinson, Ames, Scribner, Boggess, Covington, Cross, Redford and Franklin. No one voted "No".

Tina Boggess was elected Mayor Pro-Tem.

ELECTION OF COUNCIL MEMBER TO SERVE ON PLANNING AND ZONING COMMISSION:

Motion by Ames, seconded by Franklin to nominate Councilman Robinson to serve as Council member on Planning and Zoning Commission.

Roll Call Vote: Voting "Yes" were Robinson, Ames, Scribner, Boggess, Covington, Cross, Redford and Franklin. No one voted "No".

Jack Robinson elected to serve as Council member on Planning and Zoning Commission.

SELECTION AND ANNOUNCEMENT OF COMMITTEE ASSIGNMENTS:

Mayor Williams read the list of new chairmen and vice chairmen for Council Committees.

Public Safety – Chairperson – Jack Robinson; Vice Chairperson – Spencer Redford; Member Tina Boggess

Community Development – Chairperson – Cheryl Ames; Vice Chairperson – David Covington; Members – Bob Cross and Tina Boggess

Finance & Administration – Chairperson – Tina Boggess; Vice Chairperson – Cheryl Ames; Member Lee Scribner

Public Works – Chairperson Michelle Franklin; Vice Chairperson – David Covington; Member Bob Cross

Motion by Covington, Second by Ames to add a Good and Welfare portion to the Council Meeting. All in favor.

GOOD AND WELFARE:

Debbie Covington, PO Box 965, stated that she requests Council to talk in the coming weeks about repealing Ordinance 12255. Ms. Covington stated she does not like that no one can talk about grievances with City Council members or the Mayor and she believes it violates the First Amendment. People should be able to bring signs and be able to criticize public officials. She does not like restrictions on when and where you can take photos. Citizens should be able to speak their minds whether Council likes it or not. Mayor Williams stated the Ordinance

would have to be structured since it pertains to the Municipality and there will be no personal attacks allowed and no disrespecting the Chamber.

Gary Lobaugh, 821 S Arlington, stated when the original Washington Street Bridge was built, Union Pacific paid for half of it. Mr. Lobaugh asked if anyone asked Union Pacific if they would help with funding. City Administrator Matthew Wirt stated he was not City Administrator at that time but he believes Union Pacific was approached about it but they would not assist with funding unless another grade crossing was closed.


Israel Baeza, 1114 E 7, stated his thanks for the Councilmembers for stepping up because it is not easy to run for public office. There are better days ahead which started with a meeting in the morning between the State, City and County. Quarterly meetings were discussed and Mr. Baeza stated his door is open for whatever Council needs. He believes allowing public comment is a great step forward and agrees that it needs to be done respectfully. As representatives it is their job to make sure the citizens are heard. Councilwoman Boggess asked if the meetings could be held later for those that work so that they could attend as well.

Harry Hoffert, 1408 S Barrett, stated that he hopes that the new and previous Councilmembers will work together. Mr. Hoffert stated he wants to be able to place concerns on the Council and have Council respond back. The trust factor has been broken for him and that the citizens need to see the transparency that the voters deserve and what he thinks Council wants to show. Mayor Williams stated the citizen's opinions matter to him. If Council cannot find an answer, he will work hard to find a solution.


Stephanie Mitchell, 1212 S Grand, requested that "No Trucks" signs be put up on Grand Avenue. There are a lot of small children running around in the area and the trucks are also breaking the road.

Regular meeting adjourned at 7:40 p.m. on motion by Boggess, seconded by Ames. All in Favor.

THE CITY OF SEDALIA, MISSOURI



Traves Williams, Mayor



Jason S. Myers, City Clerk

Ordinance No. 12439

77.270. zSAI would like to Veto this ordinance for a number of reason

:1 it will cost an additional \$2 per ton

:2 We would use 300 gallons per week in a department that's currently under performing

:3 It will cost an additional \$62,000 per year that would put us at a loss for the year

:4 Tires could cost anywhere between \$375 per tire and up to \$500 before taxes about \$2,250 per truck on the low end \$3,000 on the high end on a 60,000 miles tire

:5 That's a 30 mile one way drive on a 60,000 mile tread at a cost of \$3,000 per truck.

:6 If the driver starts his day with a load on his truck, he losing 1hr 15 min to start his day, when that landfill closes at 3pm

:7 The miles that we would put on a truck, that's carrying an additional 4 ton of trash per trip that has to be hard on those trucks per day

:8 We are currently down a truck, and currently looking to rent a truck for the unforeseeable future, and that's an additional expense for a department that's under performing

:9 There's talks on expansion possibly at our current landfill, and i wouldn't want to lose the price of \$31 per ton cost

BILL NO. 2026-51

ORDINANCE NO. 12439

AN ORDINANCE APPROVING AND ACCEPTING AN AGREEMENT FOR SOLID WASTE DISPOSAL SERVICES FOR THE CITY OF SEDALIA.

WHEREAS, the City of Sedalia, Missouri, received a proposal from Show-Me Landfill, LLC a licensed and permitted landfill facility to dispose of municipal solid waste for the City of Sedalia; and

WHEREAS, under the proposal, the City of Sedalia shall pay the sum and amount of \$33.00 per ton, inclusive of all fees to Show-Me Landfill, LLC as more fully described in the proposed agreement attached to this ordinance and incorporated by reference herein.

NOW THEREFORE, BE IT ORDAINED BY THE COUNCIL OF THE CITY OF SEDALIA, MISSOURI, as follows:

Section 1. The Council of the City of Sedalia, Missouri hereby approves and accepts the agreement by and between the City of Sedalia, Missouri and Show-Me Landfill, LLC in substantively the same form and content as they have been proposed.

Section 2. The Mayor or City Administrator are authorized and directed to execute and the City Clerk is hereby authorized and directed to attest and fix the seal of the City of Sedalia, Missouri, on the documents in substantively the same form and content as they have been proposed.

Section 3. The City Clerk is hereby directed to file in his office a duplicate or copy of the documents after they have been executed by the parties or their duly authorized representatives.

Section 4. This ordinance shall take effect and be in full force and effect from and after its passage and approval.

Read two times by title, copies of the proposed ordinance having been made available for public inspection prior to the time the bill is under consideration by the Council and passed by the Council of the City of Sedalia, Missouri this 20th day of April 2026.

Presiding Officer of the Council

Approved by the Mayor of said City this 20th day of April 2026.

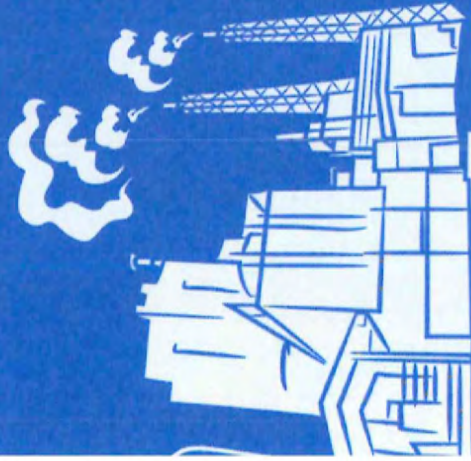
ATTEST:

Traves Williams, Mayor

Jason S. Myers, City Clerk

City of Sedalia

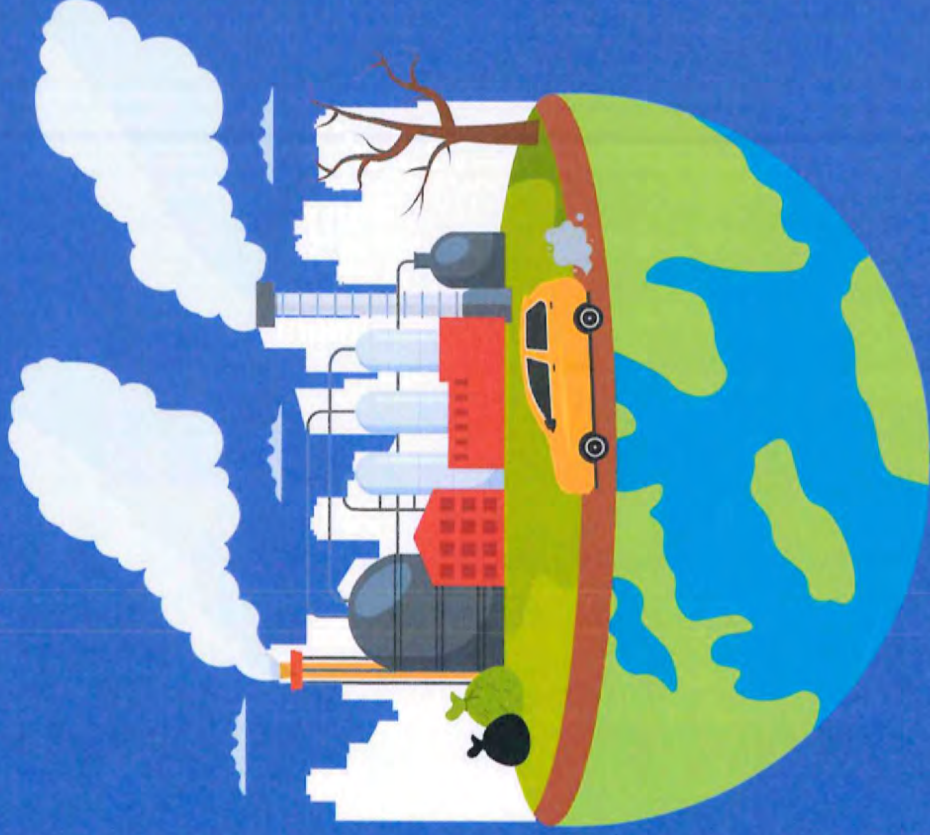
INDUSTRIAL PRETREATMENT PROGRAM UPDATES



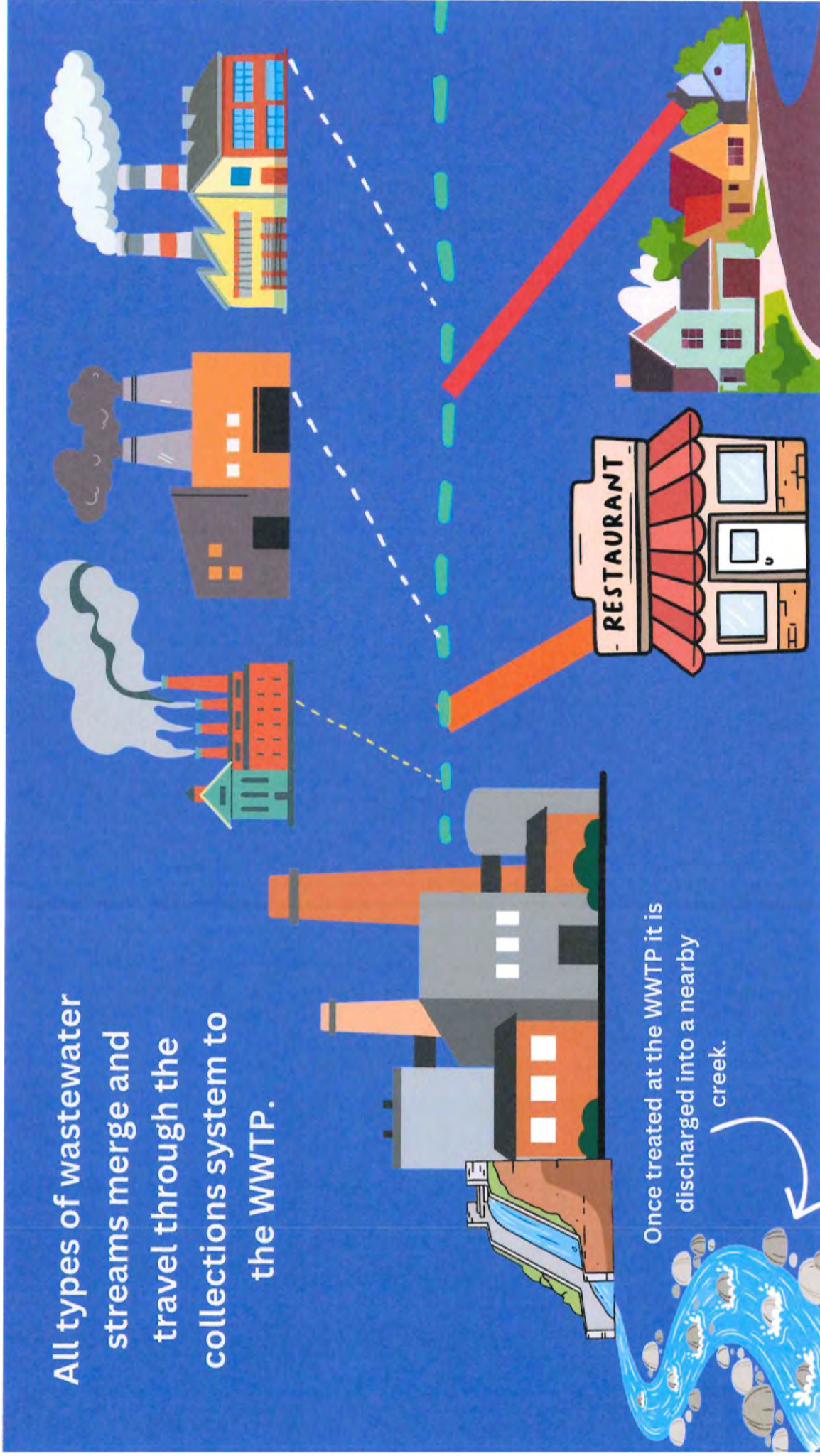
What is a Pretreatment Program?

Regulatory framework that requires industrial and commercial dischargers to treat, remove or control pollutants before sending them to the City wastewater treatment facility.

A safety shield for our City's collection system and wastewater treatment plants.



All types of wastewater streams merge and travel through the collections system to the WWTP.



Why does Sedalia have a Pretreatment Program?

REQUIRED BY BOTH THE EPA AND MO DNR.

Any Publicly Owned Treatment Works (POTW) designed to treat more than 5 million gallons per day (MGD) must have a pretreatment program. Sedalia has three wastewater treatment plants (WWTP). When combined they are designed to treat a little over 8 MGD.

Sedalia's Industrial Pretreatment Program (IPP) was developed and implemented in 1985.





Federal
Regulations



MISSOURI
DNR

State
Regulations



Local Regulations



Industrial Pretreatment
Program



Program Requirements

Identify and regulate industrial users

Develop and enforce local limits

Prevent interference and pass through causing NPDES permit violations

Permit issuance and administration

Inspection, monitoring and sampling

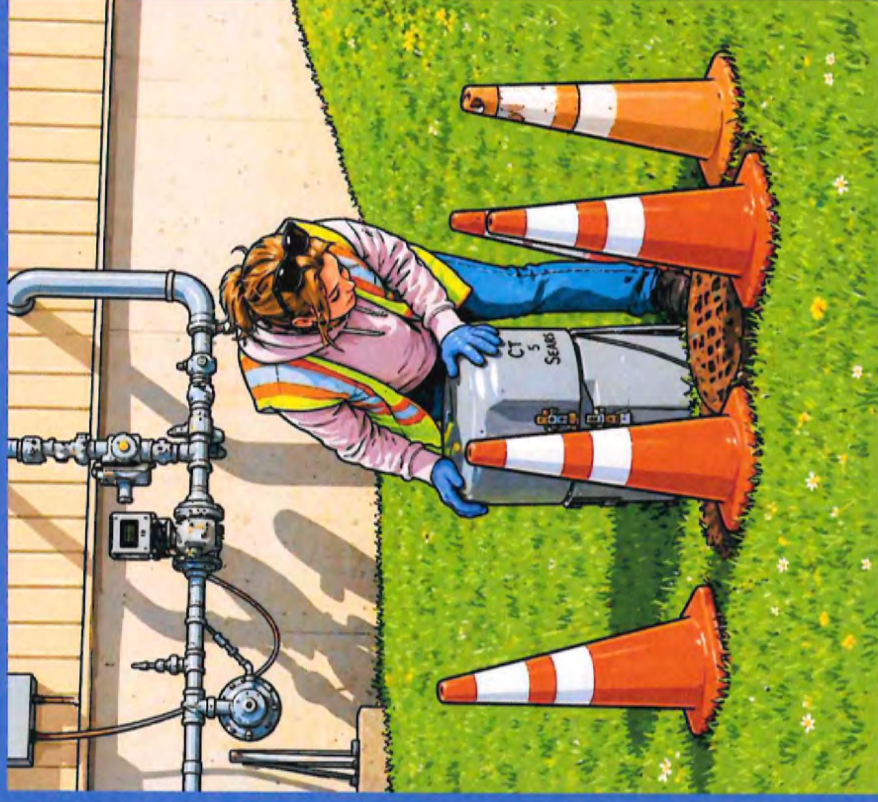
Review reports and monitor compliance.

Submit annual report to MODNR.

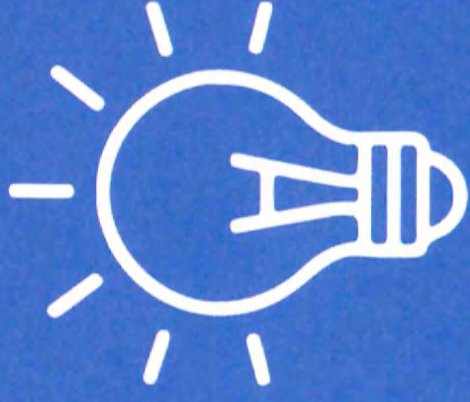


Inspected By EPA in April 2025

As a result, several areas were identified where program improvements are necessary to continue to meet compliance.



New Updates



- Sewer Use Ordinance
- Industrial User Fees
- Local Limits
- Enforcement Response Plan

What Updates Are Being Made To The Sewer Use Ordinance?



Types of control mechanisms the City can use beyond just the normal permit.



Authorizes cost recovery to maintain program implementation



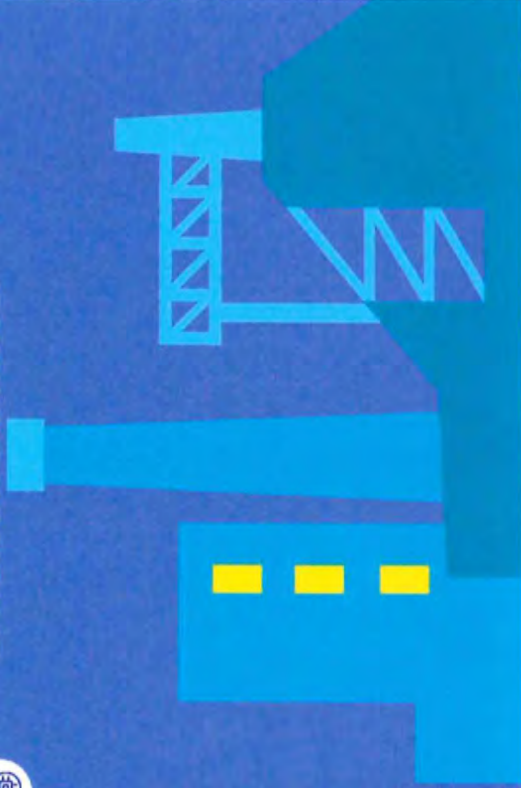
Authorizes maximum allowable industrial loads (MAIL) to be allocated in IU permits.

This allows limits to be cut like a pie. Allocating limits based off industry need.



The Legal authority and enforcement response plan will now directly align.

Updates are based on the EPA model ordinance.



Why Update?

Enables the City to recover costs associated with treating wastewater beyond typical domestic contributions, ensuring financial responsibility rests with the industrial users rather than residents.



Ensures compliance with state and federal regulations by updating program components identified as outdated during the EPA inspection.



Assigns the cost of pretreatment to the SIU discharges to the SIU and not the City .

Protects the City's investment in planned updates to the WWTP's.

Who will this affect? SIGNIFICANT INDUSTRIAL USERS (SIU)

To be an SIU an industry must meet one of the following:



Be a categorical user

Examples: Metal Finisher, Copper Forming, Iron and Steel Mfg.



Contributes more than 5 % of the hydraulic loading or organic capacity of POTW



Produces over 25,000 gallons per day of process water



Has the ability to cause harm to the POTW



Has the capabilities to cause interference or pass through.



Significant Industrial Users in Sedalia

**Waste
Corporation of
Missouri**



**Maxion
Wheels**



**Sierra Bullets
&
Starline Brass**



**Nucor Steel,
LLC.**



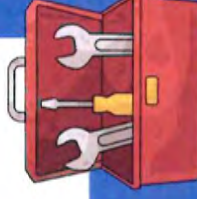
**MPW
Industrial
Water
New User**



**Pro Energy
New User**



**Stanley Black
& Decker Inc.**



**St. Joseph
Plastics
New User**



What are the new user fees?

Permit
Application Fee

New Users
Permit
Renewals
(Every 5 years)

High Strength
Waste
Surcharge

Annual Base
Activities
Fee

Annual
Inspection,
Sampling,
Reporting
Software Fee

Hauled
Waste
Fees

Additional
Administrative
Services

Permit
Modifications
Enforcement
Fees

Currently there are no fees associated with
the Industrial Pretreatment Program- other
than hauled waste.

Cost Recovery for
Disruptions to the
POTW

Actual Cost
Incurred

Who will this affect? HAULED WASTE CONTRIBUTORS

Hauled Waste

A source of wastewater transported by haulers and introduced to the POTW by a method other than a pipe from the collections system at a specified location authorized by the City.

Why Update the Hauled Waste Fees?

Hauled waste has higher levels of pollutants which the WWTP must still treat.

Currently fees do not account for the cost of treatment at the WWTP.

Places the financial responsibility on the hauler who is delivering the waste verses the citizens.

Allows the potential to accept larger volumes from new waste haulers as it lays out the foundation and requirements for waste haulers.

Modified Hauled Waste Fees

\$0.12 per gallon for delivered waste

\$150 minimum per load

Additional \$0.06/gallon for high strength waste

Analytical Fees



Local Limits:

Specific site-based rules set by the POTW that limit the amount of pollutants industries can discharge to a specific WWTP.

A technical evaluation of the local limits for the WWTP was required by MODNR in 2025.

This evaluation determined the local limits last updated in 2014 needed revised to ensure the WWTPs can handle the industrial users' discharges.

This evaluation also determined local limits were not needed for the Southeast WWTP as no industrial users discharge to that location.

Parameter ^{2,3}	MAIL (lbs./day)	
	Central Plant	North Plant
Oil and Grease	342	119
BOD	2089	3126
TSS	4093	3857
TKN	243	543
Arsenic	0.623	0.608
Cadmium	-	0.007
Chromium	3.86	3.37
Copper	1.29	0.303
Molybdenum	1.02	0.581
Nickel	3.21	1.32
Lead	0.597	0.127
Selenium	0.105	-
Zinc	5.15	3.11
Cyanide (amenable)	0.107	0.024
Chloride	[reserved]	[reserved]
Total Nitrogen	[reserved]	[reserved]
Phosphorus	[reserved]	[reserved]

How are limits determined?

Each WWTP has a maximum amount of pollutants it can safely handle each day while still protecting public health, the waterways, and staying within environmental compliance.

To find out the maximum allowable industrial loading (what industries can discharge without causing harm) we need to know what the WWTP can handle and the amount of domestic waste entering a WWTP.

$$\begin{array}{r} \text{WHAT A} \\ \text{WWTP CAN} \\ \text{SAFELY} \\ \text{TREAT} \\ \text{(MAHL)} \end{array} \quad \begin{array}{c} \text{minus} \\ - \end{array} \quad \begin{array}{r} \text{DOMESTIC} \\ \text{WASTE} \end{array} = \begin{array}{r} \text{POLLUTANT} \\ \text{ALLOCATIONS} \\ \text{FOR} \\ \text{INDUSTRIES} \\ \text{(MAIL)} \end{array}$$

Local Limits:

The Central WWTP and North WWTP each have their own specified limits.

Limits are set for the SIU based off which WWTP they discharge to.

Some pollutant limits are more stringent. This protects the WWTP/POTW as the required permit (From DNR) limits are more stringent than last permit cycle.

In the previous permit cycle for the SIUs each industry received the “entire pie” (Total Local Limit). This permit cycle local limits were properly allocated. Giving the SIUs a “portion of the pie” (pollutant) based off their need and availability.



PREVIOUS PERMIT:
EVERYONE
RECEIVED THE
WHOLE PIE.



NEW PERMITS:
INDUSTRY'S ARE
ALLOCATED A PIECE OF
THE PIE FOR EACH
POLLUTANT.

Enforcement Response Plan

ERP provides the framework for systematically investigating, documenting and selecting appropriate enforcement actions and follow up to ensure industrial users are following pretreatment standards and regulations.

The enforcement response plan (ERP) was last updated in 2018.

EPA expressed that an update is needed to align the sewer use ordinance and the ERP to outline detailed and precise enforcement procedures for noncompliance.

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KEY TAKE AWAYS



Building a strong program extends the life of the City infrastructure with components like cost recovery.



The City is required to update their pretreatment program components to continue to meet compliance with MODNR and EPA.

The pretreatment program is an essential component of protecting our City's WWTP's, employees, citizens and the environment while meeting state and federal regulations.



Thank you

Sedalia is an industrial town. Looking at the wide variety of products manufactured here in Sedalia is something we should all be proud of.

Both industry stakeholders and the City share a common commitment to protecting critical infrastructure, ensuring public safety, and preserving the environment. Implementing an updated pretreatment program will position both parties for success by ensuring compliance with local, state, and federal regulations while supporting the production of goods for the world.

SEDALIA

Let's Cross Paths



bwilbanks@sedalia.com

BILL NO. _____

ORDINANCE NO. _____

AN ORDINANCE AMENDING SECTIONS 60-100 THROUGH 60-166 OF THE CODE OF ORDINANCES OF THE CITY OF SEDALIA, MISSOURI RELATED TO SEWER USE REGULATIONS.

WHEREAS, on November 17, 2025, the City Council of the City of Sedalia, Missouri passed Resolution No. 2155 authorizing the submission of an evaluation of industrial pre-treatment local limits and draft update to City Code related to sewer use regulations to the Missouri Department of Natural Resources; and

WHEREAS, the Missouri Department of Natural Resources provided comments back and approval of the revisions to the above referenced City Code related to sewer use regulations; and

WHEREAS, the draft was approved by the Missouri Department of Natural Resources and it is in order to proceed with the amendments to Sections 60-100 through 60-166 of the Code of Ordinances of the City of Sedalia Missouri related to sewer use regulations as more fully described in Exhibit A attached to this Ordinance and incorporated by reference herein.

NOW THEREFORE, BE IT ORDAINED BY THE COUNCIL OF THE CITY OF SEDALIA, MISSOURI, AS FOLLOWS:

Section 1. Sections 60-100 to 60-166 of the Code of Ordinances of the City of Sedalia, Missouri are hereby amended as attached in Exhibit A and incorporated by reference.

Section 2. This ordinance shall be in full force and effect from and after its passage and approval by said council.

Read two times by title, copies of the proposed ordinance having been made available for public inspection prior to the time the bill is under consideration by the Council and passed by the Council of the City of Sedalia, Missouri this 4th day of May 2026.

Presiding Officer of the Council

Approved by the Mayor of said City this 4th day of May 2026.

Tina Boggess, Mayor Pro-Tem

ATTEST:

Jason S. Myers
City Clerk



Let's Cross Paths

City of Sedalia

200 S. Osage

Sedalia, MO 65301

(660) 827-3000 www.sedalia.com

To: Matthew Wirt, City Administrator

From: Brittany Wilbanks, Industrial Pretreatment Coordinator

Cc: William Bracken, Utilities Director
Ben Maness, Mid MO-Operations Wastewater Contractor

Date: April 24, 2026

Re: Industrial Pretreatment Program Updates as required by Missouri DNR.

This memorandum is submitted to request approval of the required modifications to the Industrial Pretreatment Program, as mandated by the Missouri Department of Natural Resources (DNR). These modifications address legal authority, local limits, and the enforcement response plan. The City Council approved a resolution endorsing these modifications on November 17, 2025.

The proposed modifications were subsequently submitted to the DNR on November 20, 2025, and formal approval was granted on December 8, 2025.

In accordance with Section 250.233, RSMo., and prior to initiating the public notice process, the proposed modifications were distributed to all significant industrial users requiring permits under the Industrial Pretreatment Program. Additionally, the documentation was provided to Pettis County Economic Development for dispersal to businesses within the City of Sedalia.

After distribution of the modifications, only one inquiry was received from DeLong's Inc. Based on their initial understanding, there was concern that they would be required to comply with all applicable program standards. However, following clarification, it was determined that they do not currently meet the criteria for classification as a permitted industrial user unless there is a substantial increase in wastewater discharge or a change in production processes at their facility.

Sierra Bullets submitted comments regarding the proposed modifications as part of its industrial user permit appeal, received on January 30, 2026. The company expressed concerns that the fees and fines outlined in the modifications appeared excessive and disproportionate relative to its compliance history and operational impact. Following further discussion and clarification, a mutually agreed-upon modified industrial user discharge permit was issued on March 17, 2026.

The program modifications were placed on public notice on March 6, 2026, and the Missouri Department of Natural Resources concurrently issued its public notice on the same date.

No comments were received during the 30-day public comment period.

BILL NO. _____

ORDINANCE NO. _____

AN ORDINANCE AUTHORIZING ISSUANCE OF AN INDUSTRIAL USER HAULED WASTEWATER DISCHARGE PERMIT TO MID STATES SPECIALTY EGGS, LLC.

WHEREAS, the City of Sedalia, Missouri has received a proposal from Mid States Specialty Eggs, LLC. for issuance of an industrial user hauled wastewater discharge permit; and

WHEREAS, under the permit, the City of Sedalia, Missouri shall receive from Mid States Specialty Eggs, LLC the sum and amount of Two Hundred Dollars (\$200.00) Waste Hauler Onboarding Fee prior to any discharge and should be paid at time of waste hauler permit application. Permittee is also subject to pay \$0.12/gallon (\$150.00/load minimum) and additional Six Cents (\$0.06/gallon) for high strength wastewater with additional administrative fees for sampling and contract lab analysis for said services as more fully described in the proposed permit attached to this Ordinance and incorporated by reference herein.

NOW THEREFORE, BE IT ORDAINED BY THE COUNCIL OF THE CITY OF SEDALIA, MISSOURI as follows:

Section 1. The Council of the City of Sedalia, Missouri hereby authorizes the issuance of an industrial user hauled wastewater discharge permit to Mid States Specialty Eggs, LLC as it has been proposed.

Section 2. The Mayor or City Administrator are authorized and directed to execute and the City Clerk is hereby authorized and directed to attest and fix the seal of the City of Sedalia, Missouri on the permit in substantively the same form and content as it has been proposed.

Section 3. The City Clerk is hereby directed to file in his office a duplicate or copy of the permit after it has been executed by the parties or their duly authorized representatives.

Section 4. This Ordinance shall be in full force and effect from and after its passage and approval.

Read two times by title, copies of the proposed Ordinance having been made available for public inspection prior to the time the bill is under consideration by the Council and passed by the Council of the City of Sedalia, Missouri this 4th day of May 2026.

Presiding Officer of the Council

Approved by the Mayor of said City this 4th day of May 2026.

Tina Boggess, Mayor Pro Tem

ATTEST:

Jason S. Myers
City Clerk



Let's Cross Paths

City of Sedalia

200 S. Osage

Sedalia, MO 65301

(660) 827-3000 www.sedalia.com

To: Matthew Wirt, City Administrator

From: Brittany Wilbanks, Industrial Pretreatment Coordinator

Cc: William Bracken, Utilities Director
Ben Maness, Mid MO-Operations Wastewater Contractor

Date: April 30, 2026

Re: Mid States Specialty Eggs, LLC Industrial User Hauled Wastewater Discharge Permit

This memorandum is submitted to request approval for issuance of an Industrial User Hauled Wastewater Discharge Permit to Mid States Specialty Eggs, LLC ("MSSE"). MSSE operates an egg washing facility located at 30911 State Highway HH, outside the City's jurisdictional boundaries.

MSSE has requested authorization to transport and discharge industrial wastewater from its on-site holding basin to the City's Publicly Owned Treatment Works ("POTW"). Based on data collection, site inspection, and coordination with MSSE personnel, the proposed discharge has been determined to have the reasonable potential to adversely impact the Wastewater Treatment Plant ("WWTP") and its operations. This represents the first permit of this type to be issued by the City.

Proposed Permit No. SED-C-HW-MSSE-001 establishes the conditions under which MSSE may discharge to the POTW. Prior to commencement of any discharge, MSSE shall remit a \$200 waste hauler onboarding fee. MSSE shall be assessed a hauled wastewater usage fee of \$0.12 per gallon, subject to a minimum charge of \$150 per load. Wastewater classified as high-strength shall be subject to an additional surcharge of \$0.06 per gallon. MSSE shall be responsible for all associated administrative costs, including but not limited to sampling, monitoring, and third-party laboratory analysis.

The proposed permit authorizes a maximum discharge volume of 30,000 gallons per day, contingent upon MSSE's full compliance with all permit terms, conditions, and applicable regulatory requirements. Authorization to discharge may be modified, suspended, or revoked in accordance with the City's Enforcement Response Plan and Sewer Use Ordinance in the event of noncompliance.

Approval of this permit is consistent with the City's objective to support local and regional economic activity while maintaining compliance with all applicable regulatory standards and protecting the integrity of the POTW. The controlled acceptance of hauled wastewater, under enforceable permit conditions, provides a mechanism to accommodate industrial needs without compromising treatment performance, environmental compliance, or public health.

1. PERMIT AUTHORIZATION AND ISSUANCE

INDUSTRIAL USER HAULED WASTEWATER DISCHARGE PERMIT			
Permittee <i>Industrial User Permittee</i> <i>Physical Address</i>	Mid States Specialty Eggs, LLC 30911 State Highway HH Smithton, MO 65350	Control Authority Information	City of Sedalia 200 South Osage Sedalia, MO 65301
Authorized Representative	Grant Hostetler Authorized Representative	Kody Kropf Duly Authorized Representative	
Permit Duration	Effective: 05-04-2026	Modified: [Reserved]	Expiration: 04/19/2027 Renewal Due: January 20, 2027
Legal Authority/ Pretreatment Ordinance Code Reference	City of Sedalia City Code, Chapter 60, Utilities Article IV. Sewer Use		
Pretreatment Program Approval Authority <i>Documentation for the entity responsible for program approvals.</i>	The U.S. Environmental Protection Agency has authorized the Missouri Department of Natural Resources to oversee the development of local pretreatment programs and delegate Control Authority to publicly owned treatment works (POTWs). Missouri's General Pretreatment Regulation 10 CSR 20-6.100 incorporates Federal General Pretreatment Regulation 40 CFR 403 and Federal Categorical Standards.		
Pretreatment Program Control Authority <i>Entity responsible for program implementation</i>	The City of Sedalia is the Control Authority for the State-approved Pretreatment Program and is the continuing authority for the wastewater treatment plant. The City of Sedalia operates a POTW under the NPDES permit number MO-0023019 (Central WWTP), MO-0023027 (North WWTP) and MO-0101567 (Southeast WWTP) issued by the State of Missouri.		
Authorization of Discharge	In accordance with the Pretreatment Ordinance referenced above and the conditions set forth herein, the permittee is hereby authorized to discharge industrial wastewater from the compliance monitoring locations identified in Part 2 of this permit. All discharges so authorized shall be limited and controlled pursuant to the terms and conditions of this permit.		
Permit Basis	This permit is issued based on information provided by the permittee in the baseline monitoring report (BMR), permit renewal applications, and periodic site visits by the Control Authority. The fact sheet for this permit is available upon request.		
Duty to Comply	The permittee must comply with all conditions of this permit. Failure to comply with the requirements of this permit may be grounds for administrative action, or enforcement proceedings including civil or criminal penalties, injunctive relief, and summary abatements, including revocation of this permit.		
Civil and Criminal Penalties Violations <i>40 CFR 403.8(f)(1)(vi)(A)</i>	Nothing in this permit may be construed to relieve the permittee from civil and/or criminal penalties for noncompliance. Noncompliance with any term or condition of this permit shall constitute a violation of the referenced Pretreatment Ordinance. If formal enforcement action is required to gain compliance, the permittee who is found not in compliance may be subject to fine or imprisonment under the applicable law, or both such fine and imprisonment, for each violation. The penalty may include a fine of not more than \$1000 per violation, per day, or imprisonment as provided by law, or both.		
Transferability <i>40 CFR 403.8(f)(1)(iii)(B)(2)</i>	This permit may be transferred to a new owner or operator only if the permittee gives at least thirty (30) days advance notice to the Control Authority. The notice shall include a written certification by the new operator which states that the new operator has no immediate intent to change the facility's operations and processes, identifies the specific date on which the transfer is to occur, and acknowledges full responsibility for complying with the existing individual wastewater discharge permit. Failure to provide advance notice of a transfer renders the individual wastewater discharge permit void as of the date of the facility transfer.		
Duty to Reapply Permit Reissuance <i>40 CFR 403.8(f)(1)(iii)(B)(1)</i>	A permittee that desires to continue a discharge regulated by this permit after the expiration date must apply for renewal by submitting a complete and updated permit application, no less than ninety (90) days prior to the expiration of this permit.		

*** See Page 9 for signatures

Signature	Printed Name	Title	Date
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2. APPLICABLE PRETREATMENT STANDARDS, DEFINITION OF COMPLIANCE MONITORING LOCATIONS AND EFFLUENT LIMITS

2.1. Applicable Federal and Local Regulations for Permit Limits Applicable to the Permittee

Federal Regulation Reference 40 CFR	40-CFR-403 General Pretreatment Standards	Monitoring requirements to demonstrate compliance with referenced standards are contained in this permit.
	§ 403 General Pretreatment Standards	Incorporated into the permit.
Local Limit Reference	Chapter 60, Utilities Article IV. Sewer Use	Incorporated into the permit.

2.2. Permitted Compliance Monitoring Locations

During the effective period of this permit, the Permittee is authorized to discharge wastewater from the compliance monitoring locations defined below:

Monitoring Location Name	Coordinates	Monitoring Location Description
SED-C-HW-MSSE-001	38.71650 °N, 93.26255 °W	Northwest corner of the sedimentation basin.
SED-C-HW-MSSE-002	38.71715 ° N, 93.26319 °W	Headworks of the treatment plant.



2.3 Interim Effluent Limitations and Monitoring Requirements for Hauled Waste

The interim limits outlined below shall remain in effect until a minimum of five sampling events have been completed for all listed parameters. While awaiting the results of this sampling, these interim limits shall be applied. The data collected during this period will serve as baseline monitoring and will be used to establish final effluent limitations.

Effluent Parameter	Units	Effluent Limits			Monitoring Requirements	
		Daily Average	Limit Type ⁽⁶⁾	Measurement Frequency	Sample Type ⁽³⁾⁽⁴⁾	
Flow	GPD	30,000	NA	Daily	Estimated	
pH	S.U.	6-9/ For Each Load	Enforceable	Each Load	Grab	
Chromium (Total)	mg/L	1.56 mg/L	Interim	Quarterly	Grab	
Copper (Total)	mg/L	0.5 mg/L	Interim	Quarterly	Grab	
Lead (Total)	mg/L	0.018 mg/L	Interim	Quarterly	Grab	
Nickel (Total)	mg/L	1.23 mg/L	Interim	Quarterly	Grab	
Zinc (Total)	mg/L	1.30 mg/L	Interim	Quarterly	Grab	
Silver (Total)	mg/L	0.004 mg/L	Interim	Quarterly	Grab	
Cadmium (Total)	mg/L	0.002 mg/L	Interim	Quarterly	Grab	
BOD	mg/L	250 mg/L	Enforceable	Daily	Grab	
COD	mg/L	450 mg/L	Enforceable	Weekly	Grab	
TSS	mg/L	250 mg/L	Enforceable	Daily	Grab	
HEM	mg/L	50 mg/L	Enforceable	Monthly	Grab	
Total Nitrogen	mg/L	60 mg/L	Enforceable	Weekly	Grab	
Phosphorus	mg/L	6 mg/L	Enforceable	Weekly	Grab	
Arsenic (Total)	mg/L	0.100 mg/L	Interim	Quarterly	Grab	
Molybdenum	mg/L	0.018 mg/L	Interim	Quarterly	Grab	
Selenium	mg/L	0.024 mg/L	Interim	Quarterly	Grab	
Chloride	mg/L	250 mg/L	Enforceable	Weekly	Grab	

Footnotes

3. 2.4 EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS FOR HAULED WASTE

Reserved

3.1. Permitted Discharge

<p>Discharges Must Occur Only:</p>	<ol style="list-style-type: none"> 1. After the \$200 waste hauler fee is paid for 2026. (2027 it will increase to \$350, 2028 \$500). 2. After a completed waste hauler permit has been received and approved. 3. At the City of Sedalia’s designated wastewater treatment facility (Central Wastewater Treatment Plant located at 3000 West Main Sedalia, MO 65301. All hauled waste must be discharged at the northwest corner of the sedimentation basin (Sedimentation Basin 001). Only if permission is granted by the control authority may hauled waste be discharged at Influent Structure 002. 4. During approved operating hours, as specified by the Control Authority, which are Monday through Friday 7:30 AM to 2:30 PM. 5. After a sample of the waste has been collected and brought to City staff to test for pH and temperature. The pH and temperature of the sample must meet the permit requirements prior to any discharging by the waste hauler.
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Mid-States Specialty Eggs Industrial Hauled Wastewater Discharge Permit | SED-C-HW-MSSE-001

	6. After a completed waste manifest to Control Authority staff is provided by the waste hauler.
Discharges will not be allowed during these times:	<ol style="list-style-type: none"> 1. During a rain event. For this permit a rain event can be defined as any continuous, measurable precipitation of one tenth (0.10) of an inch or more. 2. 48 hours after a rain event, which shall be calculated from the time the rain event concludes. 3. During the Missouri State Fair, August 13, 2026 to August 23, 2026 unless prior agreements have been made between the permittee and the Control Authority. 4. At any point a Control Authority staff member isn't present. 5. During potential construction phases of the Central Wastewater Treatment Plant upgrade unless approved by the City.
Prohibited Discharges:	Refer to Section 5.2

Permittee may apply for a waiver from monitoring for a Pollutant neither present nor expected to be present in the Discharge in accordance with City Code Sec. 60-128.

4. REPORTING AND NOTIFICATION REQUIREMENTS

4.1. Notification Requirements

4.1.1. Changed Condition <i>40 CFR 403.12(j)</i>	The permittee must notify the Control Authority of any changed conditions to the permittee's operations, facility, production, or altered volumes, substances, or character of pollutants of its discharge at least thirty (30) days before the change.
4.1.2. Signatory Requirements <i>40 CFR 403.12 (l)</i>	<p>All documents requiring signature shall be signed as follows:</p> <ol style="list-style-type: none"> 1. By a responsible corporate officer, if the Industrial User submitting the reports required by paragraphs (b), (d) and (e) of 40 CFR 403.12 is a corporation. For the purpose of this paragraph a responsible corporate officer means: <ol style="list-style-type: none"> (i) A president, secretary, treasurer, or vice-president of the corporation in charge of the principal business function, or any other person who performs similar policy-or decision-making functions for the corporation, or (ii) The manager of one or more manufacturing, production, or operating facilities, provided the manager is authorized to make management decisions which govern the operation of the regulated facility including having the explicit or implicit duty of making major capital investment recommendations, and initiate and direct other comprehensive measures to assure long-term environmental compliance with environmental laws and regulations; can ensure that the necessary systems are established or actions taken to gather and complete and accurate information for control for control mechanism requirements; and where authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures. 2. By a general partner or proprietor if the industrial user submitting the reports required by paragraph (b), (d), and (e) of 40 CFR 403.12 is a partnership or sole proprietorship respectively. 3. By a duly authorized representative of the individual designated in paragraph (l)(1) or (l)(2) of 40 CFR 403.12 if: <ol style="list-style-type: none"> i. The authorization is made in writing by the individual described in paragraph (l)(1) or (l)(2); ii. The authorization specifies either an individual or a position having responsibility for the overall operation of the facility from which the industrial discharge originates, such as the position of plant manager, operator of the well, or well field superintendent, or a position of equivalent responsibility for environmental matters for the company; and iii. The written authorization is submitted to the Control Authority.

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<p>4.1.3. Changes in Signatory Authority for Authorized or Duly Authorized Representatives <i>40 CFR 403.12(l)(4)</i></p>	<p>If the individual or position who has responsibility for permittee's facility, or overall responsibility for environmental matters for the company provided in this permit changes, a new authorization shall be submitted in writing documenting personnel with overall responsibility for the facility or having responsibility for environmental matters for the facility to the Control Authority. The updated authorization shall be provided prior to or together with any reports required under this permit.</p>
<p>4.1.4. Site Specific Notifications</p>	<p>[reserved]</p>

5. STANDARD CONDITIONS

5.1. General Conditions

<p>5.1.1. Severability</p>	<p>If any provision of this permit or the application of any provision of this permit to any circumstance is invalidated by a court of competent jurisdiction, the remaining provisions will not be affected thereby and will continue in full force and effect.</p>	
<p>5.1.2. Duty to Mitigate</p>	<p>The permittee must take all reasonable steps to mitigate noncompliance with any Pretreatment Standard or Requirements including halting production, including such accelerated or additional monitoring as necessary to determine the nature and impact of the noncomplying discharge. Upon identification of an impact to the POTW or the environment including events such as loss or failure of all or part of the treatment facility, the permittee must, to the extent necessary to maintain compliance with its permit, control its production or discharges (or both) until operation of the treatment facility is restored or an alternative method of treatment is provided.</p>	
<p>5.1.3. Duty to Provide Information</p>	<p>The permittee shall provide any information that the Control Authority may request to determine whether cause exists for modifying, suspending, revoking and reissuing, or terminating this permit or to determine compliance with this permit. The permittee shall also furnish copies of any records required to be kept by this permit upon request by the Control Authority.</p>	
<p>5.1.4. Permit Appeal</p>	<p>Petition for review shall be submitted within thirty (30) days of notice of the permit's issuance.</p>	<p>Failure of the Control Authority to react within sixty (60) days to the appeal shall render the appeal denied.</p>
<p>5.1.5. Permit Modification <i>40 CFR 403.8(e)</i></p>	<p>The Control Authority may modify an individual wastewater discharge permit for good cause, including, but not limited to, any of the following reasons:</p> <ol style="list-style-type: none"> 1. To incorporate any new or revised federal, state, or local pretreatment laws, standards, or requirements. 2. To address significant alterations or additions to the permittee's operation, processes, or wastewater volume or character since the time of the individual wastewater discharge permit issuance. 3. To incorporate changed or more representative wastewater characteristics such as identification of additional Pollutants of Concern or different concentrations than otherwise provided to the Control Authority. 4. A change in the POTW that requires either a temporary or permanent reduction or elimination of the authorized discharge. 5. Information indicating that the permitted discharge poses a threat to the Control Authority POTW, personnel, or the receiving waters. 6. Violation of any terms or conditions of the individual wastewater discharge permit or violation of City of Sedalia ordinance. 7. Misrepresentations or failure to fully disclose all relevant facts in the wastewater discharge permit application or in any required reporting. 8. Revision of or a grant of variance from categorical pretreatment standards pursuant to 40 CFR 403.13. 9. To correct typographical or other errors in the individual wastewater discharge permit. 10. To reflect a transfer of the facility ownership or operation to a new owner or operator where requested in accordance with Sedalia City Code Chapter 60. <p>The filing of a request by the permittee for a permit modification, or suspension, or revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance, does not stay any permit condition.</p>	

Mid-States Specialty Eggs Industrial Hauled Wastewater Discharge Permit | SED-C-HW-MSSE-001

<p>5.1.6. Permit Termination</p>	<p>The permit may be terminated for the following reasons:</p> <ol style="list-style-type: none"> 1. Violation of individual wastewater discharge permit conditions or violation of City of Sedalia ordinance, including but not limited to City Code Sec. 60-132. 2. Hauled waste begins to cause harm to the wastewater treatment at any step of the process (clarification, aeration, UV, sludge handling and processing, etc.) 3. Failure to accurately report the wastewater constituents and characteristics of its discharge. 4. Failure to report significant changes in operations or wastewater volume, constituents, and characteristics prior to discharge. 5. Refusal of reasonable access to the permittee's premises for the purpose of inspection, monitoring, or sampling. 6. Violation of the pretreatment standards the permittee is subject to herein. <p>In the event of termination, the Permittee shall be notified of the proposed termination of its discharge and be offered an opportunity to show cause as authorized by City Code Sec. 60-153 why the proposed action should not be taken. Exercise of permit termination shall not be a bar to, or a prerequisite for, taking any other action against the permittee.</p>
<p>5.1.7. Compliance with Applicable Pretreatment Standards and Requirements</p>	<p>Compliance with this permit does not relieve the permittee from its obligations regarding compliance with any and all applicable local, state and federal Pretreatment Standards and requirements including any such standards or requirements that might become effective during the term of this permit.</p>
<p>5.1.8. Confidentiality <i>Confidential Information</i> <i>40 CFR 403.14</i></p>	<p>Any information submitted to the Control Authority or State or Federal agencies related to Pretreatment Standards and requirements shall be open records in accordance with Chapter 610, RSMo., unless the permittee notifies the Control Authority that the permittee believes the information should be closed records under Chapter 610, RSMo. Any such claim must be asserted at the time of submission by stamping the words "closed record" on each page containing such information. If no claim is made at the time of submission, the Control Authority may make the information available to the public without further notice in accordance with Chapter 610, RSMo.. The Control Authority shall determine, in its sole authority, whether any information or records constitute closed records under Chapter 610, RSMo. Information and data provided to the Control Authority pursuant to this part which is effluent data shall be available to the public without restriction. All other information which is submitted to the Control Authority shall be available to the public in accordance with Chapter 610, RSMo.</p>

5.2. Prohibited Discharges

<p>5.2.1. General Prohibitions</p>	<p>The permittee must not introduce or cause to be introduced into the Control Authority's collection, transportation, and treatment system any pollutant or wastewater which causes pass-through or interference.</p>										
<p>5.2.2. Specific Prohibitions</p>	<p>The permittee must not introduce or cause to be introduced into the Control Authority's collection, transportation, and treatment system the following pollutants, substances or wastewater:</p> <table border="1" data-bbox="365 1394 1495 1932"> <tr> <td data-bbox="365 1394 586 1562"> <p>(a) Fire or Explosive Hazard</p> </td> <td data-bbox="592 1394 1495 1562"> <p>Any substance in a quantity sufficient to create a potential for fire or explosion, including, but not limited to: discharges with a closed-cup flashpoint of less than 140 degrees Fahrenheit (60 degrees Celsius), using test methods specified in 40 CFR 261.21; and any Discharge that creates two consecutive readings on an explosive hazard meter at any point in the POTW to exceed five percent (5%), or any single reading to exceed ten percent (10%) of the lower explosive limit;</p> </td> </tr> <tr> <td data-bbox="365 1570 586 1654"> <p>(b) Corrosive Wastewater and pH Limitations</p> </td> <td data-bbox="592 1570 1495 1654"> <p>Any substance having a pH outside the range of , or otherwise causing corrosive structural damage to the Control Authority's collection, transportation, and treatment system or Control Authority's equipment or personnel;</p> </td> </tr> <tr> <td data-bbox="365 1663 586 1747"> <p>(c) Solid or Viscous Substances</p> </td> <td data-bbox="592 1663 1495 1747"> <p>Any particulates, solids, organic, or inorganic material including but not limited to food waste, microplastics, resins, or viscous substances in a quantity sufficient to cause, potentially cause, or contribute to Interference or Disruption to the POTW;</p> </td> </tr> <tr> <td data-bbox="365 1755 586 1881"> <p>(d) Oxygen Demanding Pollutants</p> </td> <td data-bbox="592 1755 1495 1881"> <p>Any substance, including oxygen-demanding Pollutants (BOD, etc.), discharged to the POTW at a flow rate or concentration that will or may cause, either singly or by interaction with other substances, Interference or Disruption to the POTW, sludge process, reuse and resource recovery, or which will constitute a hazard to humans or animals;</p> </td> </tr> <tr> <td data-bbox="365 1890 586 1932"> <p>(e) Temperature Limitations</p> </td> <td data-bbox="592 1890 1495 1932"> <p>Any discharge having a temperature greater than , or which will inhibit biological activity in the treatment plant resulting in interference, but in no case wastewater</p> </td> </tr> </table>	<p>(a) Fire or Explosive Hazard</p>	<p>Any substance in a quantity sufficient to create a potential for fire or explosion, including, but not limited to: discharges with a closed-cup flashpoint of less than 140 degrees Fahrenheit (60 degrees Celsius), using test methods specified in 40 CFR 261.21; and any Discharge that creates two consecutive readings on an explosive hazard meter at any point in the POTW to exceed five percent (5%), or any single reading to exceed ten percent (10%) of the lower explosive limit;</p>	<p>(b) Corrosive Wastewater and pH Limitations</p>	<p>Any substance having a pH outside the range of , or otherwise causing corrosive structural damage to the Control Authority's collection, transportation, and treatment system or Control Authority's equipment or personnel;</p>	<p>(c) Solid or Viscous Substances</p>	<p>Any particulates, solids, organic, or inorganic material including but not limited to food waste, microplastics, resins, or viscous substances in a quantity sufficient to cause, potentially cause, or contribute to Interference or Disruption to the POTW;</p>	<p>(d) Oxygen Demanding Pollutants</p>	<p>Any substance, including oxygen-demanding Pollutants (BOD, etc.), discharged to the POTW at a flow rate or concentration that will or may cause, either singly or by interaction with other substances, Interference or Disruption to the POTW, sludge process, reuse and resource recovery, or which will constitute a hazard to humans or animals;</p>	<p>(e) Temperature Limitations</p>	<p>Any discharge having a temperature greater than , or which will inhibit biological activity in the treatment plant resulting in interference, but in no case wastewater</p>
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<p>(e) Temperature Limitations</p>	<p>Any discharge having a temperature greater than , or which will inhibit biological activity in the treatment plant resulting in interference, but in no case wastewater</p>										

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	which causes the temperature at the introduction into the treatment plant to exceed 104 °F or 40 °C;
(f) Petroleum and Mineral Oil	Petroleum oil, nonbiodegradable cutting oil, products of mineral oil origin in amounts that will cause Inference, Pass Through, or Disruption to the POTW;
(g) Toxic Gases, Vapors or Fumes	Any substance that, alone or in combination with other substances, will or may through the creation of toxic, malodorous, or noxious gases, vapors or fumes, or other Wastewater which, either singly or by interaction with other wastes create a public nuisance, create a hazard to human or animal life, create a hazard to worker health or safety, or prevents safe entry into any portion of the POTW for inspection, maintenance, or repair;
(h) Trucked or Hauled Wastewater	Trucked or hauled pollutants, except at discharge points designated by the Control Authority in accordance with this permit and City Code Chapter 60;
(i) Color	Wastewater which imparts color which cannot be removed by the treatment process, such as, but not limited to, inks, dye wastes, paints, and vegetable tanning solutions;
(j) Radioactive Wastes	Wastewater containing any radioactive waste or isotopes except in compliance with applicable Federal or State Regulations and if authorized by the Control Authority;
(k) Stormwater and Unpolluted Wastewater	Discharge from stormwater drains, roof runoffs, pond overflows, sumps, or cisterns in a quantity sufficient to cause, potentially cause, or contribute to Disruption;
(l) Industrial Residuals	Sludges, screenings or other residues from the pretreatment of industrial wastes except as specifically authorized by the Control Authority;
(m) Hazardous Waste	; Any substance that would be a hazardous waste prior to mixing with other wastestreams pursuant to 40 CFR 261, if otherwise disposed;
(n) Medical Wastes	Medical Wastes, in a quantity or quality sufficient to cause, potentially cause or contribute disruption.
(o) Toxic Discharges	Wastewater causing, alone or in conjunction with other sources, the treatment plant's effluent to fail a toxicity test; Detergents, surfactants, surface-active agents or other substances in concentrations which may cause excessive foaming in the POTW or receiving stream;
(p) Excessive Foaming	Detergents, surfactants, surface-active agents or other substances in concentrations which may cause excessive foaming in the POTW or receiving stream; Fats, oils or greases of animal or vegetable origin in concentrations greater than 100 mg/L, or any waters containing substances which may solidify or become viscous at temperatures between 32 °F and 140 °F or between 0 °C and 65 °C;
(q) FOG	Any substance that would be a hazardous waste prior to mixing with other wastestreams pursuant to 40 CFR 261, if otherwise disposed; Fats, oils or greases of animal or vegetable origin in concentrations greater than 100 mg/L, or any waters containing substances which may solidify or become viscous at temperatures between 32 °F and 140 °F or between 0 °C and 65 °C;
Storage of Prohibited Wastewater	Pollutants, substances or wastewater prohibited shall not be processed or stored in such a manner that they could be discharged to the Control Authority's collection, transportation and treatment system by way of hauled waste.

5.3. Operation and Maintenance of Pollution Controls

5.3.1. Properly Maintain Equipment	The permittee must at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with the conditions of this permit including: effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures.
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5.4. Monitoring and Records

5.4.1. Representative Samples	All wastewater samples or collection of wastewater samples must be representative of the permittee's discharge (each load).
5.4.2. Analytical Methods to Demonstrate Continued Compliance	All sampling and analysis required by this permit must be performed in accordance with the techniques prescribed in 40 CFR Part 136 and amendments thereto, otherwise approved by EPA, or as specified in this permit.

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<p><i>40 CFR 136</i></p>	<p>In accordance with 40 CFR Part 136.1, when more than one test procedure is approved under this part for the analysis of a pollutant or pollutant parameter, the test procedure must be sufficiently sensitive as defined at 40 CFR 122.21(e)(3) and 122.44(i)(1)(iv).</p>
<p>5.4.3. Authority to Enter Ready Access <i>40 CFR 403.8(f)(1)(v)</i></p>	<p>Representatives of the Control Authority are authorized to enter the premises of the permittee to determine whether the permittee is complying with all Pretreatment Standards; permittee shall provide access to all parts of the premises for the purposes of inspection, sampling, records examination and copying, and the performance of any additional duties. Unreasonable delays in allowing the Control Authority access to the permittee's premises shall be a violation of this permit.</p>
<p>5.4.4. Record-Keeping Calibration <i>40 CFR 403.12(o)</i></p>	<p>Permittee shall maintain records of information associated with this permit including waste manifests, sampling results, and daily discharge from MSSE facility.</p>
<p>5.4.5. Falsifying Information</p>	<p>Knowingly making any false statement on any report or other document required by this permit or knowingly rendering any monitoring device or method inaccurate, is a crime and may result in the imposition of criminal sanction or civil penalties or both.</p>

6. USER CHARGES AND FEES

<p>6.1 Surcharge Authority</p>	<p>Fees may be imposed for high strength discharges based on the concentration and volume of wastewater received. Surcharge parameters, strength, and cost to treat are as documented in Sedalia City Code and City of Sedalia fee schedules. Rates may be updated in the discretion of the Control Authority.</p>
<p>6.2 Hauled Waste Fees</p>	<p>Permittee must pay the \$200 Waste Hauler Onboarding Fee prior to any discharge. This should be paid at the time of the waste hauler permit application. Permittee is also subject to pay \$0.12/gallon (\$150 minimum per load) and an additional six cents (\$0.06) per gallon may be charged for high strength wastewater. Additional administrative services fees apply for sampling and contract lab analysis.</p>
<p>6.3 Schedule of User Charges and Fees</p>	<p>Fees may be imposed through approval of the City Council of Sedalia and shall include the following pretreatment fees: annual industrial user inspection, annual sampling of industrial discharges, and minor permit modifications. Fees may be imposed for gallons of hauled waste delivered, laboratory fees, hauled waste fees. When administrative costs, surveillance and inspection staff time, monitoring, enforcement efforts, and permit renewals including consulting services exceed the base services needed in a given year of the permit cycle, a permittee may be assessed a supplemental fee to recover the costs incurred.</p>
<p>6.4 Recovery of Costs Incurred</p>	<p>The permittee violating any of the provisions of this permit or other applicable Pretreatment Standards or causing disruption to the POTW will be liable to the Control Authority for any expense, loss, or damage caused by such violation or discharge. The Control Authority may also recover the costs for any cleaning, repair, or replacement work caused by the violation or discharge. Refusal to pay the assessed costs will constitute a separate violation of City Code Chapter 60. Reasonable attorneys' fees, court costs, and other expenses associated with enforcement activities, including sampling and monitoring expenses, and the cost of any actual damages incurred may be recovered by the Control Authority.</p>

7. ENFORCEMENT

7.1. Enforcement of Pretreatment Standards and Requirements

<p>7.1.1. ERP as a Pretreatment Program Component <i>40 CFR 403.8(f)(5)</i></p>	<p>The Control Authority has an Enforcement Response Plan (ERP) as a required component of the implemented Pretreatment Program. The ERP provides guidance for responding to violations of pretreatment code. Escalating enforcement actions are intended to return users to compliance as quickly as possible using appropriate and consistent escalation across the Control Authority's jurisdiction.</p>
<p>7.1.2. Considerations</p>	<p>The ERP provides guidance based on common violations; however, not all instances of noncompliance are addressed. The Control Authority shall exercise discretion to determine handling of violations, including those not covered in the ERP.</p>
<p>7.1.3. Fine Authority <i>Local Code: Section 24-200.47</i> <i>Section 24-200.47</i></p>	<p>If the Permittee has violated or continues to violate any Pretreatment Standard or Order issued associated with noncompliance, a monetary penalty shall be assessed in an amount not to exceed \$1000 per day, per violation.</p>

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Signature	Printed Name	Title	Date
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Signature	Printed Name	Title	Date
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BILL NO. _____

ORDINANCE NO. _____

AN ORDINANCE AUTHORIZING THE PURCHASE OF A VEHICLE FOR THE UTILITIES DEPARTMENT.

WHEREAS, The City of Sedalia, Missouri, have received a bid from Heavy Equipment, LLC for the purchase of one 2022-2026 (White) Chevrolet Silverado 4500 Truck with service bed for the Utilities Department; and

WHEREAS, under the attached bid, the City of Sedalia, Missouri, shall pay the following sum and amount of One Hundred-eight Thousand Dollars (\$108,000.00) to Heavy Equipment, LLC for said vehicle as more fully described in the bid attached to this ordinance and incorporated by reference herein.

NOW THEREFORE, BE IT ORDAINED BY THE COUNCIL OF THE CITY OF SEDALIA, MISSOURI, as follows:

Section 1. The Council of the City of Sedalia, Missouri, hereby approves and accepts the bid by and between the City of Sedalia, Missouri, and Heavy Equipment, LLC in substantively the same form and content as it has been proposed.

Section 2. The Mayor or City Administrator are authorized and directed to execute and the City Clerk is hereby authorized and directed to attest and fix the seal of the City of Sedalia, Missouri, on the bid in substantively the same form and content as it has been proposed.

Section 3. The City Clerk is hereby directed to file in his office a duplicate or copy of the bid after it has been executed by the parties or their duly authorized representatives.

Section 4. This ordinance shall take effect and be in full force and effect from and after its passage and approval.

Read two times by title, copies of the proposed ordinance having been made available for public inspection prior to the time the bill is under consideration by the Council and passed by the Council of the City of Sedalia, Missouri this 4th day of May 2026.

Presiding Officer of the Council

Approved by the Mayor of said City this 4th day of May 2026.

ATTEST:

Tina Boggess, Mayor Pro-Tem

Jason S. Myers
City Clerk



Let's Cross Paths

City of Sedalia

200 S. Osage

Sedalia, MO 65301

(660) 827-3000 www.sedalia.com

To: Matthew Wirt, City Administrator
From: William Bracken, Utilities Director
Date: April 29, 2026
Subject: Purchase of Service Crane Truck for Water Pollution Control Department

As part of our Water Pollution Control strategic planning, we have discussed bringing pump preventative maintenance in-house to reduce annual costs. This maintenance involves removing debris such as rags and other large solids from pump cavities, as well as performing lubrication on various sizes of submersible lift station pumps throughout our wastewater system and treatment plants. Currently, this specialized service costs the City approximately \$34,850 per year from an outside contractor.

Performing this work internally requires a service truck equipped with a crane capable of safely removing large pumps from confined pits located throughout the city. Our existing service truck, a 2003 model, has been essential to operations over its lifespan. However, it is no longer cost-effective to maintain, as it has required extensive repairs in recent years. Additionally, the crane has exceeded its expected service life and now presents safety concerns.

During the current budget planning cycle, we initially requested \$190,000 to replace this vehicle. Due to budget constraints, the approved amount was reduced to \$110,000. While this lower amount limits options, we conducted an extensive search and identified both used units with remaining service life and new, older-model units available at discounted pricing.

Through our formal bid process, we obtained three bids. Based on these results, I recommend the purchase of a new 2022 model year Chevrolet 4500 equipped with a 2024 Knapheide service bed, offered by Heavy Equipment LLC for \$108,000 due to it being the lowest bid. This unit represents a substantial value as new old stock, is unused, and includes full factory warranties. And its cost is within our reduced budget.

Thank you for your consideration.

Tabulation of Bids
1-2022-2026 (White) Chevrolet Silverado 4500 Truck with Service Bed
 April 29, 2026 2:00 p.m.
 Council Chambers

	Heavy Equipment, LLC 4501 S Banner Street Boise, Idaho 83709 \$108,000.00	Ed Morse Chevrolet 285 West Elm Street Lebanon, MO 65536 \$120,413.00	Behlmann CDJR 175 Turnbull Trail Troy, MO 63379 \$131,586.00 & \$3,379.00 for Summit + Freight
Total Proposed Cost	\$2,970.00	No Charge	\$300.00
Cost - Delivery	2022 Chevrolet/2024 Knapheide	Chevrolet 5500	Ram 4500
Make & Model	Approx. 10 days after paid in full	Est. 12-15 weeks for body	4-5 Mos. +/-
Delivery			
<u>Manufacturer Warranty</u>			
Engine/Transmission/ Drive Train	Powertrain through 10/27/2030	Basic 3 yrs/36,000 & drivetrain 5 yrs/75,000	5 Yrs/100,000
Electrical Systems/Components	Bumper to Bumber through 10/27/2028		3 Yrs/36,000
Other Parts	Bumper to Bumber through 10/27/2028		12 Mos./12,000
Extended Warranty	No	No	Yes - Chassis only (See note)
Meet Specs	Yes	Yes	Yes
Additional Charges	No	No	No

NOTE: Extended Warranty \$6,765.00 for 7 Years/150,000 warranty 2/\$200 Ded

The City of Sedalia retains the right to reject any and all proposals submitted, and to waive any informality contained in any proposal.

The City of Sedalia reserves the right to accept the proposal deemed most advantageous to the City.

This procedure is in accordance with the provisions of Ordinance No. 6626 of the City of Sedalia, Missouri. Additional information or questions concerning this request may be directed to the office of City Clerk (660-827-3000).

PART III: SPECIFICATIONS FOR VEHICLE

A complete copy of this checklist must be returned with accompanying bid form to constitute a responsive bid.

General Bid Specifications: Chevrolet Silverado 4500 Service Truck

Model Selected: 2022 -2026 Chevrolet Silverado 4500 with Service bed

	Does bid meet specifications TO BE COMPLETED BY BIDDER	
	YES	NO
1. Crew cab, two-wheel drive	<u> X </u>	<u> </u>
2. Engine: Diesel V8, 6.6 liter, heavy duty radiator and cooling system (including heater), oil filter and replaceable element air filter.	<u> X </u>	<u> </u>
3. Air Conditioning: factory installed air conditioner and fresh air heater and defroster	<u> X </u>	<u> </u>
4. Work truck Safety and Work Truck Convenience Package <small>Knapheide spec. doesn't specify "Package". Rear back-up camera. See GM "Stabilitrak"</small>	<u> </u>	<u> X </u>
5. Steering: power steering with tilt wheel	<u> X </u>	<u> </u>
6. locking rear differential <small>Has GM "Stabilitrak" w/traction control</small>	<u> </u>	<u> X </u>
7. Alternator: heavy-duty alternator required with minimum of 170 amps <small>NOTE: 150 amp single / 220 amp dual.</small>	<u> X </u>	<u> </u>
8. Battery: heavy-duty batteries	<u> X </u>	<u> </u>
9. Exhaust braking	<u> X </u>	<u> </u>
10. 7 pin trailer harness	<u> X </u>	<u> </u>
11. Front open differential	<u> X </u>	<u> </u>
12. HD 40/20/40 bench seat	<u> X </u>	<u> </u>
13. Gauges: equipped with gauges showing temperature	<u> X </u>	<u> </u>

- 14. Power Accessories: door locks and windows X
- 15. Windshield Wipers: two speed, intermittent windshield wipers X
- 16. Radio: AM/FM required X
- 17. Speakers: standard factory X
- 18. Floor Covering: heavy-duty vinyl type, no carpet X
- 19. Dual rear wheels X
- 20. Horns: factory equipped X
- 21. Cigarette lighter or auxiliary power supply X
- 22. Integrated trailer brake controller X
- 23. Anti-Freeze: permanent anti-freeze to be furnished by dealer in the radiators of the vehicles capable of withstanding -20 degree temperatures X

Bed Specifications

- 24. Knapheide 9' Steel Service Body X
- 25. 600 Series Boxes_See Attached GM-Knapheide Specification Sheet (KMS16-9)
- 26. Exterior Color: White X
- 27. Stellar EC 4000 Hydraulic crane 4,000 lb max with 20' reach X
- 28. VMAC G30+GEN combination generator /compressor 3600 watt, 120 and 240 volt X
- 29. Class V receiver hitch, 2.5" tube, 21,000 lb. capacity X
- 30. LED work lights and Strobes X
- 31. Manual downriggers on rear bed X
- 32. Rear backup camera and backup warning alarm X

A. Other Information:

It shall be the responsibility of the dealer and the car manufacturer supplying the vehicles purchased to maintain an adequate stock of all regular and special parts in the area of purchase. A special system shall be set up for expediting "hard to get" items. Shop manuals and the technical service bulletins shall also be available at the dealership for inspection by the City of Sedalia.

It shall also be the dealer's responsibility to provide to the City of Sedalia with any extended warranties that are available on the vehicle that may be considered

in the selection of the best bid.

The successful bidder shall be required to furnish part numbers for the oil filter, fuel and air filter elements on the new vehicle within 20 days after the award of the bid is made.

It is requested that the bid be done on the vehicle as specified in the specifications listed. The successful vendor will guarantee the price per unit to the City of Sedalia for a period of not less than 90 days in case additional orders are made. Any deviation from specifications shall be marked and an explanation of that deviation made.

This vehicle will be utilized in the normal marked fleet operations of the City of Sedalia Utilities Department.

BID FORM
1-2022-2026 (White) Chevrolet Silverado 4500 Truck with Service Bed

DUE DATE: Wednesday, April 29th, 2026 at 2:00 p.m. CST.

This bid covers a package consisting of one (1) Chevrolet Silverado 4500 series truck with Knapheide Service bed for The City of Sedalia Utilities Department as specified:

TOTAL PROPOSED COST OF BID \$108,000.00

COST FOR DELIVERY TO THE CITY OF SEDALIA \$2,970.00

MAKE & MODEL OF PROPOSED VEHICLE 2022 Chevrolet VIN: 1HTKHPVK7NH744162
2024 Knapheide ID: 202404260909715

PROPOSED DELIVERY OF THE VEHICLE ... Approximately 10 days after payment in full is received.

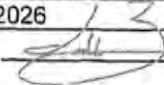
MANUFACTURER WARRANTY ON VEHICLE
Engine, Transmission and Drive Train Powertrain through 10/27/2030
Electrical Systems and Components Bumper to Bumper through 10/27/2028
Other Parts of the Vehicle Bumper to Bumper through 10/27/2028

IS EXTENDED WARRANTY AVAILABLE, IF YES, DESCRIBE BELOW THE WARRANTY AVAILABLE, COST AND LIMITATIONS:
Not through Heavy Equipment, LLC

DOES YOUR BID MEET ALL THE SPECIFICATIONS LISTED EXCEPT THOSE YOU HAVE NOTED IN THE ATTACHED BID CHECKLIST? xxx YES NO

ARE THERE ADDITIONAL CHARGES NOT LISTED IN YOUR BID? (IF THE ANSWER IS YES, PLEASE SPECIFY BELOW).
None

LIST ANY ATTACHED INFORMATION SUCH AS: PICTURES/BROCHURES OF THE PROPOSED SYSTEM, TYPES OF SPECIAL FEATURES NOT CONSIDERED, AND OTHER INFORMATION ON THIS PROPOSAL. See Attached GM-Knapheide Specification Sheet

Bidding Company: Heavy Equipment, LLC
Bidding Agent: Todd Zimmerman
Address: 4501 S Banner Street, Boise, Idaho 83709
Date: April 24, 2026 Phone: (208) 919-8342 (cellular) (208) 995-4117 (office)
Agent's Signature:  Date: April 24, 2026

The front of the envelope must clearly be marked: 2027-002 Vehicle Purchase Utilities Department Chevrolet Silverado 4500

Mail To: City of Sedalia,
Office of the City Clerk
200 S. Osage Avenue
Sedalia, MO 65301

RESOLUTION NO. _____

A RESOLUTION AUTHORIZING THE SUBMISSION OF A DEPARTMENT OF HEALTH AND SENIOR SERVICES, OFFICE OF DENTAL HEALTH GRANT APPLICATION.

WHEREAS, the City of Sedalia, Missouri, is applying for grant funds through the Department of Health and Senior Services, Office of Dental Health Grant. The Grant would reimburse the Sedalia Water Department the entire cost of approximately Sixteen Thousand Six Hundred Thirty-four dollars (\$16,634.00) to replace the system with automation, modern design and all new equipment.

NOW, THEREFORE, BE IT RESOLVED BY THE COUNCIL OF THE CITY OF SEDALIA, MISSOURI as follows:

Section 1. The Mayor or City Administrator are hereby authorized to sign the Department of Health and Senior Services, Office of Dental Health Grant Application in substantially the same form and content as attached hereto and any other official project documents that are necessary to obtain such assistance, including any agreements, contracts or other documents that are required.

Section 2. In the event a grant is awarded, the City of Sedalia is prepared to complete the project(s) within the time period as identified in the application(s).

PASSED by the Council of the City of Sedalia, Missouri, this 4th day of May, 2026.

Presiding Officer of the Council

ATTEST:

Jason S. Myers
City Clerk



Let's Cross Paths

City of Sedalia

200 S. Osage

Sedalia, MO 65301

(660) 827-3000 www.sedalia.com

To: City Council
From: Ben Stultz, Filtration Plant Chief Operator
Through: William Bracken, Utilities Director
Date: April 24th, 2026
Subject: DHSS Grant Request – Water Plant Fluoridation System Replacement

We are requesting permission to apply for a Department of Health and Senior Services (DHSS), Office of Dental Health (ODH) grant. The ODH is interested in promoting the continuation of drinking water fluoridation for protection from tooth decay, and the purpose of applying for the grant is for the replacement of the fluoridation system at the water filtration plant. The equipment is aged and rusting, and the method of refilling the day-use drums with hydrofluorosilicic (HFS) acid is cumbersome and hazardous.

The proposed system upgrade would completely replace the old system with a modern design and new equipment. If awarded, the ODH grant would reimburse the Sedalia Water Department the entire cost of approximately \$16,634.00 to replace the system with an automated, modern design and all new equipment. The new design and equipment would provide double-wall containment to prevent liquid spills and a closed system to prevent the release of hazardous gases, making the process much safer and stream-lined for the plant operators. A digital scale and new metering pumps would provide accurate measurement of HFS acid dispensed into the water supply.

If awarded, the contract would require the Sedalia Water Department to send a leading staff member, such as the chief operator, to a training course of a day or less, and to provide proof to ODH of adequate drinking water fluoridation for five years.

RESOLUTION NO. _____

A RESOLUTION AUTHORIZING THE SUBMISSION OF A WEST CENTRAL MISSOURI SOLID WASTE MANAGEMENT DISTRICT F GRANT APPLICATION.

WHEREAS, the City of Sedalia, Missouri is applying for a grant through the West Central Missouri Solid Waste Management District-Region F for the purpose of completion of the next phase to fund installation of electrical connection to power the pulverizer. The City's match is 15% or \$4,638.15.

NOW, THEREFORE, BE IT RESOLVED BY THE COUNCIL OF THE CITY OF SEDALIA, MISSOURI as follows:

Section 1. The Mayor or City Administrator are hereby authorized to sign the Solid Waste Management District F grant funds in substantially the same form and content as attached hereto and any other official project documents that are necessary to obtain such assistance, including any agreements, contracts or other documents that are required.

Section 2. The City of Sedalia, Public Works Department currently has sufficient funds budgeted for the minimum fifteen percent (15%) matching share for the project elements that are identified in the application and will allocate those funds necessary to complete the project.

Section 3. In the event a grant is awarded, the City of Sedalia working in close coordination with the West Central Missouri Solid Waste Management District and the Missouri Department of Natural Resources is prepared to complete the project within the time period identified on the signed project agreement.

Section 4. In the event a grant is awarded, the City of Sedalia is prepared to complete the project(s) within the time period as identified in the application(s).

PASSED by the Council of the City of Sedalia, Missouri, this 4^h day of May, 2026.

Presiding Officer of the Council

ATTEST:

Jason S. Myers
City Clerk



Let's Cross Paths

City of Sedalia

200 S. Osage

Sedalia, MO 65301

(660) 827-3000 www.sedalia.com

To: Matthew Wirt, City Administrator
Through: Justin Bray, Operations Director
From: Elizabeth Nations, Chief Office Administrator
Date: April 29, 2026
Subject: Authorization for Submission of a West Central Missouri Solid Waste Management District F Grant Application

The Public Works Operations Division is requesting authorization to submit a grant application to the West Central Missouri Solid Waste Management District F. In 2025 the City applied for grant funds for the purchase and installation of a commercial grade glass pulverizer. A commercial grade pulverizer can process used glass into material to be utilized in local construction and infrastructure applications including roads, trails, landscaping, parks and composting. The total cost of that project was estimated to be \$474,140.00, which was the cost of the pulverizer, shipping, installation and training. Due to the limited amount of grant funds available for Region F the Board reviewed the City's grant application and voted to fund the installation of a concrete pad and containment walls to provide a portion of the overall project.

The next grant opportunity for 2026 has opened and again there is a limited amount of funds. The City of Sedalia would like to apply for grant funds to complete the next phase of the project which would be the installation of electrical connection to power the pulverizer. The grant application requires assurance that a 15% match will be provided by the City, and this can be accomplished by way of a Council resolution. The estimated cost of the installation is \$30,921.00-\$26,282.85 grant funds with \$4,638.15 match.

The grant application including a number of associated documents is required to be completed and submitted to the Solid Waste Management District on or before Thursday, May 28, 2026.

BILL NO. _____

ORDINANCE NO. _____

AN ORDINANCE REPEALING ORDINANCE NUMBER 12392 RELATING TO THE SIDEWALK REPLACEMENT – VARIOUS LOCATIONS PROJECT.

WHEREAS, on January 5, 2026, the Council of the City of Sedalia, Missouri, passed Ordinance Number 12392 authorizing an agreement with S & A Equipment and Builders, LLC for the Sidewalk Replacement – Various Locations Project; and

WHEREAS, since the award of the agreement, circumstances have arisen that prevent the project from proceeding due to S & A Equipment and Builders, LLC being currently under contract with the City on five additional projects that are grant-funded with deadlines approaching; the five projects are behind schedule, creating concerns regarding the contractor’s capacity to complete additional work within the required timelines; and

WHEREAS, repealing said Ordinance No. 12392 and associated agreement will allow the Public Works Department to reassess the project scope, specifications and associated costs and make any revisions to the project documents and re-bid the project at a later date.

NOW THEREFORE, BE IT ORDAINED BY THE COUNCIL OF THE CITY OF SEDALIA, MISSOURI as follows:

Section 1. Ordinance Number 12392 is hereby repealed in its entirety.

Section 2. This ordinance shall be in full force and effect from and after its passage and approval.

Read two times by title, copies of the proposed ordinance having been made available for public inspection prior to the time the bill is under consideration by the Council and passed by the Council of the City of Sedalia, Missouri this 4th day of May 2026.

Presiding Officer of the Council

Approved by the Mayor of said City this 4th day of May 2026.

Tina Boggess, Mayor Pro-Tem

ATTEST:

Jason S. Myers
City Clerk

MEMO

TO: Mayor and City Council

THRU: Matthew Wirt, City Administrator

FROM: Jeremy Stone, Public Works Project Manager, City of Sedalia

COPY: Jason Myers, City Clerk

DATE: April 30, 2026

**SUBJECT: REPEAL OF CONTRACT FOR 2026-012 SIDEWALK REPLACEMENT-
VARIOUS LOCATIONS PROJECT BETWEEN S & A EQUIPMENT AND
BUILDERS, LLC. AND THE CITY OF SEDALIA**

Background

The Public Works Department advertised for bid for the IFB 2026-012 SIDEWALK REPLACEMENT-VARIOUS LOCATIONS PROJECT and awarded the low bidder S & A Equipment and Builders, LLC. under Ordinance No. 12392 on January 5, 2026.

Discussion

The Public Works Department respectfully requests that the City Council approve the rejection of Contract 2026-012 – Sidewalk Replacement (Various Locations), which was previously awarded under Ordinance No. 12392 on January 5, 2026.

Since the award of this contract, circumstances have arisen that prevent the project from proceeding as originally intended. The contractor, S & A Equipment and Builders, LLC., is currently under contract with the City on five (5) additional projects, including:

- 2025-007 North Central Neighborhood Connect Sedalia Revitalization (North Sidewalk Project)
- 2021-181C Storm Drainage Improvements Project Area 2
- 2021-181D Storm Drainage Improvements Project Area 8
- 2021-181E Storm Drainage Improvements Project Area 28
- 2021-181F Storm Drainage Improvements Project Area 30

All five (5) of these projects are grant-funded, with deadlines that are rapidly approaching. At this time, the projects are behind schedule, creating concerns regarding the contractor's capacity to successfully complete additional work within required timelines.

These circumstances necessitate the rejection of the contract at this time in order to protect the City's interests and ensure that the project can be completed in a manner that aligns with current requirements and expectations.

Rejecting the contract will allow the Public Works Department to reassess the project scope, specifications, and associated costs. The Department intends to make any necessary revisions to the project documents and will return to Council at a later date with a recommendation to re-bid the project. The project will be re-bid later this year.

Recommendation

The Public Works Department recommends that the City Council formally reject Contract 2026-012 – Sidewalk Replacement (Various Locations), previously awarded under Ordinance No. 12392.

Please feel free to contact the Public Works Department with any questions or if additional information is needed.



Let's Cross Paths

City of Sedalia

Community Development

200 S. Osage

Sedalia, MO 65301

(660) 827-3000 www.sedalia.com

April 28, 2026

City Administrator - Matthew Wirt
Mayor – Traves Williams
Members of the City Council
Sedalia, Missouri

RE: Original Records Destruction

As per RSMo 109.230(4), City records that are on file in the Community Development Office and have met the retention schedule will be destroyed in compliance with the guidelines established by the Secretary of State's Office. The Community Development Office does hereby request that the City Council authorize the destruction of the following documents:

- Commercial Stamped Plan Sets or Blueprints (Pre-2016)
- Residential Plan Sets or Blueprints (Pre-2021)
- Misc. Plan Review Documents (I.e. Hand drawn plans) (Pre-2024)

I hereby certify that the records described are no longer needed in the transaction of current business and no longer possess sufficient administrative, legal, historical or fiscal value to warrant further keeping. All documents will be destroyed via shredder.

Sincerely,

Dimitrius Maduros
Chief Building Official

November 13, 2025

Andrew Dawson

Mayor of the City of Sedalia
200 S Osage
Sedalia, MO 65301
adawson@sedalia.com

**RE: City of Sedalia, Missouri - Pretreatment Program Modification
Local Limits, Legal Authority, User Fees, & Enforcement Response Plan**

Dear Andrew Dawson,

Please find the enclosed updated components of the City's Industrial Pretreatment Program including a technical evaluation of local limits, updated Legal Authority with attached user fee schedule, and an updated Enforcement Response Plan. Note that these program updates were in response to the Abatement Order on Consent issued by Missouri Department of Natural Resources (MDNR) executed with the City in March 2024.

The following components of the Pretreatment Program were updated:

- Local Limit Technical Evaluation
 - A separate evaluation was performed for each wastewater treatment plant.
 - No limits were determined necessary for the Southeast treatment facility.
 - The Central and North facilities have updated Maximum Allowable Industrial Loads (MAILs) with some new parameters compared to the previous evaluation as well as some parameters which were omitted due to them not being identified as a pollutant of concern.
 - Limits are proposed to be adopted into the legal authority as MAILs and implemented as maximum daily limits allocated based on need.
- Legal Authority
 - The updated legal authority will replace the City's current sewer and pretreatment authority
 - Deliberately updated definitions to protect the City's treatment works from disruption and enable regulation of emerging pollutants such as PFAS
 - Incorporated reference concentrations for pollutants to represent background concentrations in the collection system
 - Broadened authority for alternative control mechanisms in addition to permits
 - Incorporated reference concentrations to facilitate identification of pollutants of concern for nondomestic dischargers
 - More robust cost recovery language including an attachment defining User Fees phased in over three years
 - Enforcement remedies aligned with the Enforcement Response Plan (ERP)

- Enforcement Response Plan (ERP)
 - Point-based system for determining enforcement and escalating violations
 - Uses modifiers to characterize nature, severity, and frequency of violations with consideration for compliance history
 - Incorporates the City's updated fine authority
- Statement of Legal Authority
 - This document was prepared by your legal counsel after reviewing the pretreatment program requirements.

Attached are the pretreatment program components discussed above for submittal to MDNR. These documents are all intended to replace the current pretreatment program components. Note that it is our intent to use the updated legal authority references and the MAILs from this most recent local limit re-evaluation with the industrial user permits which will be effective January 1, 2025.

Sincerely,

A handwritten signature in black ink that reads "Kim Cole". The signature is written in a cursive, flowing style.

Kim Cole, P.E.
Principal
DROPP Collaborative



Let's Cross Paths

City of Sedalia

200 S. Osage

Sedalia, MO 65301

(660) 827-3000 www.sedalia.com

ELECTRONIC COMMUNICATION

November 17, 2025

Mr. Brad Allen
Environmental Program Supervisor
Domestic Major & Pretreatment Unit
Operating Permits Section | Water Protection Program
Missouri Department of Natural Resources
Via email: brad.allen@dmr.mo.gov

**Re: City of Sedalia, Missouri (MSOPs: MO-0023019, MO-0023027, and MO-0101567)
Industrial Pretreatment Program Modification Request for Legal Authority, Local Limits, and
Enforcement Response Plan**

Dear Mr. Brad Allen:

Please find attached a Program Modification Request associated with the City of Sedalia's approved Industrial Pretreatment Program. This submittal was prepared by our Pretreatment Consultant, DROP Collaborative, under our supervision. The purpose of the modification is to update components of the City's Pretreatment Program, including the legal authority, cost recovery schedule, and Enforcement Response Plan. This submittal also incorporates updated local limits which the City plans to adopt as Maximum Allowable Industrial Loads which will be allocated based on need as maximum daily limits. The submittal includes a technical evaluation for the North and Central wastewater treatment plants.

The City Council has voted on a resolution providing the City's endorsement and approval of the above modifications to the Pretreatment Program. The resolution confirms the City's continued support, supervision, and funding of the program pursuant to §403.9(b)(2). In the interest of time, the Council's resolution will be provided under separate cover and sent to the State as soon as it is available.

Please note that prior to adopting the fee schedule, the City will hold a public hearing which will be put on public notice for 30-days, in keeping with Section 250.233, RSMo. The City intends to go forward with adopting the updated Program components at the first council meeting in January 2026 so that the code will be effective as soon as possible in the new year, when new industrial user permits take effect. We understand that we will be responsible for incorporating any required modifications resulting from your review of the Pretreatment Program components.

As an official of the City of Sedalia, I am stating that the program modifications made herein do not affect the POTW's authority or ability to adequately carry out the programs described in §403.8. This statement is made as required by §403.9(b)(1).

- *These modifications do not modify the basis for each procedure under 403.8(f)(2).*
- *The implementation of the Industrial Pretreatment Program is not altered and will continue to be implemented via ordinance and individual industrial user permits.*
- *The City will ensure compliance with Pretreatment Standards and Requirements and will follow their Enforcement Response Plan in the event of noncompliance by Industrial Users.*

Please contact me at 660-827-3000 or adawson@sedalia.com for further documentation or questions.

Sincerely,

A handwritten signature in blue ink, appearing to read "Andrew Dawson", with a long horizontal flourish extending to the right.

Andrew Dawson
Mayor of the City of Sedalia

- c: Chris Davies, City of Sedalia Engineer
William Bracken, Utilities Director, City of Sedalia
Brittany Wilbanks, Pretreatment Program Coordinator, City of Sedalia
Ben Maness, MID-MO Operations
Matthew Wirt, City of Administrator, City of Sedalia
Elisa Edge, Pretreatment Consultant, DROP Collaborative

Enclosures

- Legal Authority (Sewer Use code)
- Enforcement Response Plan
- Local Limits Part II Evaluation Report
- Statement of Legal Authority (prepared by DROP Collaborative, reviewed and signed by our legal counsel)



LAUBER MUNICIPAL LAW

Serving those who serve the public

October 1, 2025

Mr. Brad Allen
Water Protection Program
Missouri Department of Natural Resources
P.O. Box 176
Jefferson City, Missouri 65102
Via email: brad.allen@dnr.mo.gov

Re: **City of Sedalia, Missouri (MSOPs: MO-0023019, MO-0023027, and MO-0101567)**
Statement of Legal Authority

Dear Mr. Allen:

We serve as legal counsel to City of Sedalia in Sedalia, MO. In the course of operating a Publicly Owned Treatment Works ("POTW"), the city has adequate legal authority pursuant to Sections 77.530, 77.590, and 88.832, RSMo. to carry out the program described in 40 CFR § 403.8, as exercised by the enactment of the Sewer Use Ordinance of the city and the currently proposed changes thereto. This legal authority enables the POTW to take all actions described in 40 CFR § 403.8(f).

The materials we have examined in rendering this opinion and upon which we have relied are the following: (i) a new proposed ordinance for the Pretreatment Program implementation; (ii) pertinent statutes and regulations; (iii) relevant portions of federal regulations; and (iv) general provisions of the Sewer Use Ordinance. This opinion assumes the enactment of the proposed ordinance with changes consistent with our recommendations. Our opinion also relies upon the incorporation by reference of state and federal regulations into the ordinance.

Federal regulations require that the city operate its Pretreatment Program pursuant to legal authority contained in, among other things, an ordinance. As such, the city created, and is currently proposing changes to, its wastewater pretreatment program and enforcement plan by the enactment of a city ordinance (copy enclosed). In our opinion, the specific provisions of the ordinance that provide legal authority for each procedure required under 40 CFR§403.8(f)(2) are as follows:

- (i) Identify and locate all possible Industrial Users which might be subject to the POTW Pretreatment Program. Any compilation, index or inventory of Industrial Users made under this paragraph shall be made available to the Regional Administrator or Director upon request. See Code Sec. 60-144.
- (ii) Identify the character and volume of pollutants contributed to the POTW by the Industrial Users identified under paragraph (f)(2)(i) of 40 CFR§403.8. This information shall be made available to the Regional Administrator or Director upon request. See above and Code Sec. 60-137 and Sec. 60-126.
- (iii) Notify Industrial Users identified under paragraph (f)(2)(i) of 40 CFR§403.8, of applicable Pretreatment Standards and any applicable requirements under sections 204(b) and 405 of the Act and subtitles C and D of the Resource Conservation and Recovery Act. Within 30 days of approval

pursuant to 40 CFR §403.8(f)(6), of a list of significant industrial users, notify each significant industrial user of its status as such and of all requirements applicable to it as a result of such status. See above and Code Sec. 60-120 and Sec. 60-141.

- (iv) Receive and analyze self-monitoring reports and other notices submitted by Industrial Users in accordance with the self-monitoring requirements in 40 CFR§403.12. See Code Sec. 60-137.
- (v) Randomly sample and analyze the effluent from Industrial Users and conduct surveillance activities in order to identify, independent of information supplied by Industrial Users, occasional and continuing noncompliance with Pretreatment Standards. Inspect and sample the effluent from each Significant Industrial User at least once a year. See Code Sec. 60-147 (e).
- (vi) Evaluate whether each such Significant Industrial User needs a plan or other action to control Slug Discharges. See Code Sec. 60-115.
- (vii) Investigate instances of noncompliance with Pretreatment Standards and Requirements, as indicated in the reports and notices required under 40 CFR§403.12, or indicated by analysis, inspection, and surveillance activities described in paragraph (f)(2)(v) of 40 CFR§ 403.8. Sample taking and analysis and the collection of other information shall be performed with sufficient care to produce evidence admissible in enforcement proceedings or in judicial actions. See Code Sec. 60-151 (d).
- (viii) Comply with the public participation requirements of 40 CFR part 25 in the enforcement of National Pretreatment Standards. See Code Sec. 60-152.

Additionally, the legal authority for the City of Sedalia to engage in the activities required under 40 CFR §403.9(b)(1) is as follows:

- (i) Identify the manner in which the POTW will implement the program requirements set forth in 40 CFR § 403.8, including the means by which Pretreatment Standards will be applied to individual Industrial Users (e.g., by order, permit, ordinance, etc.).

The city may establish local pollutant limits (reserved) per Code Sec. 60-108. of the Municipal Code and require Individual Industrial Users to comply with pretreatment standards. Individual Industrial Users will be controlled by permit or other control mechanism under DIVISION 4. of the Code.

- (ii) Identify how the POTW intends to ensure compliance with Pretreatment Standards and Requirements, and to enforce them in the event of noncompliance by Industrial Users.

Refer to Code Sec. 60-147, Code Sec. 60-137, and DIVISION 7 – ENFORCEMENT REMEDIES. The Pretreatment Coordinator will annually inspect and collect a wastewater sample from Individual Industrial Users to verify compliance with the Pretreatment Standards and Requirements. Industrial Users are also required to submit baseline and periodic compliance reports. Upon review of information received and gathered, the Pretreatment Coordinator will assess compliance with schedules, reporting requirements, and applicable pretreatment standards. Upon discovery of any violation, enforcement actions set forth in the Enforcement Response Plan will be followed, including, but not limited to, notices of violation, fines, civil litigation, and referral to other authorities for administrative or criminal prosecution.

Please contact us if you have any questions.

Sincerely,



James Klahr
Lauber Municipal Law
Legal Counsel
City of Sedalia
jklahr@laubermunicipal.com
(573) 658-3094

Chapter 60 Utilities, Article IV. Sewer Use

City of Sedalia

Sewer Use Regulations

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DIVISION 1. GENERAL PROVISIONS FOR SEWER DISCHARGES

Sec. 60-100. Purpose and Policy

These Regulations set forth uniform requirements for discharges of Wastewater to the Publicly Owned Treatment Works (POTW) for the purpose of protecting the health and safety of the public, preventing pollution of waters of the State, and to enable the Control Authority to comply with all applicable State and Federal laws, including the Clean Water Act (33 U.S.C. 1251 et seq.), General Pretreatment Regulations (40 CFR 403) and the Missouri Code of State Regulations (10 CSR Division 20, Department of Natural Resources, Clean Water Commission) which provides the regulatory frame work for the Missouri Clean Water Law, (Chapter 644, RSMo). These Regulations apply to all Users of the POTW, including entities that haul wastewater to the POTW and those outside the Control Authority jurisdiction that generate wastewater contributed to the POTW.

The objectives of these Regulations are to ensure that Discharges are controlled in a manner to:

- (a) Prevent the introduction of Pollutants or substances into the POTW that will interfere with its operation;
- (b) Prevent the introduction of Pollutants or substances into the POTW which will Pass Through the system, inadequately treated, into receiving waters or the atmosphere or otherwise be incompatible with the POTW;
- (c) Protect the POTW and its personnel who may come in contact with Wastewater, biosolids, sludge and effluent in the course of their employment as well as protecting the general public;
- (d) Improve the opportunity to recycle and reclaim Wastewater, biosolids, sludge, or any other products identified for beneficial reuse;
- (e) Provide for the equitable distribution of the cost of conveyance, operation, treatment, maintenance, and improvements of the POTW; and
- (f) Ensure the Control Authority is able to comply with its National Pollutant Discharge Elimination System (NPDES) permit conditions, sludge use and disposal requirements, and all applicable Federal and State Regulations to which the POTW is subject.
- (g) Reduce impacts from Discharges of Pollutants of Emerging Concern through source identification, monitoring, and industry best practices where available.

Sec. 60-101. Administration

The Control Authority will administer, implement, and enforce the provisions of these Regulations.

Sec. 60-102. Abbreviations

The following abbreviations, when used in these Regulations, shall have the designated meanings:

BMP – Best Management Practice
BMR – Baseline Monitoring Report
BOD – Biochemical Oxygen Demand
CFR – Code of Federal Regulations
CIU – Categorical Industrial User
COD – Chemical Oxygen Demand
CROMERR - Cross Media Electronic Reporting Rule
EPA – U.S. Environmental Protection Agency
FOG – Fats, Oil and Grease
FSE – Food Service Establishment
GPD – Gallons per Day

HEM – Hexane Extractable Material
IU – Industrial User
Lb(s) – Pound(s)
MGD – Million Gallons per Day
mg/L – Milligrams per Liter
MAHL – Maximum Allowable Headworks Load
MAIL – Maximum Allowable Industrial Load
NPDES – National Pollutant Discharge Elimination System
NSCIU – Non-Significant Categorical Industrial User
PFAS – Per- and Polyfluoroalkyl Substances
PFOA – perfluorooctanoic acid
POC – Pollutant of Concern
PEC – Pollutant of Emerging Concern
POTW – Publicly Owned Treatment Works
RCRA – Resource Conservation and Recovery Act
SDCP – Slug Discharge Control Plan
SIU – Significant Industrial User
SMR – Self Monitoring Report or Periodic Report on Compliance
SNC – Significant Noncompliance
S.U. – Standard Units
TDS – Total Dissolved Solids
TSS – Total Suspended Solids
U.S.C. – United States Code

Sec. 60-103. Definitions

The following words, terms and phrases, when used in these Regulations, shall have the meanings ascribed to them as defined below, except where the context clearly indicates a different meaning:

- (a) Act or “the Act” means the Federal Water Pollution Control Act, also known as the Clean Water Act as amended, 33 U.S.C. section 1251 et seq.
- (b) Approval Authority means the Missouri Department of Natural Resources.
- (c) Authorized or Duly Authorized Representative of the User.
 - (1) If the User is a corporation, an “Authorized Representative” shall mean:
 - a. The president, secretary, treasurer, or a vice president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision-making functions for the corporation; or
 - b. The manager of one or more manufacturing, production, or operating facilities, provided the manager is authorized to make management decisions that govern the operation of the regulated facility including having the explicit or implicit duty of making major capital investment recommendations, and initiate and direct other comprehensive measures to assure long-term environmental compliance with environmental laws and regulations; can ensure that the necessary systems are established or actions taken to gather complete and accurate information for Wastewater Discharge Permit or other Control Mechanism requirements; and where authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.
 - (2) If the User is a partnership or sole proprietorship: a general partner or proprietor, respectively.

- (3) If the User is a federal, state, or local governmental facility: a director or highest official appointed or designated to oversee the operation and performance of the activities of the government facility, or their designee.
- (4) The individuals described in paragraphs 1 through 3, above, may designate a Duly Authorized Representative if the authorization is submitted to the Control Authority. The authorization shall specify the individual or position responsible for the overall operation of the facility from which the Discharge originates or that has overall responsibility for environmental matters for the User.
- (d) Best Management Practices or BMPs means implementation of activities, prohibitions of practices, maintenance procedures, and other management practices to ensure proper operation of treatment systems, and elimination or reduction of pollutants entering the treatment system.
- (e) Categorical Industrial User means an Industrial User subject to Categorical Pretreatment Standards per DIVISION 2. Sec. 60-106. See definition of Significant Industrial User.
- (f) City of Sedalia, depending on context, may mean:
 - (1) The Control Authority or its designee
 - (2) Administrator or designee
 - (3) Delegation of authority
 - (4) Publicly Owned Treatment Works (POTW)
 - (5) Wastewater Superintendent, Manager, Director, or designee.
- (g) Control Authority means City of Sedalia. Entity responsible for implementation of these Regulations.
- (h) Control Mechanism means a document issued by the Control Authority to regulate discharges of Nondomestic Wastewater to the POTW for the purpose of meeting the objectives in DIVISION 1. Sec. 60-100. Control Mechanisms include Wastewater Discharge Permits (Permits), Best Management Practices, letters of Discharge Authorization, NSCIU authorizations, or any document designated by the Control Authority as a method of controlling or prohibiting discharges to the POTW.
- (i) CROMERR means the legal framework for electronically reporting under EPA's regulatory programs authorized under 40 CFR 3. The CROMERR program ensures the enforceability of regulatory information collected electronically by EPA and EPA's state, tribal, and local government partners.
- (j) Discharge means the introduction of wastewater via a piped connection into the POTW from any source.
- (k) Disruption means a Discharge that, either alone or in combination with other Discharges, is incompatible with the POTW, such that it has a detrimental impact on any structure, function, operation, or maintenance activity of the POTW. Disruption includes discharges which cause or may cause Interference or Pass Through.
- (l) Domestic means Domestic Wastewater, sometimes referred to as sewage. Wastewater originating from bodily processes (excluding septic tank waste) and from normal household activities such as bathing, laundering, washing, and residential food preparation.
- (m) Environmental Protection Agency or EPA is the U.S. Environmental Protection Agency or, where appropriate, the Regional Water Management Division Director, the Regional Administrator, or other duly authorized official of said agency.
- (n) Existing Source is any source of Indirect Discharge that is not a "New Source."
- (o) FSE or food service establishment means a facility maintained, used, or operated for the purpose of storing, preparing, serving, manufacturing, packaging, or otherwise handling food for sale to other entities, or for consumption by the public, its members, residents, students or employees, and which has any process or device that uses or produces FOG, or grease, vapors, steam, fumes, smoke or odors, including any real property on which the FSE is located. FSEs, include, but are not limited to, restaurants, grocery stores, hotel kitchens, hospitals, nursing homes, school kitchens, bars, factory cafeterias, churches, clubs, daycare centers and mobile food establishments.
- (p) Hauled Waste means a source of wastewater transported by haulers and introduced to the POTW by a conveyance other than a pipe at specified locations authorized by the Control Authority.

- (q) Indirect Discharge means the introduction of Pollutants into the POTW from any Nondomestic source. See definition of Nondomestic Wastewater.
- (r) Industrial User means a source of Indirect Discharge.
- (s) Interference means a Discharge that, alone or in conjunction with a Discharge or Discharges from other sources, both inhibits or disrupts the POTW, its treatment process or operations or its sludge use or disposal; and therefore, is a cause of a violation of any of the requirements of the Control Authority's NPDES permit or of the prevention of sewage sludge use or disposal in compliance with any of the following statutory/regulatory provisions or permits issued thereunder, or any more stringent State or Local Regulations: Section 405 of the Act; the Solid Waste Disposal Act, including Title II commonly referred to as the Resource Conservation and Recovery Act (RCRA); any State regulations contained in any state sludge management plan prepared pursuant to Subtitle D of the Solid Waste Disposal Act; the Clean Air Act; the Toxic Substances Control Act; and the Marine Protection, Research, and Sanctuaries Act.
- (t) Local Limit means specific discharge limits developed and enforced by the Control Authority upon Users that discharge Nondomestic Wastewater in order to implement the general and specific discharge prohibitions in DIVISION 2. Sec. 60-104 and DIVISION 2. Sec. 60-105.
- (u) Maximum Allowable Headworks Loading (MAHL) means the estimated maximum loading of a Pollutant that can be received at a POTW's headworks (at the point the Wastewater enters the Wastewater Treatment Plant) based on a technical evaluation without causing Pass Through or Interference.
- (v) Maximum Allowable Industrial Load (MAIL) means the estimated maximum loading of a Pollutant that can be received at a POTW's headworks from all permitted SIUs without causing Pass Through or Interference.
- (w) Medical Waste means isolation wastes, infectious agents, human blood and blood products, pathological wastes, sharps, body parts, contaminated bedding, surgical wastes, potentially contaminated laboratory wastes, and dialysis wastes.
- (x) New Source
 - (1) Any building, structure, facility, or installation from which there is (or may be) an Indirect Discharge of Pollutants, the construction of which commenced after the publication of proposed Pretreatment Standards under Section 307(c) of the Act that will be applicable to such source if such Standards are thereafter promulgated in accordance with that section, provided that:
 - a. The building, structure, facility, or installation is constructed at a site at which no other source is located; or
 - b. The building, structure, facility, or installation totally replaces the process or production equipment that causes the discharge of Pollutants at an Existing Source; or
 - c. The production or Wastewater generating processes of the building, structure, facility, or installation are substantially independent of an Existing Source at the same site. In determining whether these are substantially independent, factors such as the extent to which the new facility is integrated with the existing plant, and the extent to which the new facility is engaged in the same general type of activity as the Existing Source, should be considered.
 - (2) Modification. Construction on a site at which an Existing Source is located results in a modification rather than a New Source if the construction does not create a new building, structure, facility, or installation meeting the criteria of DIVISION 1. Sec. 60-103. (x) (1) b or c above but otherwise alters, replaces, or adds to existing process or production equipment.
 - (3) Construction of a New Source as defined under this definition has commenced if the owner or operator has:
 - a. Begun, or caused to begin, as part of a continuous onsite construction program
 - 1. Any placement, assembly, or installation of facilities or equipment; or

2. Significant site preparation work including clearing, excavation, or removal of existing buildings, structures, or facilities which is necessary for the placement, assembly, or installation of New Source facilities or equipment; or
 - b. Entered into a binding contractual obligation for the purchase of facilities or equipment which are intended to be used in its operation within a reasonable time. Options to purchase or contracts which can be terminated or modified without substantial loss, and contracts for feasibility, engineering, and design studies do not constitute a contractual obligation under this definition.
- (y) Nondomestic Wastewater or Nondomestic Waste means any waste other than Domestic waste. See definition of Domestic.
- (z) Oil and Grease means fats, oil and grease of organic polar compounds derived from animal or plant sources as detectable in cooking oils, food scraps containing grease, butter or oil, lard or tallow, meat fat, grease and juices, gravies, sauces, shortening and dairy products, as well as nonpolar oil and grease and other greasy materials that are insoluble in water.
- (aa) Oil and/or Sand Interceptors or Separators means a device designed and installed to separate and retain Pollutants from normal wastes and permit normal sewage or liquid wastes to discharge into the disposal terminal by gravity.
- (bb) Operation and Maintenance Cost means all expenditures during the useful life of the treatment works for materials, labor, utilities, and other items which are necessary for managing and maintaining the POTW to achieve the capacity and performance for which such works are designed and constructed.
- (cc) Pass Through means a discharge which exits the POTW into waters of the United States in quantities or concentrations which, alone or in conjunction with a discharge or discharges from other sources, is a cause of a violation of any requirement of the Control Authority's NPDES permit, including an increase in the magnitude or duration of a violation.
- (dd) Person means any individual, partnership, co-partnership, firm, company, corporation, association, joint stock company, trust, estate, society, group or governmental entity, political subdivision or any other legal entity or their legal representatives, agents or assigns. The masculine gender shall include the feminine, the singular shall include the plural where indicated by the context. This definition includes all federal, state or local governmental entities.
- (ee) PFAS, or per- and polyfluoroalkyl substances means any chemical as may currently exist or as may be created in the future that meets the definition found in 40 CFR 705.3, and any known precursors thereto. This definition includes but is not limited to the compounds detected using EPA Method 1633.
- (ff) Pollutant means dredged spoil, solid waste, incinerator residue, filter backwash, sewage, garbage, sewage sludge, munitions, Medical Wastes, chemical wastes, biological materials, radioactive materials, PFAS substances, microplastics, resins, heat, wrecked or discarded equipment, rock, sand, sediment or solids, municipal, agricultural and industrial wastes, and certain characteristics of Wastewater (e.g., pH, temperature, TDS, TSS, turbidity, color, BOD, COD, toxicity, or odor), including POCs and PECs.
- (gg) Pollutant of Concern (POC) means a substance present in a discharge from a User to the POTW that has been identified by the Control Authority as being a Pollutant which impacts or may impact POTW operations and the ability to comply with Federal, State, and Local Regulations. This term also applies to pollutants of emerging concern (PECs) which are substances that have been identified as potential threats to the environment and human health but are not yet widely regulated.
- (hh) Pretreatment means the reduction of the amount of Pollutants, the elimination of Pollutants, or the alteration of the nature of Pollutant properties in Wastewater prior to, or in lieu of, introducing such Pollutants into the POTW.
- (ii) Pretreatment Requirements means any substantive or procedural requirement related to Pretreatment imposed on a User, other than a Pretreatment Standard.
- (jj) Pretreatment Standards or Standards means prohibited discharge standards, Categorical Pretreatment Standards, Best Management Practices, Local Limits, and any regulation containing Pollutant discharge limits promulgated by the EPA in accordance with Section 307(b) and (c) of the Act which applies to Indirect Discharges.

- (kk) Process Wastewater means any water, unless otherwise specified in a categorical standard, that, during manufacturing or processing, comes into contact with or results from the production or use of any raw material, intermediate product, finished product, byproduct, or waste product.
- (ll) Publicly Owned Treatment Works or POTW is a treatment works, as defined by Section 212 of the Act (33 U.S.C. Section 1292), which is owned or operated by the Control Authority within the jurisdiction of the Control Authority. This definition includes any devices or systems used in the collection, storage, treatment, recycling, and reclamation of sewage or industrial wastes of a liquid nature and any conveyances, which convey Wastewater to a treatment plant in addition to the treatment plant itself.
- (mm) Septic Tank Waste means any sewage from holding tanks such as vessels, chemical toilets, campers, trailers, and septic tanks.
- (nn) Sewage means human excrement and gray water (household showers, dishwashing operations, etc.). See definition of Domestic.
- (oo) Significant Industrial User (SIU).
 - (1) Except as provided in parts (2) and (3) of this definition, a Significant Industrial User means:
 - a. An Industrial User subject to Categorical Pretreatment Standards per DIVISION 2. Sec. 60-106 or;
 - b. An Industrial User that:
 - 1. Discharges an average of 25,000 gallons per day or more of Process Wastewater to the POTW (excluding sanitary, noncontact cooling and boiler blowdown Wastewater);
 - 2. Contributes a Process Wastestream which makes up five percent (5%) or more of the average dry weather hydraulic or organic capacity of the POTW Treatment Plant;
 - 3. Contributes a nondomestic wastestream which has a Discharge with a POC above the reference concentration and makes up five percent (5%) or more of the Maximum Allowable Industrial Load (MAIL) for a particular Pollutant as specified in DIVISION 2. Sec. 60-108. (d); or
 - 4. Is designated as such by the Control Authority on the basis that the Industrial User has a reasonable potential for adversely affecting the POTW's operation or for violating any Pretreatment Standard or Requirement.
 - (2) The Control Authority may determine that an Industrial User subject to Categorical Pretreatment Standards is a Non-Significant Categorical Industrial User rather than a Significant Industrial User on a finding that the Industrial User never discharges more than 100 gallons per day (gpd) of total Categorical Wastewater (excluding sanitary, noncontact cooling and boiler blowdown Wastewater, unless specifically included in the Pretreatment Standard) and the following conditions are met:
 - a. The Industrial User, prior to the Control Authority's finding, has consistently complied with all applicable Categorical Pretreatment Standards and Requirements;
 - b. The Industrial User annually submits the certification statement required in DIVISION 5. Sec. 60-143. (d), together with any additional information necessary to support the certification statement; and
 - c. The Industrial User never discharges any untreated concentrated Wastewater.
 - (3) Upon a finding that a User meeting the criteria above in DIVISION 1. Sec. 60-103. (oo) (1) b has no reasonable potential for adversely affecting the POTW's operation or for violating any Pretreatment Standard or Requirement, the Control Authority may at any time, on its own initiative or in response to an appeal received from an Industrial User, and in accordance with procedures in 40 CFR 403.8(f)(6), determine that such User should not be considered a Significant Industrial User.
- (pp) Slug, Slug Load or Slug Discharge means any Discharge at a flow rate or concentration, which could cause a violation of the prohibited discharge standards in DIVISION 2. Sec. 60-104 of these Regulations. A Slug Discharge is any Discharge of a non-routine, uncontrolled, or episodic nature, including but not limited to an accidental Discharge or a non-customary batch Discharge, which causes Disruption or has

a reasonable potential to cause Interference or Pass Through, or in any other way violate the POTW's regulations, Local Limits or Permit conditions.

- (qq) Stormwater means stormwater runoff, snow melt runoff, roof runoff, and surface runoff and drainage.
- (rr) Toxic Pollutant means one of the Pollutants, or combination of those Pollutants, listed as toxic in regulations promulgated by the EPA under the provisions of section 307 (33 USC 1317) of the Act.
- (ss) User means an entity with a wastewater connection to the POTW. A User may be a person, firm, corporation, partnership, governmental entity, Industrial User, or customer that contributes an Indirect Discharge or Domestic discharge to the POTW.
- (tt) Wastewater means water or other liquids which carry or contain Pollutants or water contaminants from any source.
- (uu) Wastewater Discharge Permit or Permit. See Control Mechanism.

DIVISION 2. SEWER USE REGULATIONS

Sec. 60-104. General Prohibited Discharge Standards

No User shall introduce or cause to be introduced into the POTW any Pollutant or Wastewater which causes Disruption. These general prohibitions apply to all Users of the POTW whether or not they are subject to Categorical Pretreatment Standards or any other Federal, State, and Local Regulations.

Sec. 60-105. Specific Prohibitions

No User may discharge or cause to be discharged into the POTW, directly or indirectly, any of the following:

- (a) Any substance in a quantity sufficient to create a potential for fire or explosion, including, but not limited to: discharges with a closed-cup flashpoint of less than 140 degrees Fahrenheit (60 degrees Celsius), using test methods specified in 40 CFR 261.21.
- (b) Any substance having a pH less than 6.0 or greater than 9.0, or otherwise causing corrosive structural damage to the POTW.
- (c) Any particulates, solids, or organic or inorganic material including but not limited to food waste, disposable wipes, microplastics, resins, or viscous substances in a quantity sufficient to cause, potentially cause, or contribute to Disruption.
- (d) Any substance, including oxygen-demanding Pollutants (BOD, etc.), discharged to the POTW at a flow rate or concentration that will or may cause Disruption, either singly or by interaction with other substances.
- (e) Any Discharge having a temperature greater than 120 degrees Fahrenheit (49 degrees Celsius), or which will inhibit biological activity in the treatment plant, but in no case Wastewater which causes the temperature at the introduction into the treatment plant to exceed 104 degrees Fahrenheit (40 degrees Celsius).
- (f) Petroleum oil, nonbiodegradable cutting oil, products of mineral oil origin in amounts that will cause Disruption.
- (g) Any substance that, alone or in combination with other substances in the Wastewater, will or may either singly or by interaction with other wastes create a public nuisance through the creation of toxic, malodorous, or noxious gases, vapors or fumes, poses a hazard to human health or safety, or prevents safe entry into any portion of the POTW for inspection, maintenance, or repair.
- (h) Any trucked or hauled Pollutants, except as authorized at Discharge points designated by the Control Authority.
- (i) Wastewater which imparts color which cannot be removed by the treatment process, such as, but not limited to, inks, dye wastes, paints, and vegetable tanning solutions.
- (j) Wastewater containing any radioactive wastes or isotopes except in compliance with applicable Federal or State Regulations and if authorized by the Control Authority.

- (k) Discharge from stormwater drains, roof runoffs, pond overflows, sumps, or cisterns in a quantity sufficient to cause, potentially cause, or contribute to Disruption.
- (l) Sludges, screenings, or other residues from the Pretreatment of industrial wastes except as specifically authorized by the Control Authority.
- (m) Any substance that would be a hazardous waste prior to mixing with other wastestreams pursuant to 40 CFR 261, if otherwise disposed.
- (n) Medical wastes, in a quantity or quality sufficient to cause, potentially cause, or contribute to Disruption.
- (o) Wastewater causing, alone or in conjunction with other sources, the treatment plant's effluent to fail toxicity test.
- (p) Detergents, surface active agents, or other substances in concentrations which might cause excessive foaming in the POTW or receiving stream.
- (q) Total Hexane Extractable Material (HEM), including components of Oil and Grease in concentrations determined to disrupt or interfere with the Control Authority's POTW.
- (r) A Discharge of a pollutant that contribute more than five percent (5%) of the MAIL and the concentration is above the reference concentration for which the Control Authority has developed a MAIL unless specifically authorized.

Pollutants, substances, or Wastewater prohibited by these Regulations shall not be processed or stored in such a manner that they could be discharged to the POTW. No Wastewater or Pollutant shall be directly introduced into a manhole or other opening of the POTW, other than through an approved building sewer, unless authorized by the Control Authority.

Sec. 60-106. National Categorical Pretreatment Standards

Categorical Pretreatment Standards refers to any regulation containing Pollutant Discharge limits promulgated by the EPA in accordance with Sections 307(b) and (c) of the Act (33 U.S.C. Section 1317) that apply to a specific category of Industrial Users and that appear in 40 CFR Chapter I, Subchapter N, Parts 405–471. Any User subject to Categorical Pretreatment Standards is considered a Categorical Industrial User (CIU) and shall comply with the following requirements:

- (a) Where a Categorical Pretreatment Standard is expressed only in terms of either the mass or the concentration of a Pollutant in Wastewater, the Control Authority may impose equivalent concentration or mass limits in accordance with DIVISION 2. Sec. 60-106. (e) and (f); reference 40 CFR 403.6(c).
- (b) When the limits in a Categorical Pretreatment Standard are expressed only in terms of mass of Pollutant per unit of production, the Control Authority may convert the limits to equivalent limitations expressed either as mass of Pollutant discharged per day or effluent concentration for purposes of calculating effluent limitations applicable to individual Industrial Users; reference 40 CFR 403.6(c)(2).
- (c) When Wastewater subject to a Categorical Pretreatment Standard is mixed with Wastewater not regulated by the same Standard, the Control Authority shall implement the combined wastestream formula imposed as an alternative Discharge limit in accordance with 40 CFR 403.6(e).
- (d) A Categorical Industrial User may obtain a net/gross adjustment to a Categorical Pretreatment Standard in accordance with parts DIVISION 2. Sec. 60-106. (d) (1) and (2); reference 40 CFR 403.15.
 - (1) Categorical Pretreatment Standards may be adjusted to reflect the presence of Pollutants in the Industrial User's intake water in accordance with these Regulations. Any Industrial User wishing to obtain credit for intake Pollutants must make application to the Control Authority. Upon request of the Industrial User, the applicable Standard will be calculated on a "net" basis (i.e., adjusted to reflect credit for Pollutants in the intake water) if the requirements of part (2) of these Regulations are met.
 - (2) Criteria
 - a. Either (A) The applicable Categorical Pretreatment Standards contained in 40 CFR Subchapter N specifically provide that they shall be applied on a net basis; or (B) The Industrial User demonstrates that the control system it proposes or uses to meet applicable

Categorical Pretreatment Standards would, if properly installed and operated, meet the Standards in the absence of Pollutants in the intake waters.

- b. Credit for generic Pollutants such as BOD, TSS, or Oil and Grease should not be granted unless the Industrial User demonstrates that the constituents of the generic measure in the User's effluent are substantially similar to the constituents of the generic measure in the intake water or unless appropriate additional limits are placed on process water Pollutants either at the outfall or elsewhere.
 - c. Credit shall be granted only to the extent necessary to meet the applicable Categorical Pretreatment Standard(s), up to a maximum value equal to the influent value. Additional monitoring may be necessary to determine eligibility for credits and compliance with Standard(s) adjusted under these Regulations.
 - d. Credit shall be granted only if the User demonstrates that the intake water is drawn from the same body of water as that into which the POTW discharges. The Control Authority may waive this requirement if it finds that no environmental degradation will result.
- (e) When a Categorical Pretreatment Standard is expressed only in terms of Pollutant concentrations, an Industrial User may request that the Control Authority convert the limits to equivalent mass limits. The determination to convert concentration limits to mass limits is within the discretion of the Control Authority. The Control Authority may establish equivalent mass limits only if the Industrial User meets all the conditions set forth in the items below.
- (1) To be eligible for equivalent mass limits, the Industrial User must:
 - a. Employ, or demonstrate that it will employ, water conservation methods and technologies that substantially reduce water use during the term of its Control Mechanism;
 - b. Currently use control and treatment technologies adequate to achieve compliance with the applicable Categorical Pretreatment Standard, and not have used dilution as a substitute for treatment;
 - c. Provide sufficient information to establish the facility's actual average daily flow rate for all wastestreams, based on data from a continuous effluent flow monitoring device, as well as the facility's long-term average production rate. Both the actual average daily flow rate and the long-term average production rate must be representative of current operating conditions;
 - d. Not have daily flow rates, production levels, or Pollutant levels that vary so significantly that equivalent mass limits are not appropriate to control the Discharge; and
 - e. Have consistently complied with all applicable Categorical Pretreatment Standards during the compliance period prior to the Industrial User's request for equivalent mass limits.
 - (2) An Industrial User subject to equivalent mass limits must:
 - a. Maintain and effectively operate control and treatment technologies adequate to achieve compliance with the equivalent mass limits;
 - b. Continue to record the facility's flow rates through the use of a continuous effluent flow monitoring device;
 - c. Continue to record the facility's production rates and notify the Control Authority whenever production rates are expected to vary by more than twenty percent (20%) from its baseline production rates determined in DIVISION 2. Sec. 60-106. (e) (1) c. Upon notification of a revised production rate, the Control Authority will reassess the equivalent mass limit and revise the limit as necessary to reflect changed conditions at the facility; and
 - d. Continue to employ the same or comparable water conservation methods and technologies as those implemented pursuant to DIVISION 2. Sec. 60-106. (e) (1) a so long as it discharges under an equivalent mass limit.
 - (3) When developing equivalent mass limits, the Control Authority:
 - a. Will calculate the equivalent mass limit by multiplying the actual average daily flow rate of the regulated process(es) of the Industrial User by the concentration-based Daily Maximum

and Monthly Average Standard for the applicable Categorical Pretreatment Standard and the appropriate unit conversion factor;

- b. Upon notification of a revised production rate, will reassess the equivalent mass limit and recalculate the limit as necessary to reflect changed conditions at the facility; and
 - c. May retain the same equivalent mass limit in subsequent Wastewater Discharge Permit terms if the Industrial User's actual average daily flow rate was reduced solely as a result of the implementation of water conservation methods and technologies, and the actual average daily flow rates used in the original calculation of the equivalent mass limit were not based on the use of dilution as a substitute for treatment pursuant to DIVISION 2. Sec. 60-111. The Industrial User must also be in compliance with DIVISION 8. Sec. 60-157. (a) regarding the prohibition of bypass.
- (f) The Control Authority may convert the mass limits of the Categorical Pretreatment Standards of 40 CFR Parts 414, 419, and 455 to concentration limits for purposes of calculating limitations applicable to individual Industrial Users. The conversion is at the discretion of the Control Authority. When converting such limits to concentration limits, the Control Authority will use the concentrations listed in the applicable subparts of 40 CFR Parts 414, 419, and 455 and document that dilution is not being substituted for treatment as prohibited by DIVISION 2. Sec. 60-111, (reference 40 CFR 403.6(d)). In addition, the Control Authority will document how the equivalent limits were derived for any changes from concentration to mass limits, or vice versa, and make this information publicly available, (reference 40 CFR 403.6(c)(7)).
- (g) Once included in its Control Mechanism, the Industrial User must comply with the equivalent limitations developed in DIVISION 2. Sec. 60-106 in lieu of the promulgated Categorical Standards from which the equivalent limitations were derived, (reference 40 CFR 403.6(c)(7)).
- (h) Many Categorical Pretreatment Standards specify one limit for calculating Maximum Daily Discharge limitations and a second limit for calculating maximum Monthly Average, or four (4)-day average, limitations. Where such Standards are being applied, the same production or flow figure shall be used in calculating both the average and the maximum equivalent limitation reference 40 CFR 403.6(c)(8).
- (i) Any Industrial User operating under a permit incorporating equivalent mass or concentration limits calculated from a production-based Standard shall notify the Control Authority within two (2) business days after the User has a reasonable basis to know that the production level will significantly change within the next calendar month. Any User not notifying the Control Authority of such anticipated change will be required to meet the mass or concentration limits in its permit that were based on the original estimate of the long-term average production rate; reference 40 CFR 403.6(c)(9).

Sec. 60-107. State Pretreatment Standards

Industrial Users must comply with 10 CSR 20-6.100 codified in Title 10 of the Code of State Regulations.

Sec. 60-108. Local Limits

Where specific prohibitions or limits on Pollutants or Pollutant parameters are developed by the Control Authority in accordance with 40 CFR 403.5(c) such limits shall be deemed Pretreatment Standards for the purposes of Section 307(d) of the Act and shall apply to Significant Industrial Users on an individual Pollutant basis.

- (a) The Control Authority is authorized to establish Local Limits pursuant to 40 CFR 403.5(c) through Regulation or by inclusion in Control Mechanisms as long as the Local Limits are not less stringent than any set forth in the Pretreatment Requirements of 10 CSR 20-6.100 or other requirements or prohibitions established by Federal or State Regulations (*see* 10 CSR 20-6.100(6)).
- (b) The Control Authority may require implementation of Best Management Practices by Regulation, Rule, or by inclusion in Control Mechanisms to implement Local Limits, control of Pollutants discharged to the POTW, and the requirements of DIVISION 2. Sec. 60-104 and DIVISION 2. Sec. 60-105.
- (c) Local Limits are incorporated as Maximum Allowable Industrial Loads (MAILS).

- (d) MAILs represent the total mass loading allowed from all Significant Industrial Users for a particular POC.
- (e) Loadings of Pollutants will be evaluated at the point representing where Wastewater is discharged to the POTW.
- (f) The Control Authority may issue a Control Mechanism for Industrial Users which contribute POCs higher than reference concentrations or more than five percent (5%) of the MAIL.
- (g) Allocations shall be implemented as a Maximum Daily Limitation (concentration or mass). Alternative effluent limit types may also be specified at the discretion of the Control Authority per DIVISION 4. Sec. 60-127. (a) (3).
- (h) MAILs shall be maintained on file with the Control Authority as Attachment 1 to these Regulations;
- (i) The MAILs may be updated based on technical evaluations of Local Limits.

Sec. 60-109. Best Management Practices (BMPs)

- (a) BMPs may be required by the Control Authority to implement the prohibitions listed in DIVISION 2. Sec. 60-104 and DIVISION 2. Sec. 60-105 [See 40 CFR 403.5(a)(1) and (b)].
- (b) BMPs may also be required as an alternative means (i.e., management plans) of complying with, or in place of certain established Categorical Pretreatment Standards, Local Limits, and effluent limits to minimize the introduction of pollutants into the POTW.
- (c) BMPs include treatment requirements, procedures, operational monitoring, pollution reduction practices, and practices to control plant site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw materials storage, or otherwise minimize the introduction of Pollutants to the POTW.
- (d) The Control Authority may implement, where reasonable, special permit conditions requiring Users to identify sources of PECs within their operation, evaluate reduction or elimination strategies, and execute such strategies as necessary to be consistent with the purposes of this Regulation and to comply with Federal, State and Local Regulations.

Sec. 60-110. More Stringent Standards or Requirements

The Control Authority may establish by Regulation, or by inclusion in Control Mechanisms more stringent standards or requirements on discharges of Nondomestic waste to the POTW, consistent with the purpose of these Regulations.

Sec. 60-111. Dilution

No User shall ever increase the use of process water, or in any way attempt to dilute a Discharge, as a partial or complete substitute for adequate treatment to achieve compliance with a Discharge limitation unless expressly authorized by an applicable Pretreatment Standard or Requirement. The Control Authority may impose mass limitations on Users who are using dilution in an attempt to meet applicable Pretreatment Standards or Requirements, or in other cases when the imposition of mass limitations is appropriate.

Sec. 60-112. Reference Concentrations

- (a) The Control Authority shall maintain a list of Pollutants of Concern (POCs) and corresponding reference concentrations representing background concentrations which shall be used as screening criteria to determine if a User may require a Control Mechanism to monitor, limit, or control discharges.
 - (1) This list shall be maintained on file with the Control Authority as Attachment 2 to these Regulations;
 - (2) This list may be updated as determined by the Control Authority to include additional POCs or to update the reference concentrations.
- (b) Monitoring data representative of the User's Discharge shall be collected and submitted as required by the Control Authority meeting the requirements of DIVISION 6. Sec. 60-145 and DIVISION 6. Sec. 60-146.

- (c) Monitoring data representative of the User's Discharge shall be used to document POCs including if the User meets the requirements of a Significant Industrial User per DIVISION 1. Sec. 60-103. (oo).
- (d) The reference concentrations apply at a point that is representative of the Wastewater that is discharged to the POTW.

Sec. 60-113. Outside Jurisdictional and User Agreements

- (a) The Control Authority has the authority to enter into agreements with a contributing governmental jurisdiction or User outside the POTW's sewer use area.
- (b) Agreements between the Control Authority and the contributing jurisdiction or User shall function as a Control Mechanism. In no case will an agreement, contract, or other issued Control Mechanism herein, waive required compliance with Federal, State, or Local Regulations.
- (c) Any violation of the terms and conditions of an agreement shall be deemed a violation of these Regulations and subjects the contributing jurisdiction or User to the enforcement remedies.
- (d) The contributing jurisdiction or User shall be subject to all provisions of these Regulations.
- (e) An agreement with an outside jurisdiction may contain the following provisions:
 - (1) A requirement for the contributing jurisdiction to adopt and implement a Sewer Use Ordinance or equivalent regulation which is at least as stringent as these Regulations;
 - (2) A requirement that the agreement shall be amended as necessary to reflect changes made to Federal, State, or Local Regulations;
 - (3) A requirement that the outside jurisdiction's Sewer Use Ordinance or equivalent regulation be updated in a timely manner to incorporate changes to the Control Authority's Regulations;
 - (4) A provision defining roles associated with Pretreatment implementation activities such as identification of Users, Control Mechanism development and issuance, inspection and sampling, and enforcement;
 - (5) A requirement for the contributing jurisdiction to submit reports as specified in the agreement which may include the following components:
 - a. User inventory;
 - b. Monitoring results on the Discharge to the Control Authority including flow and Pollutant characteristics;
 - c. Treatment upstream of the connection to the POTW if deemed necessary by the Control Authority
 - (6) Limits on the nature, quality, and volume of the contributing jurisdiction's Wastewater at the point where it discharges to the POTW.

DIVISION 3. PRETREATMENT OF WASTEWATER

Sec. 60-114. Pretreatment Facilities

- (a) Users shall provide Wastewater treatment as necessary to comply with these Regulations and shall achieve compliance with all Pretreatment Standards and/or Requirements established in Control Mechanisms within the time limitations specified by EPA, the State, or Control Authority, whichever is more stringent.
- (b) Any facilities necessary for compliance shall be provided, operated, and maintained at the User's expense. The Control Authority may require minimum standards for Pretreatment facilities including, but not limited to, flow monitoring and compliance monitoring station(s).
- (c) Detailed plans describing such facilities and operating procedures shall be submitted to the Control Authority for review, and shall be acceptable to the Control Authority before such facilities are constructed. The review of such plans and operating procedures shall in no way relieve the User from the responsibility of providing treatment as necessary to produce a Discharge acceptable to the Control Authority under the provisions of these Regulations.

- (d) Whenever deemed necessary, the Control Authority may require Users to restrict their Discharge during peak flow periods, designate that certain Wastewater be discharged only into specific sewers, relocate and consolidate points of Discharge, separate Nondomestic Wastewater from other sources of Wastewater, and such other conditions as may be necessary to protect the POTW and determine the User's compliance with the requirements of these Regulations.
- (e) The Control Authority may require any User discharging into the POTW to install and maintain a suitable storage and flow control to ensure equalization of discharges. A Control Mechanism may be issued solely for flow or pollutant equalization.
- (f) Oil and Grease discharges and sediment shall be controlled by appropriate devices.
 - (1) The Control Authority may develop and implement a fats, oil, and grease (FOG) Management Program or other Management Plan to regulate interceptors from domestic and nondomestic sources.
 - (2) Grease, oil, and sand interceptors shall be designed based on facility operations and anticipated characteristics of the discharge and installed as required by the Control Authority, local building codes, or local plumbing codes.
 - (3) All interceptors shall be of a type and capacity approved by the Control Authority, local building codes, and local plumbing codes and shall be so located to be easily accessible for cleaning and inspection.
 - (4) Such interceptors shall be inspected, maintained, cleaned, and repaired to ensure proper operation.
 - (5) Interceptors may be inspected by the Control Authority or other regulatory agencies to evaluate the performance of the device.
 - (6) The Control Authority may establish specific required frequencies for any or all of the above activities.
 - (7) No use of chemicals, enzymes, or other substances that emulsify Oil and Grease shall be introduced to the POTW unless otherwise approved by the Control Authority.
- (g) Users with the potential to discharge flammable substances may be required to install and maintain an approved combustible gas detection meter at a location designated by the Control Authority.
- (h) Users with the potential to discharge hydrogen sulfide gas may be required to install and maintain H₂S atmospheric gas detectors at a location designated by the Control Authority.

Sec. 60-115. Accidental Discharge/Slug Discharge Control Plans

- (a) All Users shall adequately protect against Slug Discharges.
- (b) The Control Authority shall evaluate whether an Industrial User needs a Slug Discharge Control Plan including specific BMPs to control Slug Discharges.
- (c) The Control Authority may require any Industrial User to develop, submit for approval, and implement such a plan or take other action that may be necessary to control Slug Discharges. Alternatively, the Control Authority may develop such a plan for any Industrial User.
- (d) A Slug Discharge Control Plan shall address, at a minimum, the following:
 - (1) Description of Discharge practices, including non-routine batch discharges.
 - (2) Description of stored chemicals.
 - (3) Procedures for immediately (i.e., without delay) notifying the Control Authority of Slug Discharges. An initial notification report is required under DIVISION 5. Sec. 60-139. (b).
 - (4) Procedures for follow-up written notification within five days after an accidental Discharge with the components required under DIVISION 5. Sec. 60-139. (c).
 - (5) Procedures to prevent adverse impact from any accidental or Slug Discharge including:
 - a. Equalization measures
 - b. Management of periodic operational or maintenance activities

- c. Inspection and maintenance of storage areas
 - d. Handling and transfer of materials
 - e. Loading and unloading operations
 - f. Control of plant site runoff
 - g. Worker training
 - h. Discharges from containment structures or equipment
 - i. Measures for containing toxic organic Pollutants or other Pollutants
 - j. Measures and equipment for emergency response
- (e) Significant Industrial Users, or any other Users with a SDCP requirement in a Control Mechanism, are required to notify the Control Authority immediately (i.e., without delay) of any changes at its facility affecting the potential for a Slug Discharge.
- (f) The Slug Discharge Control Plan shall be updated to adequately document BMPs in place to minimize the risk of incidents requiring reporting per DIVISION 5. Sec. 60-139.

Sec. 60-116. Duty to Mitigate

- (a) Users shall take all reasonable steps to mitigate noncompliance with any Pretreatment Standard or Requirement.
- (b) Upon identification of an impact to the POTW or the environment including events such as loss or failure of all or part of the treatment facility, the User shall, to the extent necessary to maintain compliance with its permit, control its production or discharges (or both) until operation of the treatment facility is restored or an alternative method of treatment is provided.
- (c) Response from the User may require accelerated or additional monitoring as necessary to determine the nature and impact of the noncompliance.

Sec. 60-117. Compliance Schedules

- (a) In the event that a User does not adequately comply with Pretreatment Standards and Requirements including Categorical Pretreatment Standards, a Compliance Schedule may be proposed by the User or required by the Control Authority.
- (b) For compliance with Categorical Pretreatment Standards, a Compliance Schedule may be required by DIVISION 4. Sec. 60-126. (h)
- (c) The following requirements shall be met when implementing Compliance Schedules:
 - (1) The schedule shall contain compliance milestones in the form of dates for the commencement and completion of major events leading to the construction and operation of additional Pretreatment required for the User to meet the applicable Pretreatment Standards (e.g., hiring an engineer, completing preliminary plans, completing final plans, executing contract for major components, commencing construction, completing construction, etc.).
 - (2) No compliance milestone increment referred to in DIVISION 3. Sec. 60-117. (c) (1) shall exceed nine (9) months; in no event shall more than nine (9) months elapse between compliance milestone progress reports to the Control Authority.
 - (3) Compliance milestone progress reports shall be submitted to the Control Authority by the User no later than fourteen (14) days following each date in the schedule and the final date of compliance including, as a minimum, whether or not it complied with the increment of progress, if not, the date on which it expects to comply with this increment of progress, the reason for delay, and, if appropriate, the steps being taken by the User to return to the established schedule;
 - (4) The Control Authority may modify the timeline, the required corrective actions, or both based on the following:
 - a. Interim measures identified and implemented
 - b. Consideration for capital expenditures

- c. New instances of noncompliance
- d. Other considerations deemed by the Control Authority to warrant a modification to the Compliance Schedule

Sec. 60-118. Hauled Wastewater

- (a) Hauled waste is authorized at the discretion of the Control Authority; the Control Authority may implement a Hauled Waste Program to appropriately control hauled waste.
- (b) The Discharge location and hours of acceptance of the waste shall be established by the Control Authority.
- (c) Waste haulers and the entities generating the waste are responsible for complying with all Pretreatment Standards and Requirements.
- (d) The Control Authority may require waste haulers to provide requested information related to the hauled waste discharges and may require waste haulers or generators of waste to obtain a Control Mechanism.
- (e) The Control Authority may require the waste hauler to provide a waste analysis of any load prior to Discharge, and the Control Authority may collect samples of any load to ensure compliance with applicable Standards.
- (f) Hauled waste shall not meet the definition of a hazardous waste prior to mixing with other wastestreams pursuant to 40 CFR 261, if otherwise disposed.

Sec. 60-119. Dental Dischargers

- (a) Dental dischargers must comply with 40 CFR part 441- Dental Office Point Source Category.
- (b) The Control Authority requires dental dischargers to submit a one-time compliance report as required in 40 CFR 441.50(a).
- (c) The Control Authority may periodically survey or inspect dental dischargers to ensure compliance with the Regulations.

DIVISION 4. WASTEWATER CONTROL MECHANISMS

Sec. 60-120. Control Mechanism and Permit Requirement

- (a) The Control Authority has the authority to issue Wastewater Discharge Permits or other Control Mechanisms. SIUs shall have a Wastewater Discharge Permit with the requirements in DIVISION 4. Sec. 60-127 DIVISION 4. Sec. 60-127 of these Regulations.
- (b) The Control Authority may issue other Control Mechanisms to Users that are not SIUs if needed to comply with the requirements of these Regulations. Control Mechanisms may have specific requirements that define monitoring, site-specific limits, special conditions, prohibited discharges, or Best Management Practices.
- (c) No SIU shall Discharge Wastewater into the POTW without first obtaining a Permit or Other Control Mechanism from the Control Authority, except any SIU that has filed a timely renewal pursuant to DIVISION 4. Sec. 60-124 of these Regulations.
- (d) Any violation of the terms and conditions of a Control Mechanism shall be deemed a violation of these Regulations and subjects the User to the enforcement remedies set out in these Regulations.
- (e) Obtaining a Control Mechanism does not relieve a User of its obligation to comply with all Federal, State, and Local Regulations.

Sec. 60-121. Existing Connections

Any User required to obtain a Control Mechanism who was discharging Nondomestic Waste into the POTW prior to the effective date of the Regulation and who wishes to continue the discharges in the future, shall, within thirty (30) days after said date, apply to the Control Authority for a Control Mechanism in accordance

with DIVISION 4. Sec. 60-126 and shall not cause or allow discharges to the POTW to continue after ninety (90) days of said date except in accordance with a Control Mechanism issued by the Control Authority or a time extension approved by the Control Authority.

Sec. 60-122. New Connections

Any User required to obtain a Control Mechanism who proposes to begin or recommence discharging Nondomestic Wastes into the POTW must obtain such Control Mechanism prior to beginning or recommencing Discharge. The User must apply for a Control Mechanism, in accordance with DIVISION 4. Sec. 60-126, at least ninety (90) days prior to the date upon which any Discharge will begin or recommence.

Sec. 60-123. Control Mechanism Duration

A Permit for any Significant Industrial User as defined in DIVISION 1. Sec. 60-103. (oo) must be issued for a specified time period, not to exceed five (5) years from the effective date of the permit. Control Mechanisms for other Users may be issued for any duration including no expiration date, at the discretion of the Control Authority.

Sec. 60-124. Control Mechanism Reissuance

A User with an expiring Control Mechanism shall apply for reissuance by submitting a complete application or renewal application on a form provided by the Control Authority, in accordance with DIVISION 4. Sec. 60-126 of these Regulations, a minimum of ninety (90) days prior to the expiration of the User's existing Control Mechanism. The Control Authority may authorize a User to update a previous application or otherwise provide changes and other requested information since the last application submission in lieu of completing and submitting a new application, at the Control Authority's discretion.

Sec. 60-125. Control Mechanism Decisions

- (a) The Control Authority will evaluate the data and reports provided by the User as part of the application, renewal, or changed condition request and may require additional information.
- (b) Information submitted will be used to make Control Mechanism decisions.
- (c) The requested Discharge or changed Discharge shall be deemed to be denied if the Control Mechanism is not issued or otherwise communicated by the date of the expiration of the current Control Mechanism or within ninety (90) days of submitting a Control Mechanism application.
- (d) The Control Authority may deny a Control Mechanism or limit discharges from Users.

Sec. 60-126. Control Mechanism Application and Permit Application Contents

All Significant Industrial Users required to obtain a Control Mechanism must submit an application with information related to the Industrial User's discharges. The Control Authority may require Users to submit all or some of the following information as part of an application:

- (a) Identifying Information.
 - (1) The name and address of the facility, including the name of the operator and owner.
 - (2) Contact information, description of activities, facilities, and plant production processes on the premises.
- (b) Environmental Permits. A list of any environmental control permits held by or for the facility.
- (c) Description of Operations.
 - (1) A brief description of the nature, average rate of production (including each product produced by type, amount, process, and rate of production), and standard industrial classifications of the operation(s) carried out by such User. This description should include a schematic or process flow diagram, which indicates points of Discharge to the POTW from the regulated processes.
 - (2) Types of wastes generated, and a list of all raw materials and chemicals used or stored at the facility which are, or could accidentally or intentionally be, discharged to the POTW;

- (3) Number and type of employees, hours of operation, and proposed or actual hours of operation;
- (4) Type and amount of raw materials processed (average and maximum per day);
- (5) Site plans, floor plans, mechanical and plumbing plans, and details to show all sewers, floor drains, and appurtenances by size, location, and elevation, and all points of Discharge;
- (d) Time and duration of discharges;
- (e) The location for monitoring all wastes covered by the Discharge;
- (f) Flow Measurement. Information showing the measured Average Daily and Maximum Daily flow, in gallons per day, to the POTW from regulated process streams and other streams, as necessary, to allow alternative Discharge limits set out in DIVISION 2. Sec. 60-106. (c) and 40 CFR 403.6(e)).
- (g) Measurement of Pollutants.
 - (1) New Discharges may estimate the nature and concentration of Pollutants reported based on knowledge from facilities with similar operations and planned Pretreatment.
 - (2) Samples should be taken immediately downstream from Pretreatment facilities if such facilities exist or immediately downstream from the process if no Pretreatment facilities are present.
 - (3) Additional sampling may be required by the Control Authority to properly reflect characteristics of the Wastewater discharged to the POTW.
 - (4) The information submitted shall reflect Categorical Pretreatment Standards (if applicable) for each regulated process and shall also reflect the nature and concentration of Pollutants for all nondomestic discharges from the facility.
 - a. For Users subject to Categorical Standards: If other Wastewaters are mixed with the regulated Wastewater prior to Pretreatment the User shall measure the flows and concentrations necessary to allow use of the combined wastestream formula in 40 CFR 403.6(e) to evaluate compliance with the Pretreatment Standards.
 - b. Where an alternate concentration or mass limit has been calculated in accordance with 40 CFR 403.6(e) this adjusted limit along with supporting data shall be submitted to the Control Authority.
 - (5) Where the applicable Pretreatment Standard requires compliance with a BMP or pollution prevention alternative, the User shall submit documentation as required by the Control Authority or the applicable Standards to determine compliance with the Standard.
 - (6) Sampling and analysis shall be performed in accordance with procedures set out in DIVISION 6. Sec. 60-145 and DIVISION 6. Sec. 60-146 of these Regulations.
 - (7) The Control Authority may allow submittal of data which utilizes only historical data so long as the data includes adequate and representative data for the Pollutants and monitoring locations being requested.
 - (8) The Control Authority may require a minimum of four (4) Grab Samples for pH, cyanide, total phenols, oil and grease, sulfide and volatile organic compounds for facilities for which historical sampling data do not exist;
 - (9) The report shall include documentation of the time, date and place of sampling and methods of analysis.
- (h) Compliance Schedule.
 - (1) If additional Pretreatment or operation and maintenance will be required to meet the Pretreatment Standards, the shortest schedule by which the User will provide such additional Pretreatment or operation and maintenance must be provided by the User.
 - (2) For New Sources subject to Categorical Standards the completion date in this schedule shall not be later than the compliance date established for the applicable Pretreatment Standard.
 - (3) A Compliance Schedule pursuant to these Regulations must meet the requirements set out in DIVISION 3. Sec. 60-117. (c).
- (i) Any other information deemed necessary by the Control Authority to evaluate the Discharge request.

Sec. 60-127. Control Mechanism Contents

Control Mechanisms shall include conditions to control discharges consistent with the purpose of these Regulations.

- (a) All Wastewater Discharge Permits (Permit) must contain and Control Mechanisms may contain:
- (1) A statement that indicates the Permit issuance date, expiration date and effective date.
 - (2) A statement that the Permit is nontransferable without prior notification to the Control Authority in accordance with DIVISION 4. Sec. 60-131 of these Regulations, and provisions for furnishing the new owner or operator with a copy of the existing Permit or Control Mechanism.
 - (3) Permit limits necessary to ensure discharges are controlled. The following effluent limit types and corresponding definitions may be implemented:
 - a. Instantaneous. The results of discrete samples taken at any time (composite or grab) are compared against the Instantaneous Limit.
 - b. Daily Maximum. The arithmetic mean of all valid sample results collected for a calendar day shall be compared against the Daily Maximum Limit.
 - c. Weekly Average. The arithmetic mean of all valid sample results collected for a week shall be compared against the Weekly Average Limit. Multiple samples collected on a calendar day shall be averaged prior to calculating the Weekly Average.
 - d. Monthly Average. The arithmetic mean of all valid sample results collected for a calendar month shall be compared against the Monthly Average Limit. Multiple samples collected on a calendar day shall be averaged prior to calculating the Monthly Average.

Additional effluent limit types may be applied but must be defined in the individual Control Mechanism for which they are relevant.

Averages that are mass limits are to be the arithmetic mean of individual mass calculations per sample event (concentration and corresponding flow during the sample event) collected during the time period specified by the limit type.

- (4) Best Management Practices if required by the applicable Categorical Pretreatment Standard(s).
 - (5) Self-monitoring, sampling, reporting, notification, and recordkeeping requirements. These requirements shall include an identification of Pollutants (or Best Management Practice) to be monitored, sampling location, sampling frequency, and sample type based on Federal, State, and Local Regulations.
 - (6) A statement of applicable civil and criminal penalties for violation of Pretreatment Standards and Requirements, and any applicable Compliance Schedule. Such a schedule may not extend the time for compliance beyond that required by applicable Federal, State, or Local Regulations.
 - (7) Requirements to control Slug Discharges per DIVISION 3. Sec. 60-115. (a).
 - (8) Notification that Users may apply for a waiver from monitoring for a Pollutant neither present nor expected to be present in the Discharge in accordance with DIVISION 4. Sec. 60-128.
 - (9) Any grant of the monitoring waiver by the Control Authority in accordance with DIVISION 4. Sec. 60-128 must be included as a condition in the User's Permit or other Control Mechanism.
 - (10) Any use of Zero Discharge Certifications in accordance with DIVISION 5. Sec. 60-143. (d) by the User must be included as a condition in the User's Permit or other Control Mechanism.
- (b) In addition to the above requirements, any Permit or other Control Mechanism may also contain the following requirements:
- (1) Limits on the average and maximum rate of Discharge, time of Discharge, and requirements for flow regulation and equalization.
 - (2) Limits on the instantaneous, daily and monthly average and maximum concentration, mass, or other measure of POCs.
 - (3) Requirements for the installation, operation, calibration, and maintenance of suitable flow and compliance monitoring.

- (4) Requirements for the installation of Pretreatment technology, pollution control, or construction of appropriate containment devices, designed to reduce, eliminate, or prevent the introduction of Pollutants into the POTW.
 - (5) Requirements for the development and implementation of a Slug Discharge Control Plan or other special conditions including BMPs or management plans necessary to adequately prevent accidental, unanticipated, or routine discharges and otherwise minimize Pollutants introduced into the POTW. Documentation of the BMP implementation may be required to be submitted.
 - (6) Requirements to comply with the unit charge or Schedule of User Charges and Fees associated with these Regulations.
 - (7) A statement that compliance with the Control Mechanism does not relieve the User of responsibility for compliance with all applicable Federal, State, and Local Regulations, including those which become effective after issuance of the Control Mechanism.
- (c) Other conditions as deemed appropriate by the Control Authority to ensure compliance with these Regulations, and other Federal, State, and Local Regulations.

Sec. 60-128. Waiver for Pollutant Not Present

- (a) The Control Authority may authorize the Industrial User subject to a Categorical Pretreatment Standard to forego sampling of a Pollutant regulated by a Categorical Pretreatment Standard if the Industrial User has demonstrated through sampling and other technical factors that the Pollutant is neither present nor expected to be present in the Discharge, or is present only at background levels from intake water and without any increase in the Pollutant due to activities of the Industrial User. This authorization is subject to the following conditions:
- (1) The waiver may be authorized where a Pollutant is determined to be present solely due to domestic Wastewater discharged from the facility provided that the domestic Wastewater is not regulated by an applicable Categorical Standard and otherwise includes no Process Wastewater.
 - (2) The monitoring waiver is valid only for the duration of the effective period of the Control Mechanism, but in no case longer than five (5) years. The User must submit a new request for the waiver before the waiver can be granted for each subsequent Control Mechanism.
 - (3) In making a demonstration that a Pollutant is not present, the Industrial User must provide data from at least one sampling of the facility's Process Wastewater prior to any treatment present at the facility that is representative of all Wastewater from all processes.
 - (4) The request for a monitoring waiver must be signed as required in DIVISION 5. Sec. 60-143. (f).
 - (5) Non-detectable sample results may only be used as a demonstration that a Pollutant is not present if the EPA approved method from 40 CFR part 136 with the lowest minimum detection level for that Pollutant was used in the analysis.
 - (6) Any grant of the monitoring waiver by the Control Authority must be included as a condition in the User's Control Mechanism. The reasons supporting the waiver and any information submitted by the User in its request for the waiver must be maintained by the Control Authority for three (3) years after expiration of the waiver.
 - (7) Upon approval of the monitoring waiver and revision of the User's Control Mechanism by the Control Authority, the Industrial User must certify on each report with the statement required in, that there has been no increase in the Pollutant in its wastestream due to activities of the Industrial User.
 - (8) In the event that a waived Pollutant is found to be present or is expected to be present based on changes that occur in the User's operations, the User must immediately (i.e., without delay) comply with the monitoring requirements of DIVISION 5. Sec. 60-137. (a) or other more frequent monitoring requirements imposed by the Control Authority and notify the Control Authority in accordance with DIVISION 5. Sec. 60-138.

- (9) This provision does not supersede certification processes and requirements established in Categorical Pretreatment Standards, except as otherwise specified in the Categorical Pretreatment Standard.

Sec. 60-129. Control Mechanism Appeals

Any person, including the User, may petition the Control Authority to reconsider the terms of a Control Mechanism within thirty (30) days of its issuance.

- (a) Failure to submit a timely petition for review shall be deemed to be a waiver of the administrative appeal.
- (b) In its petition, the appealing party must indicate the Control Mechanism provisions objected to, the reasons for this objection, and the alternative condition, if any, it seeks to place in Control Mechanism.
- (c) All conditions of the Control Mechanism shall be in effect pending the appeal.
- (d) If the Control Authority fails to act within sixty (60) days, a request for reconsideration shall be deemed to be denied. Decisions to deny the appeal shall be considered final administrative action for purposes of judicial review.

Sec. 60-130. Control Mechanism Modification

The Control Authority may modify a Control Mechanism for good cause, including, but not limited to, the following reasons:

- (a) To incorporate any changes to Federal, State, or Local Regulations;
- (b) To address significant alterations or additions to the User's operation, processes, or Wastewater volume or character since the time of Control Mechanism issuance;
- (c) To incorporate changed or more representative Wastewater characteristics such as identification of additional Pollutants of Concern or different concentrations than otherwise provided to the Control Authority;
- (d) A change in the POTW that requires either a temporary or permanent reduction or elimination of the authorized Discharge;
- (e) Information indicating that the Nondomestic Discharge poses a threat to the Control Authority's POTW, Control Authority personnel, or the receiving waters;
- (f) Violation of any terms or conditions of the Control Mechanism;
- (g) Misrepresentations or failure to fully disclose all relevant facts in the application or other information provided to the Control Authority, including any required reporting;
- (h) Revision of or a grant of variance from Categorical Pretreatment Standards pursuant to 40 CFR 403.13;
- (i) To correct typographical or other errors in the Control Mechanism; or
- (j) To reflect a transfer of the facility ownership or operation to a new owner or operator in accordance with DIVISION 4. Sec. 60-131.

The filing of a request by the permittee for a Control Mechanism modification does not stay any condition required by the Control Mechanism.

Sec. 60-131. Control Mechanism Transfer

Control Mechanisms may be reassigned or transferred to a new owner or operator only if the existing User provides a Notice of Transfer to the Control Authority at least thirty (30) days in advance of the transfer and the Control Authority approves the transfer. The Notice to the Control Authority must include a written certification statement with the below minimum components signed by an Authorized Representative of the new owner or operator per DIVISION 1. Sec. 60-103. (c) which certifies the following:

- (a) States that the new owner or operator has no immediate intent to change the facility's operations and processes.
- (b) Identifies the specific date on which the transfer is to occur.

(c) Acknowledges full responsibility for complying with the existing Control Mechanism.

Failure to provide advance Notice of Transfer renders the Control Mechanism voided on the date of the facility transfer. Other Control Mechanisms may not be transferred; the new Owner shall provide survey or permit application information as requested by the Control Authority.

Sec. 60-132. Control Mechanism Revocation or Termination

The Control Authority may revoke a Control Mechanism for good cause, including, but not limited to the following reasons:

- (a) Violation of the Control Mechanism;
- (b) Failure to notify the Control Authority of significant changes to the Wastewater prior to the changed Discharge pursuant to DIVISION 5. Sec. 60-138;
- (c) Falsifying self-monitoring reports and certification statements;
- (d) Tampering with monitoring equipment;
- (e) Refusing to allow the Control Authority timely access to the facility premises and records for the purposes of inspection or monitoring;
- (f) Failure to meet effluent limitations;
- (g) Failure to pay fines;
- (h) Failure to pay sewer charges;
- (i) Failure to meet Compliance Schedules or other requirements of enforcement remedies;
- (j) Failure to complete a Wastewater survey or permit application or failure to accurately report the Wastewater constituents and characteristics of the Discharge;
- (k) Violation of any Pretreatment Standard or Requirement, or any terms of the Control Mechanism or these Regulations;
- (l) Ceasing operations or failure to notify of a Transfer of Ownership without prior Control Authority approval per DIVISION 4. Sec. 60-131.

DIVISION 5. USER REPORTING REQUIREMENTS

Sec. 60-133. Submittal Requirements

- (a) Certification of the following Reports is required by an Authorized or Duly Authorized Representative of the User and contain the certification statement in DIVISION 5. Sec. 60-143. (c):
 - (1) All Baseline Monitoring Reports
 - (2) Control Mechanism Applications
 - (3) Control Mechanism Renewals
 - (4) Periodic Compliance Reports
 - (5) Reports on Compliance with Categorical Standards, and
 - (6) Requests for Waivers for Pollutants not Present must be signed by an Authorized Representative or Duly Authorized Representative of the User and contain the certification statement in DIVISION 5. Sec. 60-143. (c).
- (b) Changes in Designation of Signatory Authority
- (c) If the designation of an Authorized Representative or Duly Authorized Representative is no longer accurate because a different individual or position has responsibility for the overall operation of the facility or overall responsibility for environmental matters for the company, a new written authorization satisfying the requirements of these Regulations must be submitted to the Control Authority prior to or together with any reports to be signed by an Authorized Representative.
- (d) Electronic Reporting
- (e) Users may be required to electronically submit reports to satisfy reporting requirements.

Sec. 60-134. NSCIU Annual Reporting

- (a) A facility determined to be a Non-Significant Categorical Industrial User by the Control Authority pursuant to DIVISION 1. Sec. 60-103. (oo) (2), must annually submit the signed certification statement in DIVISION 5. Sec. 60-143. (d).

Sec. 60-135. Baseline Monitoring Report (BMR)

- (a) A Baseline Monitoring Report is required for:
 - (1) Industrial Users subject to new or updated Categorical Pretreatment Standards: Users shall submit a BMR within one hundred eighty (180) days after the effective date of a Categorical Pretreatment Standard, or the final administrative decision on a category determination under 40 CFR 403.6(a)(4), whichever is later;
 - (2) Existing Significant Industrial Users subject to Categorical Pretreatment Standards and currently discharging to the POTW: Users shall have a BMR on file or in instances where a BMR is not on file, a BMR shall be submitted by the User in the timeframe requested by the Control Authority;
 - (3) New Sources subject to Categorical Pretreatment Standards: Users shall submit a BMR at least ninety (90) days prior to commencement of the Discharge. The BMR shall include the report components specified below as well as the method of Pretreatment it intends to meet the applicable Pretreatment Standards.
 - (4) Report Components: a report which contains the information listed in DIVISION 5. Sec. 60-135. (c) and any other information required by the Control Authority.
- (b) Compliance Certification
 - (1) In addition to the report certification required in DIVISION 5. Sec. 60-133. (a) by an Authorized Representative, a compliance certification is required to be signed by a qualified professional.
 - (2) The compliance certification shall document whether or not compliance with the applicable Pretreatment Standards and Requirements are being met on a consistent basis; and, if not, whether additional operation and maintenance, or additional Pretreatment is required to meet the Pretreatment Standards and Requirements.
 - (3) The compliance certification shall include a statement documenting that a qualified professional has reviewed the BMR including the facility operations and resulting Discharge characteristics.
- (c) The report components shall be completed as requested by the Control Authority including the following information:
 - (1) All information required in DIVISION 4. Sec. 60-126;
 - (2) Report Certification per DIVISION 5. Sec. 60-133. (a)
 - (3) Compliance Certification per DIVISION 5. Sec. 60-135. (b) for Users subject to DIVISION 5. Sec. 60-135. (a) (1) and (2).

Sec. 60-136. Initial Report on Compliance with Categorical Pretreatment Standards

- (a) An Initial Report on Compliance is required for the following Users:
 - (1) Existing Sources subject to Categorical Pretreatment Standards: within ninety (90) days following the date for final compliance;
 - (2) New Sources subject to Categorical Pretreatment Standards: within ninety (90) days following commencement of the introduction of Wastewater into the POTW.
- (b) The report components shall be completed as requested by the Control Authority including the following information:
 - (1) All information required in DIVISION 4. Sec. 60-126. (f) and (g);
 - (2) Compliance Certification per DIVISION 5. Sec. 60-135. (b) for Users subject to DIVISION 5. Sec. 60-135. (a) (3).

- (c) For Industrial Users subject to equivalent mass of concentration limits established in accordance with the procedures in 40 CFR 403.6(c) the report shall contain a reasonable measure of the User's long-term production rate.
- (d) For all other Industrial Users subject to Categorical Pretreatment Standards expressed in terms of allowable Pollutant Discharge per unit of production (or other measure of operation), this report shall include the Industrial User's actual production during the appropriate sampling period.
- (e) All sampling shall be done in conformance with DIVISION 6. Sec. 60-145 and DIVISION 6. Sec. 60-146.

Sec. 60-137. Periodic Report on Compliance or Self-Monitoring Report (SMR)

- (a) Users with Control Mechanisms may be required to periodically submit Compliance Reports to the Control Authority to document compliance with the relevant Pretreatment Standards and Requirements.
- (b) Requirements for Significant Industrial Users as defined per DIVISION 1. Sec. 60-103. (oo) (1)
 - (1) The minimum reporting frequency is semi-annually; a more frequent reporting frequency may be required.
 - (2) Report Contents
 - a. Nature and concentration of Pollutants in the effluent including date and monitoring location.
 - b. Measured or estimated average and maximum daily flows. If required by the Control Authority, more detailed flow reporting.
 - c. If required, Management Plans for reduction or control of Pollutants.
 - d. Documentation of Best Management Practices as required by the Pretreatment Standard or as otherwise required by the Control Authority to determine compliance.
 - (3) All compliance reports must be signed and certified in accordance with DIVISION 5. Sec. 60-143. (c).
- (c) Requirements for Non-Significant Categorical Industrial Users defined per DIVISION 1. Sec. 60-103. (oo) (2):
 - (1) The reporting frequency is annual.
 - (2) Report Contents
 - a. Statements or documentation as required such as manifests, maintenance logs, monitoring results, flow monitoring results, or other information as required by the Control Authority to document compliance with Best Management Practices required for the Reduced Reporting.
 - b. Signed certification in accordance with DIVISION 5. Sec. 60-143. (c).
- (d) Requirements for Other Control Mechanisms
 - (1) Users with a Control Mechanism other than a Permit may be required to submit reports at a specified frequency or upon request by the Control Authority.
 - (2) If required, Report Components may include the following:
 - a. Flow measurement and analytical results
 - b. Statements or other documentation as required such as manifests, maintenance logs, monitoring results, flow monitoring results, or other information as required by the Control Authority to document compliance with Best Management Practices required for the reduced reporting.
 - c. Management Plans and corresponding documentation for reduction or control of Pollutants.
 - d. Signed certification in accordance with DIVISION 5. Sec. 60-143. (c).
- (e) Control Authority Monitoring in lieu of the User
 - (1) Where the Control Authority performs the required sampling and analysis in lieu of the User, the User may not be required to submit the report certification.

- (2) Where the Control Authority collects all the information required for the report, including flow data, the User may not be required to submit the report.
- (f) If a User subject to the reporting requirement in these Regulations monitors any regulated Pollutant at the appropriate sampling location more frequently than required by the Control Authority, using the procedures prescribed in DIVISION 6. Sec. 60-145 and DIVISION 6. Sec. 60-146 of these Regulations, the results of this monitoring shall be included in the report.

Sec. 60-138. Reports of Changed Conditions

All SIUs are required to notify the Control Authority of any planned changes to manufacturing operations or Wastewater management which may significantly alter the nature, quality or volume of its Wastewater at least thirty (30) days prior to the commencement of the changed condition.

- (a) The Control Authority may require the Industrial User to submit information as deemed necessary to evaluate the changed condition, including the submission of a control mechanism application under DIVISION 4. Sec. 60-126.
- (b) The Control Authority may issue a Control Mechanism under DIVISION 4. Sec. 60-120 or modify an existing Control Mechanism under DIVISION 4. Sec. 60-130 in response to changed conditions or anticipated changed conditions.
- (c) The Control Authority may deny the changed Discharge or modify the Control Mechanism to incorporate the changed conditions.

Sec. 60-139. Reports of Accidental and Slug Discharges (Reports of Potential Problems)

- (a) Immediate (without delay) notification upon discovery to the Control Authority is required for:
 - (1) Accidental or Slug Discharges.
 - (2) Internal or operational monitoring data or observations indicating that a Pretreatment Standard is or is likely to be violated.
- (b) The initial notification of the event shall include at a minimum, the following:
 - (1) Location of the Discharge;
 - (2) Date, time, and duration of Discharge;
 - (3) Description (type) of event resulting in the Discharge;
 - (4) The substance discharged;
 - (5) Concentration or strength of Discharge;
 - (6) Volume of Discharge;
 - (7) The cause of Discharge; and
 - (8) Corrective actions taken by the User.
 - (9) If any of the required information is not available when the incident is initially communicated, then the missing information shall be acknowledged and provided by the User as soon as it is available.
- (c) Follow-up report
 - (1) A written follow-up report is required to be submitted five (5) days following identification of the Discharge unless waived by the Control Authority
 - (2) The report shall contain:
 - a. A description of the investigation;
 - b. Amendments to the initial report;
 - c. Corrective actions to prevent future similar occurrences including updated procedures such as the Slug Discharge Control Plan;
 - d. Timeframes to implement corrective actions.
- (d) The Control Authority may issue an enforcement remedy as authorized in DIVISION 7 which may contain additional corrective actions or required responses.

- (e) Such notification shall not relieve the User of any expense, loss, damage, or other liability which might be incurred because of damage or Disruption to the POTW or the environment.
- (f) Such notification does not relieve User of any fines, penalties, or other liability which may be imposed pursuant to these Regulations, or other Federal, State, or Local Regulations.

Sec. 60-140. Reports of Permit Limit Exceedances

- (a) If sampling performed by a User indicates exceedance of an effluent limit, the User must notify the Control Authority within twenty-four (24) hours of becoming aware of the exceedance.
- (b) A resampling event shall be performed and submitted to the Control Authority within thirty (30) days after the User becomes aware of the violation.
 - (1) Where the Control Authority performs sampling in lieu of the User, the Control Authority shall repeat the sampling event unless the User is notified to perform the resampling event.
- (c) Resampling is not required for the following situations:
 - (1) If the Control Authority performs monitoring at the User's facility at least once a month, or
 - (2) If the Control Authority performs sampling at the User between the time when the initial sampling was conducted and the time when the User or the Control Authority receives the results.

Sec. 60-141. Notification of the Discharge of Hazardous Waste

- (a) Discharge of any substance that would be a hazardous waste prior to mixing with other wastestreams pursuant to 40 CFR 261, if otherwise disposed of, is prohibited unless specifically authorized by the Control Authority, in accordance with DIVISION 2. Sec. 60-104. Should a User discharge hazardous waste in violation of DIVISION 2. Sec. 60-104, said User must comply with the following provisions:
- (b) Any User who commences the discharge of hazardous waste shall notify the Control Authority, the EPA Regional Waste Management Division Director, and state hazardous waste authorities, in writing, of any discharge into the POTW of a substance which, if otherwise disposed of, would be a hazardous waste under 40 CFR Part 261. Such notification must include the name of the hazardous waste as set forth in 40 CFR Part 261, the EPA hazardous waste number, and the type of Discharge (continuous, batch, or other). If the User discharges more than one hundred (100) kilograms of such waste per calendar month to the POTW, the notification also shall contain the following information to the extent such information is known and readily available to the User: an identification of the hazardous constituents contained in the wastes and an estimation of the mass and concentration of such constituents in the wastestream discharged during that calendar month.
- (c) Notifications of changed conditions must be submitted under DIVISION 5. Sec. 60-138 of these Regulations. The notification requirement does not apply to Pollutants already reported by Users subject to Categorical Pretreatment Standards under the self-monitoring requirements of DIVISION 5. Sec. 60-133, DIVISION 5. Sec. 60-136, and DIVISION 5. Sec. 60-137 or other reporting requirements as required by the Control Authority.
- (d) All notifications must take place no later than one hundred and eighty (180) days after the discharge commences. Any notification under this paragraph need be submitted only once for each hazardous waste discharged.
- (e) In the case of any new regulations under Section 3001 of RCRA identifying additional characteristics of hazardous waste or listing any additional substance as a hazardous waste, the User must notify the Control Authority, the EPA Regional Waste Management Waste Division Director, and state hazardous waste authorities of the Discharge of such substance within ninety (90) days of the effective date of such regulations.
- (f) This provision does not create a right to discharge any substance not otherwise authorized to be discharged by these Regulations, a Control Mechanism issued thereunder, or any applicable Federal, State, or Local Regulations.

Sec. 60-142. Date of Receipt of Reports

- (a) Written reports will be deemed to have been submitted on the postmarked date. For reports which are not mailed, postage prepaid, into a mail facility serviced by the United States Postal Service, the date of receipt of the report shall govern.
- (b) In the event that electronic reports are required by the Control Authority, the date of receipt of the report shall be the date that the report is electronically transmitted.
- (c) Incomplete reports may be considered late for not including the required reporting components per DIVISION 5. Sec. 60-137.

Sec. 60-143. Certification Statements

- (a) Reports required under these Regulations shall be submitted in a format as required by the Control Authority which may be in an electronic format compliant with the Environmental Protection Agency (EPA) approved Cross Media Electronic Reporting Regulation (CROMERR) per the Code of Federal Regulations Title 40, Part 3.
- (b) Certification statements as required in this section shall be provided by an Authorized or Duly Authorized Representative as defined in DIVISION 1. Sec. 60-103. (c).
- (c) Standard report certification is required for the following reports:
 - (1) Applications in accordance with DIVISION 4. Sec. 60-122;
 - (2) Baseline monitoring reports per DIVISION 5. Sec. 60-133;
 - (3) Reports on compliance with the Categorical Pretreatment Standard deadlines per DIVISION 5. Sec. 60-136;
 - (4) Periodic compliance reports required by DIVISION 5. Sec. 60-137. (a); and
 - (5) Initial request for a monitoring waiver to forego sampling of a Pollutant on the basis of DIVISION 4. Sec. 60-128.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

- (d) No Discharge/Zero Discharge Certification may be authorized in Control Mechanisms or Permits if a User did not Discharge any Process Wastewater during a reporting period and therefore was unable to fulfill monitoring requirements specified in a Control Mechanism, or if a User's Control Mechanism requires "Zero Discharge" for part or all of its Process Wastewater. The following certification statement shall be submitted in addition to the standard report certification.

Based on my inquiry of the person or persons directly responsible for managing compliance with industrial waste discharge requirements, I certify that to the best of my knowledge and belief, this facility did not discharge Process Wastewater, including categorical wastestreams, to the sanitary sewer system during this monitoring and reporting period. I further understand that an annual inspection, as well as any necessary non-routine inspections, may be conducted by the Control Authority. During these inspections, I shall make available copies of waste manifests and any other records that support zero discharge of Process Wastewater (e.g., sludge manifest records, chemical solution replenishment records, and water bills).

- (e) Annual certification is required for Non-Significant Categorical Industrial Users. Users determined by the Control Authority to be a Non-Significant Categorical Industrial User pursuant to DIVISION 1. Sec. 60-103. (oo) (2) and DIVISION 5. Sec. 60-134 must annually submit the following certification statement signed in accordance with the signatory requirements in DIVISION 1. Sec. 60-103. (c). This certification shall accompany a report in a format as required by the Control Authority:

Based on my inquiry of the person or persons directly responsible for managing compliance with the Categorical Pretreatment Standards under 40 CFR ____, I certify that, to the best of my

knowledge and belief that during the period from _____, _____ to _____, _____ [months, days, year]:

(a) The facility described as _____ [facility name] met the definition of a Non-Significant Categorical Industrial User as described in 40 CFR 403.3(v)(2);

(b) The facility complied with all applicable Pretreatment Standards and Requirements during this reporting period; and

(c) The facility never discharged more than 100 gallons of total Categorical Wastewater on any given day during this reporting period.

This compliance certification is based on the following information:

- (f) Certification of Pollutants Not Present. The following certification is required for Users that have an approved monitoring waiver based on DIVISION 4. Sec. 60-128 to certify on each report that there has been no increase in the Pollutant in its wastestream due to activities of the User.

Based on my inquiry of the person or persons directly responsible for managing compliance with the Pretreatment Standard for 40 CFR _____ [specify applicable National Pretreatment Standard part(s)], I certify that, to the best of my knowledge and belief, there has been no increase in the level of _____ [list Pollutant(s)] in the Wastewaters due to the activities at the facility since filing of the last periodic report under 40 CFR 403.12(e).

DIVISION 6. COMPLIANCE MONITORING AND RECORDKEEPING

Sec. 60-144. Wastewater Survey

- (a) The Control Authority is authorized to identify and locate all possible Users which might be subject to the Control Authority's approved pretreatment program, any other Federal, State, or Local Regulations, or may be sources of emerging POCs.
- (b) The Control Authority is authorized to prepare forms for this purpose and may periodically require Users to respond to the requested information.
- (c) When requested by the Control Authority, all Users must submit information on the nature, volume, and characteristics of their Wastewater by completing a Wastewater survey prior to commencing their Discharge or at an alternative timeframe specified by the Control Authority.
- (d) The Control Authority may require the User to complete specific analysis of representative discharges associated with the survey request.
- (e) Failure to return the survey as requested by the Control Authority is considered a violation of these Regulations and shall be reasonable grounds for enforcement action pursuant to DIVISION 7, including termination of service.

Sec. 60-145. Analytical Requirements

- (a) Any User providing the results of analyses to the Control Authority as part of a survey, application, or report must ensure that such analyses were performed in accordance with the techniques prescribed in 40 CFR Part 136 and amendments thereto, unless otherwise specified in an applicable Categorical Pretreatment Standard or unless an alternative analysis is approved by the Control Authority.
- (b) If 40 CFR Part 136 does not contain sampling or analytical techniques for the Pollutant in question, or where the EPA determines that the Part 136 sampling and analytical techniques are inappropriate for the Pollutant in question, sampling and analyses shall be performed by using validated analytical methods or any other applicable sampling and analytical procedures, including procedures suggested by the Control Authority or other parties approved by the EPA.
- (c) Analyses performed shall be sufficiently sensitive as compared to Federal, State, and Local Regulations, such as Pollutants with established MAILs, Reference Concentrations, Pretreatment Standards, and Emerging Pollutant Water Quality Criteria.

Sec. 60-146. Sample Collection

- (a) Samples collected to satisfy the requirements of these Regulations including the required Reports must be based on data obtained through appropriate sampling and analysis performed during the period covered by the report.
- (b) All Wastewater samples must be representative of the User's Discharge for the associated reporting period.
- (c) Wastewater monitoring and flow measurement facilities shall be properly operated, kept clean, and maintained in good working order at all times. The failure of a User to keep its monitoring facility in good working order shall not be grounds for the User to claim that sample results are unrepresentative of its Discharge.
- (d) Sample Collection Types
 - (1) Grab Sample is a sample that is taken from a wastestream without regard to the flow in the wastestream and over a period of time not to exceed fifteen (15) minutes.
 - (2) Composite Sample means the sample resulting from the combination of individual Wastewater samples taken at selected intervals on an increment of either flow or time.
 - (3) Composite Wastewater samples shall be collected using twenty-four (24)-hour flow proportional composite sampling techniques, unless time proportional composite sampling or grab sampling is authorized by the Control Authority.
- (e) Sample collection shall follow procedures (including appropriate preservation) specified in 40 CFR Part 136 and appropriate EPA guidance.
- (f) Samples for oil and grease, temperature, pH, cyanide, total phenols, sulfides, and volatile organic compounds shall be obtained using grab sample collection techniques unless otherwise required by the Control Authority.
- (g) The Control Authority may require the User to install flow and sample monitoring equipment accessible by the Control Authority. The facility's sampling and monitoring equipment shall be maintained at all times in a safe and proper operating condition by the User at its own expense.
- (h) All devices used to measure Wastewater flow and quality shall be calibrated as required by the analysis or as otherwise necessary to ensure their accuracy.

Sec. 60-147. Right of Entry: Inspection and Sampling

- (a) The Control Authority has the authority to ascertain whether the purpose of these Regulations, and any Control Mechanism, or order issued hereunder, is being met and whether the User is complying with all requirements thereof.
- (b) The Control Authority shall have the right to enter the facilities of any User which discharges or otherwise introduces Wastewater to the POTW including facilities generating hauled waste or facilities discharging from outside the jurisdiction.
- (c) Users shall allow the Control Authority ready access to all parts of the premises for the purposes of inspection, sampling, records examination and copying, audio and visual documentation, and the performance of any additional duties.
- (d) Where a User has security measures in force which require proper identification and clearance before entry into its premises, the Industrial User shall make necessary arrangements with its security guards so that, upon presentation of suitable identification, personnel from the Control Authority, State, and EPA will be permitted to enter without delay, for the purposes of performing their specific responsibilities.
- (e) The Control Authority, state, and EPA shall have the right to set up on the Industrial User's property or require installation of the devices as are necessary to conduct compliance monitoring and flow monitoring of the User's Discharge.
- (f) Any temporary or permanent obstruction to safe and easy access to the industrial facility to be inspected or sampled shall be promptly removed by the Industrial User at the written or verbal request

of the Control Authority and shall not be replaced. The costs of clearing the access shall be borne by the Industrial User.

- (g) Unreasonable delays in allowing Control Authority personnel access to the Industrial User's premises during reasonable times shall be a violation of these Regulations.

Sec. 60-148. Search Warrants

If the Control Authority has been refused access to a building, structure or property, or any part thereof, and if the Control Authority has demonstrated probable cause to believe that there may be a violation of these Regulations or that there is a need to inspect as part of a routine inspection program of the Control Authority designed to verify compliance with these Regulations or any Control Mechanism or order issued hereunder, or to protect the overall public health, safety and welfare of the community, the Control Authority may seek issuance of a search warrant from the appropriate court having jurisdiction.

Sec. 60-149. Recordkeeping

- (a) Users subject to the reporting requirements of these Regulations shall retain, and make available for inspection and copying, all records of information obtained pursuant to these Regulations;
- (b) Records shall include any monitoring activities required and any additional records of information obtained pursuant to monitoring activities undertaken by the User;
- (c) Records shall include documentation associated with Best Management Practices established under DIVISION 2. Sec. 60-108. (b);
- (d) The period that records shall be maintained and made available to the Control Authority is at least three (3) years;
- (e) The record requirement of three (3) years shall be automatically extended for the duration of any litigation concerning the User or the Control Authority or where the User has been specifically notified of a longer retention period by the Control Authority, State, or EPA;
- (f) Records of analytical results shall include the date, exact place, method, and time of sampling, and the name of the person(s) taking the samples; the dates analyses were performed; who performed the analyses; the analytical techniques or methods used; and the results of such analyses.

Sec. 60-150. Confidential Information

- (a) Information and data on a User obtained from reports, surveys, applications, Permits, other Control Mechanisms, and monitoring programs, and from the Control Authority's inspection and sampling activities, shall be available to the public without restriction, unless the User specifically requests, and is able to demonstrate to the satisfaction of the Control Authority, that the release of such information would divulge information, processes, or methods of production entitled to protection as trade secrets under applicable State law (*see* Missouri Sunshine Law Chapter 610, RSMo; § 644.026.1(21), (24), RSMo; 10 CSR 20-6.020(3)). Any such request must be asserted at the time of submission of the information or data (10 CSR 20-6.100(11)).
- (b) When requested and demonstrated by the User furnishing a report that such information should be held confidential, the portions of a report which might disclose trade secrets or secret processes shall not be made available for inspection by the public, but shall be made available immediately (i.e., without delay) upon request to governmental agencies for uses related to the NPDES program or pretreatment program, and in enforcement proceedings involving the person furnishing the report. Wastewater constituents and characteristics and other effluent data, as defined at 40 CFR 2.302, shall not be recognized as confidential information and shall be available to the public without restriction (*see* § 644.026.1(21), (24), RSMo; 10 CSR 20-6.020(3)).

DIVISION 7. ENFORCEMENT REMEDIES

Sec. 60-151. Enforcement Response Plan and Authorization to Implement Enforcement Remedies

- (a) The Control Authority shall implement an Enforcement Response Plan which provides escalating enforcement remedies for noncompliance with these Regulations.
- (b) The Enforcement Response Plan shall provide recommendations and guidance to implement the enforcement remedies defined herein.
- (c) When a User violates or continues to violate any provision of these Regulations, the Control Authority shall notify the User of such violations.
- (d) The Control Authority is authorized to investigate instances of noncompliance and implement enforcement remedies to return the User to compliance or otherwise resolve the noncompliance.
- (e) Users are not relieved of liability for any violations occurring before or after receipt of notifications or enforcement remedies served by the Control Authority.
- (f) Nothing in these Regulations shall limit the authority of the Control Authority to take any action, including emergency actions or any other enforcement.
- (g) Exercise of enforcement remedies by the Control Authority shall not be a bar to, or a prerequisite for, taking any other action against the User.
- (h) Remedies Nonexclusive. The remedies authorized in these Regulations and implemented in the Enforcement Response Plan are not exclusive. The Control Authority may take any, all, or any combination of these remedies or other measures against a noncompliant User.

Sec. 60-152. Publication of Users in Significant Noncompliance

The Control Authority shall publish at least annually, in a newspaper of general circulation that provides meaningful public notice within the jurisdictions served by the Control Authority, a list of Users that, at any time during the previous twelve (12) months, were in Significant Noncompliance with applicable Pretreatment Standards and Requirements. The term "Significant Noncompliance" applies to all Significant Industrial Users (or any other Industrial User that violates DIVISION 7. Sec. 60-152. (c), (d) or (h) and shall mean:

- (a) Chronic violations of Wastewater Discharge limits, defined here as those in which sixty six percent (66%) or more of all of the measurements taken for the same Pollutant parameter during a six (6) month period exceed (by any magnitude) a numeric Pretreatment Standard or Requirement, including Instantaneous Limits;
- (b) Technical Review Criteria (TRC) violations, defined here as those in which thirty three percent (33%) or more of all of the measurements taken for the same Pollutant parameter during a six (6) month period equal or exceed the product of the numeric Pretreatment Standard or Requirement including Instantaneous Limits, multiplied by the applicable TRC (TRC = 1.4 for BOD, TSS, fats, oil, and grease, and 1.2 for all other Pollutants except pH);
- (c) Any other violation of a Pretreatment Standard or Requirement (daily maximum, long-term average, Instantaneous Limit, or narrative Standard) that the Control Authority determines has caused, alone or in combination with other discharges, Interference or Pass Through, including endangering the health of Control Authority personnel or the general public;
- (d) Any Discharge of a Pollutant that has caused imminent endangerment to human health, welfare or to the environment or has resulted in the Control Authority's exercise of its emergency authority to halt or prevent such a Discharge;
- (e) Failure to meet, within ninety (90) days after the schedule date, a compliance milestone contained in a Control Mechanism or enforcement order for starting construction, completing construction, or attaining final compliance;
- (f) Failure to provide, within forty-five (45) days after the due date, required reports such as baseline monitoring reports, ninety (90)-day compliance reports, periodic self-monitoring reports, and reports on compliance with compliance milestones;
- (g) Failure to accurately report noncompliance; or

- (h) Any other violation or group of violations, which may include a violation of Best Management Practices, which the Control Authority determines will adversely affect the operation or implementation of the local Pretreatment program.

Sec. 60-153. Administrative Enforcement Remedies

- (a) The Control Authority shall administratively document and escalate enforcement remedies relative to noncompliance with these Regulations.
- (b) Informal Review Meeting. Informal call or meeting to discuss the noncompliance either before or after the enforcement action is issued.
- (c) Informal Communication. Informal communication is used to identify and document minor instances of non-compliance with the User to avoid further noncompliance and escalation of enforcement.
- (d) Warning Letter. Warning Letters communicate instances of noncompliance of Pretreatment Standards or Requirements. The Control Authority may require the User to complete corrective actions including a written response to the violation.
- (e) Notice of Violation. Notice to the User to identify and document instances of non-compliance with Pretreatment Program requirements. The Control Authority shall require a written response from the User to be submitted to the Control Authority within 30 days (or sooner if required by the Control Authority).
- (f) Standards Meeting. A meeting to discuss a noncompliance and subsequent enforcement including discussion of corrective actions.
- (g) Consent Order. An agreement negotiated by both the Control Authority and the User. A Consent Order must be signed by representatives from both Parties before being “issued” and is therefore not subject to appeal. Corrective actions or Compliance Milestones and due dates associated with this enforcement type are a Compliance Schedule.
- (h) Compliance Order. An enforcement document which is unilaterally issued by the Control Authority. Corrective actions and assigned due dates associated with this enforcement type are a Compliance Schedule.
- (i) Significant Noncompliance Documentation. Provided by the Control Authority to a User to document Significant Noncompliance status and the associated public notice requirement per DIVISION 7. Sec. 60-152.
- (j) Show Cause Hearing. The Control Authority may order a User to appear before the Control Authority and show cause why proposed enforcement remedy should not be taken or to address an appeal initiated by a User.
 - (1) Notice shall be served on the User specifying the time and place for the hearing, the proposed enforcement action, the reasons for the action, and a request that the User show cause why this proposed enforcement action should not be taken.
 - (2) The notice of the hearing shall be served personally or by registered or certified mail (return receipt requested) at least thirty (30) days prior to the hearing. The notice may be served on any Authorized Representative of the User.
 - (3) The Show Cause Hearing may result in the noncompliance to be referred to the court of jurisdiction for a judicial enforcement remedy per DIVISION 7. Sec. 60-153. (p) (1) if an agreement cannot be reached.
- (k) Cease and Desist Orders. When the Control Authority finds that the User's past violations are likely to recur, the Control Authority may issue an order to the User directing it to cease and desist all violations and directing the User to:
 - (1) Immediately (i.e., without delay) comply with all requirements; and
 - (2) Take the appropriate remedial or preventive action as may be needed to properly address a continuing or threatened violation, including halting operations or otherwise terminating the Discharge.
- (l) Administrative Fines

- (1) Notwithstanding any other requirement of these Regulations, any User may be assessed a administrative fine in an amount not to exceed \$1,000 per violation, per day.
 - (2) In the case of monthly or other long-term average Discharge limits, fines may be assessed for each day during the period of violation.
 - (3) Failure to pay Administrative Fines shall result in late fees or interest fees consistent with the Control Authority's policy for unpaid utility bills.
- (m) Emergency Suspensions.
- (1) The Control Authority may immediately (i.e., without delay) suspend a User's Discharge with or without informal notice to the User whenever the suspension is necessary to stop an actual or threatened Discharge which poses a threat to the welfare of persons or a threat to the operation of the POTW or otherwise endangers the environment.
 - (2) The Control Authority shall allow the User to recommence its Discharge when the User has demonstrated to the satisfaction of the Control Authority that the period of endangerment has passed.
 - (3) Nothing in these Regulations shall be interpreted as requiring a hearing prior to any emergency suspension.
- (n) Water Supply Severance. When a User has violated or continues to violate any provision of these Regulations, Control Mechanism, order issued herein, or any other Pretreatment Standard or Requirement, water service to the User may be severed. Service may recommence, at the User's expense, only after the User has satisfactorily demonstrated its ability to comply and has paid all outstanding fees, fines, or penalties incurred as a result of noncompliance with these Regulations.
- (o) Permit or Control Mechanism Termination per DIVISION 4. Sec. 60-132. Such User shall be notified of the proposed termination of its Discharge and be offered an opportunity to show cause under DIVISION 7. Sec. 60-153. (j) why the proposed action should not be taken.
- (p) Appeals
- (1) Users desiring to dispute enforcement remedies including penalties, fines, and charges must file a written request for the Control Authority to reconsider the remedy within thirty (30) days of being notified.
 - (2) The Control Authority shall respond within thirty (30) days with approval or denial of the appeal.
 - (3) Enforcement actions issued without a Show Cause Hearing having taken place shall be handled through a Show Cause Hearing per DIVISION 7. Sec. 60-153. (j).
 - (4) Enforcement actions issued as a result of a Show Cause Hearing shall be handled by an appearance before the Control Authority. The User shall be notified of the date, time, and location of the appeal at least thirty (30) days prior to the appeal.

Sec. 60-154. Judicial Enforcement Remedies

- (a) When Administrative Enforcement Remedies do not successfully bring a User into compliance, the Control Authority may use judicial enforcement remedies. These mechanisms are not required to be a prerequisite to taking any other action against a User.
- (b) Injunctive Relief
 - (1) The Control Authority may petition the court with jurisdiction through the Control Authority's attorney for the issuance of a temporary or permanent injunction, as appropriate, which restrains or compels corrective action imposed by these Regulations on activities of the User.
 - (2) The Control Authority may also seek such other action as appropriate for legal and equitable relief, including a requirement for the User to conduct environmental remediation.
- (c) Civil Penalties
 - (1) A User who has violated or continues to violate any provision of these Regulations, Permit, other Control Mechanism, order issued hereunder, or any other Pretreatment Standard or Requirement, shall be liable to the Control Authority for a civil penalty of \$1,000 per violation, per day. In the

case of a monthly or other long-term average Discharge limit, penalties may accrue for each day during the period of the violation.

- (2) The Control Authority may recover reasonable attorneys' fees, court costs, and other expenses associated with enforcement activities, including sampling and monitoring expenses, and the cost of any actual damages incurred by the Control Authority.
 - (3) In determining the amount of civil liability, the Court shall take into account all relevant circumstances, including, but not limited to, the extent of harm caused by the violation, the magnitude and duration of the violation, any economic benefit gained through the User's violation, corrective actions by the User, the compliance history of the User, and any other factor as justice requires.
- (d) Criminal Prosecution.
- (1) The Control Authority is authorized to refer violations of these Regulations to the proper authorities for the investigation and enforcement of criminal matters.
 - (2) Upon conviction, criminal penalties shall be assessed to the maximum amount allowed by law on a per violation, per day basis.
 - (3) Criminal prosecution applies to the following Users:
 - a. Any User who willfully or negligently violates any provision of these Regulations, Permit, other Control Mechanism, order issued hereunder, or any other Pretreatment Standard or Requirement.
 - b. Any User who willfully or negligently introduces any substance into the POTW which causes personal injury or property damage. The fine shall be in addition to any other cause of action for personal injury or property damage available under State law.
 - c. Any User who knowingly makes any false statements, representations, or certifications in any application, record, report, plan, or other documentation filed, or required to be maintained, pursuant to these Regulations, Permit, other Control Mechanism, or order issued hereunder, or who falsifies, tampers with, or knowingly renders inaccurate any monitoring device or method.

Sec. 60-155. Supplemental Enforcement Action

Payment of Outstanding Fees and Penalties. The Control Authority may terminate a Control Mechanism, decline to issue, or decline to reissue a Control Mechanism to any User who has failed to pay any outstanding fees, fines or penalties incurred as a result of noncompliance of these Regulations.

DIVISION 8. AFFIRMATIVE DEFENSES TO DISCHARGE VIOLATIONS

Sec. 60-156. Affirmative Defense for Upset Provision.

- (a) For the purposes of these Regulations, an upset means an exceptional incident in which there is unintentional and temporary noncompliance with these Regulations because of factors beyond the reasonable control of the User. An upset does not include noncompliance to the extent caused by operational error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventive maintenance, or careless or improper operation.
- (b) An upset shall constitute an affirmative defense to an action brought for noncompliance with these Regulations if the requirements of DIVISION 8. Sec. 60-156. (c) are met.
- (c) Any User who wishes to establish the affirmative defense of upset shall demonstrate, through properly signed, contemporaneous operating logs, or other relevant evidence that:
 - (1) An upset occurred and the User can identify the cause(s) of the upset;
 - (2) The facility was at the time being operated in a prudent and workmanlike manner and in compliance with applicable operation and maintenance procedures; and
 - (3) The User has submitted information to the Control Authority as required in DIVISION 5. Sec. 60-139. (a) and (c).

- (d) In any enforcement proceeding the User seeking to establish the occurrence of an upset shall have the burden of proof.
- (e) The User shall control production of all discharges to the extent necessary to maintain compliance with these Regulations upon reduction, loss, or failure of its treatment facility until the facility is restored or an alternative method of treatment is provided. This requirement applies in the situation where, among other things, the primary source of power of the treatment facility is reduced, is lost or fails.

Sec. 60-157. Affirmative Defense for Prohibited Discharge Standards

A User shall have an affirmative defense to an enforcement action brought against it for noncompliance with the general or specific prohibitions in DIVISION 2. Sec. 60-104 and DIVISION 2. Sec. 60-105 of these Regulations if the User can prove that it did not know, or have reason to know, that its Discharge, alone or in conjunction with Discharges from other sources, would cause Disruption and that either:

- (a) No Local Limit exists, but the Discharge did not change substantially in nature or constituents from the User's prior Discharge when the Control Authority was regularly in compliance with its NPDES permit, and in the case of Interference, was in compliance with applicable sludge use or disposal requirements; or
- (b) A Local Limit exists for each Pollutant discharged and the User was in compliance with each limit directly prior to, and during, the Disruption, where compliance with a Local Limit means
 - (1) Concentrations are below the reference concentrations established in these Regulations; or
 - (2) The loading (instantaneous) is below five percent (5%) of the MAIL; or
 - (3) The discharge from a User, that has been issued a Control Mechanism, is in compliance with Pollutant limit(s) therein.

Sec. 60-158. Affirmative Defense for Bypass.

- (a) Definitions
 - (1) Bypass means the intentional diversion of wastestreams from any portion of an Industrial User's treatment facility.
 - (2) Severe property damage means substantial physical damage to property, damage to the treatment facilities which causes them to become inoperable, or substantial and permanent loss of natural resources which can reasonably be expected to occur in the absence of a bypass. Severe property damage does not mean economic loss caused by delays in production.
- (b) Prohibition of bypass.
 - (1) Measures shall be in place to prevent unanticipated bypasses.
 - (2) The Control Authority may take enforcement action against a User for a bypass.
 - (3) Bypasses are not authorized if adequate back-up equipment should have been installed with reasonable engineering judgment to prevent a bypass which occurred during normal periods of equipment downtime or preventative maintenance.
- (c) Exceptions to prohibitions of bypass:
 - (1) Bypasses which do not violate Pretreatment Standards or Requirements if it is necessary for essential maintenance to assure efficient operation; or
 - (2) Bypass was unavoidable to prevent loss of life, personal injury, or severe property damage and there were no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment downtime.
- (d) Notification.
 - (1) All bypasses (authorized, unauthorized, planned, or unanticipated) require notification by the User to the Control Authority.
 - (2) If an Industrial User knows in advance of the need for a bypass, it shall submit prior notice to the Control Authority, if possible, at least ten (10) days before the date of the bypass.

- a. Upon identification of an unanticipated bypass, the User shall immediately (i.e., without delay) submit informal notice to the Control Authority.
- b. A 5-day report is required with the following information:
 1. A description of the bypass and its cause; the duration of the bypass, including exact dates and times, and,
 2. If the bypass has not been corrected, the anticipated time it is expected to continue; and
 3. Steps taken or planned to reduce, eliminate, and prevent reoccurrence of the bypass.
 4. The Control Authority may waive the written report on a case by-case basis.

DIVISION 9. NONDOMESTIC WASTEWATER FEES AND COST RECOVERY

Sec. 60-159. Authorization to Issue and Collect Reasonable Fees

The Control Authority is authorized to issue and collect reasonable fees for reimbursement, operation, implementation, and funding to comply with these Regulations including the Control Authority's Pretreatment Program in accordance with 40 CFR 403.8(f)(3).

- (a) Fees relate solely to the matters covered by these Regulations and are separate from all other fees, administrative fines and penalties chargeable by the Control Authority.
- (b) The Control Authority may recover costs annually or as part of individual enforcement actions or at other intervals based on costs incurred.
- (c) The Fees associated with these Regulations shall be documented as part of the User Fee Schedule:
 - (1) This list shall be maintained on file with the Control Authority as Attachment 3 to these Regulations;
 - (2) In instances where redundant fee types are listed in other Control Authority Regulations, these Regulations and the User Fee Schedule shall take precedence;
 - (3) This list may be modified as determined by the Control Authority to update, add, or remove User Fees or rates.

Sec. 60-160. Nondomestic Wastewater Fees for Users

The Control Authority's User Fee Schedule listed in Attachment 3, per DIVISION 9. Sec. 60-159. (c), may include:

- (a) Fees for program implementation including User determinations, plan reviews, evaluation of new or expanded nondomestic discharges, permit or Control Mechanism issuance/renewal and modification, review of periodic monitoring reports, inspections, sampling User discharges, pretreatment software subscription, activities related to enforcement, investigation, and contracting or consulting services associated with implementation of these Regulations;
- (b) Fees associated with hauled waste;
- (c) Fees issued to FSEs to recover FOG Management Program costs;
- (d) Fees for handling high-volume, non- or low- concentrated wastestreams;
- (e) Fees for surcharges representing Pollutant strength greater than normal domestic sewage (per Attachment 4);
- (f) Cost recovery for mitigating disruptions to the POTW resulting from User discharge;
- (g) Administrative Fines as authorized in DIVISION 7. Sec. 60-153. (l)
- (h) Other fees, rates and charges at the Control Authority's discretion to comply with the requirements herein.
- (i) The Control Authority is authorized to develop alternative fees based on other models such as hydraulic or Pollutant capacity.

DIVISION 10. PUBLIC AND PRIVATE SEWER CONNECTIONS

Sec. 60-161. Use of Public Sewers Required

- (a) It shall be unlawful for any person to place, deposit, or permit to be deposited in any unsanitary manner on public or private property within the city, or in any area under the jurisdiction of the city, any human or animal excrement, garbage, or other objectionable waste.
- (b) It shall be unlawful to discharge to any natural outlet within the city, or in any area under the jurisdiction of the city, any wastewater or other polluted waters, except where suitable treatment has been provided in accordance with subsequent provisions of this article.
- (c) Except as hereinafter provided, it shall be unlawful to construct or maintain any privy, privy vault, septic tank, cesspool, or other facility intended or used for the disposal of wastewater.
- (d) The owners of all houses, buildings, or properties used for human employment, recreation, or other purposes, situated within the city and abutting on any street, alley, or right-of-way in which there is now located or may in the future be located a public sanitary sewer of the city, is hereby required at his expense to install suitable toilet facilities therein, and to connect such facilities directly with the proper public sewer in accordance with the provisions of this article, within 90 days after date of official notice to do so, provided that said public sewer is within 500 feet of the property line. All established private wastewater disposal systems in existence prior to the effective date of December 19, 2011 and all established private wastewater disposal systems in existence prior to the effective date of December 19, 2011 which are also located within 500 feet of a public sewer are hereby grandfathered; provided however, in the event that said grandfathered private wastewater disposal system fails and there is a public sewer located within 500 feet of the property line, said property owner would then be required to connect to the public sewer system.

(Ord. No. 11524, § 1(Exh. A), 2-22-2022)

Sec. 60-162. Private Wastewater Disposal

- (a) Where a public sanitary or combined sewer is not available under the provisions of DIVISION 10. Sec. 60-161. (d), the building sewer shall be connected to a private wastewater disposal system complying with the provisions of this article.
- (b) Before commencement of construction of a private wastewater disposal system the owner shall first obtain a written permit issued by the city. The application for such permit shall be made on a form furnished by the city, which the applicant shall supplement by any plans, specifications, and other information as are deemed necessary. A permit and inspection fee as set forth in the city's fee schedule shall be paid to the city at the time the application is filed.
- (c) A permit for a private wastewater disposal system shall not become effective until the installation is completed and approved by the city. The city shall be allowed to inspect the work at any stage of construction and, in any event, the applicant for the permit shall notify the city when the work is ready for final inspection, and before any underground portions are covered.
- (d) The type, capacities, location, and layout of a private wastewater disposal system shall comply with all recommendations of the state division of health except that any private lagoon shall not be constructed after the effective date of this ordinance [December 19, 2011] anywhere within the city limits of Sedalia as it would constitute a public nuisance. No permit shall be issued for any private wastewater disposal system employing subsurface soil absorption facilities where the area of the lot is less than 15,000 square feet. No septic tank or cesspool shall be permitted to discharge to any natural outlet.
- (e) At such time as a public sewer becomes available to a property served by a private wastewater disposal system, as provided in subsection (d) of this section, a direct connection shall be made to the public sewer in compliance with this article, and any septic tanks, cesspools, and similar private wastewater disposal facilities shall be abandoned and filled with suitable material.
- (f) The owner shall operate and maintain the private wastewater facilities in a sanitary manner at all times, at no expense to the city.
- (g) No statement contained in this section shall be construed to interfere with any additional requirements that may be imposed by the state division of health.

- (h) When a public sewer becomes available, the building sewer shall be connected to said sewer within 60 days and the private wastewater disposal system shall be cleaned of sludge and filled with clean bank run gravel or dirt.

(Ord. No. 11524, § 1(Exh. A), 2-22-2022)

Sec. 60-163. Building Sewers and Connections

- (a) No unauthorized person shall uncover, make any connections with or opening into, use, alter, or disturb any public sewer or appurtenance thereof without first obtaining a written permit from the city.
- (b) There shall be two classes of building sewer permits for:
 - (1) Residential and commercial service; and
 - (2) Service to establishments producing industrial wastes.
 - (3) In either case, the owner or the owner's agent shall make application on a special form furnished by the city. The permit application shall be supplemented by any plans, specifications, or other information considered pertinent at the discretion of the city. A permit and inspection fee as set forth in the city's fee schedule for a residential, commercial or industrial building sewer permit shall be paid to the city at the time the application is filed.
- (c) All costs and expenses incidental to the installation and connection of the building sewer shall be borne by the owners. The owner shall indemnify the city from any loss or damage that may directly or indirectly be occasioned by the installation of the building sewer.
- (d) A separate and independent building sewer shall be provided for every building; except where one building stands at the rear of another on an interior lot and no private sewer is available or can be constructed to the rear building through an adjoining alley, courtyard, or driveway, the building sewer from the front building may be extended to the rear building and the whole considered as one building sewer, but the city does not and will not assume any obligation or responsibility for damage caused by or resulting from any such single connection aforementioned.
- (e) Old building sewers may be used in connection with new buildings only when they are found, on examination and test by the director, to meet all requirements of this article.
- (f) The size, slope, alignment, materials of construction of a building sewer, and the methods to be used in excavating, placing of the pipe, jointing, testing and backfilling the trench, shall all conform to the requirements of the building and plumbing code or other applicable rules and regulations of the city. In the absence of code provisions or in amplification thereof, the materials and procedures set forth in appropriate specifications of the ASTM and the WPCF Manual of Practice No. 9 shall apply.
- (g) Whenever possible, the building sewer shall be brought to the building at an elevation below the basement floor. In all buildings in which any building drain is too low to permit gravity flow to the public sewer, wastewater carried by such building drain shall be lifted by an approved means and discharged to the building sewer.
- (h) No person shall make connection of roof downspouts, exterior foundation drains, areaway drains, or other sources of surface runoff or groundwater to a building sewer or building drain which in turn is connected directly or indirectly to a public sanitary sewer.
- (i) The connection of the building sewer into the public sewer shall conform to the requirements of the building and plumbing code or other applicable rules and regulations of the city, or the procedures set forth in appropriate specifications of the ASTM and the WPCF Manual of Practice No. 9. All such connections shall be made gastight and watertight. Any deviation from the prescribed procedures and materials must be approved by the director before installation.
- (j) The applicant for the building sewer permit shall notify the director when the building sewer is ready for inspection and connection to the public sewer. The connection shall be made under the supervision of the director or his representative.
- (k) The fee for connecting any new building sewer to the city sewer main shall be as set forth in the city's fee schedule.

- (l) All excavations for building sewer installation shall be adequately guarded with barricades and lights so as to protect the public from hazard. Streets, sidewalks, parkways, and other public property disturbed in the course of the work shall be restored in a manner satisfactory to the city.

(Ord. No. 11524, § 1(Exh. A), 2-22-2022)

Sec. 60-164. Extensions of System Outside of City

Any person outside the city limits may connect to the sanitary sewerage system of the city upon the following terms and conditions:

- (a) Any such person shall present an application with the detailed plans and specifications of the sewerage system existing or proposed to be constructed upon their premises and from their premises to one or more points connecting with the existing sewerage system of the city as may be designated and approved by the city engineer, and the person shall agree that they shall pay all costs and expenses in connection with the acquisition of easements if necessary, and the construction of the proposed sewerage system upon their premises and from their premises to the point of connection with the existing sewerage system of the city.
- (b) Any such person making a connection to the public sewer shall conform to the requirements of the plumbing code or other applicable rules, regulations and ordinances of the city.
- (c) Before any such person shall connect sanitary sewers to the existing sewerage system of the city, the plumbing in any building or improvement to be connected shall be inspected and approved by the plumbing inspector.
- (d) Any such person shall be responsible for the construction and maintenance of such additional sewerage system and the payments therefor, however, the entire additional sewerage system shall be constructed and maintained according to the plans and specifications so approved and by requirements as may be from time to time set forth by the city engineer.
- (e) If the person shall fail to comply with the terms and conditions of the aforesaid approved additional sewerage system as set forth herein or with the rules, regulations and ordinances relating to the sanitation department of the city with respect to the use, operation and maintenance of such sewerage system, the city engineer is hereby directed to disconnect the sewerage system of any such person.
- (f) Any such person who is not on the city water system shall pay to the finance director a sewerage service charge twice the minimum rate, plus one percent times the average commodity charge for operation and maintenance of all other residential users to be adjusted annually.
- (g) Any industry or business which is not on the city water system shall pay to the finance director a sewerage service charge as set forth in the city's fee schedule.

(Ord. No. 11524, § 1(Exh. A), 2-22-2022)

DIVISION 11. SEVERABILITY AND EFFECTIVE DATE

Sec. 60-165. Severability

If any provision of these Regulations are invalidated by any court of competent jurisdiction, the remaining provisions shall not be affected and shall continue in full force and effect.

Sec. 60-166. Effective Date

These Regulations shall be in full force and effect immediately following its passage, approval, and publication, as provided by law.

ATTACHMENT 1. MAXIMUM ALLOWABLE INDUSTRIAL LOADS (MAILs)¹

Where specific prohibitions or limits on pollutants or pollutant parameters are developed by the Control Authority in accordance with 40 CFR 403.5(c) such limits shall be deemed Pretreatment Standards for the purposes of Section 307(d) of the Act and shall apply to Users on an individual pollutant basis.

Parameter ^{2,3}	MAIL (lbs./day)	
	Central Plant	North Plant
Oil and Grease	342	119
BOD	2089	3126
TSS	4093	3857
TKN	243	543
Arsenic	0.623	0.608
Cadmium	–	0.007
Chromium	3.86	3.37
Copper	1.29	0.303
Molybdenum	1.02	0.581
Nickel	3.21	1.32
Lead	0.597	0.127
Selenium	0.105	–
Zinc	5.15	3.11
Cyanide (amenable)	0.107	0.024
Chloride	[reserved]	[reserved]
Total Nitrogen	[reserved]	[reserved]
Phosphorus	[reserved]	[reserved]

¹ Referenced in Sewer Use Regulations, DIVISION 2. Sec. 60-108.

² Metals represent the concentration resulting from an analysis for the total metal unless otherwise indicated. Allocations for Users may be incorporated into Control Mechanisms as concentrations or mass and shall apply at the point representing where the wastewater is discharged to the POTW.

³ Parameters have been abbreviated as follows: biochemical oxygen demand (BOD), total suspended solids (TSS), total Kjeldahl nitrogen (TKN).

ATTACHMENT 2. REFERENCE CONCENTRATIONS¹

The following table summarizes reference concentrations established for the POTW which may be used to identify pollutants of concern that are present in a Discharge.

Parameter ^{2,3}	Reference Concentration (mg/L)
Oil and Grease	50
BOD	250
COD	450
TSS	250
Ammonia-N	25
Total Nitrogen	60
Phosphorus	6
Silver	0.002
Arsenic	0.01
Cadmium	0.001
Cyanide	0.006
Chloride	150
Chromium	0.006
Copper	0.057
Mercury	0.0003
Molybdenum	0.009
Nickel	0.006
Lead	0.009
Selenium	0.012
Zinc	0.215

¹ Referenced in Sewer Use Regulations, DIVISION 2. Sec. 60-112.

² Metals represent the concentration resulting from an analysis for the total metal unless otherwise indicated. Additional parameters may be added at the discretion of the Control Authority.

³ Parameters have been abbreviated as follows: biochemical oxygen demand (BOD), total suspended solids (TSS), total Kjeldahl nitrogen (TKN).

ATTACHMENT 3. USER FEE SCHEDULE¹

Fee Description Per Regulation	Effective: January 1, 2026	Effective: January 1, 2027	Effective: January 1, 2028
IU Permit Application Fee <i>New users and permit renewals</i>	\$500	\$1,000	\$1,500
Plan Review & User Determinations	\$300	\$600	\$800
Annual Base Activities Fee <i>Annual inspection, review of periodic monitoring reports, annual cross-check sampling performed by Control Authority, reporting software subscription</i>	SIU: \$1,000 NSCIU/Zero Discharger: \$500 Other Control Mechanisms (e.g. Discharge Authorization, FSE): \$100	SIU: \$1,500 NSCIU/Zero Discharger: \$1,000 Other Control Mechanisms: \$200	SIU: \$3,000 NSCIUs/Zero Discharger: \$1,500 Other Control Mechanism: \$250
Additional Administrative Services <i>Permit modification, enforcement administrative fees, additional monitoring events, mitigation from IU discharges; may include fees from contract services such as laboratories or consultants</i>	Permit Modifications: \$500 (or an hourly rate) Enforcement Activities: \$200/hr (Control Authority or Contracted Services) for time to administer User Monitoring by the Control Authority: \$150 for sampler set-up and collection plus actual cost from contract lab.	Permit Modifications: \$1,000 (or an hourly rate) Enforcement Activities: \$200/hr (Control Authority or Contracted Services) for time to administer User Monitoring by the Control Authority: \$150 for sampler set-up and collection plus actual cost from contract lab.	Permit Modifications: \$1,500 (or an hourly rate) Enforcement Activities: \$200/hr (Control Authority or Contracted Services) for time to administer User Monitoring by the Control Authority: \$150 for sampler set-up and collection plus actual cost from contract lab.
Cost Recovery for mitigating Disruptions to the POTW resulting from User Discharges	Actual cost incurred plus an administrative fee.	Actual cost incurred plus an administrative fee.	Actual cost incurred plus an administrative fee.
Hauled Wastewater	\$200 Waste Hauler Onboarding \$0.12/gallon (\$150 minimum per load) Additional six cents (\$0.06) per gallon may be charged for high strength wastewater Additional Administrative Services fees apply for	\$350 Waste Hauler Onboarding \$0.12/gallon (\$150 minimum per load) Additional six cents (\$0.06) per gallon may be charged for high strength wastewater Additional Administrative Services fees apply for	\$500 Waste Hauler Onboarding \$0.12/gallon (\$150 minimum per load) Additional six cents (\$0.06) per gallon may be charged for high strength wastewater Additional Administrative Services fees apply for

Fee Description Per Regulation	Effective: January 1, 2026	Effective: January 1, 2027	Effective: January 1, 2028
	sampling and contract lab analysis	sampling and contract lab analysis	sampling and contract lab analysis
FOG Program Implementation	\$100/year	\$200/year	\$250/year
Surcharges: Fees for pollutant strength that is greater than normal domestic sewage	Fees shall be based on the High Strength Surcharge Rate (Attachment 4) with calculations based on a cost per pound of pollutant above the surcharge strength indicated.	Same	Same

¹ Referenced in Sewer Use Regulations, DIVISION 9. Sec. 60-159 and DIVISION 9. Sec. 60-160.

ATTACHMENT 4. HIGH STRENGTH SURCHARGE RATES¹

Parameter ³	Effective: January 1, 2026		Effective: January 1, 2027		Effective: January 1, 2028	
	Surcharge Strength (mg/L)	Cost (\$/lb.)	Surcharge Strength (mg/L)	Cost (\$/lb.)	Surcharge Strength (mg/L)	Cost (\$/lb.)
BOD	250	\$0.20	250	\$0.40	250	\$0.50
COD ²	450	\$0.10	450	\$0.20	450	\$0.25
TSS	250	\$0.40	250	\$0.60	250	\$0.75
Oil and Grease	50	\$0.40	50	\$0.80	50	\$1.15
Total Nitrogen	60	\$0.50	60	\$1.00	60	\$1.50
Total Phosphorus	6	\$2.50	6	\$5.00	6	\$7.00

¹ Surcharge fees shall be based on representative User data from monthly average concentrations and the total actual or estimated flow discharged, unless specified otherwise in the IU’s Control Mechanism.

² When COD:BOD ratio is greater than 3:1, the entire strength of COD may be used to calculate the surcharge. If a relationship between COD and BOD is established, the Control Authority may surcharge based on COD in lieu of BOD.

³ Parameters have been abbreviated as follows: biochemical oxygen demand (BOD), chemical oxygen demand (COD), total suspended solids (TSS).

The logo for the City of Sedalia, featuring the word "SEDALIA" in a blue, stylized, hand-drawn font. The letters are thick and have a slightly irregular, artistic feel. The "S" and "A" are particularly prominent.

Let's Cross Paths

Enforcement Response Plan

Document Publish Date **11/13/2025**

CITY OF SEDALIA

MDNR PROGRAM SUBMITTAL



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Introduction & Legal Authority

On July 24, 1990 (55 Fed. Reg. 30082), the Environmental Protection Agency promulgated regulations to require all Publicly Owned Treatment Works (POTWs) to adopt an Enforcement Response Plan (ERP) as part of their approved pretreatment programs. The regulation as stated in 40 CFR 403.8(f)(5) is as follows:



The POTW shall develop and implement an enforcement response plan. This plan shall contain detailed procedures indicating how a POTW will investigate and respond to instances of Industrial User noncompliance. The plan shall, at a minimum:

- *Describe how the POTW will investigate instances of noncompliance;*
 - *Describe the types of escalating enforcement responses the POTW will take in response to all anticipated types of Industrial User violations and the time periods within which responses will take place;*
 - *Identify (by title) the official(s) responsible for each type of response;*
 - *Adequately reflect the POTWs primary responsibility to enforce all applicable pretreatment requirements and standards, as detailed in 40 CFR 403.8(f)(1) and (f)(2).*
-

The ERP outlines the procedures that will be used to identify, document, track and respond to violations. The ERP also provides guidance for selecting the enforcement action most appropriate for the given violation.

Control Authority refers to the entity with authority for implementing the pretreatment program for the POTW. The legal authority for the Control Authority should be referenced for any term or abbreviation not defined herein.

Legal Authority Reference:

Code of Ordinances of the City of Sedalia, Missouri - Chapter 60 Utilities, Article IV. Sewer Use

Purpose and Applicability

The Industrial Pretreatment Program exists to meet the objectives of the general pretreatment regulations to prevent the introduction of pollutants into the POTW from nondomestic discharges that could cause Disruption, Interference, or Passthrough or otherwise limit the ability of the POTW to recycle or reclaim POTW wastewater or sludges consistent with § 40 CFR 403.2. The purpose of the Enforcement Response Plan (ERP) is to provide administrative guidance to the Control Authority for identifying, documenting, and responding to instances of User noncompliance with Federal, State, and Local Regulations.

Enforcement actions are intended to return Users to compliance as quickly as possible using appropriate and consistent escalation across the Control Authority's jurisdiction.

Investigating Instances of Noncompliance

The Control Authority completes several activities to document compliance and to identify instances of User noncompliance with Federal, State and Local Regulations. Activities include maintaining an Industrial User Inventory which attempts to identify active nondomestic discharges, a monitoring plan for the Control Authority to monitor industrial users, regular inspection of Users for adherence to regulations and BMPs, and thorough review of all compliance reports submitted by Industrial Users.

Function of the ERP

The function of the ERP is to systematically evaluate noncompliance of the Control Authority's Pretreatment Program. The Action Level corresponds to the enforcement response to return the User to compliance; it includes the enforcement mechanism, fine range, personnel involvement, and the time frame to document and respond to the noncompliance. This method of scoring is intended to incorporate EPA's escalation criteria of magnitude, duration, effect to the POTW, compliance history, and good faith of the User.

The method of scoring a noncompliant incident is as follows:

1. Each Violation will be evaluated against 5 criteria (modifiers): Nature, Frequency, Reporting, Severity, and SNC. The sum of all 5 modifier point values plus the base points of the violation will decide the violation score.
2. When assessing which enforcement mechanism should be issued, a compliance history score may also be added to the violation score.
3. The Control Authority may use discretion for factors not specifically considered by the modifiers to adjust the violation score using the Control Authority

Adjustment. A 0.5-point adjustment is considered discretionary, while any adjustment beyond that requires a reason for the change to be documented.

4. In instances where multiple violations are being handled on one enforcement action, the violation with the highest violation score will be used.
5. A Compliance History score will be evaluated based on the number of violations the user has accumulated over the previous 12-month period. This will be added to the violation score to obtain the final score but may be waived if it is determined by the Control Authority that the Compliance History score does not accurately represent the situation.
6. The final score is rounded down to the nearest corresponding Action Level.

Considerations

The ERP provides guidance based on common violations, however, not all instances of noncompliance are addressed in this document. As such, this document may be modified to address additional instances of noncompliance and corresponding enforcement actions, or to finetune the scoring as needed by the Control Authority. All modifications are to be documented in the Revisions Section of the ERP - significant modifications (defined by best professional judgement) to the ERP will be submitted to the Approval Authority for review. In addition to the ERP, the Control Authority maintains the ability to exercise discretion to determine handling the scoring of violations on a case-by-case basis.

The Control Authority may exercise discretion when evaluating a violation that meets the definition of more than one violation definition. In general, instances of noncompliance will be assigned to one violation type only. However, Permit Limit Exceedances will always be recorded, and additional violations that led to the exceedance may be recorded separately.

For the purposes of this document, "Pretreatment Standard" refers to both Pretreatment Standards and Pretreatment Requirements.

Remedies Non-Exclusive

The remedies are not exclusive. The Control Authority may take any, all, or any combination of these actions against a noncompliant User. Enforcement of pretreatment regulations will follow recommendations and guidance provided by the Control Authority's enforcement response plan. However, other action against any User may be taken when the circumstances warrant. Further, more than one enforcement action against any noncompliant User may be taken. If administrative remedies do not return a User to compliance, then judicial enforcement may be pursued, such as injunctive relief, civil penalties, or criminal prosecution.

Administrative Penalties

Fines issued by the Control Authority are considered Administrative Penalties and as such, do not require civil action, unless a User refuses to pay. The Control Authority may assess administrative fines to a User based on the range determined by the corresponding action levels, but not to exceed \$1,000 per day per violation. The minimum fine that may be imposed on a User is \$250. The actual assigned fine within the predetermined range is at the sole discretion of the Control Authority and may be waived if deemed fitting to the situation. Fines issued in this way are punitive and not intended to be a part of cost recovery for actual damages incurred as a result of the violation(s); these fees may also be imposed.

Action Levels, Time Frames & Fines

The entity (Control Authority or User) identifying the violation will communicate to the other party that a noncompliance occurred relative to the significance of the event. Note that initial notification of violations may include phone calls, emails, or other electronic communication.

In general, violations will be documented within ten (10) days of identification of the noncompliance. Depending on the type and severity of the violation and the time frame of when the User submits their self-monitoring report (if applicable), the enforcement mechanism initiated by the corresponding Action Level may be issued after the full report is reviewed.

Fines ranges may be administered per violation, per day. For long-term average violations, a fine may be imposed for every day that the facility is out of compliance. The enforcement action may also document other charges such as cost recovery and pass-through of charges incurred by the Control Authority to respond to the noncompliance.

The Control Authority may determine that a fine is waived in lieu of the resources committed due to the required corrective action. The fine range assigned to an enforcement may vary depending on the number of violations associated with the enforcement and the severity of the violation(s) including consideration for impact to the POTW.

Action Level	Enforcement Mechanism	Fine Range (per violation/per day)
0.5	Informal Communication	\$0
1.5	Warning Letter	\$0
	Warning Letter with Informal Review Meeting	\$0
2.5	Notice of Violation	\$0–\$500
3.5	Notice of Violation	\$250–\$500
	Notice of Violation with Informal Review Meeting	\$250–\$500
4.5	Consent Order with Standards Meeting	\$500–\$1,000
5.5	Compliance Order with Standards Meeting	\$500–\$1,000
7.5	Compliance Order with Show Cause Hearing Potential to Result in:	\$1,000
	<ul style="list-style-type: none"> - Control Mechanism Termination - Water Severance - Cease and Desist 	
	Emergency Suspension	\$1,000
8.5	Injunctive Relief	\$1,000 plus civil/criminal fines and penalties
	Refer to Judicial System	\$1,000 plus civil/criminal fines and penalties

Pretreatment Program Roles and Responsibilities

Pretreatment Program Role	Description of Responsibilities
Pretreatment Coordinator	Responsible for daily implementation of the industrial pretreatment program, including to: <ul style="list-style-type: none"> • Issue Informal Communications and Warning Letters • Issue enforcement actions at Notice of Violation • Coordinate Informal Review Meetings • Evaluation of significant noncompliance & issues SNC Summaries • Identify and investigate instances of noncompliance through the activities defined above
Pretreatment Supervisor	Responsible for daily operations of the POTW. Oversees and supervises the activities performed by the Pretreatment Coordinator: <ul style="list-style-type: none"> • Review communications with Users as needed • Final decision-making power on enforcement actions issued below Consent Order • Attend Standards Meetings
Pretreatment Administrator	Responsible for the overall operation of the POTW. Has oversight responsibilities of the Pretreatment Program including to: <ul style="list-style-type: none"> • Awareness of enforcement actions taken by the pretreatment program staff • Issue enforcement involving Consent Order and above • Hearing User appeals to administrative remedies sought by pretreatment staff
Attorney	Provides legal counsel as required by pretreatment staff. Takes the lead on referrals for civil litigation and criminal acts.
Executive Committee	Committee responsible for overseeing Show Cause Hearings and reviewing appeals brought by Users.
Facility Contact	Person responsible (representing the User) for routine communications and daily tasks associated with pretreatment requirements. Facility contacts are not authorized to sign reports unless they are documented as a Duly Authorized Representative as defined below.
Authorized Representative of User	Authorized Representative of the User as defined in 40 CFR 403.12(l)(1) including Duly Authorized Representatives of the User.

The Control Authority is responsible for the delegation of authority for the approved Pretreatment Program. The Control Authority may delegate authority to current Control Authority staff, designee, consultant, or contractor to assist with the administration of major tasks listed above to implement the Industrial Pretreatment Program.

Designated Control Authority Pretreatment Program Roles

Pretreatment Program Role	Control Authority Title
Pretreatment Coordinator	Pretreatment Coordinator
Pretreatment Supervisor	Wastewater Treatment Operations Manager
Pretreatment Administrator*	Utilities Director (Duly Authorized)
Executive Committee	Entities listed above along with Legal Counsel

** All reports required by NPDES permits, and other information requested by the Approval Authority shall be signed by a person who is a principal executive officer, ranking elected officer, or other duly authorized representative of the POTW. A person is a duly authorized representative only if authorized in writing by the principal executive officer or ranking elected official, and submitted to the Approval Authority prior to or with a required report. The duly authorized employee must be an individual or position having responsibility for the overall operation of the facility or the Pretreatment Program. Submittal of this program update documents the roles and corresponding authority of those roles to implement the Pretreatment Program.*

Enforcement Types

Enforcement Mechanism	Type	Description
Informal Review Meeting	Administrative	Informal call or meeting to discuss the noncompliance either before or after the enforcement action is issued.
Informal Communication	Administrative	Informal communication is used to identify and document minor instances of noncompliance with the User to avoid further noncompliance and escalation of enforcement.
Warning Letter	Administrative	Warning Letters communicate instances of noncompliance of Pretreatment Standards or requirements. The Control Authority may require the User to complete corrective actions including a written response to the violation.
Notice of Violation	Administrative	Notice to the User to identify and document instances of noncompliance with Pretreatment Program requirements. Requires a written response from the User to the Control Authority within 30 days (or sooner if required by the Control Authority).
Standards Meeting	Administrative	A formal meeting to discuss a noncompliant event, enforcement remedy, requested information, and corrective actions. When a Standards Meeting is part of an enforcement response with a Compliance Order, the Standards Meeting may be performed before the Order is issued.
Significant Noncompliance Summary	Administrative	Documentation provided to a User that they were found to be in Significant Noncompliance, because of the nature and/or severity of recent violations, and are subject to Public Notice. The Summary covers the previous six-month evaluation period. Refer to the SNC section for definitions and explanation of the violations and severity that trigger SNC Status.
Consent Order	Administrative	An agreement negotiated by both the Control Authority and the User. A Consent Order must be signed by representatives from both

Enforcement Mechanism	Type	Description
Compliance Order	Administrative	Parties before being “issued” and is therefore not subject to appeal. Corrective actions and due dates associated with this enforcement type are a Compliance Schedule. An enforcement document which is unilaterally issued by the Control Authority. Corrective actions and assigned due dates associated with this enforcement type are a Compliance Schedule.
Show Cause Hearing	Administrative	The User will be issued a notice to appear in front of applicable Control Authority Staff prior to either major enforcement action taken or a claim being filed against a User in the court of jurisdiction to seek judicial remedies for unresolved violations. The User alleged to have committed the violation shall have the opportunity to “Show Cause” as to how the violation(s) will be resolved administratively and shall offer reason as to why enforcement action should not escalate. The noncompliance shall be resolved administratively or referred to the court of jurisdiction if an agreement cannot be reached. Actions designated as “Emergency Actions” may be taken prior to the Control Authority issuing a Show Cause Hearing and/or prior to the meeting taking place.
Cease and Desist Order	Administrative	An Order which requires immediate actions to halt violations including an actual or threatened discharge which is on-going or likely to reoccur.
Administrative Fines	Administrative	Violations may have administrative fines on a per day, per violation basis. For a monthly or other long-term average discharge limit, penalties may accrue for each day during the period of the violation. Refer to the Action Levels, Time Frames & Fines section of this document.
Emergency Suspension	Emergency Action	Emergency Suspension is used to halt a threatened or actual discharge which has the potential to cause harm to human health, the POTW operations, or the environment. The User shall halt discharge immediately (without delay) after notice; if discharge is not halted then the Control Authority may sever the sewer connection.

Enforcement Mechanism	Type	Description
Water Supply Severance	Emergency Action	Informally notify User immediately to halt discharge within specified timeframe; if needed turn off water supply or terminate sewer connection. Users that violate or continue to violate any pretreatment standard or requirement may have their water usage severed. Service may only be recommenced after the User has returned to compliance. Any fees associated with the water supply severance are the sole responsibility of the User. Provide a minimum of 24-hour notice that the water supply will be severed.
Control Mechanism Termination	Administrative	Users that violate or continue to violate any pretreatment standard or requirement may have their control mechanism terminated with an opportunity to Show Cause. Renewal is at the sole discretion of the Control Authority. The User may be required to submit a new application and fee.
Injunctive Relief	Judicial	The Control Authority may petition the court for the issuance of a temporary or permanent injunction, which restrains or compels the specific performance of the individual wastewater discharge permit, order, or other requirement. The Control Authority may also seek other action such as a requirement for the User to conduct environmental remediation. Injunctive Relief is typically used when administrative actions are deemed insufficient or have already failed.
Civil Penalties	Judicial	When administrative remedies have failed to return a User to compliance or when a User refuses to pay administrative penalties, the Control Authority may seek Civil Penalties through the Court of Jurisdiction.
Criminal Referral	Judicial	The Control Authority is authorized to refer violations of these Regulations to the proper authorities for the investigation and enforcement of criminal matters.

Significant Noncompliance

Significant Noncompliance (SNC) is as defined in 40 CFR 403.8(f)(2)(viii). Any User that meets at least one of the following definitions for SNC shall receive an SNC Summary from the Control Authority with the details of the violation(s) and shall be published per the public participation requirements in 40 CFR 403.8(f)(2)(viii) at least once per calendar year (typically after calendar year ends). Enforcement actions may be escalated based on a violation meeting a definition of SNC. A Significant Noncompliance (SNC) Summary will be sent to each User having a violation that triggers SNC.

SNC Item Reference	Brief Description	Applies To	Details
1	Chronic Criteria¹	SIUs	66% or more of sample results for an individual pollutant exceed the permit limit.
2	Technical Review Criteria¹	SIUs	33% or more of the sample results equal or exceed the Technical Review Criteria (TRC). The TRC is the permit limit times a multiplier. <ul style="list-style-type: none"> • For BOD, TSS, ammonia and oil & grease: 1.4 multiplier • For all other pollutants (metals, organics, etc.): 1.2 multiplier <i>*TRC does not apply to pH.</i>
3	Causes Interference or Pass Through	All Users	Any other violation of a Pretreatment Standard or Requirement that causes Interference or Pass Through.
4	Imminent Endangerment	All Users	Discharge caused imminent endangerment to human health, welfare, or to the environment (including POTW personnel and the public).
5	Missed Compliance Milestone by more than 90 days	SIUs	Compliance Milestone is missed by more than 90 days without an alternative compliance schedule authorized by the Control Authority.
6	Late Report by more than 45 days	SIUs	Applies to reports such as: baseline monitoring reports, 90-day compliance reports, periodic self-monitoring reports, and reports on compliance with compliance schedules.
7	Failure to Accurately Report Noncompliance	SIUs	User fails to adequately identify and notify the Control Authority of exceedances of Pretreatment Standards or other noncompliance with pretreatment requirements.
8	Other Violations	All Users	Violation of a BMP or other permit requirement which impacts the Control Authority's ability to properly implement the Pretreatment Program.

¹ Evaluated based on the first half of the calendar year and the second half of the calendar year.

Violation Definitions

Violation	Definition	Base Points	Nature	Reporting
Accidental and/or Slug Discharge	Failure to adequately protect against slug discharges. Ongoing accidental discharges are evidence of inadequate protection against slug discharges and are therefore considered a violation. Failure to notify of an accidental discharge or slug discharge is considered noncompliance.	0	<ul style="list-style-type: none"> • Not Applicable: Accidental Discharge; Pretreatment Standard(s) not violated • Minor: Ongoing accidental discharges; Pretreatment Standard(s) not violated • Substantial: Potential to cause Pretreatment Standard(s) violation • Excessive: Pretreatment Standard(s) violation observed • Gross: Intentional discharge or negligent operations 	Applies
Dilution in Lieu of Treatment	Dilution occurs when an a User adds water to their effluent for the purpose of decreasing the concentration of measured pollutants in order to meet pretreatment standards.	1	<ul style="list-style-type: none"> • Minor: Unaware • Gross: Intentional 	Applies
Discharge of Hazardous Wastes	Discharge of waste or wastewater that meets the definition of a RCRA Hazardous Waste into the POTW's collection system without prior approval from Control Authority.	1	<ul style="list-style-type: none"> • Substantial: User unaware of discharge or unaware of RCRA status • Gross: User aware of discharge and failed to report 	Applies
Failure to Comply with Corrective Action	Related to other enforcement mechanisms previously issued which require corrective action. Corrective actions may be communicated in NOV's or other less formal enforcement mechanisms including inspection reports. Does not apply to compliance schedules (e.g., issued in control mechanisms, consent or compliance orders; see Missed Compliance Schedule Milestone). Interim measures are actions taken to address the deficiency that are not acceptable by Control	0	<ul style="list-style-type: none"> • Not Applicable: Corrective action implemented but not reported • Minor: Equivalent interim measure implemented • Substantial: Interim measure implemented, only partially adequate to resolve deficiency • Excessive: No interim measure implemented • Gross: Corrective action ignored 	Applies

Violation	Definition	Base Points	Nature	Reporting
	Authority as long-term alternatives to the assigned Corrective Action.			
Failure to Follow BMPs	Industrial User has failed to follow all, or part of a Best Management Practice required by their permit or alternative control mechanism including BMPs which are required or defined in slug discharge control plans. For this violation type, Pretreatment Standard does not include Pretreatment Requirements.	0	<ul style="list-style-type: none"> • Minor: No Pretreatment Standard(s) violated • Substantial: Potential to cause Pretreatment Standard(s) violation • Excessive: Pretreatment Standard(s) violation observed • Gross: Intentional or negligent 	Applies
Improper Pretreatment System Operation	Violations relating to improper operation, improper management, or improper maintenance of a pretreatment system as designed to control discharges to the POTW.	0	<ul style="list-style-type: none"> • Minor: No Pretreatment Standard(s) violated • Substantial: Potential to cause Pretreatment Standard(s) violation • Excessive: Pretreatment Standard(s) violation observed • Gross: Intentional or negligent 	Applies
Improper Sampling Event	A required sample collected in such a way that deviates from the accepted procedure as outlined in 40 CFR Part 136 or required in a permit or alternative control mechanism, or as required in local regulations. This violation includes not using sufficiently sensitive methods of analysis and tampering with any monitoring equipment.	0	<ul style="list-style-type: none"> • Minor: Unintentional and/or caused by third-party lab error • Gross: Intentional/negligent and/or tampering with sampling equipment 	Applies
Inadequate Recordkeeping	Inadequate recordkeeping related to maintaining 3 years of records associated with pretreatment requirements. Examples include not maintaining records for calibrations, hauled waste, or laboratory results.	0	<ul style="list-style-type: none"> • Minor: Individual records missing • Substantial: Multiple records missing • Excessive: Major gaps in recordkeeping 	Does Not Apply

Violation	Definition	Base Points	Nature	Reporting
Inadequate Reporting of Changed Conditions	Industrial User has failed to inform Control Authority of changes to their manufacturing operation that could impact their wastewater characteristics within the allotted time frame.	0	<ul style="list-style-type: none"> • Minor: Minor modification to process • Substantial: Results in >20% change to effluent characteristic or change results in new user classification. • Excessive: Change caused Pretreatment Standard violation(s) • Gross: Intentional or negligent withholding of information 	Applies
Inadequate Response for Requested Information	Failure of a User to return requested information or inaccurate information is provided. Applies to specific requests including surveys and One-Time Dental Discharge Compliance Reports. For permitted Users, see Reporting Violation.	0	<ul style="list-style-type: none"> • Minor: Compliance determination is not dependent on requested information • Substantial: Compliance determination is dependent on requested information • Excessive: Potential Pretreatment Standard(s) violation. • Gross: Intentionally providing inaccurate information or ignoring requests 	Does Not Apply
Missed Compliance Schedule Milestone	The date for a compliance schedule for a specified industry has passed or the terms of the action item have not been satisfied. An extension has not been issued by Control Authority. Compliance milestones may be required in enforcement actions, permits or other control mechanisms as a compliance schedule.	0.5	<ul style="list-style-type: none"> • Not Applicable: Milestone complete but not reported • Minor: <15 Days Late • Substantial: 15 - 45 Days Late • Excessive: 45 - 90 Days Late • Gross: > 90 Days Late 	Applies
Missed Parameter or Monitoring Event	Failure of a User to provide analysis of a parameter as required by their permit, alternative control mechanism or federal pretreatment regulations. Percentages for nature are per parameter per required sample event for the reporting period.	0	<ul style="list-style-type: none"> • Minor: <25% missing or inadequate • Substantial: 25-50% missing or inadequate, or any categorical required parameters missing • Excessive: >50% missing or inadequate • Gross: Negligent in monitoring duties 	Applies

Violation	Definition	Base Points	Nature	Reporting
Other Violation of Pretreatment Regulations	Control Authority is authorized to enforce upon any pretreatment standard or requirement defined by federal, state or local laws and regulations including permit requirements.	0	<ul style="list-style-type: none"> • Minor: Control Authority Discretion • Substantial: Control Authority Discretion • Excessive: Control Authority Discretion • Gross: Control Authority Discretion 	Applies
Permit Limit Exceedance	A required monitoring parameter exceeds the limit established in either Control Authority's local limits, or the User's permit or alternative control mechanism. This violation also includes failure to report the noncompliance to Control Authority. Continuous monitoring violations may be handled under the BMP section.	0	<ul style="list-style-type: none"> • Minor: Result < limit times the TRC (reference SNC) • Minor: pH result >3.5 and <12.0 s.u. • Substantial: Result > limit times the TRC multiplier (consistent with SNC definition) • Substantial: pH result between 2.0-3.5 or 12.0-12.5 s.u. • Excessive: Result >5 times the limit • Excessive: pH result <2.0 or >12.5 (meets RCRA definition of corrosivity) • Gross: Result > ten (10) times the limit 	Applies
Reporting Violation: Late or Incomplete	Failure of a User to submit a proper report required by 40 CFR Part 403, the POTW's Pretreatment Program, an individual User permit, or an alternative control mechanism. This includes reports such as baseline monitoring reports, periodic self-monitoring reports, 90-day compliance reports, and compliance schedule progress reports. Reports that are incomplete (improperly certified or that do not contain all required information that is otherwise obtainable) are considered late until a complete report has been submitted. This only applies to a stand-alone reporting violation. Inadequate reporting of changed conditions is its own violation category.	0	<ul style="list-style-type: none"> • Minor: <5 Days Late • Substantial: 5 - 15 Days Late • Excessive: 15 - 45 Days Late • Gross: > 45 Days Late 	Does Not Apply
Site Entry Denial	Denial or unnecessary or excessive delay of entry to authorized, credentialed Control Authority personnel or other state or federal entities for the purpose of inspection or sampling.	1	<ul style="list-style-type: none"> • Excessive: User is not cooperative • Gross: User is threatening or adverse 	Does Not Apply

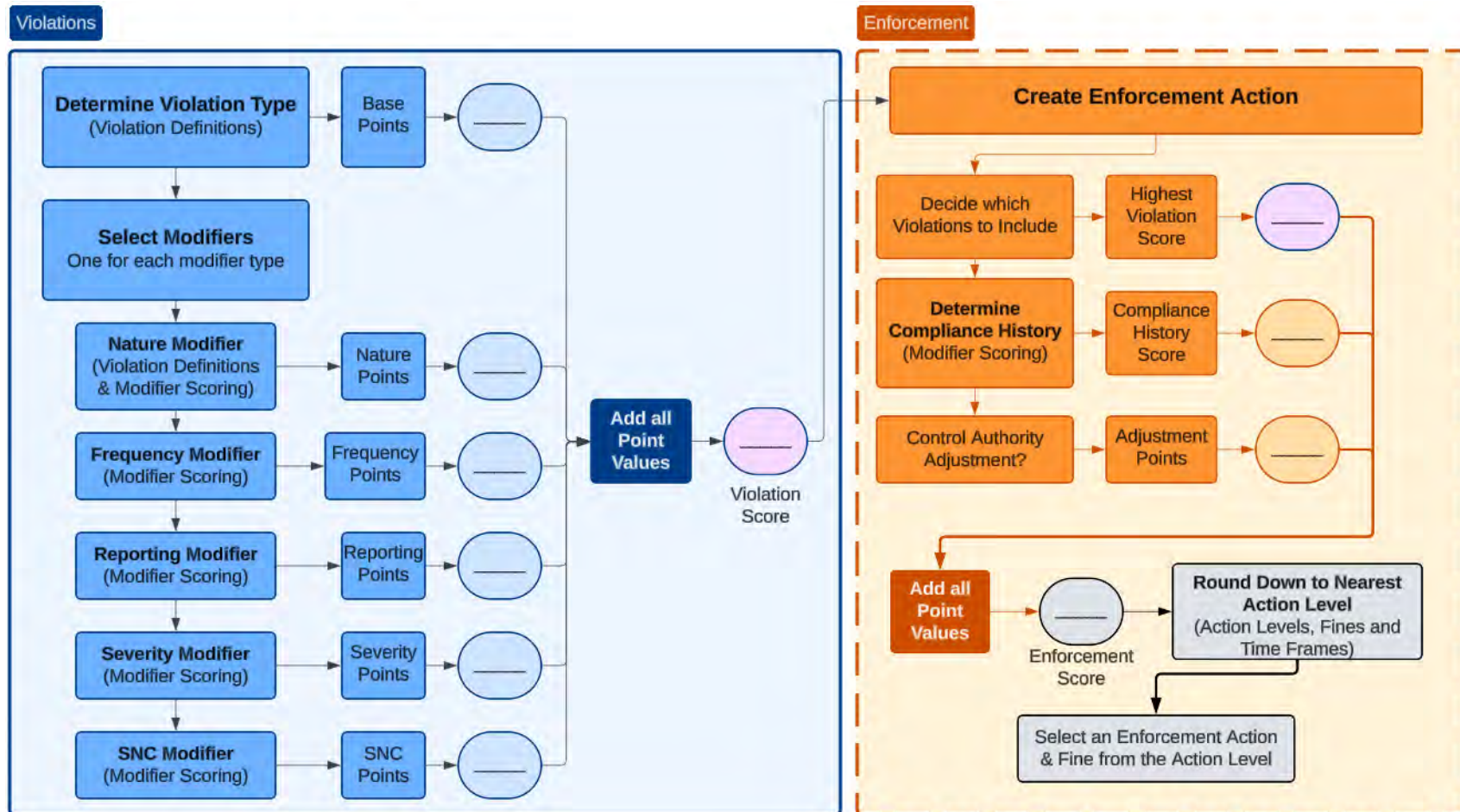
Violation	Definition	Base Points	Nature	Reporting
Unauthorized Bypass	Intentional diversion of wastestreams from any portion of an Industrial User's treatment facility. Bypasses may occur if they do not cause a violation of pretreatment standards only if needed for essential operation. Specific notification and reporting requirements apply (refer to control mechanism).	1	<ul style="list-style-type: none"> • Minor: Pretreatment Standard(s) not violated • Substantial: Potential for Pretreatment Standard(s) to be violated • Excessive: Pretreatment Standard(s) are violated (confirmed) • Gross: Bypass caused by negligence 	Applies
Unauthorized Discharge	A discharge from a source which was not previously disclosed that would otherwise be regulated by Control Authority per Federal, State or Local Regulations.	1	<ul style="list-style-type: none"> • Minor: Undisclosed source has no reasonable potential for impact. • Substantial: Undisclosed source has minor potential for impact. • Excessive: Undisclosed source has major potential or confirmed impact. • Gross: Intentional or negligent non-disclosure of source. 	Applies
Waste Hauler Misconduct	Violations pertaining to waste hauler misconduct including but not limited to failing to adequately clean up messes after discharging, being disrespectful to operators or other POTW staff, and discharging unauthorized material.	0	<ul style="list-style-type: none"> • Minor: Unsanitary conditions left at disposal site • Substantial: Waste hauler disrespectful to Control Authority staff • Excessive: Discharge to unauthorized location • Excessive: Discharge of unpermitted material • Excessive: Discharge by unpermitted hauler • Gross: Violent, dangerous or threatening behavior on Control Authority property 	Does Not Apply

Modifier Scoring

Category	Title	Score
Frequency	Isolated ¹	0.5
	Recurring ²	1
	Ongoing ³	2
	Ongoing (Compliant with Corrective Action) ⁴	1
	Ongoing (Noncompliant with Corrective Action) ⁵	2
Reporting	Not Applicable	0
	Timely Report	0
	Late or Incomplete Report	0.5
	Not Reported	1
Nature	Minor	0.5
	Substantial	1.5
	Excessive	2
	Gross	3
Severity	No Disruption or impact	0
	Potential to cause disruption	0.5
	Disruption but not interference or pass-through	1
	Causes Interference or Pass-Through (SNC #3)	0
	Causes Imminent Endangerment (SNC #4)	0
SNC	Not SNC	0
	#3 - Causes Interference or Pass-Through	3
	#4 - Imminent Endangerment	4
	#5 - Missed Compliance Milestone Event >90 Days	0.5
	#6 - Late Report > 45 days	0.5
	#7 - Failure to Accurately Report Noncompliance	1.5
	#8 - Other impact to CA's ability to implement Program (BMPs)	1
	Unknown - Needs More Information	0
Compliance History⁶	Good (<3)	0
	Fair (<5 violations)	0.5
	Poor (<10 violations)	1.0
	Very Poor (10 or more violations)	1.5

- 1 Evaluated per pollutant, per compliance monitoring location per type of noncompliant event. For non-parameter related events, frequency typically refers to the type of noncompliant event (with Control Authority discretion for unrelated occurrences).
- 2 Isolated means the first violation of its type in a rolling 12-month period.
- 3 Recurring means the second violation of its type in a rolling 12-month period.
- 4 Ongoing means three (3) or more violations of its type in a rolling 12-month period.
- 5 Reporting modifiers are as related to reporting requirements for the specific report or event.
- 6 Compliance History is the total number of individual violations, regardless of type, by the User during a rolling 12-month period.

Appendix A: ERP Flow Diagram



This diagram shows the progression of the **Function of the ERP (link to details)**. Text in parenthesis shows the name of the corresponding section of the document with the relevant information for the step.

Revisions

Date	Purpose/Description	Responsible Person Title (Affiliation)
11/13/2025	Submittal to MDNR	Kim Cole, P.E. (DROP Collaborative)

City of Sedalia, Missouri | MO-0023019

Technical Re-Evaluation of Local Limits: Central WWTP

Document Publish Date: **11/12/2025**

For Missouri Department of Natural Resources

Prepared By:



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Part II. Detailed Technical Reevaluation of Local Limit Report Form

All POTWs with approved programs must continue to develop local limits as necessary per 40 CFR 403.5(c) (1)¹. This Part II form addresses the detailed technical reevaluation of local limits for one POTW and its permit. For more than one plant and permit, please provide a separate Part II and I (if needed) form. Components of Part I are used for reporting of the Part II Detailed Reevaluation. This form must summarize the results of the detailed reevaluation.

Because POTW site-specific conditions change, Section 2.0 of this form provides some factors to consider that may indicate the need for a more detailed technical re-evaluation of local limits. If any of those factors indicate a need for the detailed technical re-evaluation, then the POTW should complete Part II of this Form.

Reference Document: 2004 EPA Local Limits Development Guidance.

Note: Missouri state regulations at 10 CSR 20-6.100 incorporate the federal 40 CFR 403 pretreatment regulations by reference; therefore, only the federal regulations will be cited in this form.

1.0 BASIC INFORMATION

1.1 POTW NAME/CONTROL AUTHORITY:	Sedalia Central WWTP / City of Sedalia
---	--

1.2 NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) MISSOURI STATE OPERATING PERMIT

PERMIT NO.	EXPIRATION DATE	WWTP NAME
MO-0023019	10/31/2028	Sedalia Central WWTP

1.3 LOCAL LIMIT REEVALUATION REPORT WITH CONTROL AUTHORITY LETTER

1.3.1 Due Date for Detailed Technical Reevaluation:	11/30/2025
1.3.2 Entity Performing Local Limit Analysis:	DROP Collaborative
1.3.3 Region VII Spreadsheet Version:	PublicBeta v2.2.11

2.0 BACKGROUND LEADING TO THE NEED TO REVISE LOCAL LIMITS

The City of Sedalia submitted a Part I. Technical Evaluation performed by Drop Collaborative in February 2025 which determined the need to revise local limits.

3.0 REQUIRED DETAILED TECHNICAL REEVALUATION REPORTING COMPONENTS

3.1	Part I Form, if completed prior to Part II. <i>Refer to Appendix A.</i>
3.2	Previous Detailed Technical Local Limit Evaluation – Data and Summary Pages or Other Summary Sheets. <i>Refer to Appendix D.</i>
3.3	General: Wastewater Treatment Facilities and Operations (optional). Attach current effective permit, if not provided. <i>Refer to Appendix C - Will be provided upon request.</i>
3.4.	Pollutants of Concern (POCs) list and how developed. POCs not included or added per Part I. Section 5.0 – Pollutant of Concern. Tables included. <i>Refer to Section 2.</i>
3.5.	Discussion: Input, Assumptions and Methods Use in the Region 7 Spreadsheet for 1) conventional, 2) conservative, 3) non-conservative pollutants. <i>Refer to Section 3.</i>
3.5.1	Table of Plant Removal Efficiencies. <i>Refer to Table 3.4</i>
3.5.2	Table of Domestic Sampling Summary. <i>Refer to Table 3.3</i>
3.5.3	Table of Influent Sampling and Effluent Sampling. <i>Refer to Table 3.3</i>
3.6.	Results: Part I. Section 9.0 - Reevaluation Comparison of Current Head works Loading to Revised MAHLs for 1) conventional, 2) conservative, 3) non- conservative pollutants. <i>Refer to Section 4</i>
3.6.1	Table of Existing MAILs, calculated or proposed MAILs for 1) conventional, 2) conservative, 3) non-conservative pollutants. <i>Refer to Table 4</i>
3.6.2	Provide written rationale for selected local limits for each POC. <i>Refer to Table 5.1</i>
3.7.	Summary of local limits for adoption and table showing methodology for allocation of Revised MAILs in permits. <i>With limit durations</i>
3.7.1	Recommendations for on-going local limits evaluations.
3.8.	Appendices Summarizing General Information. <i>Refer to Section 5</i>
3.8.1	Most recent Industrial Waste Survey Summary Table. <i>Refer to Appendix B.</i>
3.8.2	Region VII Spreadsheet Data Input, Output, Sludge Printouts (for MAHL comparison and current conditions) as Adobe pdf. Excel Spreadsheet may be requested by approval authority. <i>Refer to Appendix E.</i>
3.8.3	Raw Analytical Data (Contract Laboratory Reports) – <i>Will be provided upon request</i>

4.0 CERTIFICATION BY AN OFFICAL REPRESENTATIVE OF THE MUNICIPALITY PER 40 CFR 403.9(b)(1)

"I certify under penalty of law that this document and all attachments were prepared under direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations"

Authorized Representative Signature

William Bracken

Date

11/18/2025

Duly Authorized Representative Name

William Bracken

Duly Authorized Representative Title

Utilities Director

Email Contact of Duly Authorized Representative:

Section 2: Pollutants of Concern (POCs) [MO 780-2954 3.4]

Pollutants of Concern (POCs) were identified based on EPA guidance, NPDES permit parameters, and pollutants of concern for the identified industrial users. Table 2.1 summarizes the pollutants of concern initially included for evaluation as well as the basis for the evaluation.

Table 2.1: Pollutants of Concern (POCs) [MO 780-2954 3.4]

Pollutant of Concern	Basis for Inclusion
Silver	EPA Specified
Arsenic	EPA Specified, 503 Protection, NPDES Monitoring only
Cadmium	EPA Specified, 503 Protection
Cyanide	EPA Specified
Chromium	EPA Specified
Copper	EPA Specified, 503 Protection, NPDES Permit Limit
Mercury	EPA Specified, 503 Protection
Molybdenum	EPA Specified, 503 Protection
Nickel	EPA Specified, 503 Protection
Lead	EPA Specified, 503 Protection
Selenium	EPA Specified, 503 Protection
Zinc	EPA Specified, 503 Protection
BOD	EPA Specified, NPDES Permit Limit
TSS	EPA Specified, NPDES Permit Limit
Ammonia-N	NPDES Monitoring Only
TKN	EPA Specified, NPDES Monitoring Only
Phosphorus	Future regulation
COD	KimHEC Recommendation, alternative to BOD
Total Nitrogen	Future regulation
Chloride	Industry POC
Cyanide (amenable)	In place of cyanide total
Chromium VI, total	
Phenol	Expanded Effluent testing
Sulfate	Expanded Effluent testing
HEM	Prohibited discharge

Section 3. Discussion of Inputs [MO 780-2954 3.5]

Based on the technical evaluation of local limits, a local limit update was determined necessary. This section provides the information used in EPA Region VII Local Limit Calculator Spreadsheet (Version 6, Appendix E). the local limit calculations and is based on the information summarized in the Local Limit Part I evaluation (Appendix A).

Table 3.1 EPA Region VII Local Limit Calculator Inputs [MO 780-2954 3.3]

Data Variables	Value	Basis Notes
Non SIU Flow	1.409 MGD	Non SIU flow calculated as total flow minus SIU flow. Flow data based on data from 2021 to 2025.
SIU Flow	0.284 MGD	Current Significant Industrial Users. For regulated basis, description, flow, and POCs included see Table 3.2
Total Flow	1.693 MGD	Average flow from discharge monitoring reports from 2021 to 2025.
7q10	0.1 cfs	Low flow of the receiving stream. Refer to the POTW's NPDES permit.
Hardness	335.5	Based on POTW/receiving stream data.
Flow to Dgstr	NA	Based on volume of sludge wasted to the digester per day.
Sludge Flow to Disposal	NA	Based on annual dry tons production at % solids when land applied. Calculation is included at the bottom of the Region VII Spreadsheet and uses the metric dry tons per year and the average percent solids to calculate average MGD.
Sludge Disposal % solids	NA	Average percent solids of the sludge when it is disposed of/land applied.
Site Use	NA	Based on the life of the fields for land application
Site Size	NA	Based on current understanding of land available for land application of biosolids.
Sludge Quality Level	NA	Excellent Quality
Design Capacity	See Table 3.4 Design Basis	Based on plant design pollutants.

The City of Sedalia is currently performing an industrial waste survey. Sixteen industries were identified as being currently permitted or needing further evaluation based on surveys sent out in 2023. Flows from the industries listed in Table 3.2 below are included as the nondomestic flow in this evaluation.

Table 3.2 Significant Industrial Users

Industry Name	Regulated Basis	Description	Average Flow (GPD)	Pollutants of Concern Present
Maxion Wheels - Sedalia, LLC	CFR 433	Fabricates steel wheels. Nickel, zinc and phosphate precipitation	171,305	Lead, nickel, zinc, oil and grease
Waste Corporation of Missouri, LLC	CFR 445	Landfill	12,132	Leachate
MPW	> 25,000 GPD process wastewater	De-ionizing resin *not permitted yet	100,000	Cyanide, chloride
Proenergy	CFR 433	Metal anodize and waterjet *not permitted yet	600	Chromium, nickel, zinc, phosphorus, COD

Table 3.3 summarizes the data included in the local limits reevaluation. Available data from 2022 to 2025 was used to determine influent, effluent and domestic concentrations. Only data from 2025 was used for influent cadmium and selenium given the lower MRL for non-detects. The most recent background sample from a domestic location was used to determine background loading to the WWTP.

Table 3.3 Dataset Summaries

Pollutant of Concern	Influent		Effluent		Background	
	# Non-detects / # Samples	Date Range	# Non-detects / # Samples	Date Range	# Non-detects / # Samples	Date Range
Silver	8 / 8	2024 - 2025	8 / 8	2024 - 2025	1 / 1	2025
Arsenic	7 / 8	2024 - 2025	7 / 8	2024 - 2025	1 / 1	2025
Cadmium	8 / 8	2024 - 2025	7 / 7	2024	1 / 1	2025
Cyanide	8 / 8	2024 - 2025	9 / 9	2024 - 2025	1 / 1	2025
Chromium	7 / 8	2024 - 2025	8 / 8	2024 - 2025	1 / 1	2025
Copper	2 / 13	2022 - 2025	14 / 38	2022 - 2025	0 / 1	2025
Mercury	8 / 8	2024 - 2025	8 / 8	2024 - 2025	1 / 1	2025
Molybdenum	7 / 8	2024 - 2025	7 / 8	2024 - 2025	1 / 1	2025
Nickel	4 / 13	2022 - 2025	5 / 13	2022 - 2025	1 / 1	2025
Lead	7 / 8	2024 - 2025	8 / 8	2024 - 2025	1 / 1	2025
Selenium	7 / 8	2024 - 2025	7 / 8	2024 - 2025	1 / 1	2025
Zinc	0 / 13	2022 - 2025	0 / 13	2022 - 2025	0 / 1	2025
BOD	0 / 165	2022 - 2025	18 / 164	2022 - 2025	0 / 1	2025
TSS	0 / 174	2022 - 2025	4 / 168	2022 - 2025	1 / 1	2025
Ammonia-N	0 / 145	2022 - 2025	19 / 156	2022 - 2025	0 / 1	2025
TKN	0 / 56	2022 - 2025	0 / 47	2022 - 2025	0 / 1	2025
Phosphorus	1 / 58	2022 - 2025	0 / 45	2022 - 2025	0 / 1	2025
COD	0 / 0	NA	0 / 0	NA	0 / 0	NA
Total Nitrogen	0 / 1	2022-2025	EPA ECHO	2025	0 / 1	2025
Chloride	0 / 1	2025	0 / 1	2025	0 / 1	2025
Cyanide (amenable)	0 / 0	NA	0 / 0	NA	0 / 0	NA
Chromium VI, total	0 / 0	NA	0 / 1	2025	0 / 0	NA
Phenol	0 / 1	2025	2 / 2	2025	0 / 1	2025
Sulfate	0 / 0	NA	0 / 0	NA	0 / 0	NA
HEM	0 / 0	NA	6 / 13	2022 - 2025	0 / 0	NA

Table 3.4 presents POC data used in the EPA Region VII spreadsheet to calculate the revised local limits and the basis for the data. Silver, cadmium, cyanide and mercury were all non-detect at the influent. For removal efficiency, both overall average removal rates and paired removal rates were calculated. For background concentrations, site specific domestic concentrations were used. For parameters without site specific background data, average background concentrations from various Missouri communities as calculated by DROP (Data Reporting Operations software) were used.

Table 3.4 Data Inputs [MO 780-2954 3.5.1- 3.5.3]

Pollutant of Concern	Influent Levels (mg/L)	Levels (mg/L)	Removal Efficiency	Background Levels (mg/L)
Silver	<0.003 All NDs	<0.003	75% Used Literature removal value	<0.003 Site specific background data
Arsenic	0.004 Average of detected results	0.005	45% Used Literature removal value	<0.003 Site specific background data
Cadmium	<0.003 2025 data, all NDs	<0.005	67% Used Literature removal value	<0.003 Site specific background data
Cyanide	<0.006 All NDs	<0.009	69% Used Literature removal value	<0.01 Site specific background data
Chromium	0.012 Average of detected results	<0.009	21% Used average removal %	<0.003 Site specific background data
Copper	0.033 Average of detected results	0.756	86% Used Literature removal value	0.018 Site specific background data
Mercury	<0.0002 All NDs	<0.0002	60% Used Literature removal value	<0.0002 Site specific background data
Molybdenum	0.009 Average of detected results	0.09	50% Used Literature removal value	<0.003 Site specific background data
Nickel	0.02 Average of detected results	0.012	41% Used average removal %	<0.003 Site specific background data
Lead	0.015 Average of detected results	<0.005	69% Used average removal %	<0.003 Site specific background data
Selenium	<0.003 Average of all results	0.005	50% Used Literature removal value	<0.003 Site specific background data
Zinc	0.063 Average of detected results	0.033	24% Used paired removal %	0.061 Site specific background data

Pollutant of Concern	Influent Levels (mg/L)		Effluent Levels (mg/L)	Removal Efficiency		Background Levels (mg/L)	
BOD	175	Average of detected results	11.	88%	Used Design Capacity	117.	Site specific background data
TSS	251	Average of detected results	11.6	80%	Used Design Capacity	<5.	Site specific background data
Ammonia-N	22.5	Average of detected results	7.89	74%	Used Design Capacity	31.1	Site specific background data
TKN	31.	Average of detected results	8.79	72%	Used Design Capacity	37.9	Site specific background data
Phosphorus	9.44	Average of detected results	4.82	49%	Used Design Capacity	2.75	Site specific background data
COD	NO DATA			NA		727.708	DROP background average
Total Nitrogen	44.3	Average of detected results	19.6	56%	Used average removal %	37.9	Site specific background data
Chloride	401	Average of detected results	383	4%	Used average removal %	60.4	Site specific background data
Cyanide (amenable)	NO DATA			NA		0.004	DROP background average
Chromium VI, total	NO DATA		0.00004	NA		0.009	DROP background average
Phenol	0.073	Average of detected results	<0.026	90%	Used Literature removal value	0.105	Site specific background data
Sulfate	NO DATA			NA		101	DROP background average
HEM	NO DATA		1.46	90%	Used Literature removal value	30.0	DROP background average

Biosolids from all three plants Central, North, and Southeast are combined before composting. Table 3.5 summarizes results from the Central WWTP biosolids. The sludge allowable influent loading was calculated using low ceiling criteria, total sludge flow and plant removal efficiency. Comparison of Sedalia biosolid results compared to domestic level biosolids show elevated concentrations for chromium, copper, nickel, lead, molybdenum and zinc.

Table 3.5 Biosolids Data

Pollutant of Concern	# Non-detects / # Samples	Date Range	Average Concentration (mg/kg)	Maximum Concentration (mg/kg)	Ceiling / Low Metals Limits (mg/kg) ¹
Silver	2 / 2	2025	<7.3	<10.9	
Arsenic	1 / 2	2025	9.65	11.2	75 / 41
Cadmium	1 / 2	2025	2.30	2.4	85 / 39
Cyanide	1 / 2	2025	8.41	16.7	
Chromium	0 / 2	2025	46.3	49.2	1200
Copper	0 / 2	2025	1150	2010	4300 / 1500
Mercury	1 / 2	2025	0.78	0.86	57 / 17
Molybdenum	0 / 1	2025	16.90	16.9	75 / NA
Nickel	0 / 2	2025	46.5	46.7	420 / NA
Lead	1 / 2	2025	106.1	158	840 / 300
Selenium	1 / 2	2025	10.75	11.2	100 / 36
Zinc	0 / 2	2025	1173	1850	7500 / 2800

1. 40 CFR 503.13 Tables 1 and 3

Design capacities were estimated using NPDES Permit MO-0023019 and compared to the Basis of Design Report (Burns and McDonnell, 2021). For this evaluation, the design loading from the Basis of Design Report (Burns and McDonnell, 2021) were used.

Design Basis/Capacity of the WWTP	
Design Population Equivalent	30,300
Design Flow (MGD)	3.03
Actual Population of Sewer Service Area	7,500
Actual Flow (MGD)	1.693
SIU Documented Flows (MGD)	0.284
Uncontrolled Flow (MGD)	1.409

Parameter	Typical (lbs/d/cap)	Design Capacity Based on P.E. (lbs/day)	Design Basis based on Burns and McDonnell Basis of Design, 2024
BOD	0.17	5,151	4330
COD	0	0	0
TSS	0.2	6,060	5190
TKN	0.033	1,000	860
Ammonia-N	0.0198	600	465
Phosphorus	0.0088	267	215
Flow (MGD)	100	3	3.03

Section 4. Results

Current headworks loading at the wastewater treatment plant indicate that the plant is not significantly loaded (Table 4.1). Influent data for silver, cadmium, cyanide, mercury and selenium were all non-detects, so loading is not calculated.

Table 4.1 Existing vs Revised MAHLs [MO 780-2954 3.6]

Pollutant of Concern	Current MAHLs (lbs/day)	Revised MAHLs (lbs/day)	Current Headworks Loading (lbs/day)	% Loading of Revised MAHL
Silver	NA	1.78	All NDs	---
Arsenic	NA	0.72	0.061	8%
Cadmium	NA	0.09	All NDs	---
Cyanide	NA	0.24	All NDs	---
Chromium	NA	4.32	0.191	4%
Copper	NA	1.64	0.465	28%
Mercury	NA	0.03	All NDs	---
Molybdenum	NA	1.17	0.150	13%
Nickel	NA	3.59	0.355	10%
Lead	NA	0.69	0.247	36%
Selenium	NA	0.15	All NDs	---
Zinc	NA	6.44	0.985	15%
BOD	NA	4330	2467	57%
TSS	NA	5190	3543	68%
Ammonia-N	NA	465	318	68%
TKN	--	860	423	49%
Phosphorus	--	215	131	61%
COD	--	---	NO DATA	--
Total Nitrogen	--	497	625	126%
Chloride	--	3664	5661	155%
Cyanide (amenable)	--	0.24	NO DATA	--
Chromium VI, total	--	0.05	NO DATA	--
Phenol	--	366	1.03	0.3%
Sulfate	--	---	NO DATA	--
HEM	--	733	NO DATA	--

Figure 4.1 Revised MAHLs and Headworks Comparison

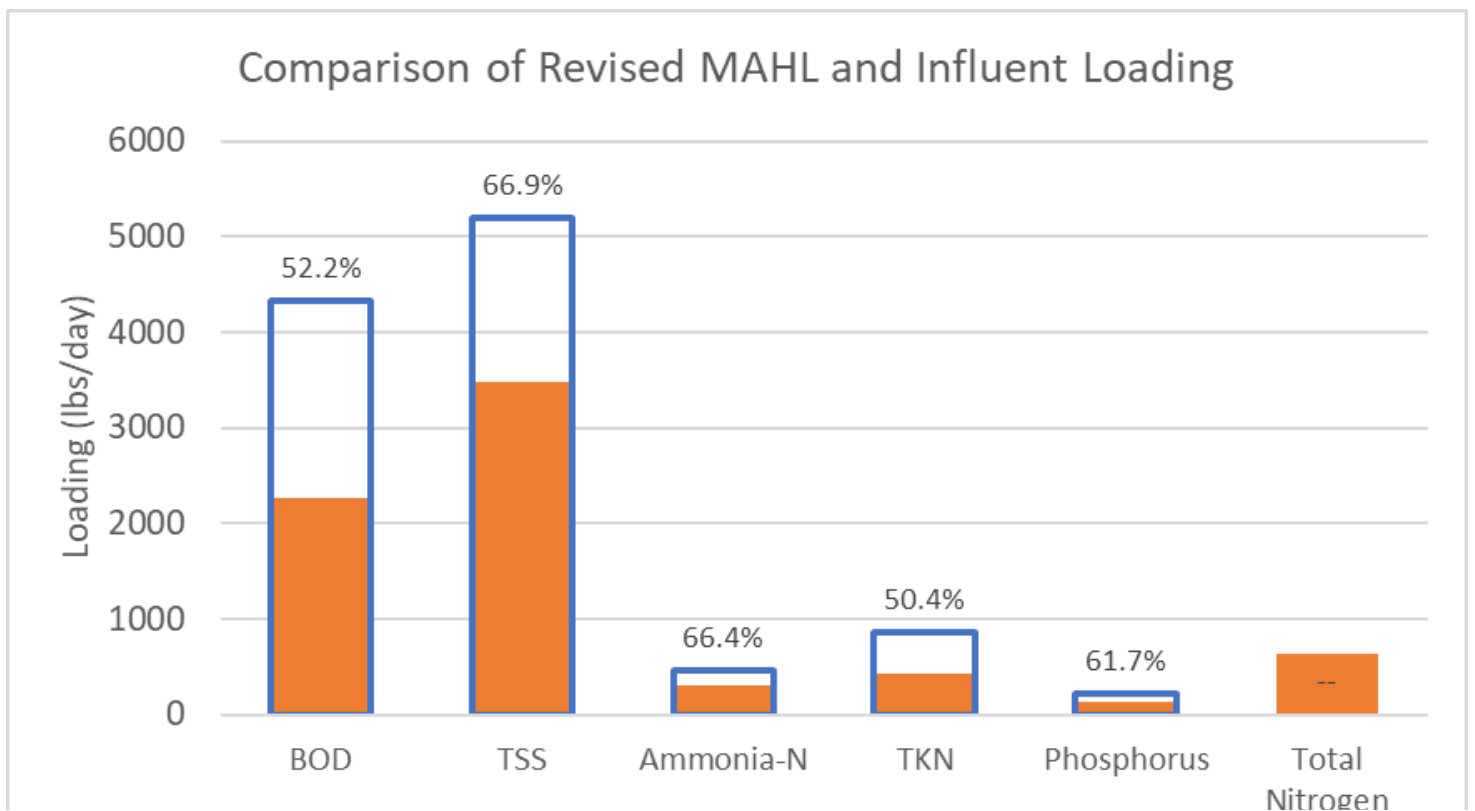
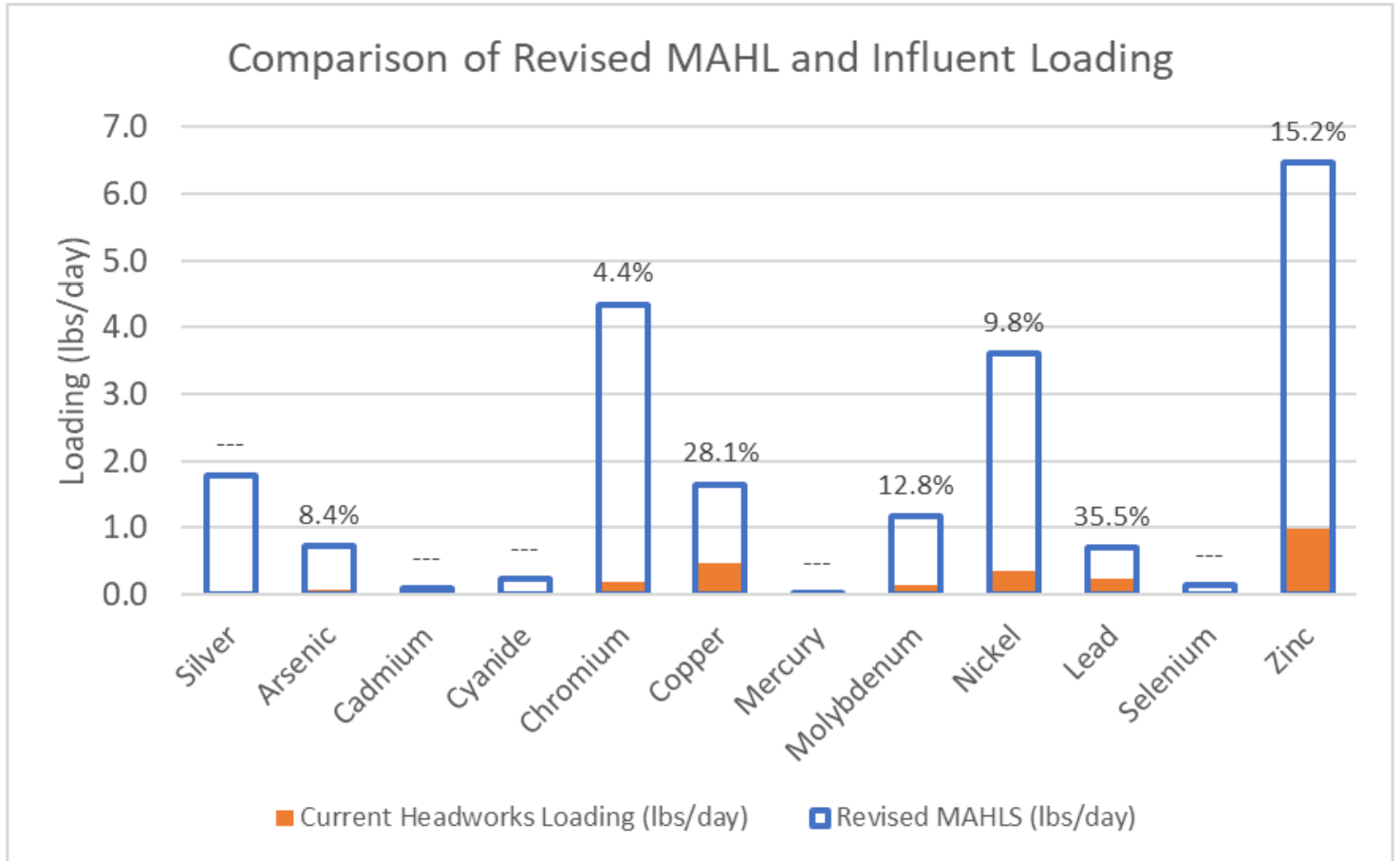
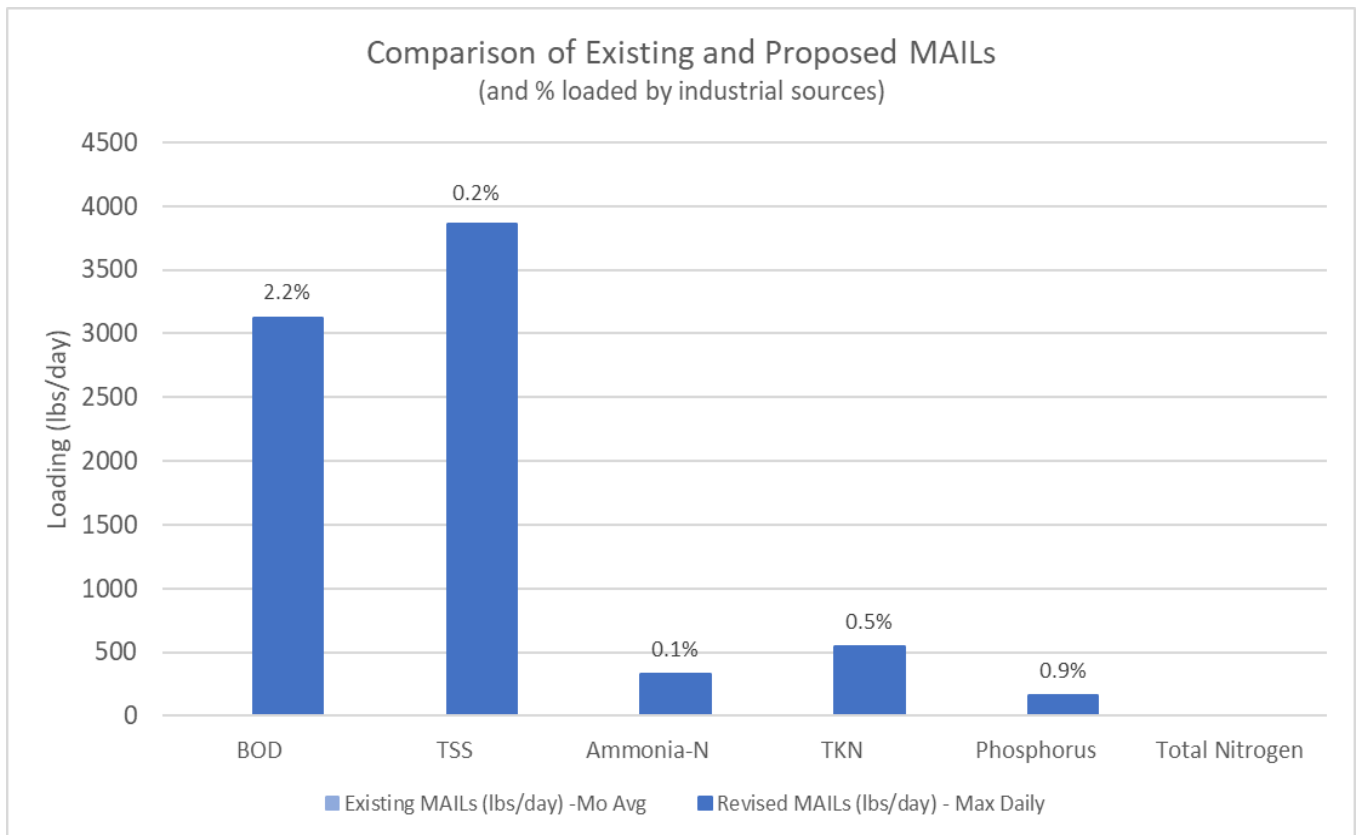
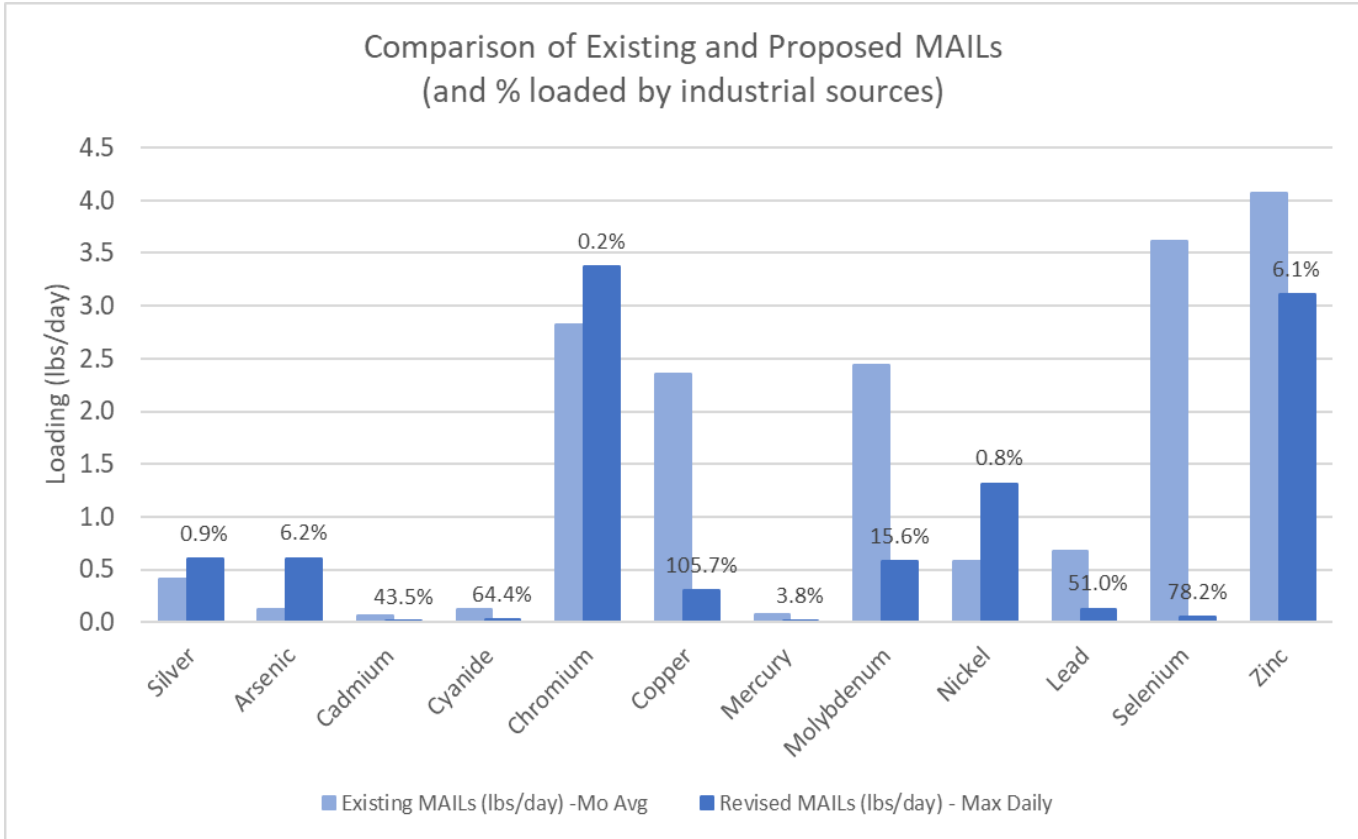


Table 4.2 presents the existing and revised MAILs, MAIL reserved for each pollutant of concern and corresponding uniform concentration (for reference only). The MAIL reserved represents a 10% reserve of the MAIL for each pollutant of concern and is already taken into account in the revised MAIL. The revised MAILs for the pollutants of concern are higher than current MAILs with the exception of cyanide and molybdenum (Table 4.2, Figure 4.2).

Table 4.2 Existing vs Proposed MAILs [MO 780-2954 3.6.1]

Pollutant of Concern	Existing MAILs (lbs/day) -Mo Avg	Revised MAILs (lbs/day) - Max Daily	MAIL Reserved (lbs/day)	MAIL Higher or Lower
Silver	0.299	1.578	0.175	Higher
Arsenic	0.177	0.623	0.069	Higher
Cadmium	0.021	0.057	0.006	Higher
Cyanide	0.187	0.107	0.012	Lower
Chromium	2.75	3.86	0.429	Higher
Copper	0.829	1.286	0.143	Higher
Mercury	0.02	0.023	0.003	Higher
Molybdenum	2.00	1.02	0.114	Lower
Nickel	1.14	3.21	0.356	Higher
Lead	0.358	0.597	0.066	Higher
Selenium	0.100	0.105	0.012	Higher
Zinc	3.26	5.15	0.572	Higher
BOD	--	2089	866	NA
TSS	--	4093	1038	NA
Ammonia-N	--	6.510	93.000	NA
TKN	--	243	172	NA
Phosphorus	--	140	43	NA
COD	--	---	---	NA
Total Nitrogen	--	46	5	NA
Chloride	--	2659	296	NA
Cyanide (amenable)	--	0.107	0.012	NA
Chromium VI, total	--	0.050	0.006	NA
Phenol	--	328.7	36.5	NA
Sulfate	--	--	--	NA
HEM	--	342	38	NA

Figure 4.2. Existing and Revised MAIL Comparison Graphs



Section 5. Summary of Recommended Local Limits [MO 780-2954 3.7]

Table 5.1 presents the MAILs for pollutants of concern that are recommended to be adopted, updated or omitted and includes the rationale for each. Parameters that are categorical standards, have elevated influent or industrial concentrations compared to background concentrations or are heavily loaded (greater than 60% for metals and greater than 80% for conventional) were all considered in the determination of adopting MAILs.

Table 5.1 Proposed Changes to Local Limits

Pollutant of Concern	Current Local Limit?	Adopt / Update	Reference Only MAHLs (lbs/day)	Max Daily MAILs (lbs/day)	Rationale
Silver	Yes	Omit	1.78	1.58	All NDs at the influent and not an industry POC
Arsenic	Yes	Update	0.721	0.623	Influent slightly elevated, industry POC
Cadmium	Yes	Omit	0.092	0.057	All NDs at the influent and not an industry POC
Cyanide	Yes	Omit	0.236	0.107	Adopt as Cyanide (amenable)
Chromium	Yes	Update	4.32	3.86	Elevated influent and industrial concentrations
Copper	Yes	Update	1.64	1.29	Industrial POC
Mercury	Yes	Omit	0.028	0.023	All NDs at the influent, not an industry POC
Molybdenum	Yes	Update	1.17	1.02	Elevated influent and industrial concentrations
Nickel	Yes	Update	3.59	3.21	Elevated influent and industrial concentrations
Lead	Yes	Update	0.692	0.597	Elevated influent and industrial concentrations
Selenium	Yes	Update	0.147	0.105	Elevated influent concentrations - adopt or omit?
Zinc	Yes	Update	6.44	5.15	Elevated industrial concentrations
BOD	PD*	Adopt	4330	2089	Design Parameter
TSS	PD*	Adopt	5190	4093	Design Parameter
Ammonia-N	No	Omit	465	6.510	Adopt TKN instead
TKN	No	Adopt	860	243	Design Parameter
Phosphorus	No	Reserve	215	140	Future Regulation
COD	No	Omit	---	---	Monitor for next local limit evaluation
Total Nitrogen	No	Reserve	497	46	Future Regulation
Chloride	No	Reserve	3664	2659	Industry POC, High concentration in receiving stream
Cyanide (amenable)	No	Adopt	0.236	0.107	In lieu of cyanide total
Chromium VI, total	No	Omit	0.050	0.050	Not an industry POC
Phenol	No	Omit	366	328.7	All NDs at the influent, not an industry POC
Sulfate	No	Omit	--	--	Recommend monitoring
HEM	No	Adopt	733	342	Recommended; Removed from specific prohibitions in code

Any pollutants of concern not recommended for adoption are omitted from the summary of local limits presented in Table 5.2. In order to allocate based on the need for the industrial contributors, the MAILs should be implemented in the City code as maximum daily prohibited mass limit. For pollutants of concern listed in the NPDES permit as monitoring only, local limits are recommended to be adopted as reserve/draft limit. Industrial permits should be updated to include the allocated portion of the proposed MAILs, no permits shall be issued for more than five years.

Table 5.2 Summary of Local Limits for Adoption [MO 780-2954 3.6.2]

Pollutant of Concern	Reference Only MAHLs (lbs/day)	Max Daily MAILs (lbs/day)	Reference Only Uniform Concentration (mg/L)	Limiting Criteria for Local Limit
Arsenic	0.72	0.623	0.26	503 EQ
Chromium	4.32	3.86	1.63	Water Quality
Copper	1.64	1.29	0.54	NPDES #
Molybdenum	1.17	1.02	0.43	503 EQ
Nickel	3.59	3.21	1.36	Water Quality
Lead	0.69	0.597	0.25	Water Quality
Selenium	0.15	0.105	0.04	Water Quality
Zinc	6.44	5.15	2.18	Water Quality
BOD	4330	2089	883	Design Capacity
TSS	5190	4093	1730	Design Capacity
TKN	860	243	103	Design Capacity
Cyanide (amenable)	0.236	0.107	0.021	Water Quality
HEM	733	342	144	Water Quality
Phosphorus	RESERVED			
Total Nitrogen	RESERVED			
Chloride	RESERVED			

Conclusions and Recommendations:

This technical evaluation updates the City of Sedalia's Central WWTP local limits in response to the findings of the Part I Technical Evaluation and updated analytical data from influent, effluent, background, and biosolids samples. Based on the findings of the technical evaluation the following is recommended:

- The City retain and revise arsenic, chromium, copper, molybdenum, nickel, lead, selenium and zinc as local limits. Chromium, lead and nickel have elevated influent and industrial concentrations compared to background concentrations. Copper is an industry POC and there is a NPDES permit limit. Zinc is 15% loaded at the headworks and an industry POC. Cyanide is being retained and revised due to detected results at the
- The City adopt BOD, TSS, TKN, HEM and cyanide (amenable) as local limits in the City's ordinance. It is recommended to adopt BOD, TSS and TKN to protect WWTP from NPDES permit violations and maintain quality of biosolids. There is no influent data for cyanide (amenable) and it is assumed that cyanide (amenable) is equal to cyanide (total). Cyanide (total) is non-detect at samples collected at the influent, it has the potential to be heavily loaded with concentrations close to the reporting limit. HEM was removed from the list of specific prohibitions in the City's legal authority in lieu of a technically derived limit.
- It is recommended to reserve MAILs for phosphorus and total nitrogen as emerging pollutants of concern with the potential to have a NPDES permit limit in the future based on water quality criteria. It is also recommended to reserve a MAIL for chloride due to the high levels in the receiving stream. It is also recommended to add COD to the sample plan for influent, effluent and industries with the goal of using COD in lieu of BOD for the next local limit evaluation
- POCs omitted from the revised list of local limits include silver and mercury. Silver and mercury are not detected in the influent or industry samples.

Overall, the evaluation found that the treatment plant is not significantly loaded with respect to metals or conventional pollutants. However, based on other considerations—such as elevated influent concentrations, presence of industrial contributors, NPDES permit limits and applicable categorical standards—it is recommended that the City revise and adopt updated local limits in its ordinance as Daily Maximum MAILs.

Appendices
[MO 780-2954 3.8]

Appendix A. Technical Evaluation Part 1[MO 780-2954 3.1]



MISSOURI DEPARTMENT OF NATURAL RESOURCES
 WATER PROTECTION PROGRAM, WATER POLLUTION CONTROL BRANCH
 INDUSTRIAL PRETREATMENT PROGRAM

**TECHNICAL EVALUATION OF LOCAL LIMITS (40 CFR 122.44(j)(2)(ii))
 AND DETAILED TECHNICAL REEVALUATION OF LOCAL LIMITS 40
 CFR 403.5(c)(1))**

FOR OFFICE USE ONLY	
PERMIT ID NUMBER	
DATE RECEIVED	

GENERAL INSTRUCTIONS FOR COMPLETING THIS FORM ARE AVAILABLE BELOW.

PART I. LOCAL LIMIT REVIEW: TECHNICAL EVALUATION REPORT

Federal and state regulations require a periodic review of local limits, and publicly owned treatment works (POTW) with approved programs must continue to develop local limits as necessary per 40 CFR 403.5(c)(1)1. Pursuant to 40 CFR 122.44(j)(2)(ii), federal regulations require a written technical evaluation of the need to revise local limits following each permit issuance or re-issuance. These periodic local limit reviews are a required condition of your Missouri National Pollutant Discharge Elimination System (NPDES) permit(s). Part I of this form addresses the local limits review for one POTW and its permit. Because POTW site-specific conditions change, Section 2.0 of this form provides a list of factors that may indicate the need for a more detailed technical re-evaluation of local limits using Part II of this form. Reference Document: 2004 EPA Local Limits Development Guidance.

¹Note: Missouri state regulations at 10 CSR 20-6.100 incorporate the federal 40 CFR 403 pretreatment regulations by reference; therefore, only the federal regulations will be cited in this form.

1.0 BASIC INFORMATION

1.1 POTW NAME/CONTROL AUTHORITY: City of Sedalia

1.2 NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) MISSOURI STATE OPERATING PERMIT

PERMIT NO.	EXPIRATION DATE	WWTP NAME	
MO-0023019	October 31, 2028	Sedalia Central WWTP	
PERMITTED DESIGN FLOW (MGD)	AVERAGE ACTUAL FLOW (MGD)	POPULATION EQUIVALENT <small>(Design/Actual)</small>	BIOSOLIDS DISPOSAL METHOD
3.03 MGD	2.02	30,300/11,412 (service area: 8,820)	Composting

1.3 LOCAL LIMIT REPORT WITH LETTER

1.3.1 Date Technical Evaluation is Due: May 1, 2024, September 1, 2024 and

1.3.2 Entity Performing Local Limit Analysis: City of Sedalia

1.3.3 Region VII Spreadsheet Version: V2.3

1.4 CONTACT PERSON FOR POTW:

NAME	TITLE	TELEPHONE NUMBER WITH AREA CODE	EMAIL
Ben Maness	Wastewater Manager	573-645-0366	bmaness@sedalia.com

1.5 SIGNATORY AUTHORIZATION FOR POTW (if different):

NAME	TITLE	TELEPHONE NUMBER WITH AREA CODE	EMAIL
William Bracken	Utilities Director	660-827-3000	wbracken@sedalia.com

2.0 POTW BASIS FOR EVALUATION

2.1 IDENTIFIED FACTORS MAY WARRANT A DETAILED TECHNICAL REEVALUATION OF LOCAL LIMITS:

<input checked="" type="checkbox"/>	Change in Water Quality Criteria	<input type="checkbox"/>	Plant Conditions: Increase/Decrease of Hydraulic Loading
<input type="checkbox"/>	Change in Sludge Quality Criteria	<input type="checkbox"/>	Change in Biosolids Disposal Method
<input type="checkbox"/>	Plant Conditions: Increased Design Capacity	<input checked="" type="checkbox"/>	POTW Operational/Performance Problems
<input checked="" type="checkbox"/>	Plant Conditions: Other Design Modifications	<input checked="" type="checkbox"/>	Changes in Industrial User Contributions (Flows or characteristics)
<input type="checkbox"/>	Outfall Relocation (Different Receiving Stream)	<input checked="" type="checkbox"/>	Addition or Removal of NPDES Permit Limit
<input type="checkbox"/>	Change in Air Pollution Control Permit	<input type="checkbox"/>	New NPDES Whole Effluent Toxicity Testing Requirement
<input type="checkbox"/>	Significant increase or decrease in Biosolid production		

2.2 WRITTEN DETAILED DESCRIPTION OF THE ABOVE REASON(S) FOR COMPLETING OR NOT COMPLETING A TECHNICAL REEVALUATION:

Central plant is currently going through upgrades on the aeration basin and sludge de-watering. New permit limits have also been implemented with the new permit cycle which began November 1, 2023 and will end October 31, 2028. There were chronic permitted effluent limitation violations during the last permit cycle. As well, new industrial users have been identified and their discharge characteristics may change the industrial loading present. A Part II evaluation does need to be completed; however, before finalizing updated local limits the industrial contributors and corresponding POCs need to be confirmed.

3.0 POTW PRETREATMENT PROGRAM DESCRIPTION OF PROCEDURES AND DATA

3.1 INDUSTRIAL WASTE SURVEY (40 CFR 403.8(f)(2)(i))

3.1.1 Date Industrial Waste Survey (IWS) was last performed:

Ongoing- majority in August 2023

3.1.2 Pursuant to 40 CFR 403.8(f)(6) date of approved industrial users list:

In-progress Goal: Turn in with 2025 annual report.



Updated list of industrial users meeting the requirement of 40 CFR 403.3(v)(1) and (v)(3) is attached separately for approval because the POTW has not provided the updated list to the approval authority.

3.1.3 Summary of IWS Process/Findings of IWS including any newly identified significant industrial users (attachment of a table is required for a detailed findings discussion per 40 CFR 403.8(f)(2)(i) and (ii)):

See attached table. However, this list will continue to change as the IWS process continues. In 2023 more than 58 surveys were returned; from the original list approximately 16 have been identified as either currently permitted or needing further evaluation.

3.1.3 Industrial Waste Survey Schedule per 40 CFR 403.8(f)(2)(iii):

An IWS is currently underway; categorical determinations and other significant industrial users are being identified. Before local limits are updated, we need to identify the nondomestic flows from SIUs for the wastewater treatment plant.

3.2 SIGNIFICANT INDUSTRIAL USER COMPLIANCE WITH PRETREATMENT STANDARDS AND SIGNIFICANT NONCOMPLIANCE DETERMINATION

POTW Annual Report attached, **Summary:**

The 2023 Annual Report is attached once for all three WWTP Local Limits Evaluation Part 1.

Two users were found to be in Significant Non-Compliance 2023. Sierra Bullets (Permit No. 010120-05) (discharges to the North WWTP) and Central Missouri Landfill (Permit No. 010120-0) which discharges to the Central WWTP. Both were found to be in SNC for multiple permit limit exceedances.

3.3 FREQUENCY AND PROCESS OF INDUSTRIAL LOAD EVALUATION/MASS BALANCE WITH HEADWORKS

A mass balance is being incorporated into the Pretreatment Program procedures. Industry data is being summarized so that it can be compared to the overall loading at each WWTP.

3.4 BIOSOLIDS: DESCRIPTION OF HOW BIOSOLIDS MONITORING DATA IS USED IN THE POTW PRETREATMENT PROGRAM

The sludge from Central WWTP is combined with sludge from North and Southeast WWTP's once it reaches the biosolids facility. The only analysis conducted on each individual load is for total solids and total volatile solids. Therefore it is hard to use the biosolids data in reference to each individual plant, as it is tested as a whole (once composted). The current biosolids testing does not indicate any overloading. Separate sampling is being incorporated into the sample plan going forward with the intention of doing a mass balance for each WWTP.

3.5 DOES THE POTW MONITORING FOLLOW 40 CFR 136 SAMPLE COLLECTION AND ANALYSIS REQUIREMENTS?

Yes or No Also, describe those Pollutant of Concern (POCs) sampled in house versus use of a contract laboratory below.

All samples are collected and analyzed following the requirements of 40 CFR 136.

Currently all POC samples are sent to a contracted lab (Engineering Survey and Services). However conventional pollutants such as BOD, TSS and Ammonia are completed in house.

3.6 HAULED WASTE		
3.6.1 Describe Hauled Waste Program and Current Legal Authority Waste haulers (septic and port-a-potties) are currently allowed to discharge at the influent at the Central WWTP (main recipient) and the Southeast WWTP. 40,000 gallons per month is typically discharged per month (with an additional 20,000 gallons per the month of the State Fair).		
3.6.2 Hauled Waste City Code Citation	Sec. 60-300 to Sec 60-325, (Ord. No. 9837, § 1, 2-7-2011)	
3.6.3 Is Hauled Waste Currently Accepted?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
3.6.4 Is Hazardous Waste 40 CFR 261 Accepted?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
3.6.5 Is Any Landfill Leachate Accepted?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
3.6.6 Hauled Waste Determination.	<input checked="" type="checkbox"/> Not significant per 40 CFR 403.3(v)(3). No haulers after evaluation are significant. <input type="checkbox"/> Significant, included in Section 3.1.3, <i>IWS summary table</i> .	
4.0 PRETREATMENT PROGRAM MONITORING		
4.1 SAMPLING PLAN SUMMARY TO ENSURE EFFECTIVENESS OF PRETREATMENT PROGRAM		
Expanded effluent samples will be paired with an influent sample for POCs. Annual or at least three rounds of expanded effluent testing will be completed as required during this permit cycle. An annual priority pollutants on biosolids will be completed. Background samples will be taken to confirm what pollutants are elevated at the head works. The influent monitoring results will be compared to background concentrations. The influent loads will also be calculated and compared to current MAILs.		
4.2 INFLUENT SAMPLING LOCATION		
Headworks		
4.3 WHOLE EFFLUENT TOXICITY (WET) TEST		
4.3.1 Date of Last Acute WET Test	July 26, 2024 to July 28, 2024	
4.3.2 Date of Last Chronic WET test	April 22, 2024 to April 26, 2024	
4.3.3 Explain any issues or findings of the WET tests:		
No issues were found with the WET tests. All three plants met requirements.		
4.4 EXPANDED EFFLUENT (Priority Pollutant Scan) TESTING		
4.4.1 Dates of last three (3) Expanded Effluent Testing Events		
Most Recent	2nd Most Recent	3rd Most Recent
refer to most recent NPDES renewal app		
4.4.2 Explain detections of any expanded effluent test results.		
The detected effluent results were aligned with expected concentrations for typical wastewater pollutants (copper, nickel, zinc, etc). Chloroform also had a result of 6 ug/L which is commonly used in the laboratory.		
4.5. BIOSOLIDS PRIORITY POLLUTANT TESTING		
4.5.1 Dates of last three (3) Priority Pollutant Testing of Biosolids (Required for all POTWs with a Pretreatment Program in NPDES permit Standard Conditions, Part III)		
Most Recent	2nd Most Recent	3rd Most Recent
Not Completed	Not Completed	Not Completed
4.5.2. Explain detections of any biosolids priority pollutant test results.		
A complete priority pollutant testing has not been completed.		
4.6. ADDITIONAL PROGRAM MONITORING		
Testing for Chromium, Copper, Cyanide, Lead, Mercury, Nickel, Selenium and Zinc are tested on a monthly basis after the sludge from all three plants has been mixed together and processed as compost. These results have never been above limits. However, priority pollutants testing will be conducted annually starting in 2025.		

5.0 SUMMARY OF POCs – MAY BE ADDED TO DETAILED LOCAL LIMIT REEVALUATION

A local limit evaluation was performed by Barr Engineering in 2020; the conclusions from this report were that the current local limits were deemed adequate. The 2020 evaluation identified Total Antimony, Chloride, Total Boron, Fluoride, Oil and Grease, and Sulfate + Chloride in addition to typical POCs of metals, cyanide, and conventional pollutants. The report also recommended monitoring for nutrients.

6.0 SUMMARY OF CURRENT LOCAL LIMITS

6.1 CITY ORDINANCE

6.1.1 Date Local Limits Last Adopted in City Ordinance	February 22, 2022
6.1.2 City Code Citation/Reference for Local Limits	Ordinance No. 11524 60-195 (C) 1-4
6.1.3 Date Local Limits Were Last Evaluated, if unknown, place NA	2020

6.2 CURRENT ADOPTED LOCAL LIMITS: CHECK ALL THAT APPLY.

<input type="checkbox"/> Adopted as Uniform Concentrations	<input checked="" type="checkbox"/> Adopted as Maximum Allowable Industrial Loads (MAILs) [†]
<input type="checkbox"/> Adopted as Maximum Daily Limits	<input type="checkbox"/> Adopted as Maximum Daily Loads
<input type="checkbox"/> Adopted as Monthly Average Limits	<input type="checkbox"/> Adopted as Monthly Average Loads
<input type="checkbox"/> Local Limits are Currently Adopted outside the sewer use ordinance	
<input type="checkbox"/> No Local Limits for Metals are Currently Adopted	

6.3 CURRENT LOCAL LIMITS IN ORDINANCE OR OTHERWISE ADOPTED

Parameter	Local Limit	MAIL	Units	Adopted?	Limiting AHL ¹ Criteria	Allocation Method and Notes
Silver, Total (T)	mg/L	0.299	lbs.da	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Water Quality	uniform, based on need and flow
Arsenic, T	mg/L	0.177	lbs/da	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	503 NA	uniform, based on need, based on flow
Cadmium, T	mg/L	0.021	lbs/da	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Water Quality	uniform, based on need and flow
Cyanide, T	mg/L	0.187	lbs/da	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Water Quality	uniform, based on need and flow
Chromium, T	mg/L	2.753	lbs/da	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Scndry Inhib	uniform, based on need and flow
Copper, T	mg/L	0.829	lbs/da	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	NPDES #	uniform, based on need and flow
Mercury, T	mg/L	0.02	lbs/da	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Water Quality	uniform, based on need and flow
Molybdenum, T	mg/L	2.00	lbs/da	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	503 NA	uniform based on need and flow
Nickel, T	mg/L	1.142	lbs/da	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	503 NA	uniform based on need and flow
Lead, T	mg/L	0.358	lbs/da	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Water Quality	uniform based on need and flow
Selenium, T	mg/L	0.10	lbs/da	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Water Quality	uniform based on need and flow
Zinc, T	mg/L	3.259	lbs/da	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Secondary Inhib	uniform based on need and flow
Hexavalent Chromium, Dissolved	mg/L	N/A		<input type="checkbox"/> Yes <input type="checkbox"/> No		
Chromium, Trivalent	mg/L	N/A		<input type="checkbox"/> Yes <input type="checkbox"/> No		
pH ²	mg/L			<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Oil & Grease Total <input type="checkbox"/> Nonpolar <input type="checkbox"/> Polar ³ <input checked="" type="checkbox"/>	100 mg/L			<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	NPDES #	Animal fats oil & grease limited to 100 mg/L in the prohibited discharge standards.
Parameter	Local Limit	MAIL	Units	Adopted?	Limiting AHL ¹ Criteria	Allocation Method and Notes
BOD	mg/L	300	mg/L	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		Sec. 60-195(b)(2)c
TSS	mg/L	350	mg/L	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		Sec. 60-195(b)(2)c
TKN	mg/L			<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
COD	mg/L			<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Ammonia-N	mg/L			<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Quality	
Phosphorus	mg/L			<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Quality	removed from most recent permit
Boron				<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Quality	removed from most recent permit
Chloride				<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Quality	removed from most recent permit
Fluoride				<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Quality	removed from most recent permit

¹AHL = allowable headworks loading, ² Prohibited Discharge Standard, ³ Polar HEM determined by the difference between total HEM and SGT-HEM or nonpolar.

* Note: MAILs are applied to industries. if categorical limits are more stringent then the categorical limit is in the permit. The City is in the process of confirming allocations to ensure that the MAILs are not over-allocated.

6.3.1 Background for the additional local limits above beyond EPAs 15 National Pollutants of Concern

No local limits have been adopted based on the most recent evaluation.

7.0 NEW OR REVISED NPDES PERMIT LIMITS

List any new or revised POTW NPDES Permit Limitations

Parameter	Mo. Avg. Limit	Units	Max Daily Limit	Units	Needs revised or new local limit?
Ammonia July	1.2	mg/L	3.3	mg/L	recommended for evaluation
Ammonia August	1.4	mg/L	3.3	mg/L	recommended for evaluation
Ammonia October	2.7	mg/L	8.1	mg/L	recommended for evaluation
Oil and Grease	*	mg/L	Monitoring Only	mg/L	
Total R. Copper	16.3	ug/L	43.8	ug/L	recommended for evaluation

7.1 Include a summary of any monitoring issues for listed parameters.

No monitoring issues have been found for the listed parameters.

7.2 List any compliance issues during the POTW's last NPDES Permit Cycle.

During a routine compliance inspection by DNR on June 7 and 8, 2022 it was found that the Central WWTP violated permitted effluent limits 20 months over the two year period. On November 16, 2022 the Department issued Notice of violations and failure to adequately resolve the violations. Please see the summary found in the attachments for the NPDES violations at the WWTP.

8.0 APPROVED LOCAL LIMIT ANALYSIS COMPARED TO CURRENT CONDITIONS

WWTP Average Actual Flow – Previous Study (MGD)	1.93 (2020)	Population from Previous Study	7,500 (2020 study)
WWTP Average Actual Flow (MGD) - Current Conditions	2.02	Current Population	8,820
Non-Domestic Flow (MGD) – Previous Study	0.168	No. SIUs – Previous	2 IUs Maxion Wheels and WCA Landfill
Non-Domestic Flow – Current Conditions (MGD) <i>Subtract industrial flows from average actual flows</i>	TBD	No. SIUs - Current	TBD- IWS Still in process.

9.0 CURRENT LOADING COMPARED TO MAHL - INFLUENT MONITORING AND ANALYSIS

Date Range of Influent Data: 7/16/2024- 7/22/2024

Pollutant of Concern (total)	2013/2020	Average Current Headworks Loading (lbs/day)	Maximum Current Headworks Loading (lbs/day)	# of NDs / # of Samples	2013	(optional) Preliminary MAHL (lbs/day)	(optional) Average % of Re-Calculated MAHL
	Previous Study ¹ MAHL (lbs/day)				Average % current loading of Previous MAHL		
Silver, Total (T)	3.50/1.94	0.044	0.044	7/7	1.2%		
Arsenic, T	0.51/0.57	0.073	0.073	7/7	14%		
Cadmium, T	0.03/0.15	0.073	0.073	7/7	243% (Non-detects)		
Cyanide, T	0.23/0.26	0.073	0.073	7/7	32%		
Chromium, T _{III}	14.01/25.64	0.146	0.146	7/7	1%		
Copper, T	14.01/1.93	0.338	2.214	2/7	2%		
Mercury, T	0.02/0.04	0.003	0.003	7/7	15%		
Molybdenum, T	2.44/0.17	1.456	1.456	7/7	60%		
Nickel, T	2.49/2.81	0.260	0.568	6/7	10%		
Lead, T	1.00/1.09	0.076	0.073	7/7	7%		
Selenium, T	0.14/0.10	0.073	0.073	7/7	52%		
Zinc, T	5.04/6.71	0.780	1.675	0/7	15%		
Cr-VI, diss.							
BOD	6,517	1,940	11,906	0/141		2,700	72%
TSS	6,517	2,754	32,128	0/192		3,130	88%
Oil & Grease Total <input type="checkbox"/> Nonpolar <input checked="" type="checkbox"/> Polar ² <input type="checkbox"/>	100 mg/L mg/L mg/L						

Optional Parameters; Fill in Additional as Applicable (Not part of the 15 National POCs)

COD							
TKN		444	722	0/58		600	74%
Ammonia-N	456	353	1,184	0/167		305	116%
Phosphorus, T		132	551	1/60		155	85%
Aluminum, T							
Phenol							

¹ Note: If MAHLs from the previous analysis are unavailable, please use current conditions to create MAHLs. ²HEM determined by the difference between total HEM or polar and SGT-HEM or nonpolar.

9.1 Discuss MAHL Comparison to Current Loading

The City of Sedalia has performed monitoring events of the wastewater treatment plant to evaluate current loading. As summarized above, loading for each parameter is reflected in the table.

Please note that when the last local limit evaluation was performed in 2020, the local limits were not updated including the corresponding allowable headworks and allowable industrial loads.

Based on the Burns & McDonnell Summary of Design, the design basis has been updated and is reflected as preliminary MAHLs representing the updated basis for the Central Plant design.

The data is currently limited by nondetects which result in higher % loadings. Several metals are 7/7 nondetect results.

Also, note that the comparison of average to maximum daily loads has some variability especially for conventional pollutants and nutrients.

10.0 CURRENT BIOSOLIDS DATA – AVERAGE AND MAXIMUM BIOSOLIDS CONCENTRATIONS

10.1 Date(s) of current biosolids data: Refer to sample plan, no data is available for individual plants.

10.2 Indicate the average and maximum biosolids concentration for the previous permit cycle. Also, indicate the number of samples upon which the analysis is based.

Pollutant of Concern	No. Nondetects/ No. Biosolids Samples	Average (mg/kg)	Maximum (mg/kg)	Back-Calculated Influent Concentration (mg/L)	Actual Measured Influent Concentration (mg/L)	Influent Concentration Used For Updated Local Limits (mg/L)
Silver, Total (T)	not	summarized				
Arsenic, T						
Cadmium, T						
Cyanide, T						
Chromium, T						
Copper, T						
Mercury, T						
Molybdenum, T						
Nickel, T						
Lead, T						
Selenium, T						
Zinc, T						
Trivalent Chromium	See total chrome					
Hexavalent Chromium						
Ammonia-N						

10.3 Biosolids Priority Pollutant Testing – Summarize any detections only below. Indicate the average and maximum biosolids concentration for the previous permit cycle. If all pollutants were non-detections, please indicated that below.

not tested						

10.4 Discussion of back-calculated results above.

not evaluated (recommendation for additional monitoring).

11.0 LOCAL LIMIT TECHNICAL EVALUATION SUMMARY - NEED TO REVISE CONCLUSIONS

11.1 Are POTW influent actual flows different from the previous local limit evaluation? Higher Lower

If flows have changed significantly (typically greater than 20% actual hydraulic flows), reevaluate local limits.

11.2 Are industry total flows higher or lower than the previous local limit evaluation? Higher Lower

If Yes, re-evaluate local limits.

11.3 Are industries having trouble meeting limits? i.e., are violations issued? Yes No

If yes, consider re-evaluating local limits to determine basis, factors of safety, current loading considerations, etc.

11.4 Are any current pollutant loadings (metals) more than 60% loaded? (% of MAHL) Yes No

Confirm that the elevated loading is attributed to the permitted industrial user(s) and/or domestic contributions. In addition, check to see whether industries are the contributor or combined with another source.

11.5 Are any current pollutant loadings (conventional) more than 80% loaded? (% of MAHL) Yes No

If yes, ensure the loading is attributed to domestic and/or identified industrial contributions. If yes, 80% is a rule of thumb, plant design varies, and POTW may have successful compliance history, thus not merit reevaluation.

11.6 Is there a pollutant loading which is not accounted for between the domestic loading and the industry loading compared to headworks loading? Yes No

under evaluation

If Yes, ensure current industrial users' monitoring frequency are adequate to determine compliance and confirm that contributions are not coming from an unidentified industrial discharger.

11.7 Confirm that a current IWS has recently been performed (or as documented above, that an on-going IWS evaluation is conducted). Yes No

If No, must be completed before the technical evaluation can be considered complete.

11.8 Were any new Pollutants of Concern identified from the IWS process, expanded effluent testing, or biosolids priority pollutant testing requirements? Yes No

If Yes, include in the relevant sections of the report where preliminary MAHLs and MAILs are compared to currently adopted local limits (this was an optional evaluation in Section 9.0). Highly recommended, if Yes. Transfer POCs for a re-evaluation.

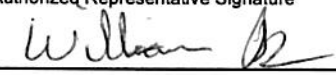
11.9 Do the biosolids results correlate to the headworks concentrations? Yes No

If No, confirm monitoring frequencies are adequate. refer to next steps

11.10 Any NPDES permit limit violations attributed to capacity issues or a slug event? Yes No

If Yes, was the cause of the event identified (explain below). Use the space below to explain any of the above.

The wastewater treatment plants are heavily loaded for conventional pollutants; metal issues may be attributed to not having sufficiently sensitive reporting limits.

11.11 New or revised NPDES permit limits that will necessitate a reevaluation of local limits?		<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
<i>If Yes, use the space below to explain any of the above.</i>			
12.0 STATEMENT OF THE NEED TO REVISE LOCAL LIMITS (OR DETERMINATION THAT THE LOCAL LIMITS ARE ADEQUATE)			
<input checked="" type="checkbox"/> This evaluation determined that a local limit update is needed or otherwise determined to be beneficial to the POTW. Part II is required to be completed as the next step.			
<input type="checkbox"/> This evaluation determines that the current local limits (or no local limits) adequately protect the POTW and the POTW will retain the current local limits (or no local limits). End of Technical Evaluation of the Need to Update Local Limits.			
13.0 ATTACHMENTS			
<input checked="" type="checkbox"/>	1.	Most recent Industrial Waste Survey Summary Table. <i>Table provided below.</i>	
<input checked="" type="checkbox"/>	2.	Previous Local Limit Evaluation – Data and Summary Pages or Other Summary	
<input type="checkbox"/>	3.	Region VII Spreadsheet Input and Output (for MAHL comparison and current conditions)	
<input checked="" type="checkbox"/>	4.	Most recent POTW Pretreatment Annual Report	
<input type="checkbox"/>	5.	Raw Analytical Data (Contract Laboratory Reports) – <i>Will be provided upon request.</i>	
<input type="checkbox"/>	6.	Other	
<input type="checkbox"/>	7.	Other	
14.0 SUMMARY OF FUTURE ACTIONS/SAMPLING PLANS/NEXT STEPS/PROPOSED SCHEDULE			
The City will begin to complete POC testing on individual sludge loads leaving each individual WWTP. Priority pollutant testing will be conducted on sludge as required by the permit. An increase in domestic background sampling will be completed.			
A Part II local limit evaluation is recommended after plant improvements are completed and after all nondomestic discharges have been evaluated for SIU status.			
OPTIONAL QUESTIONS REGARDING MILITARY SERVICE			
Have you or an immediate family member ever served in the U.S. Armed Forces?		<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
If yes, would you like information about military-related services in Missouri?		<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
15.0 CERTIFICATION OF A DULY AUTHORIZED REPRESENTATIVE OF THE POTW			
<i>"I certify under penalty of law that this document and all attachments were prepared under direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations"</i>			
Authorized Representative Signature		Date	
		2/27/2025	
Duly Authorized Representative Name		Duly Authorized Representative Title	
William Bracken		Utilities Director	
Email Contact of Duly Authorized Representative: wbracken@cityofsedalia.com			

SIUs that Discharge to Central Plant

SIU Name	SIC/NAICS	Categorical Standard or Other SIU Status	Principal Product	Pollutants of Concern	Regulated Flow (GPD)	Compliance and Permit Status
GFL Landfill	SIC 4953 NAICS 562212	40 CFR 445.3	Leachate	Cadmium, Chromium, Copper, Cyanide, Lead Mercury, Nickel, Silver, Zinc, Ammonia, BOD	36,000	Under a schedule of compliance
Maxion	NAICS 336330 336390 336399 336211 SIC 3714 3499 5013	40 CFR 433.15	Steel Wheels	Lead, Nickel, Zinc, and Oil and Grease	150,000	Compliant
Duke Manufacturing	NAICS 42442 332999 SIC 3444	TBD	Stainless Steel Food Serving Units	TBD	TBD	N/A
Gardner Denver	NAICS 333912 332117 SIC 3563 3564	TBD	Blowers	TBD	TBD	N/A
MPW	SIC 8999 NAICS 339999	TBD	Regenerated Water	TBD	TBD	N/A
Owens Corning	NAICS 327212, 327211 SIC 3229, 3211, 3299	TBD	Cellulated Glass Insulation	TBD	TBD	N/A
Quality Rubber		TBD	Latex Rubber Pads	TBD	TBD	N/A
WireCo	NAICS 332618 331222 SIC 1629 6512 3315 3496	TBD	Wire Rope Cable	TBD	TBD	N/A

Central- NPDES Violations

01/2022: Nitrogen, ammonia total [as N]
02/2022: Nitrogen, ammonia total [as N]
03/2022: Nitrogen, ammonia total [as N]
04/2022: Nitrogen, ammonia total [as N]
05/2022: BOD, 5-day, 20 deg. C
06/2022: BOD, 5-day, 20 deg. C Nitrogen, ammonia total [as N] E. coli
07/2022: BOD, 5-day, 20 deg. C
08/2022: BOD, 5-day, 20 deg. C Nitrogen, ammonia total [as N] E. coli
09/2022: BOD, 5-day, 20 deg. C Nitrogen, ammonia total [as N] E. coli
10/2022: BOD, 5-day, 20 deg. C Nitrogen, ammonia total [as N]
11/2022: Nitrogen, ammonia total [as N]
12/2022: Nitrogen, ammonia total [as N]
01/2023: BOD, 5-day, 20 deg. C Nitrogen, ammonia total [as N]
02/2023: BOD, 5-day, 20 deg. C Solids, total suspended Nitrogen, ammonia total [as N]
03/2023: BOD, 5-day, 20 deg. C Nitrogen, ammonia total [as N]
04/2023: Nitrogen, ammonia total [as N]
05/2023: Nitrogen, ammonia total [as N] E. coli
06/2023: BOD, 5-day, 20 deg. C Nitrogen, ammonia total [as N]
07/2023: BOD, 5-day, 20 deg. C Nitrogen, ammonia total [as N]
08/2023: BOD, 5-day, 20 deg. C Nitrogen, ammonia total [as N] E. coli
09/2023: BOD, 5-day, 20 deg. C Nitrogen, ammonia total [as N]
10/2023: E. coli
02/2024: BOD, 5-day, 20 deg. C
03/2024: Nitrogen, ammonia total [as N]
04/2024: BOD, 5-day, 20 deg. C Nitrogen, ammonia total [as N]
08/2024: BOD, 5-day, 20 deg. C Nitrogen, ammonia total [as N] E. coli
09/2024: BOD, 5-day, 20 deg. C Nitrogen, ammonia total [as N] E. coli
10/2024: Nitrogen, ammonia total [as N]
12/2024: Copper, total recoverable

Table 7 Central WWTP – MAHL Results

Parameter	Previous MAHL (lb/d)	Calculated MAHL (lb/d)	Influent Loading as a % of Calculated MAHL	Limiting Criteria ⁽¹⁾
Antimony	NA	76.06	0.09%	Water quality
Arsenic	0.51	0.57	11%	Sludge loading
Boron	NA	32.40	18%	Water quality
Cadmium	0.03	0.15	35%	Water quality
Chromium III (total)	14.01	25.64	2.8%	Inhibition
Copper	14.01	1.93	42%	Water quality (MSOP limit)
Cyanide	0.23	0.26	11%	Water quality
Lead	1.00	1.09	16%	Water quality
Mercury	0.02	0.04	6.6%	Water quality
Molybdenum	2.44	0.17	42%	Sludge loading
Nickel	2.49	2.81	33%	Sludge loading
Selenium	0.14	0.10	22%	Water quality
Silver	3.50	1.94	0.37%	Water quality
Zinc	5.04	6.71	41%	Sludge loading
Ammonia, as NH ₃	934	456	78%	WWTP design
BOD ₅	39,811	6,517	40%	WWTP design
Chloride	NA	3,805	125%	Water quality
Fluoride	NA	64.4	15%	Water quality
Oil and grease	NA	2,012	14%	Water quality (MSOP limit)
Phosphorus	NA	10.25	1,278%	Water quality
Sulfate	NA	NA	NA	NA
Chloride + Sulfate	NA	16,096	34%	Water quality
Total Nitrogen	NA	228	200%	Water quality
TSS	95,235	6,517	69%	WWTP design

Note:

1. 6 mg/L (estimated) was used as a projected water quality criterion for total nitrogen. 0.5 mg/L (estimated) was used as a projected water quality criterion for total phosphorus.

Appendix B. Industrial Waste Survey

Industrial User	Address	WWTP	Permit Status	SIU Status	Most Recent Site Visit	NAICS Code	Principal Products	Process Discharge Total	Sewer Flow Total	Source Industrial Waste Discharge
Starline Brass	1300 W. Henry St. Sedalia, MO 65301	Central	New combined permit 1/1/2026	CIU - § 468.15	Inspection 4/28/2025	332992	Cartridge casings	10,300gpd		Copper forming
Stanley Black and Decker (formerly Waterloo Industries, Inc.)	1500 Waterloo Rd. Sedalia, MO 65301	North	Permitted	CIU - § 433.17	Inspection 4/28/2025	332439	Metal Storage Cabinets- 5,500 cabinets	88,089gpd	26,000 GPD	Ecoat Parts Washer / Ecoat / Powder Paint Washer / Various sources
Maxion Wheels	3610 W. Main St. Sedalia, MO 65301	Central	Permitted	CIU - § 433.17	Inspection 9/11/2024	336390	Steel Wheels	146,440gpd	200,000	Wastewater Treatment Facility
Nucor Steel Sedalia	500 Rebar Rd Sedalia, MO 65301	North	Permitted	CIU - § 420.46, § 420.66	8/5/2024	331111	Carbon Steel Rebar- 1,232.87 tons / Slag- 147.95 tons / Mill Scale- 15.93 tons	310,475gpd	161,113gpd	CCM Primary Closed Cooling / CCM Tertiary + HU Non- Contact Cooling / LF + Transformer Non-Cooling / Fume Treatment Plant Non- Contact Cooling / EAF + Transformer + SVC Non- Contact Cooling / Ecs Non- Contact Cooling / Plate Heat Exchangers Non-Contact Cooling / Rolling Mill + Induction Furnace Non- Contact Cooling / CCM Primary Emergency Circuit / CCM Tertiary Emergency Circuit / Continuous Charging Emergency Circuit / Induction Furnace Emergency Circuit / CCM Secondary Contact Cooling / CCM Tertiary Contact Cooling / QTB/Spooler Line Contact Cooling / Finishing Stands Contact Cooling / Rough Stands Contact Cooling
Sierra Bullets	1400 W. Henry St. Sedalia, MO 65301	North	Permitted with Starline	CIU - § 468.15	Inspection- 4/28/2025	332992	Small arms Projectiles- 800,000each	21,745gpd	23,000gpd	Copper forming
Waste Corporation of Missouri	24461 Oak Grove Lane Sedalia, MO 65301	Central	Permitted	SIU - Potential to impact POTW	6/12/2025	562212	N/A	36,000gpd	36,140gpd	Leachate
St. Joseph Plastics	1500 Sedalia Rd. Sedalia, MO 65301	North	New permit 1/1/2026	SIU based on anticipated flow; Pretreatment required	1/23/2025	562920 / 423930	Polypropylene (PCR)- 15,000lbs	5,757gpd	12,000	Friction Washing & Drying / Hydrocyclone Separation / Separated Waste drainage / Wash tank Weekly Draining
MPW	3205 W Main St. Sedalia, MO 65301	Central	New permit 1/1/2026	SIU > 25,000 GPD Potential to impact POTW	7/18/2025	339999	Resin regeneration from ion exchange mobile units	85,100gpd	150,000	Process water from Resin Regeneration
PROENERGY	2001 Pro Energy Blvd. Sedalia, MO 65301	Central	New permit 1/1/2026	CIU - § 433.17	7/18/2025	811310	Repair & Upfit generation and transmission equipment	0gpd	2950gpd	N/A
Bothwell Memorial Hospital	601 E 14th Sedalia, MO 65301	North	NA	Not SIU; Not CIU	2/29/2024	N/A	Medical products	12,250gpd	115,670gpd	N/A

Industrial User	Address	WWTP	Permit Status	SIU Status	Most Recent Site Visit	NAICS Code	Principal Products	Process Discharge Total	Sewer Flow Total	Source Industrial Waste Discharge
De Long's Inc.	131 Harding Ave. Sedalia, MO 65301	SE	NA	Not SIU; Not CIU No discharge	11/30/2023	332312	Steel / 12 tons	0gpd	163	N/A
Duke Manufacturing	601 Duke Dr. Sedalia, MO 65301	Central	NA	Not SIU; Not CIU	7/17/2025	332999	Food serving Units-varies / Stainless tables-40 units / Ovens-10 units / Warming units-varies	1,236gpd	2,817	Auto Pain Washer / Floor Scrubber / Compressor Discharge / Deburr Operation
Gardner Denver Machine	305 N. State Fair Blvd. Sedalia, MO 65301	Central	NA	Not SIU; Not CIU Closed system, No discharge	7/18/2025	333912	8 Air Compressors / 90 Blowers	0gpd	15,000	N/A
Missouri Pressed Metals	1200 E Boonville St. Sedalia, MO 65301	SE	NA	Not SIU; Not CIU No discharge of process wastewater.	7/17/2025	332999	Bushings, bearings & structural parts	0.06gpd	396gpd	N/A
Owens Corning Group	2700 W. 16th Sedalia, MO 65301	Central	NA	Not SIU; Not CIU	7/17/2025	32721	Cellulated Glass Insulation- 27,897lbs	1,100gpd	20,480gpd	Mold Coating
Quality Rubber	415 Metallic Rd. Sedalia, MO 65301	Central	NA	Not SIU; Not CIU	7/17/2025	30 sub D	Latex Rubber pads/sponges-150lbs	190gpd	3,513gpd	Boiler / Autoclave condensation
Sedalia Tool & Mfg	1400 Sedalia Rd. Sedalia, MO 65301		NA	Not SIU; Not CIU	NA	33271	Various metal parts for local manufacturing- 200parts	0gpd	154gpd	N/A
Wire Co WorldGroup	24150 Oak Grove Ln. Sedalia, MO 65301	Central	NA	Not SIU; Not CIU	7/17/2025		Wire rope; some plastic coated	0gpd		N/A

Appendix C. Current Effective NPDES Permit [MO 780-2954 3.3]
(Available upon request)

Appendix D. Previous Detailed Technical Local Limit Evaluation [MO 780-2954 3.2]

Local Limits Reevaluation Report

City of Sedalia Wastewater Treatment Plants

Prepared for
City of Sedalia

August 2020



Local Limits Reevaluation Report

City of Sedalia Wastewater Treatment Plants

Prepared for
City of Sedalia

August 2020

Local Limits Reevaluation Report
City of Sedalia Wastewater Treatment Plants
August 2020

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Certifications

I hereby certify that this report was prepared by me or under my direct supervision and that I am a duly licensed Professional Engineer under the laws of the State of Missouri.



Allison L. Pearson
PE #: 2014016993

August 20, 2020

Date

Abbreviations

AHL	Allowable headworks loading
BOD ₅	Biochemical oxygen demand, 5-day
City	City of Sedalia
EPA	U.S. Environmental Protection Agency
FOG	Fat, oil, and grease
MAHL	Maximum allowable headworks loading
MAIL	Maximum allowable industrial loading
MDNR	Missouri Department of Natural Resources
MGD	Million gallons per day
MSOP	Missouri State Operating Permit
NPDES	National Pollutant Discharge Elimination System
POC	Pollutant of concern
POTW	Publicly owned treatment works
SIU	Significant industrial user
TSS	Total suspended solids
WQC	Water quality criteria
WWTP	Wastewater treatment plant

1 Introduction

The City of Sedalia (City) contracted with Barr Engineering Co. (Barr) to review the City's industrial pretreatment program, which is established in accordance with the National Pretreatment Standard (40 CFR Part 403). Review of the pretreatment program included a reevaluation of existing local limits established for all significant industrial users (SIUs) defined in 40 CFR 403.3(v) that discharge into the City's three wastewater treatment plants (WWTPs):

- Sedalia Central WWTP, National Pollutant Discharge Elimination System (NPDES) Missouri State Operating Permit (MSOP) No. MO-0023019;
- Sedalia North WWTP, MSOP No. MO-0023027; and
- Sedalia Southeast WWTP, MSOP No. MO-010567.

The City conducted an evaluation of "the need to revise local limits under 40 CFR 403.5(c)(1)" to meet the requirements of 40 CFR 122.44(j)(2)(ii) and the WWTPs' MSOPs and determined that a reevaluation of local limits is necessary. The City submitted this determination to the Missouri Department of Natural Resources (MDNR) Pretreatment Coordinator on September 27, 2019, which outlined the following preliminary recommendations:

- Evaluate the following at each WWTP to determine if local limits for parameters need to be revised:
 - Central WWTP: cadmium and zinc;
 - North WWTP: cadmium and zinc; and
 - Southeast WWTP: cadmium, copper, lead, and zinc.
- Continue to collect routine influent samples for POCs that have local limits, including metals, and oil and grease, to increase statistical accuracy for future headworks loading and local limits evaluations. Barr recommends this data be collected on an annual basis, at a minimum.
- Revise local limits for applicable parameters in the event that continued sampling indicates ongoing loadings above EPA recommended thresholds.

The purpose of this report is to document the reevaluation of the City's local limits in accordance with the US Environmental Protection Agency's (EPA) Guidance Document EPA 833-R04-002A, *Local Limits Development Guidance* (reference (1)), herein referred to as the EPA Guidance document. This report is organized into the following sections:

- Section 2: Pollutants of Concern (POC);
- Section 3: Local Limits Development Data Utilized;

- Section 4: Local Limits Evaluation Methods;
- Section 5: Local Limits Designation and Implementation;
- Section 6: Local Limits Reevaluations;
- Section 7: Evaluation Results;
- Section 8: Conclusions and Recommendations; and
- Section 9: References.

The contents of this report may serve as a guidance document for City personnel; however, the actual process by which local limits are developed or permit effluent limits are reevaluated may vary based on the specifics of each individual future situation.

1.1 Statutory Authority

Authority of a publicly owned treatment works (POTW) to create and implement local pretreatment standards for non-domestic users is granted by 40 CFR Part 403. The nonconventional pollutants and toxics found in many industrial discharges may be detrimental to the collection system and impact the efficiency or effectiveness of treatment at the POTW. The two primary concerns associated with POTWs receiving industrial waste, as defined by 40 CFR 403.3 (k) and (p), are interference and pass through. In general, interference is any discharge that alone, or combined with other discharges, negatively impacts the operation or treatment processes of the POTW or its sludge treatment, use, or disposal. Pass through is any discharge to the POTW that alone, or combined with other discharges, exits the POTW to waters of the United States causing a violation of the POTW's effluent limitations. A common example of interference or pass through at a POTW is a slug load of conventional pollutants, such as 5-day biochemical oxygen demand (BOD₅), total suspended solids (TSS), pH, or oil and grease that inhibits the operation of POTW equipment or causes a violation of effluent limitations.

The national pretreatment program, a component of EPA's NPDES program, established three types of standards that apply to different groups of industrial users. The three types of pretreatment standards – prohibited discharges, categorical standards, and local limits – are described in the following subsections. The City enforces each type of standard through its pretreatment program.

1.1.1 Prohibited Discharges

Prohibited discharges apply universally to all industrial users and are broken down further into general and specific prohibitions. General prohibitions prevent an industrial user from discharging any substance that may cause pass through or interference at the receiving POTW. Specific prohibitions include eight discharge categories that are forbidden for industrial users. The eight categories include any pollutants which may create the risk of fire or explosion; cause structural damage through corrosion; create flow obstructions; inhibit biological activity with excessive heat; contain oils that may cause pass through or interference; create toxic vapors, gases, or fumes; are hauled to an undesignated discharge point within the collection system or POTW; or are discharged at excessive rates of flow or excessive concentrations.

1.1.2 Categorical Standards

EPA has designated categories of industrial users subject to specific pretreatment standards as outlined in 40 CFR 405 – 471. These industrial users are subject to specific discharge limitations to POTWs for various toxic and nonconventional pollutants. Categorical effluent limitations are performance-based and not necessarily protective of water quality or the assets of a POTW.

1.1.3 Local Limits

Local limits may be established by POTWs to enforce permit limits needed to address site-specific issues or issues not adequately covered by prohibited discharges or categorical standards (e.g., water quality or asset protection). In addition, local limits may be developed to enforce applicable state or local regulations. This report will review the existing SIUs that discharge to the WWTPs and outline in detail the process by which local limits are developed and implemented. Local limits should be developed before a discharge causes pass through or interference; however, existing limits may be reevaluated following operational issues or periods of noncompliance.

1.2 WWTP Descriptions and Existing Local Limits

The City's three WWTPs, which include the Central, North, and Southeast WWTPs, primarily treat domestic wastewater, but also receive wastewater from commercial facilities, industrial sources, and hauled sources, as well as limited amounts of stormwater. Sludge, or biosolids, from the WWTPs is sent to the City's composting facility and distributed for general public use. It is of significance to note the City will soon be initiating a Comprehensive Wastewater and Water Master Plan (Master Plan) that will include an evaluation of the existing WWTPs and recommendations for the operational structure of the WWTPs to meet 10-, 20-, and 30- year future needs for wastewater treatment across the City. The City anticipates that the development of the Master Plan will take place over the next two to three years and that projects at the WWTPs could commence as early as 2021. Projects that commenced in 2020 total approximately \$4.5 million in services, and include rehabilitation of the Central Regional Lift Station, rehabilitation of Thompson Meadows North, rehabilitation of 3000 W. Main Street Lift Station, and rehabilitation and engineering of the Central WWTP for capacity design.

In addition, North WWTP and Southeast WWTP are currently subject to interim effluent limitations for total recoverable copper. Final effluent limitations for total recoverable copper will become effective April 1, 2024. The use of a metals translator study is planned to more accurately define the partitioning of particulate and dissolved copper in the receiving water bodies. The ultimate goal of the study is to develop a metals translator for copper that will be used to recalculate the copper effluent limitation of the North and Southeast WWTP MSOPs in accordance with USEPA metals translator guidance titled, *The Metals Translator: Guidance for Calculating a Total Recoverable Permit Limit from a Dissolved Criterion*. The results of the study will be incorporated into MSOP renewal materials.

The following subsections include facility-specific information for each of the WWTPs.

1.2.1 Central WWTP

The Central WWTP, located at 2900 West Main, operates under MSOP No. MO-0023019. It has a design flow of 3.03 million gallons per day (MGD). Effluent from the facility is discharged to Brushy Creek through Outfall 001.

1.2.2 North WWTP

The North WWTP, located at 23985 Georgetown Road, operates under MSOP No. MO-0023027. It has a design flow of 2.5 MGD. Effluent from the facility is discharged to the Pearl River (formerly known as Sewer Branch) through Outfall 001.

1.2.3 Southeast WWTP

The Southeast WWTP, located at 26999 Goodwill Chapel Road, operates under MSOP No. MO-010567. The Southeast WWTP and has a design flow of 2.6 MGD. Effluent from the facility is discharged to Breakfast Branch through Outfall 001.

1.2.4 Existing Local Limits

Table 1 presents the City's existing local limits, which were approved on June 2, 2014.

Table 1 City of Sedalia Existing Local Limits

Pollutant	Central WWTP Limit (lb/day)	North WWTP Limit (lb/day)	Southeast WWTP Limit (lb/day)
Arsenic	0.177	0.122	0.059
Cadmium	0.021	0.069	0.02
Chromium III (total)	2.753	2.822	2.314
Copper	0.829	2.355	0.558
Cyanide	0.187	0.127	0.136
Lead	0.358	0.672	0.237
Mercury	0.020	0.074	0.022
Molybdenum	2.00	2.44	2.16
Nickel	1.142	0.577	0.564
Selenium	0.100	0.361	0.002
Silver	0.299	0.412	0.297
Zinc	3.259	4.063	2.435
Total toxic organics (TTO)	2.13 mg/L	2.13 mg/L	2.13 mg/L
BOD ₅	300 mg/L	300 mg/L	300 mg/L
TSS	350 mg/L	350 mg/L	350 mg/L

2 Pollutants of Concern (POC)

The first step of developing or reevaluating local limits is to identify POC that may be associated with a POTW or its industrial users. The following sections identify the evaluation criteria used to identify POC for the City's WWTPs. Section 2.3 identifies the POC selected for the local limits evaluation.

2.1 National POC

At a minimum, the set of 15 national POC identified by EPA must be considered in the evaluation. The national POC are as follows: arsenic, cadmium, chromium, copper, cyanide, lead, mercury, nickel, silver, zinc, molybdenum, selenium, BOD₅, TSS, and ammonia (only for those that accept non-domestic sources of ammonia).

2.2 Potential POC

In addition to the national POC, priority pollutants may be considered, more specifically, organic priority pollutants. The full list of EPA priority pollutants can be found in Appendix A of 40 CFR 423. It is important to note that regulatory changes may result in pollutants that were not previously a concern becoming a POC. Staying aware of these regulatory changes and how they may impact POC is essential. Finally, there are common sources of POC associated with POTWs that should be considered. Applicable sources are outlined in further detail in this section.

2.2.1 Sludge Quality Standards

Sludge standards for use or disposal of sewage sludge are established in 40 CFR Part 503, which include pollutant limits for metals for land application, surface disposal, and incineration. The City's WWTPs dispose of sludge through compost for public distribution; therefore, the pollutants outlined in 40 CFR Part 503.13 are applicable for POC determinations. Applicable standards for land application of sludge are also included in MDNR's *Standard Conditions for NPDES Permits, Part III – Biosolids and Sludge from Domestic Treatment Facilities* (reference (2)).

2.2.2 Prohibitions to Protect Collection System and Plant Operation

Pollutants that have historically caused, or could potentially cause, collection system disruptions or inhibition at the POTW should be assessed to be potential POC. An example of one such pollutant is oil and grease. The City's WWTPs did not experience any pass through or interference events between 2015 and July 2020.

2.2.3 POC Based on Available Plant Data

POC can be identified through review of historical sampling records at a POTW. The City's WWTPs keep monthly records of influent and effluent concentrations in accordance with their respective MSOP. Additional data, such as annual sludge reports or influent metals sampling, may also be reviewed for POC determinations.

2.2.4 POC from Commercial or Industrial Discharges

Reviewing available discharge data from SIUs permitted by the City is another important method for identifying potential POC. Periodic monitoring reports as required by the SIUs' Industrial User Permits from the City often contain the data needed for monitoring of existing local limits. However, the development of new local limits may require additional data not provided in the periodic monitoring reports. Staying informed of major manufacturing or production changes at the facility will help the City identify POC that may require new or reevaluated local limits before an instance of pass through or inhibition occurs. Currently, there are six SIUs permitted by the City for discharge to the City's WWTPs:

- Central WWP:
 - Maxon Wheels – Sedalia, LLC (formerly Hayes Lemmerz International, Inc) (SIC 5013) – wastewater from automotive wheel (steel) manufacturing.
 - Waste Corporation of Missouri, Inc. Central Missouri Landfill (WCA) (SIC 4953) – leachate discharge from solid waste landfill.
 - *Note: The City is currently in the process of permitting Jostens Inc. / Print Lynx (SIC 2752), a digital printing and publishing facility.*
- North WWTP:
 - Nucor Steel Sedalia, LLC (SIC 3312) – wastewater from scrap metal recycling using electric arc furnace (EAF), continuous casting, and rolling mill technologies.
 - Sierra Bullets, LLC (SIC 3482 and 3351) – wastewater from mechanical press forming of small arms projectiles using copper and lead.
 - Stanley Black and Decker, Inc. (formerly Waterloo Industries, Inc.) (SIC 3469) – wastewater from metal container manufacturing.
 - *Note: The City is currently in the process of permitting Lyne Plastics, LLC (SIC 4953), a plastics separation facility and MPW Industrial Water, an ion exchange resin regeneration facility.*
- Southeast WWTP:
 - Inter-state Studio and Publishing Co. (SIC 2741) – wastewater from photography, digital printing, and publishing.

2.2.5 Hauled Waste

The Central WWTP is the only WWTP in Sedalia that accepts hauled waste. Hauled waste accepted at the Central WWTP includes pumped waste from septic tanks and portable toilets. Pumped waste may contain many of the same pollutants as domestic waste, but often at higher concentrations. Domestic pumped wastes tend to have higher concentrations of heavy metals and solids. Additionally, pumped waste from

domestic sources may contain grease trap cleaning waste, which can have low pH values and cause clogging, damage, or inefficient operation of the POTW. Pumped wastes from portable toilets can also include chemicals used for disinfection, antibacterial, or deodorizing purposes.

2.3 Selection of POC for Local Limits Sampling and Development

Once POC have been identified, the determination of which POC require sampling or local limits development may be based on, but is not limited to, three primary criteria:

- The pollutant is considered a national POC (Section 2.1).
- The pollutant has an applicable local or state regulatory limit, MSOP limit, or sludge disposal limit (40 CFR 503).
- The pollutant is historically known or suspected to cause operational problems at a POTW, such as inhibition, interference, or pass through.

Table 2 summarizes the POC identified for further evaluation at each of the City's WWTPs.

Table 2 POC Selected for Sedalia's WWTPs

Parameter	Central WWTP	North WWTP	Southeast WWTP
Arsenic, total	X	X	X
Cadmium, total	X	X	X
Chromium III (total)	X	X	X
Copper, total	X	X	X
Cyanide	X	X	X
Lead, Total	X	X	X
Molybdenum, total	X	X	X
Nickel, total	X	X	X
Selenium, total	X	X	X
Silver, total	X	X	X
Zinc, total	X	X	X
Aluminum, total	--	X	--
Antimony, total	X	X	--
Ammonia	X	X	X
BOD ₅	X	X	X
Boron, total	X	--	--
Chloride	X	--	--
Chlorine, total residual	--	X	--
Chromium VI, dissolved	--	X	--
Fluoride	X	X	--
Iron, total	--	X	--
Nitrate	X	X	X
Nitrite	X	X	X
Oil and grease	X	X	X
Phenols, total	--	X	--
Phosphorus	X	X	X
Sulfate	X	X	--
Total Kjeldahl Nitrogen (TKN)	X	X	X
TSS	X	X	X

3 Local Limits Development Data Utilized

The following sections outline the sampling and analytical recommendations provided in the EPA Guidance document for a local limits evaluation. The data utilized for this report includes routine effluent data and sludge data collected at the WWTP in accordance with the MSOP, and influent and effluent data analyzed for the POC identified in Table 2. Barr and the City developed a Sampling and Analysis Plan (SAP) to guide the POC sampling and analysis conducted at each WWTP in July 2020 for this report. The SAP is included in Appendix A.

3.1 Sampling Parameters

One of the most important data needs for calculation and evaluation of local limits is accurate flow data for the headworks of the WWTPs and discharges from SIUs. Flow data at the headworks of the WWTPs is recorded regularly. Flows are reported as daily averages in monthly WWTP reports; however, if needed, flow data is available in smaller increments. Contributions from hauled waste at the headworks can be estimated from WWTP records or literature values. Flow data for each SIU is included on the monitoring reports required by the Industrial User Permit issued from the WWTP. Using flow data collected, the domestic flows can be calculated as follows:

$$\text{Estimated Domestic Flow} = \text{Headworks Flow} - \text{Hauled Waste Flows} - \text{SIU Flows}$$

Laboratory sampling parameters for the evaluation of local limits will include the POC identified in Section 2.3 of this report.

3.2 Sampling Locations

EPA recommends three primary sample types be collected from a WWTP: influent, effluent, and sludge. Samples collected from the headworks should not be collected within 72 hours of a rain event producing 0.1 inch of rain or more. Effluent samples should be collected from the permitted outfall assigned by the WWTP's MSOP. Effluent samples are essential to identifying potential operational problems and for calculating site-specific removal efficiencies. Sludge sampling is required for the annual domestic sludge reporting through the MDNR. In general, sampling required by MDNR should be sufficient for local limit calculations and evaluations; however, additional sampling may be needed at the discretion of POTW personnel.

In some instances, sampling of isolated points in the collection system, representative of domestic loadings may be necessary. Appendix V of *Local Limits Development Guidance Appendices* (reference (3)), hereafter referred to as the EPA Guidance document appendices, may be used for POC for which there is no domestic analysis data.

Finally, sampling of discharge points from SIUs should be completed. Periodic monitoring reports from the SIUs contain sampling data from the discharge point of the facility; however, sampling may be conducted at the connection point of the SIU to the City sewer system should additional sampling be

needed, at the discretion of City personnel. If necessary, a different downstream sampling point may be selected, provided there is no mixing or dilution from other sewer flows.

For the purpose of this evaluation, influent and effluent samples were collected at each WWTP's headworks and permitted outfall location, respectively, for the POC discussed in Section 2.3 of this report.

3.3 Sampling Frequency

During the initial stages of developing or analyzing a POC for a local limit, sampling is recommended to be done more frequently. EPA recommends that when initial determinations of the need for local limits are being made, such as when first opening a new POTW or making significant changes to POTW treatment processes or design, organic priority pollutants should be sampled for one to two days from the WWTP influent, WWTP effluent, and in-system sewer sample. In addition, WWTP sludge should be sampled for one day. EPA recommends sampling for national POC and POC of specific concern to a POTW for seven to fourteen days from the WWTP influent and effluent, seven days from the in-system sewer sample, and two days from the WWTP sludge. Finally, EPA recommends sampling WWTP sludge for two days to establish percent solids (PS) and for one day for Toxicity Characteristic Leaching Procedure (TCLP) pollutants. More detail can be found in Section 4.3.1 of the EPA Guidance document.

Once the initial development or evaluation phase of local limits is completed, EPA makes recommendations for ongoing sampling in the EPA Guidance document. It is recommended that, at a minimum, a full sampling suite be collected and analyzed once each year. It is recommended that this sample include parameters that already have a local limit, parameters that have a maximum allowable headworks load (MAHL) but not a local limit, the national POC, organic priority pollutants, and sludge parameters (40 CFR 503.8). In addition, EPA also recommends that sampling for pollutants with an existing local limit be completed every three months and sludge sampling be completed every six months. With the exception of sampling required by regulatory agencies or permits, such as the NPDES permit, all other sampling activities are at the discretion of WWTP personnel.

In addition to the routine influent, effluent, and sludge data collected in accordance with each WWTP's MSOP, five influent samples were taken at each WWTP in August 2019 to determine the need to reevaluate the WWTPs' local limits. Following this determination, three influent and three effluent samples were taken at each WWTP in July 2020 to ensure adequate sample data was available for the POC identified in Section 2.3 of this report.

3.4 Sampling Types

There are four primary sample types that are collected for local limit evaluations: grab, composite, flow-weighted, and solids. Grab samples are those collected typically manually, over short time intervals, independently of current flow rates. According to EPA guidance, grab sampling is most appropriate for pH, cyanide, volatile organic compounds (VOCs), total phenols, oil and grease, total petroleum hydrocarbons, sulfide, flashpoint, and temperature.

When grab sampling is not appropriate, composite or flow-weighted samples should be collected. Both typically are done with automatic samplers. Composite samples are collected in equal volumes at a set sampling interval. Composite samples are most desirable for plants with uniform flows. For variable flows, flow-weighted samples are preferred. Flow-weighted sampling is similar to composite sampling except that rather than collect samples on a set time interval, samples are collected after passage of a set volume through the sample point.

Sludge sampling must be done in compliance with 40 CFR 503.8. This means samples of the plant sludge should be taken from various locations of the sludge and combined into a single sample. By compositing the sludge samples, it ensures that a representative sample is collected.

The data utilized for this report was collected using grab, composite, and solids methods. For reference, the SAP (Appendix A) includes sampling types for the POC identified for this study.

3.5 Laboratory Analysis Methods

Data utilized for this report was analyzed using the appropriate 40 CFR 136 and 40 CFR 503.8 laboratory analytical methods.

All wastewater laboratory analysis must be performed in accordance with 40 CFR 136. Sampling for the development of categorical limits is also performed in accordance with 40 CFR 136. By using the same methods for sampling and analysis, it ensures that the calculated local limits will be directly comparable to the categorical limits. In the instance that sampling and analysis methods are not included in 40 CFR 136 for a POC, it is up to the discretion of City personnel to determine what the most appropriate sampling and analysis method would be. Items that may be taken into consideration include the minimum detection level for the pollutant, expected concentrations of POC, and, if applicable, the ratio of total to dissolved POC.

All laboratory analysis of sludge must be performed in accordance with 40 CFR 503.8.

3.6 Data Management

Upon receipt of laboratory reports, a quality assurance/quality control (QA/QC) review is recommended. Completing a QA/QC review can identify errors made by the laboratory during sample preparation or analysis and can also help to identify deviation from the approved sampling methods by samplers. The SAP (Appendix A) identifies QA/QC procedures for the sampling conducted for this report.

4 Local Limits Evaluation Methods

This report uses the EPA's Region 7 Local Limits Calculator spreadsheet (R7 Spreadsheet) to evaluate the need for new or revised local limits. The R7 Spreadsheet assists a POTW's evaluation of the need for local limits or reevaluation of existing local limits using a MAHL and maximum allowable industrial loading (MAIL) approach. The following sections describe the MAHL and MAIL methodologies recommended by EPA and used in the R7 Spreadsheet. Section 7 of this report includes the results of the R7 Spreadsheet calculations.

4.1 MAHL Calculations

The MAHL for each POC is the most conservative of the allowable headworks loadings (AHL) calculated for a POTW. AHLs identify the loading allowable at the headworks of the POTW that can still be treatable to meet permitted effluent limits, sludge land application concentrations, and to not exceed inhibition concentrations. The AHL calculations used for the City's WWTPs in the R7 Spreadsheets (Appendix B Appendix C, and Appendix D) consider effluent criteria, such as MSOP permit limits and Missouri water quality criteria, inhibition concentrations for sludge treatment, and sludge loading-based concentrations. Additional AHLs described in Sections 4.1.2.4 and 4.1.2.5 include asset protection-based AHLs and air quality-based AHLs. While not used in the current calculations, they may be used in the future, if applicable to the City's WWTPs.

4.1.1 Removal Efficiency Calculations

AHL calculations use POC removal efficiencies to determine the acceptable loadings at a POTW's headworks. EPA recommends site-specific removal efficiencies be calculated for a POC when sufficient data is available. In instances when there is not sufficient data, literature-based values or values specific to the WWTP design may be used. However, these values are not necessarily reflective of the actual operation of the WWTP. There are a number of removal efficiency calculation methodologies outlined in the EPA Guidance document, the suitability of which are determined by the amount and type of data available for analysis. In general, the most flexible of the calculation methods is the mean removal efficiency, which is found by averaging data sets for influent and effluent concentrations over the same time frame. The following equation can then be used to calculate removal efficiency.

$$\text{Removal Efficiency (\%)} = \frac{\text{Avg Influent Conc.} - \text{Avg Effluent Conc.}}{\text{Avg Influent Conc.}}$$

4.1.2 Allowable Headworks Loading (AHL) Calculations

AHLs should be calculated for multiple criteria as appropriate for each WWTP. While the criteria selected may need to be reconsidered to reflect changes to the system or local industrial users, the following criteria have been evaluated for potential AHL calculations for the City's WWTPs.

4.1.2.1 Effluent Limit-Based AHL

AHLs based on the effluent limitations in the MSOPs should always be considered. The effluent limit-based AHL demonstrates what concentrations of pollutants at the headworks can be effectively treated or removed by the WWTP in order to meet the permitted effluent limitations.

In instances where a POC does not have a permitted effluent limitation in the MSOP, the R7 Spreadsheet uses the chronic water quality criteria (WQC) of the WWTP's receiving water to calculate the effluent limit-based AHL. When a chronic WQC is not available for a parameter, a calculated average monthly limit (AML) value is substituted as the chronic WQC. The AML is found by first determining the wasteload allocation (WLA) for chronic and acute circumstances. The WLA is essentially a mass balance calculation using the acute or chronic aquatic life protection criteria as established in 10 CSR 20-7.031. The WLA calculations account for the concentration of the pollutant in the receiving stream upstream of the discharge, the flow of the receiving stream, the concentration of the POC in the effluent, and the effluent flow. Using a designated multiplier, the WLA can be used to calculate a long-term average (LTA) for both chronic and acute conditions. The most protective LTA (acute vs. chronic) is then used to calculate the AML. The calculation of an AML is not intended to substitute for an existing or future effluent limitation established in the MSOP, nor is it intended to suggest the POC requires an effluent limitation if one does not currently exist. Calculating an AML is only a means to apply an additional level of scrutiny to POC that do not have permitted effluent limits, when applicable. By considering all appropriate AHLs, it can better ensure the most conservative value is selected and the subsequently developed local limit is protective of the WWTP and the receiving water body.

Using the permitted limits or the calculated AML, the plant removal efficiencies, and the plant influent flow data, the AHL can be calculated using the following equation.

$$AHL_{Effluent} \left(\frac{lb}{day} \right) = \frac{8.3454 * Effluent\ Limit\ or\ WQC \left(\frac{mg}{L} \right) * Plant\ Influent\ Flow\ (MGD)}{1 - \frac{Plant\ Removal\ Efficiency\ (\%)}{100}}$$

4.1.2.2 Inhibition-Based AHL

Some POC may interfere with the biological process in secondary treatment at a POTW when present above certain concentrations. Generally, the interference with biological processes at a POTW is referred to as inhibition, and the concentration at which biological treatment processes are impeded is called the inhibition concentration. The inhibition-based AHL demonstrates the allowable loading of pollutants that would not exceed the inhibition concentration at the headworks. Literature-based inhibition concentrations are available for certain pollutants; however, it is possible to develop site-specific inhibition concentrations that would more accurately reflect the conditions at a POTW. Inhibition concentrations for selected POC are available as Appendix G of the EPA Guidance document appendices. Table 3 presents secondary treatment inhibition categories from Appendix G of the EPA Guidance document appendices used for each WWTP's inhibition AHL calculations.

Table 3 Secondary Treatment Inhibition Categories

Facility	Secondary Treatment Inhibition Category ¹
Central WWTP	Activated sludge
North WWTP	Trickling filter
Southeast WWTP	Activated sludge

Note:

1. The anaerobic digesters at the Central and North WWTPs were decommissioned in 2015.

The following equation illustrates the calculation of an inhibition-based AHL. The equation may be modified to include the plant removal rate between primary and secondary treatment.

$$AHL_{Inhibition} \left(\frac{lb}{day} \right) = \frac{8.3454 * Inhibition\ Conc. \left(\frac{mg}{L} \right) * Plant\ Influent\ Flow\ (MGD)}{Plant\ Removal\ Efficiency\ (\%)}$$

4.1.2.3 Sludge Loading-Based AHL

Sludge from the WWTPs is dried and sent to the City’s composting site and distributed to the general public. Per the WWTP’s MSOPs, general public use means, “compost is for crops and vegetation including use in residential areas, public use areas and for horticulture, silviculture and agricultural uses.” The City’s compost is monitored as described in 40 CFR CFR 503 and MDNR *Standard Conditions for NPDES Permits, Part III – Biosolids and Sludge from Domestic Treatment Facilities* (reference (2)), which includes metal pollutant limits for biosolids. Consideration of metal limits in 40 CFR 503 and reference (2) ensures that industrial discharges will not impact the disposal of WWTP sludge through compost distribution.

The sludge loading-based AHL can be calculated using the following equation from Appendix T of the EPA Guidance document appendices, where the sludge flow rate (Q_{Sludge}) for each WWTP is equal to the total sludge flow for disposal (i.e., sent to the City’s compost facility), in dry metric tons per day. Q_{Sludge} for each WWTP is estimated from the total amount of sludge and number of sludge loads sent to the City’s compost facility each year.

$$AHL_{Sludge} \left(\frac{lb}{day} \right) = \frac{40\ CFR\ 503.13\ or\ Std.\ Cond.\ Part\ III\ Limit \left(\frac{mg}{kg} \right) * Q_{Sludge} * 0.0022}{Plant\ Removal\ Efficiency\ (\%)}$$

4.1.2.4 Asset Protection-Based AHL

To prevent physical damage to a POTW, asset protection concentrations may be identified as needed. The asset protection concentration should represent the minimum concentration of the pollutant at the headworks that can be observed to cause conditions that are likely to cause damage to a POTW’s equipment immediately or over time. Identifying these concentrations is based on the best judgment and observations of POTW personnel. The following equation outlines how the AHL can be calculated, if needed, in the future.

$$AHL_{Asset} \left(\frac{lb}{day} \right) = 8.3454 * Asset\ Protection\ Conc. \left(\frac{mg}{L} \right) * Plant\ Influent\ Flow\ (MGD)$$

There are currently no POC that require an asset protection-based AHL for the WWTPs; therefore, asset protection-based AHLs were not included in this review.

4.1.2.5 Air Quality-Based AHLs

Air quality-based AHLs are only applicable for a POTW that has been regulated as an air pollution source. An air quality-based AHL is calculated using the permitted air emission standards. The City's WWTPs are not currently permitted as air emission sources; therefore, air quality-based AHLs are not applicable to this evaluation and were not included in this review.

4.1.2.6 AHL Special Considerations

While most AHLs can be determined using the calculations outlined in Section 4.1, there are a few pollutants that may require additional consideration, including conventional pollutants such as BOD₅, TSS, and ammonia. To ensure that a POTW meets their permitted effluent limits for these pollutants, EPA recommends the original design capacities for treatment be used to determine the AHL. The EPA Guidance document also suggests that peak loading conditions be considered to ensure that the local limit will be protective during periods of high flow. The R7 Spreadsheets (Appendix B, Appendix C, and Appendix D) include design-based AHLs for BOD₅, TSS, and ammonia.

4.2 MAHL Determination

Once applicable AHLs are calculated, the MAHL is found to be the lowest calculated AHL for each pollutant, which ensures that the most conservative or protective value is used and considers the impacts of each individual pollutant. Once the MAHL has been identified, a factor of safety of ten percent is applied to the MAHL to provide a margin for unaccounted for factors, as recommended in Section 6.2.3 of the EPA Guidance document. Higher safety factors may be beneficial in situations with fewer sampling events, greater chances for slug loadings, or a history of compliance problems.

4.3 MAIL Calculations

Once the MAHL has been calculated, the presumed local limit for industrial users can be calculated based on the MAIL. The MAIL is the portion of the MAHL available to a POTW's industrial users and represents the maximum loading at the WWTP that can be allocated to industrial users while still ensuring compliance with the AHL criteria used for each POC. The MAIL is calculated as the MAHL less the loadings associated with domestic waste and any other waste sources not controlled by permit effluent limits.

To determine the MAIL, all sources of uncontrolled wastes, which are wastes not controlled by permit effluent limits, should be determined. Typical sources of uncontrolled wastes include domestic and commercial wastewater. Systems with significant contributions from infiltration or stormwater may consider such contributions as uncontrolled sources. Site-specific uncontrolled source loadings can be found by sampling at a point in the sewer system that has no industrial waste sources. Another method is to subtract the known contribution by industrial users of a pollutant from the influent concentration at the

headworks of the WWTP. For the purpose of this report, the following methods were used with respect to uncontrolled waste:

- Domestic concentrations from the EPA Guidance document appendices (Appendix V) were used, except in situations where EPA's values were higher than the WWTPs' total influent concentration; the domestic concentrations were set to the influent concentrations in this situation.
- Hauled waste contributions, accepted only at the Central WWTP, were assumed to be negligible.

The calculated MAIL in the R7 Spreadsheets presents a presumed uniform local limit for all industrial users. This MAIL value is compared to the existing local limits (Table 1). In the case where the MAIL is less than the existing local limit, a revised local limit may be considered for that POC. The implementation of local limits is discussed further in Section 5.

5 Local Limits Designation and Implementation

The following subsections outline the process used to evaluate local limits and implementation. Designation and implementation of local limits, as discussed in the EPA Guidance document, is to be performed at the discretion of the City.

5.1 Determining the Need for New or Revised Local Limits

The need for a new or revised local limit can be determined in a few ways. The first, and least desirable way, is to create or revise a local limit after observing operational problems or difficulty meeting effluent limitations at a POTW. This is the least desirable way of determining if a new or revised local limit is needed as it does not take a proactive approach, but instead relies on observing a problem before a solution is implemented.

The most desirable method of determining the need for a new or revised local limit is to first identify the applicable POC for a POTW and calculate all applicable MAHL/MAIL for the POC. Once the MAHL/MAIL have been determined, the MAIL is compared to the existing local limits and the MAHL is compared to actual industrial loading received at a POTW. For this study, revisions to local limits may be considered when the existing local limit exceeds the calculated MAIL. For POC without existing local limits, this study considers the following EPA guidance, which recommends that a POTW implement a local limit when (reference (3)):

- The average influent loading is above 60 percent of the MAHL;
- The maximum daily loading is greater than 80 percent of the MAHL any time during a 12-month period; or
- The average daily loading for any of the conventional pollutants (BOD₅, TSS, ammonia, and phosphorus) reaches 80 percent of the POTW's design capacity during any one month of the year.

Local limit recommendations are considered on a pollutant-by-pollutant basis to account for various loading sources and WWTP-specific characteristics. Section 7 includes the results of the MAHL/MAIL evaluations.

For pollutants where local limits are not existing or recommended, effluent limits of a SIU's permit should be based upon categorical standards, where applicable. As indicated in Section 2.2.4, there are six SIUs that discharge treated industrial wastewater to the City's WWTPs; of these six SIUs, five SIUs are subject to the following categorical pretreatment standards:

- Central WWP:
 - Maxon Wheels – Sedalia, LLC (SIC 5013) – 40 CFR 133
 - WCA (SIC 4953) – 40 CFR 445
- North WWTP:

-
- Nucor Steel Sedalia, LLC (SIC 3312) – 40 CFR 420
 - Sierra Bullets, LLC (SIC 3482 and 3351) – 40 CFR 468, 471
 - Stanley Black and Decker, Inc. (SIC 3469) – 40 CFR 133

5.2 MAIL Allocation and Implementation

Chapter 6 of the EPA Guidance document reviews the various methods for allocating calculated MAILs to SIUs and local limits implementation. These methods are up to the discretion of WWTP personnel and may depend on the individual pollutant (i.e., the selected method does not have to be used for every pollutant). Commonly used allocation methods include uniform MAIL allocation, flow proportionate MAIL allocation, and allocation on a case-by-case basis.

6 Local Limits Reevaluations

Once local limits have been developed for a POTW, reviews and reevaluations of the limits and their performance are essential. EPA recommends that facilities with a history of issues with inhibition or pass through perform an evaluation of the POTW, including the local limits, annually. EPA recommends that reviews include a comparison of plant influent data for loadings at the headworks to MAHLs that have been previously calculated. If the headworks loading is nearing or exceeds the MAHL, the value may need to be reevaluated or a new local limit may be needed. EPA recommends a reevaluation of local limits for toxics organics and metals when loadings near 60 percent of their MAHL and conventional pollutants and non-toxic organic when loadings near 80 percent of their MAHL. Other indicators to consider include significant increases in loading from prior years, which may indicate the need for a new or revised local limit, or instances where the loading is significantly below the MAHL, which may indicate that a local limit is too stringent and that more loading could be allocated to SIUs.

In addition to reviewing a POTW's influent data, EPA recommends a review of compliance history of the POTW and SIUs. Consistent issues with noncompliance may indicate the need for further evaluation or calculation of new or revised local limits.

In the event of significant changes such as an addition or loss of a SIU, changes to WQC of the POTW's receiving water body, or changes to MSOP permitted effluent limitations, personnel may elect to perform a more detailed review of the local limits. This may include collecting samples, analyzing data, and calculating new MAHLs. Depending on the results of the analysis, personnel may find it necessary to alter or implement new local limits.

Barr determined the need for a technical reevaluation of local limits for Sedalia's WWTPs due to the following:

- A headworks loading evaluation using the previously calculated MAHLs (reference (4)) indicated the following metals at each WWTP exceeded EPA's recommended 60% loading threshold:
 - Central WWTP: cadmium and zinc;
 - North WWTP: cadmium and zinc; and
 - Southeast WWTP: cadmium, copper, lead, and zinc.
- A new SIU (Nucor Steel Sedalia, LLC) began operations in late 2019.
- The MSOPs for each WWTP were reissued (effective April 1, 2019) since the previous local limits evaluation (reference (4)); the reissued MSOPs include monitoring requirements for nutrients (phosphorus, TKN, nitrate, and nitrite).
- Other than nutrients, additional new POC have been identified at each WWTP since the previous local limits evaluation, which include the following:

-
- Central WWTP:
 - Antimony, total
 - Chloride
 - Boron, total
 - Fluoride
 - Oil and grease
 - Sulfate
 - Chloride + sulfate
 - North WWTP:
 - Aluminum, total
 - Antimony, total
 - Chlorine, total residual
 - Chromium VI, dissolved
 - Fluoride
 - Iron, total
 - Oil and grease
 - Phenols, total
 - Sulfate
 - Southeast WWTP:
 - Oil and grease

7 Evaluation Results

The existing local limits were evaluated using data from the period of 2015 through July 2020. The following sections describe the calculation results using EPA's R7 Spreadsheet for each WWTP (Appendix B, Appendix C, and Appendix D), including the recalculated MAHLs (Section 7.1) and MAILs (Section 7.2).

7.1 MAHL Results

AHLs were calculated for each POC in the R7 Spreadsheets (Appendix B, Appendix C, and Appendix D) using three possible scenarios for non-conventional pollutants (effluent limitation-based, inhibition-based, and sludge loading-based) and the WWTP design loading for conventional pollutants (BOD₅, TSS, and ammonia). AHL calculations were performed using available WWTP data for influent concentration, effluent concentration, and removal efficiencies whenever possible (Table 4 through Table 6). Laboratory data was reviewed for quality, including consistency of reporting limits and the number of non-detectable results. In instances where reporting limits varied and a significant number of non-detectable samples were present, data selected for use was limited to the July 2020 sampling data to capture results at lower reporting limits.

Table 4 Central WWTP – POC Influent, Effluent, and Removal Efficiency Data

Parameter	Sample Size		Average Concentration (mg/L)		Removal Efficiency
	Influent	Effluent	Influent	Effluent	
Antimony	3	3	0.00433	0.00403	9.0%
Arsenic	3	3	0.00380	0.00290	23.7%
Boron	3	6	0.371	0.369	0.63%
Cadmium	3	3	0.00327	0.00007	79.0%
Chromium III (total)	3	3	0.04400	0.00218	95.0%
Copper	8	18	0.05013	0.00751	85.0%
Cyanide	3	3	<0.00367	<0.00367	69.0% ^[2]
Lead	3	3	0.010833	0.00217	80.0%
Mercury	3	3	0.000151	<0.00010	66.4%
Molybdenum	3	3	0.004550	0.00600	50.0% ^[1]
Nickel	3	3	0.05700	0.02333	59.1%
Selenium	3	3	0.00141	0.00109	22.9%
Silver	3	3	0.00044	0.00010	77.8%
Zinc	8	18	0.172	0.0421	75.4%
Ammonia, as NH ₃	258	269	22.2	0.42	98.1%
BOD ₅	64	412	160	4.21	97.4%

Chloride	3	3	296	288	2.7%
Fluoride	3	3	0.59	0.64	_[3]
Nitrate	4	4	0.13	3.53	Note 4
Nitrite	4	4	0.03	0.18	Note 4
Oil and grease	3	4	17.2	1.38	92.0%
Phosphorus	4	4	8.14	6.38	21.5%
Sulfate	3	3	43.0	52.1	_[3]
Chloride + Sulfate	3	3	339	340	_[3]
TKN	4	4	28.2	8.28	_[4]
Total Nitrogen	4	4	28.3	12.0	57.7%
TSS	249	406	280	6.30	97.8%

Notes:

1. Due to the combination of different laboratory reporting limits and the number of non-detectable results, the removal efficiency for molybdenum was set as the literature value in Appendix V of the EPA Guidance document appendices.
2. The literature value in Appendix V of the EPA Guidance document appendices was used for cyanide since all sample results were below the laboratory reporting limits.
3. A removal efficiency was not considered in the R7 calculations for fluoride, sulfate, and chloride + sulfate due to higher effluent concentrations than influent concentrations.
4. Total nitrogen, equal to the sum of TKN and nitrate-nitrite, was used in lieu of independent calculations for TKN, nitrate, and nitrite in the R7 calculations.

Table 5 North WWTP – POC Influent, Effluent, and Removal Efficiency Data

Parameter	Sample Size		Average Concentration (mg/L)		Sample Size
	Influent	Effluent	Influent	Effluent	
Aluminum	3	3	0.939	0.153	83.7%
Antimony	3	3	0.00257	0.00230	10.4%
Arsenic	3	3	0.00190	0.00167	12.3%
Cadmium	8	25	0.00140	0.00084	40.4%
Chromium III (total)	3	3	0.00467	0.00057	87.9%
Chromium VI	3	3	0.00423	0.00173	59.1%
Copper	3	3	0.08567	0.01237	85.6%
Cyanide	3	3	<0.00367	<0.00367	69.0% ^[2]
Iron	3	3	2.35	0.317	86.5%
Lead	3	3	0.01833	0.00573	68.7%
Mercury	3	3	0.00015	<0.00010	67.0%
Molybdenum	3	3	0.0355	0.0365	50.0% ^[1]
Nickel	8	4	0.02125	0.00428	79.9%

Selenium	3	3	0.00687	0.00129	81.2%
Silver	3	3	0.00060	0.00058	75.0% ^[1]
Zinc	3	3	0.181	0.0260	85.7%
Ammonia, as NH ₃	258	280	18.7	1.30	93.0%
BOD ₅	60	256	366	10.5	97.1%
Chlorine, Total Residual	3	3	0.018	0.056	.. ^[3]
Fluoride	3	3	0.387	0.450	.. ^[3]
Nitrate	3	3	0.354	8.91	.. ^[4]
Nitrite	3	3	0.024	0.250	.. ^[4]
Oil and grease	4	60	57.6	2.53	95.6%
Phenols, Total	3	3	0.040	0.005	86.9%
Phosphorus	4	9	4.78	3.50	26.8%
Sulfate	3	3	176	140	20.8%
TKN	4	9	38.9	7.94	.. ^[4]
Total Nitrogen	4	4	39.5	15.2	61.4%
TSS	204	257	870	10.0	98.9%

Notes:

1. Due to the combination of different laboratory reporting limits and the number of non-detectable results, the removal efficiencies for molybdenum and silver were set as the literature values in Appendix V of the EPA Guidance document appendices.
2. The literature value in Appendix V of the EPA Guidance document appendices was used for cyanide since all sample results were below the laboratory reporting limits.
3. A removal efficiency was not considered in the R7 calculations for total residual chlorine and fluoride due to higher effluent concentrations than influent concentrations.
4. Total nitrogen, equal to the sum of TKN and nitrate-nitrite, was used in lieu of independent calculations for TKN, nitrate, and nitrite in the R7 calculations.

Table 6 Southeast WWTP – POC Influent, Effluent, and Removal Efficiency Data

Parameter	Sample Size		Average Concentration (mg/L)		Sample Size
	Influent	Effluent	Influent	Effluent	
Arsenic	8	4	0.00205	0.00164	45.0% ^[1]
Cadmium	8	4	0.00051	0.00080	67.0% ^[1]
Chromium III (total)	8	4	0.00402	0.00266	33.9%
Copper	8	64	0.03229	0.00903	72.0%
Cyanide	3	3	<0.00367	<0.00367	69.0% ^[2]
Lead	8	4	0.00626	0.00135	78.5%
Mercury	3	3	<0.0001	<0.0001	60.0% ^[2]
Molybdenum	3	3	0.00150	0.00093	19.1%
Nickel	3	3	0.00430	0.00300	30.2%
Selenium	3	3	0.00131	0.00107	18.1%
Silver	3	3	0.00055	0.00053	75.0% ^[1]
Zinc	8	55	0.06719	0.05338	20.6%
Ammonia, as NH ₃	255	280	17.9	0.44	97.6%
BOD ₅	80	264	93.7	5.87	93.7%
Nitrate	3	3	0.33	11.43	.. ^[3]
Nitrite	3	3	0.04	0.19	.. ^[3]
Oil and grease	3	53	7.67	0.94	87.7%
Phosphorus	12	12	2.55	1.80	29.5%
TKN	12	12	16.8	1.52	.. ^[3]
Total Nitrogen	12	12	17.1	13.5	21.0%
TSS	255	269	155	9.77	93.7%

Notes:

1. Due to the combination of different laboratory reporting limits and the number of non-detectable results, the removal efficiencies for arsenic, cadmium, and silver were set as the literature value in Appendix V of the EPA Guidance document appendices.
2. The literature value in Appendix V of the EPA Guidance document appendices was used for cyanide and mercury since all sample results were below the laboratory reporting limits.
3. Total nitrogen, equal to the sum of TKN and nitrate-nitrite, was used in lieu of independent calculations for TKN, nitrate, and nitrite in the R7 calculations.

The minimum, most conservative value of the calculated AHLs was selected as the MAHL. A factor of safety of ten percent was applied to the MAHLs to allow for unaccounted factors. Table 7 through Table 9 summarize the previously calculated MAHL (reference (4)), recalculated MAHL, influent loading as a percentage of the recalculated MAHL, and limiting criteria. Influent loading that exceeds 60% of the MAHL for non-conventional pollutants and 80% for conventional pollutants is shown as **bold, underlined text**.

Changes to MAHLs from the previous report (reference (4)) to this evaluation are explained by a difference in calculation methods between the two studies (the previous study did not use EPA's R7 Spreadsheet). Further detail on the AHL calculation process is included in Section 4.1 of this report. The results of the MAHL calculations are included in the R7 Spreadsheets (Appendix B, Appendix C, and Appendix D).

Table 7 Central WWTP – MAHL Results

Parameter	Previous MAHL (lb/d)	Calculated MAHL (lb/d)	Influent Loading as a % of Calculated MAHL	Limiting Criteria ^[1]
Antimony	NA	76.06	0.09%	Water quality
Arsenic	0.51	0.57	11%	Sludge loading
Boron	NA	32.40	18%	Water quality
Cadmium	0.03	0.15	35%	Water quality
Chromium III (total)	14.01	25.64	2.8%	Inhibition
Copper	14.01	1.93	42%	Water quality (MSOP limit)
Cyanide	0.23	0.26	11%	Water quality
Lead	1.00	1.09	16%	Water quality
Mercury	0.02	0.04	6.6%	Water quality
Molybdenum	2.44	0.17	42%	Sludge loading
Nickel	2.49	2.81	33%	Sludge loading
Selenium	0.14	0.10	22%	Water quality
Silver	3.50	1.94	0.37%	Water quality
Zinc	5.04	6.71	41%	Sludge loading
Ammonia, as NH ₃	934	456	78%	WWTP design
BOD ₅	39,811	6,517	40%	WWTP design
Chloride	NA	3,805	125%	Water quality
Fluoride	NA	64.4	15%	Water quality
Oil and grease	NA	2,012	14%	Water quality (MSOP limit)
Phosphorus	NA	10.25	1,278%	Water quality
Sulfate	NA	NA	NA	NA
Chloride + Sulfate	NA	16,096	34%	Water quality
Total Nitrogen	NA	228	200%	Water quality
TSS	95,235	6,517	69%	WWTP design

Note:

1. 6 mg/L (estimated) was used as a projected water quality criterion for total nitrogen. 0.5 mg/L (estimated) was used as a projected water quality criterion for total phosphorus.

Table 8 North WWTP – MAHL Results

Parameter	Previous MAHL (lb/d)	Calculated MAHL (lb/d)	Influent Loading as a % of Calculated MAHL	Limiting Criteria ^[1]
Aluminum	NA	22.78	44%	Water quality
Antimony	NA	51.80	0.05%	Water quality
Arsenic	1.54	1.07	1.9%	Sludge loading
Cadmium	0.02	0.04	41%	Water quality
Chromium III (total)	21.07	20.29	0.25%	Water quality
Chromium VI	NA	0.290	16%	Water quality
Copper	19.72	1.39	67%	Water quality (MSOP limit)
Cyanide	2.11	0.17	11%	Water quality
Iron	NA	79.9	32%	Water quality
Lead	31.84	0.50	40%	Water quality
Mercury	1.71	0.03	6.4%	Water quality
Molybdenum	2.71	0.14	282%	Sludge loading
Nickel	17.88	1.83	12.5%	Sludge loading
Selenium	4.17	0.15	49%	Sludge loading
Silver	4.81	1.26	0.52%	Water quality
Zinc	6.32	11.72	17%	Sludge loading
Ammonia, as NH ₃	1,025	292	69%	WWTP design
BOD ₅	43,687	6,274	63%	WWTP design
Chlorine, Total Residual	NA	0.119	164%	Water quality
Fluoride	NA	43.17	10%	Water quality
Oil and grease	NA	2,453	25%	Water quality (MSOP limit)
Phenols, Total	NA	211	0.20%	Water quality
Phosphorus	NA	7.37	700%	Water quality
Sulfate	NA	NA	NA	NA
Total Nitrogen	NA	168	254%	Water quality
TSS	104,532	6,274	150%	WWTP design

Note:

1. 6 mg/L (estimated) was used as a projected water quality criterion for total nitrogen. 0.5 mg/L (estimated) was used as a projected water quality criterion for total phosphorus.

Table 9 Southeast WWTP – MAHL Results

Parameter	Previous MAHL (lb/d)	Calculated MAHL (lb/d)	Influent Loading as a % of Calculated MAHL	Limiting Criteria
Arsenic	1.38	0.36	9.1%	Sludge loading
Cadmium	0.02	0.09	8.9%	Water quality
Chromium III (total)	13.76	5.16	1.3%	Water quality
Copper	2.05	2.74	19%	Water quality
Cyanide	0.22	0.26	11%	Water quality
Lead	0.37	0.96	11%	Water quality
Mercury	0.03	0.03	2.6%	Water quality
Molybdenum	2.44	0.37	6.6%	Sludge loading
Nickel	13.76	3.05	2.3%	Water quality
Selenium	0.14	0.10	22%	Water quality
Silver	1.06	1.61	8.1%	Water quality
Zinc	4.13	6.12	18%	Water quality
Ammonia, as NH ₃	917	627	46%	WWTP design
BOD ₅	39,100	4,889	31%	WWTP design
Oil and grease	NA	1,348	9.2%	Water quality (MSOP limit)
Phosphorus	NA	11.48	360%	Water quality
Total Nitrogen	NA	123	225%	Water quality
TSS	93,535	6,274	40%	WWTP design

Note:

1. 6 mg/L (estimated) was used as a projected water quality criterion for total nitrogen. 0.5 mg/L (estimated) was used as a projected water quality criterion for total phosphorus.

7.2 MAIL Results and POC Recommendations

The following subsections present each WWTP’s MAIL results from the R7 Spreadsheets (Appendix B, Appendix C, and Appendix D) compared against the WWTP’s existing local limits (Table 1) and present a recommendation for each POC.

7.2.1 Central WWTP

Table 10 summarizes the MAIL results from the Central WWTP’s R7 Spreadsheet (Appendix B) against the WWTP’s existing local limits. No changes to the current local limits are being recommended at this time; however, recommendations for each POC considering the MAIL results and additional considerations, where applicable, include the following:

- Arsenic, cadmium, chromium, copper, cyanide, lead, mercury, nickel, silver, zinc, oil and grease, BOD₅, and TSS: the calculated MAIL is greater than the existing local limit for these parameters and the average influent loading as a percentage of the MAHL is within EPA recommended limits; therefore, the current local limits are deemed adequate at this time.
- Antimony, boron, fluoride, and sulfate: the WWTP's average influent loadings for these parameters are not near the "percentages of MAHL" recommended by EPA to consider implementing a local limit, nor has the WWTP experienced water quality, inhibition, or sludge concerns due to these parameters. Therefore, no local limit is recommended at this time. Barr recommends the Central WWTP continue to review the monitoring data for these parameters provided by the SIUs. Boron, fluoride, and sulfate are monitoring parameters for WCA Landfill, added to the facility's reissued permit (effective January 1, 2020) due to MDNR concerns.
- Molybdenum: the calculated MAIL is less than the existing local limit; however, the average influent loading accounts for approximately 42% of the calculated MAHL. The only AHL criterion for molybdenum is sludge loading. The City's sludge concentrations (average of 2.71 mg/kg) are well below the respective MDNR 18 mg/kg pollutant limit. No change to the local limit is recommended at this time; however, Barr recommends that the City consider a revision to the local limit if sludge concentrations near 60% of the pollutant limit.
- Selenium: the calculated MAIL is less than the existing local limit; however, the average influent loading accounts for approximately 22% of the calculated MAHL. SIU sampling data for selenium was not available for this study. Barr recommends the City continue to monitor selenium data provided by SIUs and compare industrial data to the recalculated MAIL. No change to the local limit is recommended at this time; however, Barr recommends the City consider a revision of the local limit if the combined sampling data from the SIUs nears 60% MAIL capacity or the WWTP's influent headworks loading approaches 60% of the MAHL.
- Chloride: the average influent concentration (296 mg/L) and average effluent concentration (288 mg/L) at the Central WWTP exceed the applicable water quality criteria of 230 mg/L, resulting in a negative MAIL. Non-industrial sources are likely contributors to high chloride concentrations. Barr recommends the City continue to review chloride monitoring data from SIUs (currently a monitoring parameter for WCA) and implement best management practices (BMPs) for chloride reduction. In addition, Barr recommends that the City perform domestic-only sampling to determine contributions from non-industrial sources. If SIU monitoring data and domestic monitoring data indicate industrial sources contribute to significant chloride loading, Barr recommends the City consider adopting a local limit.
- Sulfate: no limiting criteria are present for sulfate, nor has the Central WWTP experienced water quality, inhibition, or sludge concerns due to sulfate; therefore, a local limit is not recommended at this time.
- Chloride + Sulfate: when chloride and sulfate are combined, the WWTP's average influent loading accounts for approximately 34% of the calculated MAHL, with chloride as the influential pollutant.

As mentioned previously, Barr recommends the City and Central WWTP implement practices to monitor influent chloride sources and reduce influent concentrations. A local limit for chloride + sulfate is not recommended at this time.

- Total nitrogen and total phosphorus: the average influent concentrations and average effluent concentrations at the Central WWTP exceed Barr’s projected water quality criteria of 6 mg/L for total nitrogen and 0.5 mg/L for total phosphorus, resulting in a negative MAILs; however, MDNR has not implemented WQC for these parameters. No local limits are recommended at this time. While WCA has a monitoring requirement for total phosphorus, there are no monitoring requirements or permit limits for phosphorus for the other SIUs. There are no monitoring requirements or permit limits for nitrogen for any of the contributing SIUs. It is recommended that the City’s SIU inspection and sampling events include these parameters. In addition, Barr recommend the City perform domestic-only sampling to determine contributions from non-industrial sources.
- Ammonia: ammonia influent loading accounts for approximately 78% of the calculated MAHL (design loading) at the Central WWTP. The WWTP does not attribute high influent concentrations to industrial sources. Therefore, no local limit is recommended at this time. Barr recommends the WWTP continue to monitor ammonia during SIU sampling events and perform domestic-only sampling to determine contributions from non-industrial sources.

Table 10 Central WWTP – MAIL Results

Parameter	Existing Local Limit (lb/d)	MAIL (lb/d)
Antimony	NA	68.40
Arsenic	0.177	0.465
Boron	NA	25.19
Cadmium	0.021	0.092
Chromium III (total)	2.753	23.00
Copper	0.829	1.075
Cyanide	0.187	0.209
Lead	0.358	0.834
Mercury	0.020	0.031
Molybdenum	2.00	0.097
Nickel	1.142	1.910
Selenium	0.100	0.075
Silver	0.299	1.736
Zinc	3.259	3.763
Ammonia, as NH ₃	NA	308

BOD ₅	300 mg/L	3,741 mg/L
Chloride	NA	NA
Fluoride	NA	54.57
Oil and grease	100 mg/L	1,130 mg/L
Phosphorus	NA	NA
Sulfate	NA	NA
Chloride + Sulfate	NA	10,003
Total Nitrogen	NA	NA
TSS	350 mg/L	3,581 mg/L

7.2.2 North WWTP

Table 11 summarizes the MAIL results from the North WWTP's R7 Spreadsheet (Appendix C) against the WWTP's existing local limits. No changes to the current local limits are being recommended at this time; however, recommendations for each POC considering the MAIL results and additional considerations, where applicable, include the following:

- Arsenic, chromium, cyanide, nickel, silver, zinc, oil and grease, and BOD₅: the calculated MAIL is greater than the existing local limit for these parameters and the average influent loading as a percentage of the MAHL is within EPA recommended limits; therefore, the current local limits are deemed adequate at this time.
- Cadmium, lead, mercury, and selenium: the calculated MAILs are less than the existing local limits; however, the WWTP's average influent loadings for these parameters are not near the "percentages of MAHL" recommended by EPA to consider implementing a local limit, nor has the WWTP experienced water quality, inhibition, or sludge concerns due to these parameters. Barr recommends the City continue to monitor SIU data for these parameters to evaluate industrial data compared to the recalculated MAIL. Barr recommends the City consider a revision of the local limit if the sampling data SIUs near 60% MAIL capacity or the WWTP's influent headworks loading approaches 60% of the MAHL.
- Aluminum, antimony, chromium VI, iron, fluoride, and total phenols: the WWTP's average influent loadings for these parameters are not near the "percentages of MAHL" recommended by EPA to consider implementing a local limit, nor has the WWTP experienced water quality, inhibition, or sludge concerns due to these parameters. Therefore, no local limit is recommended at this time. Barr recommends the North WWTP continue to review the monitoring data for these parameters provided by the SIUs.
- Copper: the calculated MAIL (0.311 lb/d) is less than the existing local limit (2.355 lb/d) and the influent loading accounts for 67% of the calculated MAHL. Copper influent and effluent concentrations have been an ongoing concern for the North WWTP; the North WWTP had four

MSOP effluent limit violations between 2015 and 2019. Average SIU copper data from Stanley Black & Decker (0.004 lb/d) is well below the permit limit of 0.10 lb/d. The average copper data from Sierra Bullets, LLC (0.179 lb/d), while below the existing local limit of 2.355 lb/d, exceeds the 0.10 lb/d categorical permit limit. Barr recommends the City continue to evaluate copper data from SIU and consider revision after results of the metals translator study, which will likely impact the calculation of local limits. In addition, Barr recommends the City conduct domestic-only samples to identify non-industrial sources of copper, continue to review copper monitoring data from SIUs, and potentially revise the copper local limit at the North WWTP if SIU data nears 60% of the MAIL.

- Molybdenum: although the calculated MAIL is less than the existing local limit and influent loading is greater than 60% of the calculated MAHL, the only AHL criterion for molybdenum is sludge loading. The City's sludge concentrations (average of 2.71 mg/kg) are well below the respective MDNR 18 mg/kg pollutant limit. No change to the local limit is recommended at this time; however, Barr recommends that the City consider a revision to the local limit if sludge concentrations near 60% of the pollutant limit. Barr also recommends the City continue to monitor SIU water quality data to evaluate industrial data compared to the recalculated MAIL.
- Chlorine, total residual: the average influent concentration (0.018 mg/L) and average effluent concentration (0.056 mg/L) at the WWTP exceed water quality criteria of 0.011 mg/L, resulting in a negative MAIL. It is important to note that laboratory analysis methods are not sufficiently sensitive enough to detect concentrations at or below WQC. The WWTP does not attribute total residual chlorine to industrial sources; therefore, no local limit is proposed at this time.
- Sulfate: no limiting criteria are present for sulfate, nor has the WWTP experienced water quality, inhibition, or sludge concerns due to sulfate; therefore, a local limit is not recommended at this time.
- Total nitrogen and total phosphorus: the average influent concentrations and average effluent concentrations at the North WWTP exceed Barr's projected water quality criteria of 6 mg/L for total nitrogen and 0.5 mg/L for total phosphorus, resulting in a negative MAILs; however, MDNR has not implemented WQC for these parameters. No local limits are recommended at this time. Because the North WWTP's SIUs do not have total nitrogen or total phosphorus permit limits, Barr recommends the City's SIU inspection and sampling events include these parameters. In addition, Barr recommends the City perform domestic-only sampling to determine contributions from non-industrial sources.
- Ammonia: the WWTP's average influent loading for these parameters is not near the "percentages of MAHL" recommended by EPA to consider implementing a local limit, nor does the WWTP consider influent ammonia from industrial sources to be significant. Therefore, no local limit is recommended at this time.
- TSS: although the MAIL exceeds the existing local limit, the average influent loading accounted for approximately 150% of the calculated MAHL. The WWTP effectively treats TSS concentrations

to meet MSOP permit limits. In addition, the WWTP does not attribute high influent concentrations to industrial sources. Therefore, no local limit is recommended at this time.

Table 11 North WWTP – MAIL Results

Parameter	Existing Local Limit (lb/d)	MAIL (lb/d)
Aluminum	NA	14.22
Antimony	NA	46.60
Arsenic	0.122	0.953
Cadmium	0.069	0.024
Chromium III (total)	2.822	18.23
Chromium VI	NA	0.233
Copper	2.355	0.311
Cyanide	0.127	0.144
Iron	NA	65.33
Lead	0.672	0.324
Mercury	0.074	0.022
Molybdenum	2.44	0.103
Nickel	0.577	1.503
Selenium	3.61	0.127
Silver	0.412	1.13
Zinc	4.063	9.341
Ammonia, as NH ₃	NA	129
BOD ₅	300 mg/L	1,450 mg/L
Chlorine, Total Residual	NA	NA
Fluoride	NA	37.15
Oil and grease	100 mg/L	542 mg/L
Phenols, Total	NA	189.8
Phosphorus	NA	NA
Sulfate	NA	NA
Total Nitrogen	NA	NA
TSS	350 mg/L	1,376 mg/L

7.2.3 Southeast WWTP

Table 12 summarizes the MAIL results from the Southeast WWTP's R7 Spreadsheet (Appendix D) against the WWTP's existing local limits. No changes to the current local limits are being recommended at this time; however, recommendations for each POC considering the MAIL results and additional considerations, where applicable, include the following:

- Arsenic, cadmium, chromium, copper, cyanide, lead, mercury, nickel, selenium, silver, zinc, oil and grease, BOD₅, and TSS: the calculated MAIL is greater than the existing local limit for these parameters and the average influent loading as a percentage of the MAHL is within EPA recommended limits; therefore, the current local limits are deemed adequate at this time.
- Molybdenum: the calculated MAIL is less than the existing local limit; however, the average influent loading accounts for approximately 6.6% of the calculated MAHL. The only AHL criterion for molybdenum is sludge loading. The City's sludge concentrations (average of 2.71 mg/kg) are well below the respective MDNR 18 mg/kg pollutant limit. No change to the local limit is recommended at this time; however, Barr recommends that the City consider a revision to the local limit if sludge concentrations near 60% of the pollutant limit.
- Total nitrogen and total phosphorus: the average influent concentrations and average effluent concentrations at the Southeast WWTP exceed Barr's projected WQC of 6 mg/L for total nitrogen and 0.5 mg/L for total phosphorus, resulting in a negative MAILs; however, since MDNR has not implemented WQC for these parameters, no local limits are recommended at this time. Because Inter-State Studio and Publishing Co. does not have total nitrogen or total phosphorus permit limits, Barr recommends the City's SIU inspection and sampling events include these parameters. In addition, Barr recommend the City perform domestic-only sampling to determine contributions from non-industrial sources.
- Ammonia: the WWTP's average influent loading for these parameters is not near the "percentages of MAHL" recommended by EPA to consider implementing a local limit, nor does the WWTP consider influent ammonia from industrial sources to be significant. Therefore, no local limit is recommended at this time.

Table 12 Southeast WWTP – MAIL Results

Parameter	Existing Local Limit (lb/d)	MAIL (lb/d)
Arsenic	0.059	0.297
Cadmium	0.020	0.076
Chromium III (total)	2.314	4.585
Copper	0.558	1.998
Cyanide	0.136	0.208
Lead	0.237	0.774

Mercury	0.022	0.027
Molybdenum	2.16	0.307
Nickel	0.564	2.680
Selenium	0.002	0.070
Silver	0.297	1.328
Zinc	2.435	4.533
Ammonia, as NH ₃	NA	479
BOD ₅	300 mg/L	98,485 mg/L
Oil and grease	100 mg/L	30,031 mg/L
Phosphorus	NA	NA
Total Nitrogen	NA	NA
TSS	350 mg/L	130,096 mg/L

7.3 Summary of Results

Based on the evaluations presented in Sections 7.1 and Section 7.2, Barr recommends the City consider the following for each WWTP:

- Central WWTP:
 - Continue SIU monitoring for antimony, boron, fluoride, and sulfate. No local limit for these parameters is recommended at this time.
 - Continue SIU monitoring for selenium and compare monitoring results to MAIL; consider revising the local limit if the monitoring results near the MAIL.
 - Continue to review sludge data against pollutant limits; consider a revision to the molybdenum local limit if sludge concentrations of molybdenum near 60% of the pollutant limit.
 - Consider implementing BMPs for chloride to reduce influent concentrations; consider adopting a local limit if concentrations are not reduced through BMPs.
 - Sample for total nitrogen and total phosphorus during City SIU sampling events and continue monitoring for ammonia during SIU sampling events.
 - Perform domestic-only sampling.

- North WWTP:
 - Continue SIU monitoring for aluminum, antimony, chromium VI, iron, fluoride, sulfate, and total phenols. No local limit for these parameters is recommended at this time.
 - Continue SIU monitoring for cadmium, lead, mercury, and selenium and compare monitoring results to MAIL; consider revising the local limit if the monitoring results near the MAIL.
 - Continue SIU monitoring for molybdenum and consider revision to local limit if sludge concentrations of molybdenum near 60% of the pollutant limit. Continue to review sludge data against pollutant limits.
 - Continue SIU monitoring for copper and compare monitoring results to MAIL; consider revising the local limit if the monitoring results near the MAIL.
 - Consider a revision of the copper local limit following the completion of the metals translator study, which is anticipated to result in a change of the WWTP's effluent limit calculation through use of a site-specific translator value.
 - Sample for total nitrogen and total phosphorus during City SIU sampling events.
 - Perform domestic-only sampling.

- Southeast WWTP:
 - Continue to review sludge data against pollutant limits; consider a revision to the molybdenum local limit if sludge concentrations of molybdenum near 60% of the pollutant limit.
 - Sample for total nitrogen and total phosphorus during City SIU sampling events.
 - Perform domestic-only sampling.
 - Integrate results of the metals translator study, which is anticipated to result in a change of the WWTP's copper effluent limit calculation through use of a site-specific translator value, into ongoing local limits evaluations. .

It is of significance to note that the use of the default domestic waste metal concentrations from Appendix V of the EPA Guidance document appendices were higher than the average influent for many POC. The use of EPA default domestic concentrations for POC where the average influent concentrations were lower than EPA's default values would have resulted in a domestic load that exceeded the MAHL, and thus, a negative MAIL. As mentioned previously, Barr recommends the City collect and analyze local domestic-only samples to accurately capture non-industrial contributions to the WWTPs. Additional recommendations are provided in Section 8.

8 Conclusions and Recommendations

As outlined in Section 7 of this report, MAHLs/MAILs were calculated for the purpose of reevaluating existing local limits and assessing the potential need for new local limits. Based upon the evaluation, no changes to the current local limits are being recommended at this time; however, the following are general recommendations applicable to each WWTP:

- Collect domestic-only samples to identify non-industrial contributions of POC.
- Sample total nitrogen and total phosphorus during City SIU sampling events.
- Consider BMPs for chloride to reduce influent concentrations from non-industrial sources (although chloride was not identified as a POC at the North and Southeast WWTP for this study, it is assumed that BMPs implemented by the City may affect the influent concentrations at all WWTPs).
- Continue to review sludge sampling data against pollutant limits; consider a revision to molybdenum local limits if sampling concentrations near 60% of the pollutant limit.
- Compare headworks loading to calculated MAHLs on an annual basis to evaluate the effectiveness of local limits, particularly since industrial loading has increased in the City since 2019.

In addition to the general recommendations for each WWTP, the following are WWTP-specific recommendations:

- Central WWTP:
 - Continue SIU monitoring for antimony, boron, fluoride, and sulfate. No local limit for these parameters is recommended at this time.
 - Continue SIU monitoring for selenium and compare monitoring results to MAIL; consider revising the local limit if the monitoring results near the MAIL.
- North WWTP:
 - Continue SIU monitoring for aluminum, antimony, chromium VI, iron, fluoride, sulfate, and total phenols. No local limit for these parameters is recommended at this time.
 - Continue SIU monitoring for cadmium, lead, mercury, and selenium and compare monitoring results to the MAIL; consider revising the local limit if the monitoring results near the MAIL.
 - Continue SIU monitoring for copper and compare monitoring results to MAIL; consider revising the local limit if the monitoring results near the MAIL and/or upon completion of the metals translator study.

-
- Southeast WWTP:
 - Integrate results of the metals translator study, which is anticipated to result in a change of the WWTP's copper effluent limit calculation through use of a site-specific translator value, into ongoing local limits evaluations.

9 References

1. **USEPA.** *Local Limits Development Guidance*. s.l. : United States Environmental Protection Agency, 2004. 833-R-04-002A.
2. **MNDR.** *Standard Conditions for NPDES Permits, Part III - Biosolids and Sludge from Domestic Treatment Facilities*. s.l. : Missouri Department of Natural Resources Clean Water Commission, 2019.
3. **USEPA.** *Local Limits Development Guidance Appendices*. s.l. : United States Environmental Protection Agency, 2004. EPA 833-R-04-002B.
4. **Black and Veatch & Olsson Associates.** *Evaluation of Local Discharge Limits for City of Sedalia, Missouri*. 2013.

Appendix A

Sampling and Analysis Plan

Sampling and Analysis Plan

North, Central, and Southeast Wastewater Treatment Plants Local Limits Evaluation

Prepared for
City of Sedalia

June 2020



Sampling and Analysis Plan

North, Central, and Southeast Wastewater Treatment Plants Local Limits Evaluation

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Sampling and Analysis Plan

North, Central, and Southeast Wastewater Treatment Plants Local Limits Evaluation

June 2020

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1 Introduction

This Sampling and Analysis Plan (SAP) describes sampling to be performed for local limits evaluations for three wastewater treatment plants (WWTP) operated by the City of Sedalia (Sedalia), in Pettis County, Missouri. Operation of the three WWTPs, herein referred to as the Central, North, and Southeast WWTP, is covered by the following National Pollutant Discharge Elimination System (NPDES) Missouri State Operating Permits (MSOP):

- Central WWTP – MSOP No. MO-0023019
- North WWTP – MSOP No. MO-0023027
- Southeast WWTP – MSOP No. MO-010567

The MSOPs required the WWTPs to conduct a technical evaluation of the need to revise local limits by October 1, 2019. This evaluation determined the need for each WWTP to further evaluate and potentially revise their local limits. The purpose of this SAP is to establish reliable procedures for collection, analysis, and reporting of sample data required for the evaluation and revision of local limits. This SAP provides guidance for continued routine sampling for pollutants of concern (POCs) identified for the local limits study to increase statistical accuracy for future headworks loading and local limits evaluations. This SAP is organized into the following sections:

- Existing, routine WWTP sampling (Section 2);
- Sampling Frequency and Duration (Section 3);
- Field Sampling Procedures (Section 4);
- Analytical Methods and Data Quality Objectives (Section 5);
- Data Management (Section 6); and
- References (Section 7).

2 Existing Sampling

Table 1 summarizes the existing routine sampling conducted at each WWTP in accordance with their MSOP, excluding whole effluent toxicity (WET) testing. In addition to the sampling summarized in Table 1, each WWTP measures the temperature and pH of the influent and effluent daily. Each plant also routinely measures Total Suspended Solids (TSS) and 5-Day Biochemical Oxygen Demand (BOD₅) to calculate monthly removal efficiencies required by the MSOPs.

Table 1 Sedalia WWTP MSOP-Required Sampling Summary

WWTP	Sampling Location and Frequency	Parameter
Central	Effluent - Daily (weekday)	Flow
	Effluent - Weekly	<ul style="list-style-type: none"> • BOD₅ • TSS • E.coli • Ammonia, as N • pH
	Effluent - Monthly	<ul style="list-style-type: none"> • Total Phosphorus • Total Kjeldahl Nitrogen (TKN) • Nitrate + Nitrite
	Effluent - Quarterly	<ul style="list-style-type: none"> • Oil and Grease • Copper, Total Recoverable • Nickel, Total Recoverable • Zinc, Total Recoverable • Boron, Total Recoverable • Chloride + Sulfate • Fluoride
	Influent – Monthly	<ul style="list-style-type: none"> • Ammonia, as N • Total Phosphorus • TKN • Nitrate + Nitrite
North	Effluent - Daily (weekday)	<ul style="list-style-type: none"> • Flow
	Effluent - Weekly	<ul style="list-style-type: none"> • BOD₅ • TSS • E.coli • Ammonia, as N • pH
	Effluent - Monthly	<ul style="list-style-type: none"> • Total Phosphorus • TKN • Nitrate + Nitrite

	Effluent - Quarterly	<ul style="list-style-type: none"> • Oil and Grease • Cadmium, Total Recoverable • Chromium VI, Dissolved • Copper, Total Recoverable
	Influent – Monthly	<ul style="list-style-type: none"> • Ammonia, as N • Total Phosphorus • TKN • Nitrate + Nitrite
Southeast	Effluent - Daily (weekday)	<ul style="list-style-type: none"> • Flow
	Effluent - Weekly	<ul style="list-style-type: none"> • BOD₅ • TSS • E.coli • Ammonia, as N • pH
	Effluent - Monthly	<ul style="list-style-type: none"> • Copper, Total Recoverable • Total Phosphorus • TKN • Nitrate + Nitrite
	Effluent - Quarterly	<ul style="list-style-type: none"> • Oil and Grease • Total Hardness
	Influent – Monthly	<ul style="list-style-type: none"> • Ammonia, as N • Total Phosphorus • TKN • Nitrate + Nitrite

3 Sampling Frequency

The frequency and sample type of the proposed sampling activities are summarized below for each WWTP (Central – Table 2, North – Table 3, and Southeast – Table 4). The parameters listed in Table 2 through Table 4 include the POCs identified for the local limits study, with the exception of Ammonia, BOD5, and TSS, which the WWTPs have sampled routinely in the previous five years.

A minimum of 3 influent samples and 3 effluent samples of the parameters listed for each WWTP in Table 2 through Table 4 is recommended. If sample analyses result in unexpected or inconsistent results, Sedalia may consider additional sample collections. Samples should be 24-hour composite samples unless sampling methods only allow for grab samples.

Table 2 Central WWTP – Parameter and Sample Type

Parameter	Sample Type
Chloride, mg/L	Composite
Fluoride, mg/L	Composite
Nitrate (as N), mg/L	Composite
Nitrite (as N), mg/L	Composite
Total Kjeldahl Nitrogen, mg/L	Composite
Oil and Grease, mg/L	Grab
Phosphorus – Total, mg/L	Composite
Sulfate, mg/L	Composite
Antimony – Total, mg/L	Composite
Arsenic – Total, mg/L	Composite
Boron – Total, mg/L	Composite
Cadmium – Total, mg/L	Composite
Chromium – Total, mg/L	Composite
Copper – Total, mg/L	Composite
Cyanide – Total, mg/L	Grab
Lead – Total, mg/L	Composite
Mercury – Total, mg/L	Composite
Molybdenum – Total, mg/L	Composite
Nickel – Total, mg/L	Composite
Selenium – Total, mg/L	Composite
Silver – Total, mg/L	Composite
Zinc – Total, mg/L	Composite

Table 3 North WWTP – Parameter and Sample Type

Parameter	Sample Type
Chlorine, Total Residual, mg/L	Composite
Fluoride, mg/L	Composite
Nitrate (as N), mg/L	Composite
Nitrite (as N), mg/L	Composite
Total Kjeldahl Nitrogen, mg/L	Composite
Oil and Grease, mg/L	Grab
Phosphorus – Total, mg/L	Composite
Sulfate, mg/L	Composite
Total Phenols, mg/L	Grab
Aluminum – Total, mg/L	Composite
Antimony – Total, mg/L	Composite
Arsenic – Total, mg/L	Composite
Boron – Total, mg/L	Composite
Cadmium – Total, mg/L	Composite
Chromium – Total, mg/L	Composite
Chromium IV – Dissolved, mg/L	Composite
Copper – Total, mg/L	Composite
Cyanide – Total, mg/L	Grab
Iron – Total, mg/L	Composite
Lead – Total, mg/L	Composite
Mercury – Total, mg/L	Composite
Molybdenum – Total, mg/L	Composite
Nickel – Total, mg/L	Composite
Selenium – Total, mg/L	Composite
Silver – Total, mg/L	Composite
Zinc – Total, mg/L	Composite

Table 4 Southeast WWTP – Parameter and Sample Type

Parameter	Sample Type
Nitrate (as N), mg/L	Composite
Nitrite (as N), mg/L	Composite
Total Kjeldahl Nitrogen, mg/L	Composite
Oil and Grease, mg/L	Grab
Phosphorus – Total, mg/L	Composite
Arsenic – Total, mg/L	Composite
Boron – Total, mg/L	Composite
Cadmium – Total, mg/L	Composite
Chromium – Total, mg/L	Composite
Copper – Total, mg/L	Composite
Cyanide – Total, mg/L	Grab
Lead – Total, mg/L	Composite
Mercury – Total, mg/L	Composite
Molybdenum – Total, mg/L	Composite
Nickel – Total, mg/L	Composite
Selenium – Total, mg/L	Composite
Silver – Total, mg/L	Composite
Zinc – Total, mg/L	Composite

4 Field Sampling Procedures

The following subsections describe field sampling procedures, including documentation, sample collection, and equipment handling.

4.1 Field Documentation

At a minimum field notes will be used to document information during sampling events. The field notebook will be scanned to create digital copies. Information recorded in the field notebook will include, but is not limited to:

- Date and time of sampling;
- Field conditions;
- Weather conditions;
- Measurements taken by portable field instruments;
- Operating conditions of the equipment;
- Equipment performance issues; and
- Any other unusual conditions or occurrences that may impact the quality of collected samples.

4.2 Sampling Procedures

Portable handheld monitoring instruments will be used to collect field data. Multiprobes will be rinsed with deionized water between sample sites to prevent fouling and cross-contamination. Operation, calibration, and maintenance of all portable monitoring equipment will be performed according to the manufacturer's instruction manual.

Sampling procedures will vary by sample type. For parameters requiring a 24-hour composite sample, an automatic sampling device will be used to collect 48 aliquots (subsamples) at 30 minute intervals. Grab samples will be taken according to each facility's standard sampling procedures. All samples will be sealed inside laboratory-supplied containers. Sample preservative, where needed, will be added in the laboratory before going to the field. All unpreserved containers should be rinsed twice with sample water before the sample is collected. For each rinsing, the container should be partially filled, capped, and shaken; then the rinsate should be discarded. Rinsing of the sample container is not applicable to any containers with a preservative. Once filled, sample containers will be labeled using indelible ink with site identification information including sample identifier and the date and time the sample was taken. The sealed samples will be placed inside sealable plastic bags and stored inside coolers containing ice. Additional ice will be added to the coolers prior to shipment or transfer so that a shipment or transfer temperature of approximately 4 degrees Celsius will be maintained. Prior to sealing each cooler, a chain-of-custody (COC) document will be completed and placed in each cooler. The COC document will include the project name, sampler's name, parameters for laboratory analysis, and date and time that each sample was taken. Once

the cooler is full and the COC has been placed in the cooler, the cooler will be sealed tightly and overnigheted to the laboratory, in the event that shipment is required.

The individual at each WWTP who is to coordinate field sampling will arrange to receive all sampling records from the selected laboratory. Typically, a copy of all COCs and field notes will be included with the sample analysis report after each sampling event.

4.3 Equipment Decontamination

To eliminate potential chemical carryover between sample containers and locations, all field equipment will be decontaminated prior to first use. In general, decontaminating sampling equipment between composite samples involves rinsing with distilled water to remove visible debris. Equipment will be dried using clean disposable towels. Decontaminated equipment will be protected from the elements until it is used. When sampling is completed, all equipment that has come into contact with wastewater will be rinsed thoroughly with an approved detergent and distilled water.

5 Analytical Methods and Data Quality Objectives

Analyses should be performed in conformance with the methods listed in Table 5 or an equivalent test method that is capable of yielding valid data consistent with the reporting limits for methods identified in Table 5. Analytical methods provided in Table 5 are approved methods found in 40 CFR Part 136. Data quality indicators are summarized in Table 6. Project data quality objectives (DQOs) are qualitative and quantitative statements that specify the quality of the analytical data needed to support decisions made throughout the project. Several DQOs have been identified and are presented below along with brief descriptions of steps that will be taken to address them. The data must satisfy these site-specific DQOs:

1. Analytical results must accurately reflect the system water quality. Chemical analyses are performed to confirm the specific chemical constituents in sampled media at the facility. The analytical results are compared to each other, to historical concentrations, and to regulatory standards appropriate for WWTPs, and are used to assess operational performance.
2. Analytical results must satisfy quality control requirements for accuracy, precision, representativeness, completeness, and comparability.
3. One duplicate sample will be collected per every 10 samples collected (e.g., If three influent and effluent samples are collected from each plant, the total number of samples collected will be 18, which means a minimum of one duplicate sample should be collected).

The laboratory analyses require a high level of data quality and are used to determine the overall performance of various operations. These analyses are characterized by rigorous quality assurance/quality control (QA/QC) protocols and documentation and provide qualitative and quantitative data. Analytical protocols and data review procedures must be in accordance with recognized state and/or federal requirements to ensure the data are valid.

Table 5 Analytical Methods

Parameter	Analytical Method	Lowest Reporting Limits
Chloride, mg/L	EPA 300.0 Rev 2.1	0.5 mg/L
Chlorine, Total Residual, mg/L	SM 4500-Cl-D-2011	0.01 mg/L
Fluoride, mg/L	EPA 300.0 Rev 2.1	0.2 mg/L
Nitrate (as N), mg/L	EPA 352.1	0.10 mg/L
Nitrite (as N), mg/L	SM 4500-NO ₂ -B-2011	0.005 mg/L
Total Kjeldahl Nitrogen, mg/L	SM 4500-N _{org} B-2011	1.0 mg/L
Oil and Grease, mg/L	EPA 1664 Rev A	1.0 mg/L
Phosphorus – Total, mg/L	SM 4500-P B(5)-2011 and SM 4500-P E-2011	0.05 mg/L
Sulfate	EPA 300.0 Rev 2.1	5.0 mg/L
Total Phenols, mg/L	EPA 420.1, SM 5530-B-2010, or SM 5530 D-2010	0.005 mg/L

Aluminum – Total, mg/L	EPA 200.8 Rev 5.4	200 µg/L
Antimony – Total, mg/L	EPA 200.8 Rev 5.4	6 µg/L
Arsenic – Total, mg/L	EPA 200.8 Rev 5.4	5 µg/L
Boron – Total, mg/L	EPA 200.8 Rev 5.4	100 µg/L
Cadmium – Total, mg/L	EPA 200.8 Rev 5.4	0.3 µg/L
Chromium – Total, mg/L	EPA 200.8 Rev 5.4	10 µg/L
Chromium IV – Dissolved, mg/L	EPA 218.6 Rev 3.3	0.005 mg/L
Copper – Total, mg/L	EPA 200.8 Rev 5.4	5 µg/L
Cyanide – Total, mg/L	EPA 335.4 Rev 1.0 or SM 4500-CN ⁻ B-2011 and C-2011	0.005 mg/L
Iron – Total, mg/L	EPA 200.8 Rev 5.4	10 µg/L
Lead – Total, mg/L	EPA 200.8 Rev 5.4	5 µg/L
Mercury – Total, mg/L	EPA 1631E	0.2 µg/L
Molybdenum – Total, mg/L	EPA 200.8 Rev 5.4	100 µg/L
Nickel – Total, mg/L	EPA 200.8 Rev 5.4	10 µg/L
Selenium – Total, mg/L	EPA 200.8 Rev 5.4	5 µg/L
Silver – Total, mg/L	EPA 200.8 Rev 5.4	3 µg/L
Zinc – Total, mg/L	EPA 200.8 Rev 5.4	5 µg/L

Table 6 Data Quality Indicators

DQI	Definition	Determination Methodologies
Precision	<p>The measurement among repeated measurements of the same property under identical or substantially similar conditions; calculated either as the range or as the standard deviation.</p> <p>May also be expressed as a percentage of the mean of the measurements, such as relative range or relative standard deviation (coefficient of variation).</p>	<p>Field sampling precision will be determined by using field duplicate samples.</p> <p>Laboratory precision will be determined by comparing the results of split samples, duplicate samples, and duplicate spike samples.</p>
Bias	<p>The systematic or persistent distortion of a measurement process that causes errors in one direction.</p>	<p>Laboratory bias will be determined as part of its internal quality control (QC). Bias effects that fall outside the laboratory's acceptance limits will be flagged.</p>
Accuracy	<p>A measurement of the overall agreement of a measurement to a known value; includes a combination of random error (bias) components of both sampling and analytical operations.</p>	<p>Laboratory accuracy will be determined by analysis of standard reference samples, spiked samples and/or matrix-spiked samples, as well as by instrument and method blank samples.</p>
Representativeness	<p>A qualitative term that expresses "the degree to which data accurately and precisely represent a characteristic of a population, parameter variations at a sampling point, a process condition, or an environmental condition."</p>	<p>Samples will be collected in such a manner that will assure representativeness with respect to space, time, and flow. More specifically, samples will be collected from a well-mixed area of the stream, and sample collection will be distributed throughout the year and across the range of flow conditions.</p>
Comparability	<p>A qualitative term that expresses the measure of confidence that one data set can be compared to another and can be combined for the decision(s) to be made.</p>	<p>Consistent field and laboratory data will be used throughout the project, except where improvements are required for data quality.</p>
Completeness	<p>A measure of the amount of valid data needed to be obtained from a measurement system.</p>	<p>The goal will be to complete 90 percent or better of the total number of measurements expected according to the project sampling plan.</p>
Sensitivity	<p>The capability of a method or instrument to discriminate between measurement responses representing different levels of the variable of interest.</p>	<p>The lowest reporting limits for the stream variables to be measured for this project are shown in Table 5.</p>

6 Data Management

Field data sheets will be completed by the sampling staff. This information will be entered into a spreadsheet or database and archived. Quality assurance data sheet checks will include scanning for apparent entry errors, measurement errors, and omissions. Suspect data will be flagged and/or excluded from use. Data may be presented in table, graph, and chart format. Unusual data will be rechecked to verify their accuracy.

Laboratory results will be entered into a computer database and/or spreadsheet, which will be maintained by Sedalia or Barr staff. Data will be proofread for typos and transcription errors. It will also be cross-checked against field notes and data sheets. QC data (e.g., duplicates, calibration data, etc.) will be reviewed. If data quality does not meet project specifications, the deficient data will be flagged or discarded and the cause of failure evaluated.

For the QC procedures completed as part of this project, staff will follow the EPA document, *Guidance on Environmental Data Verification and Data Validation* (EPA QA/G-8) (USEPA, 2002). All data that does not meet validation and verification criteria will be discarded. Data review will be conducted by Sedalia staff.

7 References

USEPA, 2002. *Guidance on Environmental Data Verification and Data Validation* (EPA QA/G-8). United States Environmental Protection Agency Office of Information, Washington, DC 20460. EPA/240/R-02/004. November 2002.

Appendix B

Central WWTP R7 Calculations

Tab	Comment
General	Orange tabs were added by Barr Engineering Co. (Barr)
General	POCs added to this calculator (i.e., not EPA's default POCs) are shown in the green tabs. Tabs for EPA's default POCs are the standard gray color.
General	Reviewer notes specific to tabs are presented with orange headings
Data (Column I - sludge information)	Not all information was available for sludge; AHLs calculated from EPA's dry sludge are presented in the sludge tab.
All individual POC tabs	The digestion calculation was manually removed from each tab since the WWTP does not have anaerobic digestion treatment.
All individual POC tabs	"Barr notes to reviewers" have been added where Barr manually updated POC tabs
All individual POC tabs	Instream concentrations were not added for this analysis as the 7Q10 value is zero.

Table 1. Freshwater Criteria Conversion Factors for Dissolved Metals

Metal	Conversion Factors	
	Acute	Chronic
Arsenic	1.000	1.000
Cadmium *	0.944	0.909
Chromium (III)	0.316	0.860
Chromium (VI)	0.982	0.962
Copper	0.960	0.960
Lead *	0.791	0.791
Mercury	0.85	N/A
Nickel	0.998	0.997
Silver	0.85	N/A
Zinc	0.978	0.986

* Conversion factors fro Cd and Pb are hardness dependent. The valuse show are with a hardness of 100 mg/L as calcium carbonate (CaCO₃).

LOCAL LIMITS CALCULATOR

09/01/20

Note: To activate the WQS you have to choose a State in the dropdown in Cell B3

City: **Sedalia (Central Plant)**

State: **MO**

Plant

Data:

Non SIU Flow, MGD:	1.762	Sludge To Disposal, MGD:	NA
TOTAL Flow, MGD:	1.930	Sludge Disposal %Solids:	NA
7Q10, MGD:	0.00	Site Use, Years:	NA
Stream Hardness, mg/l	311	Site Size, Acres:	NA
Flow To Digsr: MGD:	NA	Sludge Quality Level:	NA

Peek

Add Pollutant

Adjust Domestic

<

#

	NPDES Limit	Removal Efficiencies		Domestic Level	MO WQS	Reserve Factor	Avg. Infl mg/L	AS Inhibition	Digestion Inhibition
		Primary	Plant						
Ag	NA	20%	78%	0.000	0.0267	10%	0.000	NA	NA
As	NA	NA	24%	0.004	0.1500	10%	0.004	0.1	NA
Cd*	NA	15%	79%	0.003	0.0020	10%	0.003	1	NA
CN	NA	27%	69%	0.002	0.0050	10%	0.002	0.1	NA
Cr*	NA	27%	95%	0.006	0.2183	10%	0.044	1	NA
Cu*	0.018	22%	85%	0.050	NA	10%	0.050	1	NA
Hg	NA	10%	66%	0.0002	0.00077	10%	0.00015	0.1	NA
Mo	NA	NA	50%	0.005	NA	10%	0.005	NA	NA
Ni*	NA	14%	59%	0.047	0.1363	10%	0.057	1.0	NA
Pb*	NA	57%	80%	0.011	0.0135	10%	0.0108	1	NA
Se	NA	NA	23%	0.001	0.0050	10%	0.001	NA	NA
Zn*	NA	27%	75%	0.172	0.3114	10%	0.172	0.3	NA
O&G	10	NA	92%	17.200	NA	10%	17.200	NA	NA
Nitrogen_T	NA	NA	58%	28.300	6.0000	10%	28.300	NA	NA
Sb	NA	NA	9%	0.004	4.3000	10%	0.004	NA	NA
Boron	NA	NA	1%	0.300	2.0000	10%	0.371	NA	NA
Chloride	NA	NA	3%	296.000	230.0000	10%	296.000	NA	NA
Fluoride	NA	NA	0%	0.255	4.0000	10%	0.590	NA	NA
Sulfate	NA	NA	0%	43.000	NA	10%	43.000	NA	NA
Ch_and_Sulf	NA	NA	0%	339.000	1000.0000	10%	339.000	NA	NA
Phosphorus	NA	NA	22%	8.140	0.5000	10%	8.140	NA	NA

*HARDNESS DEPENDENT

SIUs and Plant Flows		
SIU	Averages from 2015-2019 Pretreatment Reports	
	Avg. Process Flow (1000 gal/d)	Avg. Total Flow (1000 gal/day)
Maxion Wheels	143	143
WCA Landfill	25	25
2	168.000	168.000

Notes to reviewers added by Barr:

Column or cell reference

Comment

- Column E: EPA's literature domestic values are presented default, in bold blue text
- Column F: 6 mg/L is a Barr- forecasted WQC for total nitrogen (TKN + nitrate-nitrite), 0.5 is a forecasted WQC for phosphorus.
- Column H: Influent concentrations are from data collected for this study.
- Column H: Domestic levels were all set to the influent data concentrations since the literature values were higher than the domestic concentrations with the exception of chromium, nickel, boron, and fluoride.
- Column I (sludge): Not all information was available for sludge; AHLs calculated from EPA's dry sludge are presented in the sludge tab.
- Cell E6: This is the mean effluent hardness from the facility (7Q10 is 0, thus this is able to be used).
- Phosphorus: Design information was not available from the WWTP; therefore, a forecasted WQC for phosphorus was used to estimate the AHL.
- BOD, TSS, NH3 Design: Values from average lbs/day are from the City's previous local limits study.
- Cell I30: The estimated population is from the WWTP's 2016 NPDES permit application.

Conventional Pollutants/Nutrients

	DW Design		Domestic Sources lbs/day	Expansion Factory	Avg. Infl mg/L	Domestic Sources Estimator		
	Daily avg lbs/day	Peak lbs/day				Pop: 7500 persons	lbs/cap/day	lbs/day
BOD	6,517	NA	1,275	0%	160	BOD	0.17	1,275
TSS	6,517	NA	1,500	0%	280	TSS	0.2	1,500
NH3	456	NA	149	0%	22.2	NH3	0.0198	149
P,total	NA	NA	66	0%	8.14	P,total	0.0088	66

NOTE: all values mg/l unless noted

CONVERSIONS

CFS TO MGD	1	CFS =	0.646	mgd
SLUDGE, DT/Y to MGD	dt/y	avg %sld		mgd
	1	1.1%	=	5.97E-05
SLUDGE DryMetricTons/Y to MGD	DMT/Y	avg %sld		mgd
	1	1.1%	=	6.58E-05
SLUDGE DryMetricTons/Y to DT/y	1	DMT/y =	1.10231	DT/Y

SUMMARY OF MASS LOADINGS FOR SEDALIA (CENTRAL PLANT), MO

	Domestic/comml Sources		LOCAL LIMIT		Maximum Allowable Industrial Load (MAIL)	Maximum Allowable Headworks Load (MAHL)	Headworks ACTUAL Avg. Load	Current Loading as % of MAHL	Limiting Criteria	
	lbs.	% of limit	mg/L	lbs.						%
Ag	0.006	0%	1.239	1.736	90%	0.193	1.94	0.007	0.37%	Water Quality
As	0.056	10%	0.332	0.465	81%	0.052	0.57	0.061	10.68%	503 NA
Cd	0.048	32%	0.065	0.092	61%	0.010	0.15	0.053	35.15%	Water Quality
CN	0.027	10%	0.149	0.209	81%	0.023	0.26	0.029	11.35%	Water Quality
Cr	0.088	0%	16.412	22.996	90%	2.555	25.64	0.708	2.76%	Secndry Inhib
Cu	0.737	38%	0.768	1.075	56%	0.119	1.93	0.807	41.78%	NPDES #
Hg	0.002	6%	0.022	0.031	85%	0.003	0.04	0.002	6.59%	Water Quality
Mo	0.067	38%	0.069	0.097	55%	0.011	0.17	0.073	42.00%	503 NA
Ni	0.691	25%	1.363	1.910	68%	0.212	2.81	0.917	32.62%	503 NA
Pb	0.159	15%	0.595	0.834	77%	0.093	1.09	0.174	16.06%	Water Quality
Se	0.021	20%	0.054	0.075	72%	0.008	0.104	0.023	21.74%	Water Quality
Zn	2.528	38%	2.686	3.763	56%	0.418	6.71	2.769	41.27%	Secndry Inhib
O&G	252.755	13%	1130.055	1583.343	79%	175.927	2012	276.855	13.76%	NPDES #
Nitrogen T	415.871	182%	-120.475	-168.800	-74%	-18.756	228.31	455.522	199.52%	Water Quality
Sb	0.064	0%	48.815	68.396	90%	7.600	76.1	0.070	0.09%	Water Quality
Boron	4.409	14%	25.189	25.189	78%	2.799	32.4	5.972	18.43%	Water Quality
Chloride	4349.744	114%	-350.004	-490.398	-13%	-54.489	3804.9	4764.475	125.22%	Water Quality
Fluoride	3.747	6%	38.950	54.574	85%	6.064	64.4	9.497	14.75%	Water Quality
Sulfate	631.888	NA	NA	NA	NA	NA	NA	692.137	NA	NA
Ch and Sulf	4981.632	31%	7139.368	10003.111	62%	1111	16096.2	5456.612	33.90%	Water Quality
Phosphorus	119.618	1167%	-70.250	-98.429	-960%	-11	10.3	131.023	1277.98%	Water Quality

Existing Local Limit (lb/d)	Calc LL > Existing LL?
0.299	yes
0.177	yes
0.021	yes
0.187	yes
2.753	yes
0.829	yes
0.02	yes
2	no
1.142	yes
0.358	yes
0.100	no
3.259	yes

Barr notes to reviewers:

1. MAIL mg/L (orange cells) were added manually by Barr for review purposes.
2. The existing local limit comparison table was also added manually by Barr to compare the MAILs to the existing limits.

TOXIC POLLUTANTS SUMMARY

UNIFORM CONCENTRATION LIMIT

IF APPLIED

	mg/l
Ag	1.239
As	0.332
Cd	0.065
CN	0.149
Cr	16.412
Cu	0.768
Hg	0.022
Mo	0.069
Ni	1.363
Pb	0.595
Se	0.054
Zn	2.686
Nitrogen T	-120.475
Sb	48.815
Boron	17.979
Chloride	-350.004
Fluoride	38.950
Sulfate	0.000
Ch and Sulf	7139.368
Phosphorus	-70.250

MIDDLE TIER THRESHOLD

	lb/day
Ag	0.0002
As	0.0001
Cd	0.0000
CN	0.0000
Cr	0.0026
Cu	0.0002
Hg	0.0000
Mo	0.0000
Ni	0.0003
Pb	0.0001
Se	0.0000
Zn	0.0007
Nitrogen T	0.0228
Sb	0.0076
Boron	0.0032
Chloride	0.3805
Fluoride	0.0064
Sulfate	0.0000
Ch and Sulf	1.6096
Phosphorus	0.0010

Conventional Pollutants/Nutrients - Long Term Average Limits

Based on Design Daily Average Criteria

	Domestic/comml Sources		LOCAL LIMIT		Maximum Allowable Industrial Load (MAIL)	Maximum Allowable Headworks Load (MAHL)	Headworks ACTUAL Avg. Load	Current Loading as % of MAHL
	lbs.	% of limit	lbs.	% of MAHL				
BOD	1275	20%	5242	80%	0	6517	2575	40%
TSS	1500	23%	5017	77%	0	6517	4507	69%
NH3	149	33%	308	67%	0	456	357	78%
P.total	66	NA	NA	NA	0	0	131	NA

Conventional Pollutants/Nutrients - Daily Maximum Limits

Based on Peak Design Criteria

	Domestic/comml Sources		LOCAL LIMIT		Maximum Allowable Industrial Load (MAIL)	Maximum Allowable Headworks Load (MAHL)	Headworks ACTUAL Avg. Load	Current Loading as % of MAHL
	lbs.	% of limit	lbs.	% of MAHL				
BOD	1275	NA	NA	NA	0	NA	2575	NA
TSS	1500	NA	NA	NA	0	NA	4507	NA
NH3	149	NA	NA	NA	0	NA	357	NA
P.total	66	NA	NA	NA	0	NA	131	NA

Conventional Pollutants/Nutrients Uniform Concentration Limits

Flow for SIUs Receiving Limits, mgd: 0.168

	Daily Max	Mo. Avg.	Existing Local Limit (mg/L)	Calc LL > Existing LL?
	mg/l	mg/l		
BOD	NA	3741	300	yes
TSS	NA	3581	350	yes
NH3	NA	219	NA	yes
P.total	NA	NA	NA	NA

Manually added by Barr

Appendix C

North WWTP R7 Calculations

Tab	Comment
General	Orange tabs were added by Barr Engineering Co. (Barr)
General	POCs added to this calculator (i.e., not EPA's default POCs) are shown in the green tabs. Tabs for EPA's default POCs are the standard gray color.
General	Reviewer notes specific to tabs are presented with orange headings
Data (Column 1 - sludge information)	Not all information was available for sludge; AHLs calculated from EPA's dry sludge are presented in the sludge tab.
All individual POC tabs	The digestion calculation was manually removed from each tab since the WWTP does not have anaerobic digestion treatment.
All individual POC tabs	"Barr notes to reviewers" have been added where Barr manually updated POC tabs
All individual POC tabs	Instream concentrations were not added for this analysis as the 7Q10 value is zero.

Table 1. Freshwater Criteria Conversion Factors for Dissolved Metals

Metal	Conversion Factors	
	Acute	Chronic
Arsenic	1.000	1.000
Cadmium *	0.944	0.909
Chromium (III)	0.316	0.860
Chromium (VI)	0.982	0.962
Copper	0.960	0.960
Lead *	0.791	0.791
Mercury	0.85	N/A
Nickel	0.998	0.997
Silver	0.85	N/A
Zinc	0.978	0.986

* Conversion factors for Cd and Pb are hardness dependent. The values shown are with a hardness of 100 mg/L as calcium carbonate (CaCO₃).

LOCAL LIMITS CALCULATOR

09/01/20

Note: To activate the WQS you have to choose a State in the dropdown in Cell B3

City: **Sedalia (N Plant)**

State: **MO**

Plant Data:	Non SIU Flow, MGD:	0.891	Sludge To Disposal, MGD:	NA
	TOTAL Flow, MGD:	1.294	Sludge Disposal %Solids:	NA
	7Q10, MGD:	0.00	Site Use, Years:	NA
	Stream Hardness, mg/l	327	Site Size, Acres:	NA
	Flow To Digsr, MGD:	NA	Sludge Quality Level:	NA

Peek

Add Pollutant Adjust Domestic < #

	NPDES Limit	Removal Efficiencies		Domestic Level	MO WQS	Reserve Factor	Avg. Infl mg/L	Trickling Filter Inhibition	Digestion Inhibition
		Primary	Plant						
Ag	NA	20%	75%	0.001	0.0291	10%	0.001	NA	NA
As	NA	NA	12%	0.002	0.1500	10%	0.002	NA	NA
Cd*	NA	15%	40%	0.001	0.0020	10%	0.001	NA	NA
CN	NA	27%	69%	0.002	0.0050	10%	0.002	30	NA
Cr*	NA	27%	88%	0.005	0.2275	10%	0.005	3.5	NA
Cu*	0.0185	22%	86%	0.140	NA	10%	0.086	NA	NA
Hg	NA	10%	67%	0.0002	0.00077	10%	0.00015	NA	NA
Mo	NA	NA	50%	0.003	NA	10%	0.036	NA	NA
Ni*	NA	14%	80%	0.021	0.1422	10%	0.021	NA	NA
Pb*	NA	57%	69%	0.018	0.0144	10%	0.0183	NA	NA
Se	NA	NA	81%	0.001	0.0050	10%	0.007	NA	NA
Zn*	NA	27%	86%	0.181	0.3250	10%	0.181	NA	NA
O&G	10	NA	96%	57.600	NA	10%	57.600	NA	NA
Sb	NA	NA	10%	0.003	4.3000	10%	0.003	NA	NA
Chlorine_TR	NA	NA	0%	0.018	0.0110	10%	0.018	NA	NA
Fe	NA	NA	87%	0.989	1.0000	10%	2.350	NA	NA
Fluoride	NA	NA	0%	0.255	4.0000	10%	0.387	NA	NA
Phenols_T	NA	NA	87%	0.000	2.5600	10%	0.040	NA	NA
Sulfate	NA	NA	21%	176.000	NA	10%	176.000	NA	NA
Cr_VI	NA	NA	59%	0.004	0.0110	10%	0.004	NA	NA
Al	NA	NA	84%	0.939	0.3440	10%	0.939	NA	NA
Nitrogen_T	NA	NA	61%	39.500	6.0000	10%	39.500	NA	NA
Phosphorus	NA	NA	27%	4.780	0.5000	10%	4.780	NA	NA

*HARDNESS DEPENDENT

SIUs and Plant Flows		
SIU	Averages from 2015-2019 Pretreatment Reports	
	Avg. Process Flow (1000 gal/d)	Avg. Total Flow (1000 gal/day)
Nucor Steel Sedalia, LLC	311	314
Sierra Bullets, LLC	20	25.2
Stanley Black and Decker, Inc.	63.6	63.6
3	394.600	402.800

Notes to reviewers added by Barr:

Column or cell reference	Comment
Column E	EPA's literature domestic values are presented default, in bold blue text
Column F	6 mg/L is a Barr- forecasted WQC for total nitrogen (TKN + nitrate-nitrite), 0.5 is a forecasted WQC for phosphorus.
Column D	Res for chlorine, total residual and fluoride were negative and thus, not used.
Column D	Literature values for removal efficiencies for molybdenum and silver were used due to the number of non-detect samples.
Column D	Literature values for removal efficiencies for cyanide, molybdenum, and silver were used due to the number of non-detect samples (cyanide samples were all non-detect).
Column H	Influent concentrations are from data collected for this study.
Column H	Domestic levels were all set to the influent data concentrations since the literature values were higher than the domestic concentrations with the exception of chromium, nickel, boron, and fluoride.
Column I (sludge)	Not all information was available for sludge; AHLs calculated from EPA's dry sludge are presented in the sludge tab.
Cell E6	This is the mean effluent hardness from the facility (7Q10 is 0, thus this is able to be used).
Phosphorus	Design information was not available from the WWTP; therefore, a forecasted WQC for phosphorus was used to estimate the AHL.
BOD, TSS, NH3 Design	Values from average lbs/day are from the City's previous local limits study.
Cell I30	The estimated population is from the WWTP's 2016 NPDES permit application.

	Conventional Pollutants/Nutrients					Domestic Sources Estimator		
	DW Design		Domestic Sources lbs/day	Expansion Factory	Avg. Infl mg/L	Pop: 8250 persons		
	Daily avg lbs/day	Peak lbs/day				lbs/cap/day	lbs/day	
BOD	6,274	NA	1,403	0%	366	BOD	0.17	1,403
TSS	6,274	NA	1,650	0%	870	TSS	0.2	1,650
NH3	292	NA	163	0%	18.7	NH3	0.0198	163
P,total	NA	NA	73	0%	4.78	P,total	0.0088	73

NOTE: all values mg/l unless noted

CONVERSIONS			
CFS TO MGD	<input type="text" value="1"/>	CFS =	0.646 mgd
SLUDGE, DT/Y to MGD	dt/y	avg %sld	mgd
	<input type="text" value="1"/>	<input type="text" value="1.1%"/>	= 5.97E-05
SLUDGE DryMetricTons/Y to MGD	DMT/Y	avg %sld	mgd
	<input type="text" value="1"/>	<input type="text" value="1.1%"/>	= 6.58E-05
SLUDGE DryMetricTons/Y to DT/y	<input type="text" value="1"/>	DMT/y =	1.10231 DT/Y

SUMMARY OF MASS LOADINGS FOR SEDALIA (N PLANT), MO

	Domestic/commcl Sources		LOCAL LIMIT		% of MAHL	Reserve lbs.	Maximum Allowable Headworks Load (MAHL) lbs.	Headworks ACTUAL Avg. Load lbs.	Current Loading as % of MAHL	Limiting Criteria
	lbs.	% of limit	Maximum Allowable Industrial Load (MAIL)							
			mg/L	lbs.						
Ag	0.004	0%	0.335	1.126	90%	0.125	1.26	0.006	0.52%	Water Quality
As	0.014	1%	0.284	0.953	89%	0.106	1.07	0.021	1.91%	503 NA
Cd	0.010	28%	0.007	0.024	65%	0.003	0.037	0.015	41%	Water Quality
CN	0.014	8%	0.043	0.144	83%	0.016	0.17	0.020	11%	Water Quality
Cr	0.035	0%	5.426	18.226	90%	2.025	20.29	0.050	0.25%	Water Quality
Cu	1.041	75%	0.063	0.311	22%	0.035	1.39	0.025	67%	NPDES #
Hg	0.001	4%	0.006	0.022	86%	0.002	0.03	0.002	6.4%	Water Quality
Mo	0.022	16%	0.031	0.103	76%	0.011	0.14	0.383	281.9%	503 NA
Ni	0.158	9%	0.447	1.503	82%	0.167	1.83	0.229	12.5%	503 NA
Pb	0.136	27%	0.096	0.324	65%	0.036	0.50	0.198	40%	Water Quality
Se	0.010	7%	0.038	0.127	84%	0.014	0.15	0.074	49%	503 NA
Zn	1.345	11%	2.780	9.341	90%	1.038	11.72	1.953	17%	503 NA
O&G	428.118	17%	542.408	1822.140	74%	202.460	2452.72	621.617	25%	NPDES #
Sb	0.019	0%	13.870	46.595	90%	5.177	51.79	0.028	0.05%	Water Quality
Chlorine TR	0.134	113%	-0.004	-0.014	-11%	-0.002	0.12	0.194	164%	Water Quality
Fe	7.351	9%	19.447	65.331	82%	7.259	79.94	25.361	32%	Water Quality
Fluoride	1.895	4%	11.057	37.145	86%	4.127	43.17	4.176	10%	Water Quality
Phenols_T	0.000	0%	56.501	189.807	90%	21.090	210.90	0.432	0.20%	Water Quality
Sulfate	1308.139	NA	NA	NA	NA	NA	NA	1899.385	NA	NA
Cr VI	0.031	11%	0.069	0.233	80%	0.026	0.29	0.046	16%	Water Quality
Al	6.979	31%	4.232	14.217	62%	1.580	22.78	10.134	44%	Water Quality
Nitrogen T	293.588	175%	-33.713	-113.254	-68%	-12.584	167.75	426.282	254%	Water Quality
Phosphorus	35.528	482%	-7.543	-25.341	-344%	-2.816	7.37	51.586	700%	Water Quality

Existing Local Limit (lb/d)	Calc LL > Existing LL?
0.412	yes
0.122	yes
0.069	no
0.127	yes
2.822	yes
2.355	no
0.074	no
2.44	no
0.577	yes
0.672	no
3.61	no
4.063	yes

Barr notes to reviewers:

1. MAIL mg/L (orange cells) were added manually by Barr for review purposes.
2. The existing local limit comparison table was also added manually by Barr to compare the MAILs to the existing limits.

TOXIC POLLUTANTS SUMMARY

UNIFORM CONCENTRATION LIMIT		MIDDLE TIER THRESHOLD	
IF APPLIED mg/l		lb/day	
Ag	0.335	Ag	0.0001
As	0.284	As	0.0001
Cd	0.007	Cd	0.0000
CN	0.043	CN	0.0000
Cr	5.426	Cr	0.0020
Cu	0.063	Cu	0.0001
Hg	0.006	Hg	0.0000
Mo	0.031	Mo	0.0000
Ni	0.447	Ni	0.0002
Pb	0.096	Pb	0.0000
Se	0.038	Se	0.0000
Zn	2.780	Zn	0.0012
Sb	13.870	Sb	0.0032
Chlorine TR	-0.004	Chlorine TR	0.0000
Fe	19.447	Fe	0.0080
Fluoride	11.057	Fluoride	0.0043
Phenols T	56.501	Phenols T	0.0211
Sulfate	0.000	Sulfate	0.0000
Cr VI	0.069	Cr VI	0.0000
Al	4.232	Al	0.0023
Nitrogen T	-33.713	Nitrogen T	0.0168
Phosphorus	-7.543	Phosphorus	0.0007

Conventional Pollutants/Nutrients - Long Term Average Limits
Based on Design Daily Average Criteria

	Domestic/commcl Sources		LOCAL LIMIT		Reserve lbs.	Maximum Allowable Headworks Load (MAHL) Avg. lbs.	Headw ACTUAL Avg. Load lbs.	Current Loading as % of MAHL
	lbs.	% of limit	lbs.	% of MAHL				
BOD	1403	22%	4872	78%	0	6274	3950	63%
TSS	1650	26%	4624	74%	0	6274	9389	150%
NH3	163	56%	129	44%	0	292	202	69%
P.total	73	NA	NA	NA	0	NA	52	NA

Conventional Pollutants/Nutrients - Daily Maximum Limits
Based on Peak Design Criteria

	Domestic/commcl Sources		LOCAL LIMIT		Reserve lbs.	Maximum Allowable Headworks Load (MAHL) Peak lbs.	Headw ACTUAL Avg. Load lbs.	Current Loading as % of MAHL
	lbs.	% of limit	lbs.	% of MAHL				
BOD	1403	NA	NA	NA	0	NA	3950	NA
TSS	1650	NA	NA	NA	0	NA	9389	NA
NH3	163	NA	NA	NA	0	NA	202	NA
P.total	73	NA	NA	NA	0	NA	52	NA

Conventional Pollutants/Nutrients Uniform Concentration Limits
Flow for SIUs Receiving Limits, mgd: 0.403

	Daily Mail mg/l	Mo. Avg mg/l	Existing Local Limit	Calc LL >
BOD	NA	1450	300	yes
TSS	NA	1376	350	yes
NH3	NA	38	NA	yes
P.total	NA	NA	NA	NA

Manually added by Barr

Average Headworks Concentration Based on Sludge Metals Content

These calculations are designed to use measured levels of metals in sludge to back-calculate the most probable influent concentration for long term loadings at the treatment plant. It should be used especially when influent levels are measured at below detection limit.

Input from DATA Page:

Ave. total Plant flow, mgd: **1.29**
 annual sludge production, dt/y: **189.6**

503 Metals Limits

Sludge Metals Loadings from 503 reports

Metal	Evaluate For:		Plant Removal Eff.	%point Variance from Literature Mean	lbs to Sludge per day	lbs/day at Headworks	Calculated Influent mg/L	Use Sludge "Influent"	Measured Influent Level	Dry Sludge Eq.	
	Avg	Max								Crit Class A mg/kg	AHL lbs/day
Ag	0.00	0.00	75%	-	0.000	0.000	0.0000	Ag	0.0006	41	0.95
As	6.01	0.00	45%	-	0.006	0.014	0.0013	As	0.0019		
Cd	0.95	0.00	67%	-	0.001	0.001	0.0001	Cd	0.0014	39	0.28
CN	0.00	0.00	69%	-	0.000	0.000	0.0000	CN	0.0018		
Cr	24.2	0.0	82%	-	0.025	0.031	0.0028	Cr	0.0047		
Cu	143	0.0	86%	-	0.149	0.173	0.0160	Cu	0.0857	1500	5.01
Hg	0.463	0.000	60%	-	0.000	0.001	0.0001	Hg	0.0002	17	0.07
Mo	2.71	0.00	50%	-	0.003	0.006	0.0005	Mo	0.0355	18	0.10
Ni	39.4	0.0	42%	-	0.041	0.097	0.0090	Ni	0.0213	420	1.50
Pb	51.1	0.00	61%	-	0.053	0.087	0.0081	Pb	0.0183	300	1.25
Se	3.24	0.00	50%	-	0.003	0.007	0.0006	Se	0.0069	36	0.13
Zn	339	0.0	79%	-	0.353	0.446	0.0414	Zn	0.1810	2800	9.34

Sludge Data Analysis

Metal	Date	Date	Date	Date	Date	Date	Date	Date	Date	Average	Max
Ag										0.00	0.00
As										0.00	0.00
Cd										0.00	0.00
CN										0.00	0.00
Cr										0.0	0.0
Cu										0.0	0.0
Hg										0.0000	0.0000
Mo										0.0	0.0
Ni										0.0	0.0
Pb										0.00	0.00
Se										0.0	0.0
Zn										0.0	0.0
%solids										0.0	0.0

Barr notes to reviewers:

- Tables with orange headings were added by Barr. Due to limited sludge information, the dry sludge equation from Appendix T of EPA's Local Limits Development Guidance document was used. This calculation uses MDNR low metal concentrations for biosolids.
- Influent flow concentrations were not back-calculated for sludge due to:
 - the availability of influent data
 - sludge quality data is combined from all plants; thus, is not representative of the POC concentrations at each WWTP.
- Crit low metal concentrations are from MDNR's Form 5 annual report. Concentrations in red deviate from MDNR's NPDES Standards Part III for Biosolids (referenced in the MSOP).

WWTP	Average Annual Disposal (Dry Tons)	Average Loads (Days) to Disposal	Qsludge
Central	324.1	265.3	1.22
North	117.7	90.6	1.30
SE	189.6	128.2	1.48



From MDNR Standard Condition III: Biosolids

Pollutant	Milligrams per kilogram dry weight
Arsenic	41
Cadmium	39
Copper	1,500
Lead	300
Mercury	17
Nickel	420
Selenium	100
Zinc	2,800

From MDNR Form 5, Section 2 for Biosolids (2019 Update)

POLLUTANT	AVERAGE SAMPLE CONCENTRATION mg/kg DRY WEIGHT	LOW METAL CONCENTRATION mg/kg DRY WEIGHT	CEILING CONCENTRATION mg/kg DRY WEIGHT
ARSENIC		41	75
CADMIUM		39	85
COPPER		1,500	4,300
LEAD		300	840
MERCURY		17	57
MOLYBDENUM		18	75
NICKEL		420	420
SELENIUM		36	100
ZINC		2,800	7,500

From 40 CFR 503

Pollutant	Ceiling concentration (milligrams per kilogram) ¹
Arsenic	75
Cadmium	85
Copper	4300
Lead	840
Mercury	57
Molybdenum	75
Nickel	420
Selenium	100
Zinc	7500

¹Dry weight basis.

²(2) Cumulative pollutant loading rates.

Table 2 of §503.13-Cumulative Pollutant Loading Rates

Pollutant	Cumulative pollutant loading rate (kilograms per hectare)
Arsenic	41
Cadmium	39
Copper	1500
Lead	300
Mercury	17
Nickel	420
Selenium	100
Zinc	2800

Appendix D

Southeast WWTP R7 Calculations

Tab	Comment
General	Orange tabs were added by Barr Engineering Co. (Barr)
General	POCs added to this calculator (i.e., not EPA's default POCs) are shown in the green tabs. Tabs for EPA's default POCs are the standard gray color.
General	Reviewer notes specific to tabs are presented with orange headings
Data (Column 1 - sludge information)	Not all information was available for sludge; AHLs calculated from EPA's dry sludge are presented in the sludge tab.
All individual POC tabs	The digestion calculation was manually removed from each tab since the WWTP does not have anaerobic digestion treatment.
All individual POC tabs	"Barr notes to reviewers" have been added where Barr manually updated POC tabs
All individual POC tabs	Instream concentrations were not added for this analysis as the 7Q10 value is zero.

Table 1. Freshwater Criteria Conversion Factors for Dissolved Metals

Metal	Conversion Factors	
	Acute	Chronic
Arsenic	1.000	1.000
Cadmium *	0.944	0.909
Chromium (III)	0.316	0.860
Chromium (VI)	0.982	0.962
Copper	0.960	0.960
Lead *	0.791	0.791
Mercury	0.85	N/A
Nickel	0.998	0.997
Silver	0.85	N/A
Zinc	0.978	0.986

* Conversion factors for Cd and Pb are hardness dependent. The values shown are with a hardness of 100 mg/L as calcium carbonate (CaCO₃).

LOCAL LIMITS CALCULATOR

09/01/20

City: **Sedalia (SE Plant)**

State: **MO**

Plant

Data:

Non SIU Flow, MGD: 1.936	Sludge To Disposal, MGD: NA
TOTAL Flow, MGD: 1.940	Sludge Disposal %Solids: NA
7Q10, MGD: 0.00	Site Use, Years: NA
Stream Hardness, mg/l: 298	Site Size, Acres: NA
Flow To Digrs: MGD: NA	Sludge Quality Level: NA

Peek

Note: To activate the WQS you have to choose a State in the dropdown in Cell B3

Add Pollutant

Adjust Domestic

<

#

	NPDES Limit	Removal Efficiencies		Domestic Level	MO WQS	Reserve Factor	Avg. Infl mg/L	AS Inhibition	Digestion Inhibition
		Primary	Plant						
Ag	NA	20%	75%	0.008	0.0248	10%	0.008	0.25	NA
As	NA	NA	45%	0.002	0.1500	10%	0.002	0.1	NA
Cd*	NA	15%	67%	0.001	0.0019	10%	0.001	1	NA
CN	NA	27%	69%	0.002	0.0050	10%	0.002	0.1	NA
Cr*	NA	27%	34%	0.004	0.2108	10%	0.004	1	NA
Cu*	NA	22%	86%	0.032	0.0237	10%	0.032	1	NA
Hg	NA	10%	60%	0.0001	0.00077	10%	0.00005	0.1	NA
Mo	NA	NA	19%	0.002	NA	10%	0.002	NA	NA
Ni*	NA	14%	30%	0.004	0.1315	10%	0.004	1.0	NA
Pb*	NA	57%	79%	0.006	0.0128	10%	0.0063	0.1	NA
Se	NA	NA	18%	0.001	0.0050	10%	0.001	NA	NA
Zn*	NA	27%	21%	0.067	0.3004	10%	0.067	1	NA
O&G	10	NA	88%	7.670	NA	10%	7.670	NA	NA
Nitrogen_T	NA	NA	21%	17.100	6.0000	10%	17.100	NA	NA
Phosphorus	NA	NA	30%	2.550	0.5000	10%	2.550	NA	NA

*HARDNESS DEPENDENT

SIUs and Plant Flows		
SIU	Averages from 2015-2019 Pretreatment Reports	
	Avg. Process Flow (1000 gal/d)	Avg. Total Flow (1000 gal/day)
Inter-State Studio and Publishing	4.4	4.4
1	4.400	4.400

Notes to reviewers added by Barr:

Column or cell reference	Comment
Column E	EPA's literature domestic values are presented default, in bold blue text
Column F	6 mg/L is a Barr- forecasted WQC for total nitrogen (TKN + nitrate-nitrite), 0.5 is a forecasted WQC for phosphorus.
Column H	Influent concentrations are from data collected for this study.
Column H	Domestic levels were all set to the influent data concentrations since the literature values were higher than the domestic concentrations.
Column I (sludge)	Not all information was available for sludge; AHLs calculated from EPA's dry sludge are presented in the sludge tab.
Cell E6	This is the mean effluent hardness from the facility (7Q10 is 0, thus this is able to be used).
Phosphorus	Design information was not available from the WWTP; therefore, a forecasted WQC for phosphorus was used to estimate the AHL.
BOD, TSS, NH3 Design	Values from average lbs/day are from the City's previous local limits study.
Cell I30	The estimated population is from the WWTP's 2016 NPDES permit application.

	Conventional Pollutants/Nutrients				Avg. Infl mg/L	Domestic Sources Estimator		
	DW Design		Domestic Sources lbs/day	Expansion Factory		Pop: 7500 persons		
	Daily avg lbs/day	Peak lbs/day				lbs/cap/day	lbs/day	
BOD	4,889	NA	1,275	0%	93.65	BOD	0.17	1,275
TSS	6,274	NA	1,500	0%	155	TSS	0.2	1,500
NH3	627	NA	149	0%	17.9	NH3	0.0198	149
P,total		NA	66	10%	2.55	P,total	0.0088	66

NOTE: all values mg/l unless noted

CONVERSIONS

CFS TO MGD	
1	CFS = 0.646 mgd
SLUDGE, DT/Y to MGD	
1	dt/y avg %sld = 5.97E-05 mgd
1	1.1%
SLUDGE DryMetricTons/Y to MGD	
1	DMT/Y avg %sld = 6.58E-05 mgd
1	1.1%
SLUDGE DryMetricTons/Y to DT/y	
1	DMT/y = 1.10231 DT/Y

SUMMARY OF MASS LOADINGS FOR SEDALIA (SE PLANT), MO

	Domestic/commdl Sources		LOCAL LIMIT		Maximum Allowable Industrial Load (MAIL)	% of MAHL	lbs. Reserve	Maximum Allowable Headworks Load (MAHL) lbs	Headworks ACTUAL Avg. Load lbs	Current Loading as % of MAHL	Limiting Criteria
	lbs.	% of limit	mg/L	lbs.							
Ag	0.129	8%	36.198	1.328	83%	0.148	1.61	0.129	8.1%	Water Quality	
As	0.033	9%	8.081	0.297	82%	0.033	0.36	0.033	9.1%	503 NA	
Cd	0.008	9%	2.068	0.076	82%	0.008	0.09	0.008	8.9%	Water Quality	
CN	0.030	11%	5.676	0.208	80%	0.023	0.26	0.030	11%	Water Quality	
Cr	0.065	1%	124.954	4.585	89%	0.509	5.16	0.065	1.3%	Water Quality	
Cu	0.521	19%	54.438	1.998	73%	0.222	2.74	0.522	19%	Water Quality	
Hq	0.001	3%	0.744	0.027	88%	0.003	0.03	0.001	2.6%	Water Quality	
Mo	0.024	7%	8.359	0.307	84%	0.034	0.37	0.024	6.6%	503 NA	
Ni	0.069	2%	73.035	2.680	88%	0.298	3.05	0.070	2.3%	Water Quality	
Pb	0.101	11%	21.103	0.774	81%	0.086	0.96	0.101	10.5%	Water Quality	
Se	0.021	21%	1.904	0.070	71%	0.008	0.10	0.021	21.5%	Water Quality	
Zn	1.085	18%	123.519	4.533	74%	0.504	6.12	1.087	17.8%	Water Quality	
O&G	123.816	9%	30031.488	1102.036	82%	122.448	1348.30	124.086	9.2%	NPDES #	
Nitrogen T	276.044	225%	-3756.392	-137.845	-112%	-15.316	122.88	276.671	225.2%	Water Quality	
Phosphorus	41.164	359%	-728.160	-26.721	-233%	-2.969	11.47	41.258	359.6%	Water Quality	

Existing Local Limit (lb/d)	Calc LL > Existing LL?
0.297	yes
0.059	yes
0.02	yes
0.136	yes
2.314	yes
0.558	yes
0.022	yes
2.16	NA
0.564	yes
0.002	yes
0.002	yes
2.435	yes

Barr notes to reviewers:

1. MAIL mg/L (orange cells) were added manually by Barr for review purposes.
2. The existing local limit comparison table was also added manually by Barr to compare the MAILs to the existing limits.

TOXIC POLLUTANTS SUMMARY

UNIFORM CONCENTRATION LIMIT

IF APPLIED		MIDDLE TIER THRESHOLD	
	mg/l		lb/day
Aq	36.198	Aq	0.0002
As	8.081	As	0.0000
Cd	2.068	Cd	0.0000
CN	5.676	CN	0.0000
Cr	124.954	Cr	0.0005
Cu	54.438	Cu	0.0003
Hq	0.744	Hq	0.0000
Mo	8.359	Mo	0.0000
Ni	73.035	Ni	0.0003
Pb	21.103	Pb	0.0001
Se	1.904	Se	0.0000
Zn	123.519	Zn	0.0006
Nitrogen T	-3756.392	Nitrogen T	0.0123
Phosphorus	-728.160	Phosphorus	0.0011

Conventional Pollutants/Nutrients - Long Term Average Limits

Based on Design Daily Average Criteria

	Domestic/commdl Sources		LOCAL LIMIT		Maximum Allowable Industrial Load (MAIL)	% of MAHL	lbs. Reserve	Maximum Allowable Headworks Load (MAHL) Avg. lbs	Headworks ACTUAL Avg. Load lbs	Current Loading as % of MAHL
	lbs.	% of limit	lbs.	% of MAHL						
BOD	1275	26%	3614	74%	0	4889	1515	31%		
TSS	1500	24%	4774	76%	0	6274	2508	40%		
NH3	149	24%	479	76%	0	627	290	46%		
P.total	66	NA	NA	NA	0	0	41	NA		

Conventional Pollutants/Nutrients - Daily Maximum Limits

Based on Peak Design Criteria

	Domestic/commdl Sources		LOCAL LIMIT		Maximum Allowable Industrial Load (MAIL)	% of MAHL	lbs. Reserve	Maximum Allowable Headworks Load (MAHL) Peak lbs	Headworks ACTUAL Avg. Load lbs	Current Loading as % of MAHL
	lbs.	% of limit	lbs.	% of MAHL						
BOD	1275	NA	NA	NA	0	NA	NA	1515	NA	
TSS	1500	NA	NA	NA	0	NA	NA	2508	NA	
NH3	149	NA	NA	NA	0	NA	NA	290	NA	
P.total	66	NA	NA	NA	0	NA	NA	41	NA	

Conventional Pollutants/Nutrients Uniform Concentration Limits

Flow for SIUs Receiving Limits, mgd: 0.0044

	Daily Max mg/l	Mo. Avg. mg/l	Existing Local Limit	Calc LL > Existing
BOD	NA	98465	300	yes
TSS	NA	130086	350	yes
NH3	NA	13040	NA	yes
P.total	NA	NA	NA	NA

Manually added by Barr

Appendix E. Region VII Spreadsheet Data [MO 780-2954 3.8.2]

LOCAL LIMITS CALCULATOR

11/12/2025

City: **Sedalia Central WWTP** NPDES #: **MO-0023019**

State: **MO**

Plant	Non SIU Flow, MGD: 1.409	Flow To Digstr: MGD: NA
Data:	TOTAL Flow, MGD: 1.693	Sludge to Disposal, MGD: NA
	7Q10, MGD: 0.0646	Sludge to Disposal, %Solids: NA
	Stream Hardness, mg/l: 336	Site Use, Years: NA
	Sludge Quality Level: EQ	Site Size, Acres: NA

Add Pollutant Adjust Domestic < #

	NPDES Limit	Removal Efficiencies		Domestic Level	MO	Reserve Factor	Avg. Infl mg/L	AS Inhibition	Digestion Inhibition
		Primary	Plant		WQS				
Ag	NA	20%	75%	0.0025	0.0304	10%	0.0029	0.3	NA
As	NA	NA	45%	0.0025	0.1500	10%	0.0037	0.1	NA
Cd*	NA	15%	67%	0.0025	0.0021	10%	0.0025	1.0	NA
CN	NA	27%	69%	0.0100	0.0050	10%	0.0056	0.1	NA
Cr*	NA	27%	21%	0.0025	0.2323	10%	0.0115	1.0	NA
Cu*	0.0163	22%	86%	0.0183	NA	10%	0.0327	1.0	NA
Hg	NA	10%	60%	0.0002	0.0008	10%	0.0002	0.1	NA
Mo	NA	NA	50%	0.0025	NA	10%	0.0090	NA	NA
Ni*	NA	14%	41%	0.0025	0.1453	10%	0.0203	1.0	NA
Pb*	NA	57%	69%	0.0025	0.0149	10%	0.0149	0.1	NA
Se	NA	NA	50%	0.0025	0.0050	10%	0.0025	NA	NA
Zn*	NA	27%	24%	0.0608	0.3321	10%	0.0626	1.0	NA
Cl	NA		4%	60.4	250.0	10%	401.0	180.0	
Hex Chrome	NA		NA	0.0	0.011	10%	NO DATA	1	NA
Phenol	NA		90%	0.1	2.5	10%	0.1		
Sulfate	NA		90%	101.2058	250.0	10%	NO DATA	30.0	750
Total Nitrogen	NA		56%	37.9000	15.0	10%	44.30		
HEM	NA		90%	29.9914	5.0	10%	NO DATA		

*HARDNESS DEPENDENT

	DW Design		Domestic Sources lbs/day	Expansion Factor	Avg. Infl mg/L	Avg. Infl lbs/day
	Daily avg lbs/day	Maximum lbs/day				
BOD	4,330	-	1,375	20%	174.91	2469.3
TSS	5,190	-	59	20%	250.97	3543.1
TKN	860		445	20%	31.00	437.7
P,total	215		32	20%	9.44	133.3
Ammonia	465		365	20%	22.5	318.2

Domestic Sources Estimator				
Pop:	7,500 persons		Domestic conc *	% IU Contr.
	lbs/cap/day	lbs/day	Dom flow * 8.34	to Design
BOD	0.17	1,275.00	1374.59	28%
TSS	0.2	1,500.00	58.74	67%
TKN	0.033	247.50	445.27	-1%
P,total	0.0088	66.00	32.31	47%
Ammonia	0.0198	148.50	365.38	37%

SUMMARY OF MASS LOADINGS FOR SEDALIA CENTRAL WWTP, MO

Parameter	Domestic/commcl Sources		LOCAL LIMIT		lbs. Reserve	Maximum Allowable Headwrks Load (MAHL) lbs	Headworks ACTUAL Avg.Load lbs	Current Loading as % of MAHL	Limiting Criteria
	lbs.	% of limit	Maximum Allowable Industrial Load (MAIL)						
	lbs.	% of MAHL	lbs.	% of MAHL					
Ag	0.029	2%	1.578	89%	0.175	1.78	0.041	2%	Water Quality
As	0.029	4%	0.623	86%	0.069	0.72	0.052	7.2%	503 EQ
Cd	0.029	32%	0.057	61%	0.006	0.09	0.035	38%	Water Quality
CN	0.117	50%	0.107	45%	0.012	0.24	0.079	34%	Water Quality
Cr	0.029	1%	3.862	89%	0.4291	4.32	0.162	4%	Water Quality
Cu	0.215	13%	1.286	78%	0.143	1.64	0.462	28%	NPDES #
Hg	0.002	8%	0.023	83%	0.003	0.03	0.003	11%	Water Quality
Mo	0.029	3%	1.025	88%	0.114	1.17	0.127	11%	503 EQ
Ni	0.029	1%	3.205	89%	0.356	3.59	0.286	8%	Water Quality
Pb	0.029	4%	0.597	86%	0.066	0.69	0.210	30%	Water Quality
Se	0.029	20%	0.105	72%	0.012	0.15	0.035	24%	Water Quality
Zn	0.714	11%	5.149	80%	0.572	6.44	0.883	14%	Water Quality
Cl	710	19%	2659	73%	295.4	3664	5661	155%	Water Quality
Hex_Chrome	0.11	65%	0.05	31%	0.01	0.16	NA	#N/A	Water Quality
Cyanide (am)	0.05	0%	0.614	1%	0.07	73.00	NA	#N/A	Water Quality
Phenol	1.23	0%	328.658	90%	36.518	366.41	1.03	0%	Water Quality
Total Nitrogen	445.27	90%	46.462	9%	5.162	496.90	625.411	126%	Water Quality
HEM	352	48%	342	47%	38	732.82	NA	#N/A	Water Quality

TOXIC POLLUTANTS SUMMARY

UNIFORM CONCENTRATION LIMIT			MIDDLE TIER THRESHOLD	
Parameter	If APPLIED		lb/day	
	empty	Uniform Conc. (mg/L)		
Silver	Ag	0.666	Ag	0.0002
Arsenic	As	0.263	As	0.0001
Cadmium	Cd	0.024	Cd	0.0000
Cyanide	CN	0.045	CN	0.0000
Chromium	Cr	1.630	Cr	0.0004
Copper	Cu	0.543	Cu	0.0002
Mercury	Hg	0.010	Hg	0.0000
Molybdenum	Mo	0.433	Mo	0.0001
Nickel	Ni	1.353	Ni	0.0004
Lead	Pb	0.252	Pb	0.0001
Selenium	Se	0.045	Se	0.0000
Zinc	Zn	2.174	Zn	0.0006
Chloride	Cl	1122.4		
Chromium IV, tr	Hex_Chrome	0.021		
Cyanide (amena	Cyanide (amenable)	#REF!		
Phenol	Phenol	138.731		
Total Nitrogen	Total Nitrogen	19.612		
HEM	HEM	144.539	HEM	0.073281937

Conventional Pollutants/Nutrients - Long Term Average Limits

sign Daily Average Criteria

	Domestic/commcl Sources		LOCAL LIMIT		lbs. Reserve	Maximum Allowable Headwrks Load (MAHL) Avg.lbs	Headworks ACTUAL Avg.Load lbs	Current Loading as % of MAHL
	lbs.	% of limit	lbs.	% of MAHL				
BOD	1375	32%	2089	48%	866	4330	2469	57%
TSS	59	1%	4093	79%	1038	5190	3543	68%
TKN	445	52%	243	28%	172	860	438	51%
P _{total}	32	15%	140	65%	43	215	133	62%
Ammonia-N	365	79%	7	1%	93	465	318	68%

Conventional Pollutants/Nutrients - Daily Maximum Limits

Peak Design Criteria

	Domestic/commcl Sources		LOCAL LIMIT		lbs. Reserve	Maximum Allowable Headwrks Load (MAHL) Peak,lbs	Headworks ACTUAL Avg.Load lbs	Current Loading as % of MAHL
	lbs.	% of limit	lbs.	% of MAHL				
BOD	1375	NA	NA	NA	0	0	2469	NA
TSS	59	NA	NA	NA	0	0	3543	NA
TKN	445	NA	NA	NA	0	0	438	NA
P _{total}	32	NA	NA	NA	0	0	133	NA

Conventional Pollutants/Nutrients Uniform Concentration Limits

Flow for SIUs Receiving Limits, mgd: **0.284056559**

Parameter	Column	Daily Max	
		Daily Max (mg/L)	Mo. Avg. (mg/L)
BOD		NA	882
TSS		NA	1728
TKN		NA	102
P _{total}		NA	59
Ammonia		NA	3

City of Sedalia, Missouri | MO-0023027

Technical Re-Evaluation of Local Limits: North WWTP

Document Publish Date: **11/12/2025**

For Missouri Department of Natural Resources

Prepared By:



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B. Industrial Waste Survey	<i>[MO 780-2954 3.8.1]</i>	
C. Current Effective NPDES Permit (Available upon request)	<i>[MO 780-2954 3.3]</i>	
D. Previous Detailed Technical Local Limit Evaluation*	<i>[MO 780-2954 3.2]</i>	
*See <i>Technical Re-evaluation of Local Limits for Central WWTP</i>	<i>[MO 780-2954 3.8.2]</i>	
E. Region VII Spreadsheet Data	<i>[MO 780-2954 3.8.3]</i>	
F. Raw Analytical Data (Available upon request)		

Part II. Detailed Technical Reevaluation of Local Limit Report Form

All POTWs with approved programs must continue to develop local limits as necessary per 40 CFR 403.5(c) (1)¹. This Part II form addresses the detailed technical reevaluation of local limits for one POTW and its permit. For more than one plant and permit, please provide a separate Part II and I (if needed) form. Components of Part I are used for reporting of the Part II Detailed Reevaluation. This form must summarize the results of the detailed reevaluation.

Because POTW site-specific conditions change, Section 2.0 of this form provides some factors to consider that may indicate the need for a more detailed technical re-evaluation of local limits. If any of those factors indicate a need for the detailed technical re-evaluation, then the POTW should complete Part II of this Form.

Reference Document: 2004 EPA Local Limits Development Guidance.

Note: Missouri state regulations at 10 CSR 20-6.100 incorporate the federal 40 CFR 403 pretreatment regulations by reference; therefore, only the federal regulations will be cited in this form.

1.0 BASIC INFORMATION

1.1 POTW NAME/CONTROL AUTHORITY:	Sedalia North WWTP / City of Sedalia
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1.2 NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) MISSOURI STATE OPERATING PERMIT

PERMIT NO.	EXPIRATION DATE	WWTP NAME
MO-0023027	10/31/2028	Sedalia North WWTP

1.3 LOCAL LIMIT REEVALUATION REPORT WITH CONTROL AUTHORITY LETTER

1.3.1 Due Date for Detailed Technical Reevaluation:	11/30/2025
1.3.2 Entity Performing Local Limit Analysis:	DROP Collaborative
1.3.3 Region VII Spreadsheet Version:	PublicBeta v2.2.11

2.0 BACKGROUND LEADING TO THE NEED TO REVISE LOCAL LIMITS

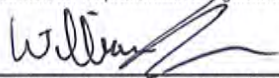
The City of Sedalia submitted a Part I. Technical Evaluation performed by Drop Collaborative in February 2025 which determined the need to revise local limits.

3.0 REQUIRED DETAILED TECHNICAL REEVALUATION REPORTING COMPONENTS

3.1	Part I Form, if completed prior to Part II. <i>Refer to Appendix A.</i>
3.2	Previous Detailed Technical Local Limit Evaluation – Data and Summary Pages or Other Summary Sheets. <i>Refer to Appendix B.</i>
3.3	General: Wastewater Treatment Facilities and Operations (optional). Attach current effective permit, if not provided. <i>Refer to Appendix C - Will be provided upon request.</i>
3.4.	Pollutants of Concern (POCs) list and how developed. POCs not included or added per Part I. Section 5.0 – Pollutant of Concern. Tables included. <i>Refer to Section 2.</i>
3.5.	Discussion: Input, Assumptions and Methods Use in the Region 7 Spreadsheet for 1) conventional, 2) conservative, 3) non-conservative pollutants. <i>Refer to Section 3.</i>
3.5.1	Table of Plant Removal Efficiencies. <i>Refer to Table 3.4</i>
3.5.2	Table of Domestic Sampling Summary. <i>Refer to Table 3.3</i>
3.5.3	Table of Influent Sampling and Effluent Sampling. <i>Refer to Table 3.3</i>
3.6.	Results: Part I. Section 9.0 - Reevaluation Comparison of Current Head works Loading to Revised MAHLs for 1) conventional, 2) conservative, 3) non- conservative pollutants. <i>Refer to Section 4</i>
3.6.1	Table of Existing MAILs, calculated or proposed MAILs for 1) conventional, 2) conservative, 3) non-conservative pollutants. <i>Refer to Table 4</i>
3.6.2	Provide written rationale for selected local limits for each POC. <i>Refer to Table 5.1</i>
3.7.	Summary of local limits for adoption and table showing methodology for allocation of Revised MAILs in permits. <i>With limit durations</i>
3.7.1	Recommendations for on-going local limits evaluations.
3.8.	Appendices Summarizing General Information. <i>Refer to Section 5</i>
3.8.1	Most recent Industrial Waste Survey Summary Table. <i>Refer to Appendix D.</i>
3.8.2	Region VII Spreadsheet Data Input, Output, Sludge Printouts (for MAHL comparison and current conditions) as Adobe pdf. Excel Spreadsheet may be requested by approval authority. <i>Refer to Appendix E.</i>
3.8.3	Raw Analytical Data (Contract Laboratory Reports) – <i>Will be provided upon request</i>

4.0 CERTIFICATION BY AN OFFICAL REPRESENTATIVE OF THE MUNICIPALITY PER 40 CFR 403.9(b)(1)

"I certify under penalty of law that this document and all attachments were prepared under direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations"

Authorized Representative Signature 	Date 11/18/2025
Duly Authorized Representative Name William Bracken	Duly Authorized Representative Title Utilities Director
Email Contact of Duly Authorized Representative: wbracken@sedalia.com	

Section 2: Pollutants of Concern (POCs) [MO 780-2954 3.4]

Pollutants of Concern (POCs) were identified based on EPA guidance, NPDES permit parameters, and pollutants of concern for the identified industrial users. Table 2.1 summarizes the pollutants of concern initially included for evaluation as well as the basis for the evaluation. POCs with current local limits are bolded.

Table 2.1: Pollutants of Concern (POCs) [MO 780-2954 3.4]

Pollutant of Concern	Basis for Inclusion
Silver	EPA Specified
Arsenic	EPA Specified, 503 Protection, NPDES Monitoring only
Cadmium	EPA Specified, 503 Protection, NPDES Permit Limit
Cyanide	EPA Specified
Chromium	EPA Specified
Copper	EPA Specified, 503 Protection, NPDES Permit Limit
Mercury	EPA Specified, 503 Protection
Molybdenum	EPA Specified, 503 Protection
Nickel	EPA Specified, 503 Protection
Lead	EPA Specified, 503 Protection
Selenium	EPA Specified, 503 Protection
Zinc	EPA Specified, 503 Protection
BOD	EPA Specified, NPDES Permit Limit
TSS	EPA Specified, NPDES Permit Limit
Ammonia-N	NPDES Monitoring Only
TKN	EPA Specified, NPDES Monitoring Only
Phosphorus	NPDES Monitoring Only
COD	DROP Collaborative Recommendation
Total Nitrogen	NPDES Monitoring Only
Chloride	DROP Collaborative Recommendation
Cyanide (amenable)	In place of cyanide total
Chromium VI, total	
Phenol	Expanded Effluent testing
HEM	Prohibited Discharge

Section 3. Discussion of Inputs [MO 780-2954 3.5]

Based on the technical evaluation of local limits, a local limit update was determined necessary. This section provides the information used in EPA Region VII Local Limit Calculator Spreadsheet (Version 6, Appendix E). The local limit calculations and is based on the information summarized in the Local Limit Part I evaluation (Appendix A).

Table 3.1 EPA Region VII Local Limit Calculator Inputs [MO 780-2954 3.3]

Data Variables	Value	Basis Notes
Non SIU Flow	0.685 MGD	Non SIU flow calculated as total flow minus SIU flow. Flow data based on data from 2021 to 2025.
SIU Flow	0.142 MGD	Current Significant Industrial Users. For regulated basis, description, flow, and POCs included see Table 3.2
Total Flow	0.827 MGD	Average flow from discharge monitoring reports from 2021 to 2025.
7q10	0 cfs	Low flow of the receiving stream. Refer to the POTW's NPDES permit.
Hardness	358	Based on POTW/receiving stream data.
Flow to Dgstr	NA	Based on volume of sludge wasted to the digester per day.
Sludge Flow to Disposal	NA	Based on annual dry tons production at % solids when land applied. Calculation is included at the bottom of the Region VII Spreadsheet and uses the metric dry tons per year and the average percent solids to calculate average MGD.
Sludge Disposal % solids	NA	Average percent solids of the sludge when it is disposed of/land applied.
Site Use	NA	Based on the life of the fields for land application
Site Size	NA	Based on current understanding of land available for land application of biosolids.
Sludge Quality Level	NA	Excellent Quality
Design Capacity	See Table 3.4 Design Basis	Based on plant design pollutants.

The City of Sedalia is currently performing an industrial waste survey. Sixteen industries were identified as being currently permitted or needing further evaluation based on surveys sent out in 2023. Flows from these identified industries are included as the nondomestic flow in this evaluation.

Table 3.2 Significant Industrial Users

Industry Name	Regulated Basis	Description	Average Flow (GPD)	Pollutants of Concern Present
Sierra Bullets, LLC	CFR 468	Small caliber projectiles, bullets	21,632	Copper, lead , zinc
Stanley Black and Decker, Inc	CFR 433	Fabricated sheet metal products	43,160	Metals, nonconventional pollutants, pH, solids
Nucor Steel Sedalia, LLC	CFR 420	Produce carbon steel merchants	46,757	Metals
St. Joseph Plastics	Otherwise SIU	*Not permitted yet	30,400	
Starline Brass	CFR 46	Small caliber projectiles, bullets	*Combined with Sierra Bullets	*Combined with Sierra Bullets

Table 3.3 summarizes the data selected for the local limits reevaluation. All available data from 2022 to 2025 was used to determine influent, effluent and domestic concentrations. Only data from 2025 was used for influent cadmium and selenium given the lower MRL for non-detects. The most recent background sample from a site specific domestic location was used to determine background loading to the WWTP.

Table 3.3 Dataset Summaries

Pollutant of Concern	Influent		Effluent		Background	
	# Non-detects / # Samples	Date Range	# Non-detects / # Samples	Date Range	# Non-detects / # Samples	Date Range
Silver	8 / 8	2024 - 2025	8 / 8	2024 - 2025	1 / 1	2025
Arsenic	8 / 8	2024 - 2025	8 / 8	2024 - 2025	1 / 1	2025
Cadmium	8 / 8	2024 - 2025	31 / 39	2022 - 2025	1 / 1	2025
Cyanide	8 / 8	2024 - 2025	8 / 8	2024 - 2025	1 / 1	2025
Chromium	8 / 8	2024 - 2025	10 / 12	2022 - 2025	1 / 1	2025
Copper	1 / 8	2024 - 2025	1 / 43	2022 - 2025	0 / 1	2025
Mercury	8 / 8	2024 - 2025	8 / 8	2024 - 2025	1 / 1	2025
Molybdenum	7 / 8	2024 - 2025	7 / 8	2024 - 2025	1 / 1	2025
Nickel	7 / 8	2024 - 2025	7 / 8	2024 - 2025	0 / 1	2025
Lead	6 / 8	2024 - 2025	7 / 8	2024 - 2025	1 / 1	2025
Selenium	8 / 8	2024 - 2025	8 / 8	2024 - 2025	1 / 1	2025
Zinc	1 / 8	2024 - 2025	0 / 8	2024 - 2025	0 / 1	2025
BOD	0 / 157	2022 - 2025	1 / 196	2022 - 2025	0 / 1	2025
TSS	0 / 198	2022 - 2025	0 / 196	2022 - 2025	0 / 1	2025
Ammonia-N	0 / 185	2022 - 2025	0 / 192	2022 - 2025	0 / 1	2025
TKN	0 / 50	2022 - 2025	0 / 50	2022 - 2025	0 / 1	2025
Phosphorus	0 / 52	2022 - 2025	1 / 49	2022 - 2025	0 / 1	2025
COD	0 / 0	NA	0 / 0	NA	0 / 0	0
Total Nitrogen	0 / 1	2025	0 / 10	2025	0 / 1	2025
Chloride	0 / 1	2025	0 / 1	2025	0 / 1	2025
Cyanide (amenable)	0 / 0	NA	0 / 0	NA	0 / 0	NA
Chromium VI, total	0 / 0	NA	1 / 1	2025	0 / 0	NA
Phenol	0 / 1	2025	1 / 2	2025	0 / 1	2025
HEM	0 / 0	NA	10 / 27	2022 - 2025	0 / 0	NA

Table 3.4 presents POC data used in the EPA Region VII spreadsheet to calculate the revised local limits and the basis for the data. For removal efficiency, both overall average removal rates and paired removal rates were calculated. For background concentrations, an average of the most recent background samples from two domestic locations were used. There was not updated background samples for chloride, hexavalent chromium and phenol, so average background concentrations from various Missouri communities s calculated by DROP (Data Reporting Operations software) were used. In the case that domestic concentrations are greater than influent concentrations, background concentrations were set to influent concentrations in the EPA Region VII spreadsheet.

Table 3.4 Data Inputs [MO 780-2954 3.5.1- 3.5.3]

Pollutant of Concern	Influent Levels (mg/L)	Levels (mg/L)	Removal Efficiency	Background Levels (mg/L)
Silver	<0.003 All NDs	<0.003	66% Used Literature removal value	<0.003 Site specific background data
Arsenic	<0.003 2025 data, All NDs	<0.005	0%	<0.003 Site specific background data
Cadmium	<0.003 2025 data, All NDs	0.002	68% Used Literature removal value	<0.003 Site specific background data
Cyanide	<0.005 All NDs	<0.006	59% Used Literature removal value	<0.01 Site specific background data
Chromium	<0.003 2025 data, All NDs	0.007	55% Used Literature removal value	<0.003 Site specific background data
Copper	0.048 Average of all results	0.057	61% Used paired removal %	0.012 Site specific background data
Mercury	<0.0002 All NDs	<0.0002	50% Used Literature removal value	<0.0002 Site specific background data
Molybdenum	0.021 Average of detected results	0.089	50% Used Literature removal value	<0.003 Site specific background data
Nickel	0.008 Average of detected results	0.01	29% Used Literature removal value	0.005 Site specific background data
Lead	0.007 Average of detected results	0.005	29% Used paired removal %	<0.003 Site specific background data
Selenium	<0.003 2025 data, All NDs	<0.005	50% Used Literature removal value	<0.003 Site specific background data
Zinc	0.059 Average of detected results	0.075	34% Used paired removal %	0.041 Site specific background data

Pollutant of Concern	Influent Levels (mg/L)		Effluent Levels (mg/L)	Removal Efficiency		Background Levels (mg/L)	
	Value	Description		Value	Description	Value	Description
BOD	257	Average of detected results	24.1	39%	Used Design Capacity	48.	Site specific background data
TSS	117	2024 data to current	30.2	47%	Used PE * 0.2 lbs/day	25.	Site specific background data
Ammonia-N	14.8	Average of detected results	4.97	58%	Used Design Capacity	11.9	Site specific background data
TKN	27.8	Average of detected results	8.91			20.4	Site specific background data
Phosphorus	4.51	Average of detected results	2.52		Used Design Capacity	2.11	Site specific background data
COD	NO DATA	Average of detected results	NO DATA			727	DROP background average
Total Nitrogen	23.8	Average of detected results	18.9	20%	Used average removal %	23.9	Site specific background data
Chloride	226	Average of detected results	190	16%	Used average removal %	70.1	Site specific background data
Cyanide (amenable)	NO DATA		NO DATA			0.004	DROP background average
Chromium VI, total	NO DATA		<0.00003			0.009	DROP background average
Phenol	0.51	Average of detected results	0.445	59%	Assumed same removal as CN	0.135	Site specific background data
HEM	NO DATA		3.41			29.9	DROP background average

Biosolids from all three plants Central, North and Southeast are combined before composting. Table 3.5 summarizes results from the North WWTP biosolids. The sludge allowable influent loading was calculated using low ceiling criteria, total sludge flow and plant removal efficiency. Comparison of Sedalia biosolid results compared to domestic level biosolids show elevated concentrations for cadmium, chromium, copper, nickel, lead, molybdenum and zinc.

Table 3.5 Biosolids Data

Pollutant of Concern	# Non-detects / # Samples	Date Range	Average Concentration (mg/kg)	Maximum Concentration (mg/kg)	Back-calculated Concentration (mg/L)	Ceiling / Low Metals Limits (mg/kg) ¹
Silver	1 / 1	2025	<6.7	<6.7	NO DATA	
Arsenic	1 / 1	2025	<6.9	<6.9	NO DATA	75 / 41
Cadmium	0 / 1	2025	4.5	4.5	NO DATA	85 / 39
Cyanide	0 / 1	2025	2.61	2.61	NO DATA	
Chromium	0 / 1	2025	53.9	53.9	NO DATA	
Copper	0 / 1	2025	1837	1837	NO DATA	4300 / 1500
Mercury	0 / 1	2025	0.91	0.91	NO DATA	57 / 17
Molybdenum	0 / 1	2025	34.1	34.1	NO DATA	75 / NA
Nickel	0 / 1	2025	71	71	NO DATA	420 / NA
Lead	0 / 1	2025	154	154	NO DATA	840 / 300
Selenium	0 / 1	2025	7	7	NO DATA	100 / 36
Zinc	0 / 1	2025	1953	1953	NO DATA	7500 / 2800

1. 40 CFR 503.13 Tables 1 and 3

Design capacities were estimated using NPDES Permit MO-0023027 and the Basis of Design Report (Burns and McDonnell, 2021). The NPDES estimates were used for the design capacity at the North Plant.

Design Basis/Capacity of the WWTP	
Design Population Equivalent	25,000
Design Flow (MGD)	2.50
Actual Population of Sewer Service Area	8,250
Actual Flow (MGD)	0.827
SIU Documented Flows (MGD)	0.142
Uncontrolled Flow (MGD)	0.685

Parameter	Typical (lbs/d/cap)	Design Capacity Based on P.E. (lbs/day)	Design Basis based on Burns and McDonnell Basis of Design, 2024 (lbs/day)
BOD	0.17	4,250	2330
COD	NA	NA	NA
TSS	0.2	5,000	2870
TKN	0.033	825	360
Ammonia-N	0.0198	495	215
Phosphorus	0.0088	220	84
Flow (MGD)	100	2.5	1.50

Section 4. Results

Current headworks loading at the wastewater treatment plant indicate that the plant is not significantly loaded (Table 4.1). Influent data for silver, arsenic, cadmium, cyanide, chromium, mercury and selenium were all non-detects, so loading is not calculated.

Table 4.1 Existing vs Revised MAHLs [MO 780-2954 3.6]

Pollutant of Concern	Current MAHLs (lbs/day)	Revised MAHLs (lbs/day)	Current Headworks Loading (lbs/day)	% Loading of Revised MAHL
Silver	NA	0.69	All NDs	---
Arsenic	NA	0.69	All NDs	---
Cadmium	NA	0.02	All NDs	---
Cyanide	NA	0.08	All NDs	---
Chromium	NA	3.76	All NDs	---
Copper	NA	0.40	0.332	82%
Mercury	NA	0.01	All NDs	---
Molybdenum	NA	0.66	0.144	22%
Nickel	NA	1.49	0.057	4%
Lead	NA	0.16	0.050	32%
Selenium	NA	0.07	All NDs	---
Zinc	NA	3.69	0.405	11%
BOD	NA	4250	1775	42%
TSS	NA	5000	811	16%
Ammonia-N	NA	495	102	21%
TKN	--	825	192	23%
Phosphorus	--	220	31	14%
COD	--	0.00	NO DATA	--
Total Nitrogen	--	650	164	25%
Chloride	--	2053	NO DATA	--
Cyanide (amenable)	--	0.04	NO DATA	--
Chromium VI, total	--	0.02	NO DATA	--
Phenol	--	108	3.519	3%
HEM	--	304	NO DATA	--

Figure 4.1 Revised MAHLs and Headworks Comparison

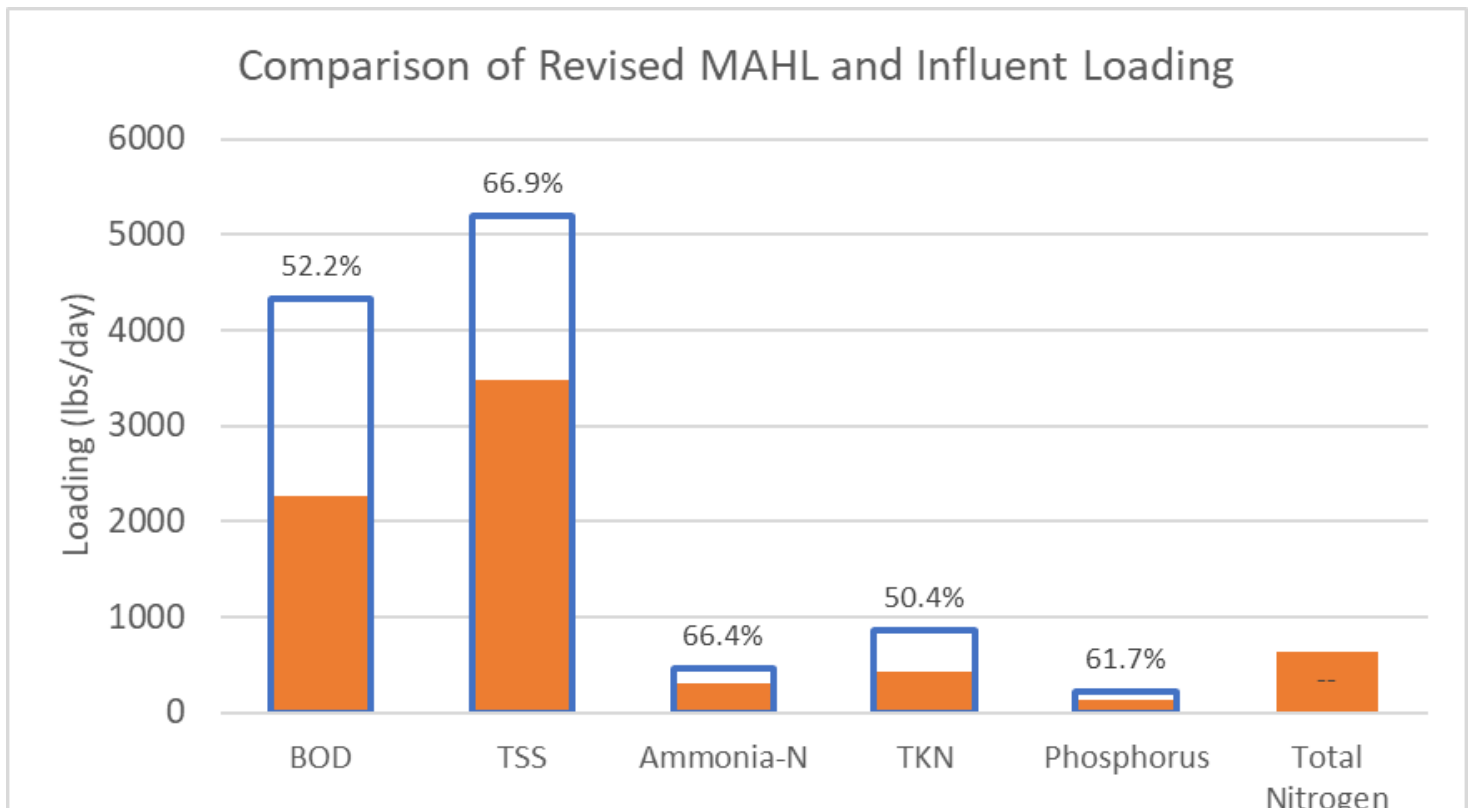
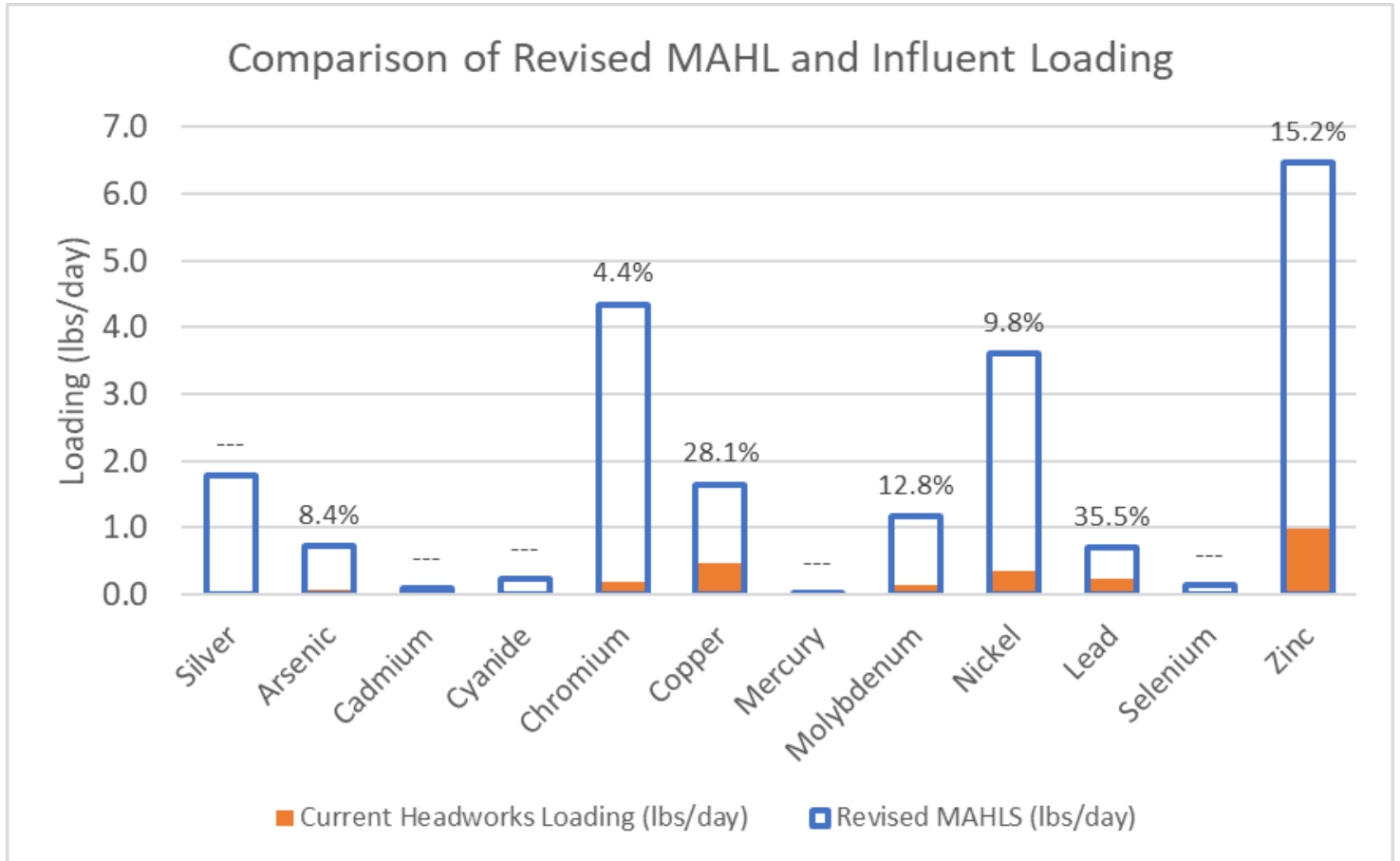
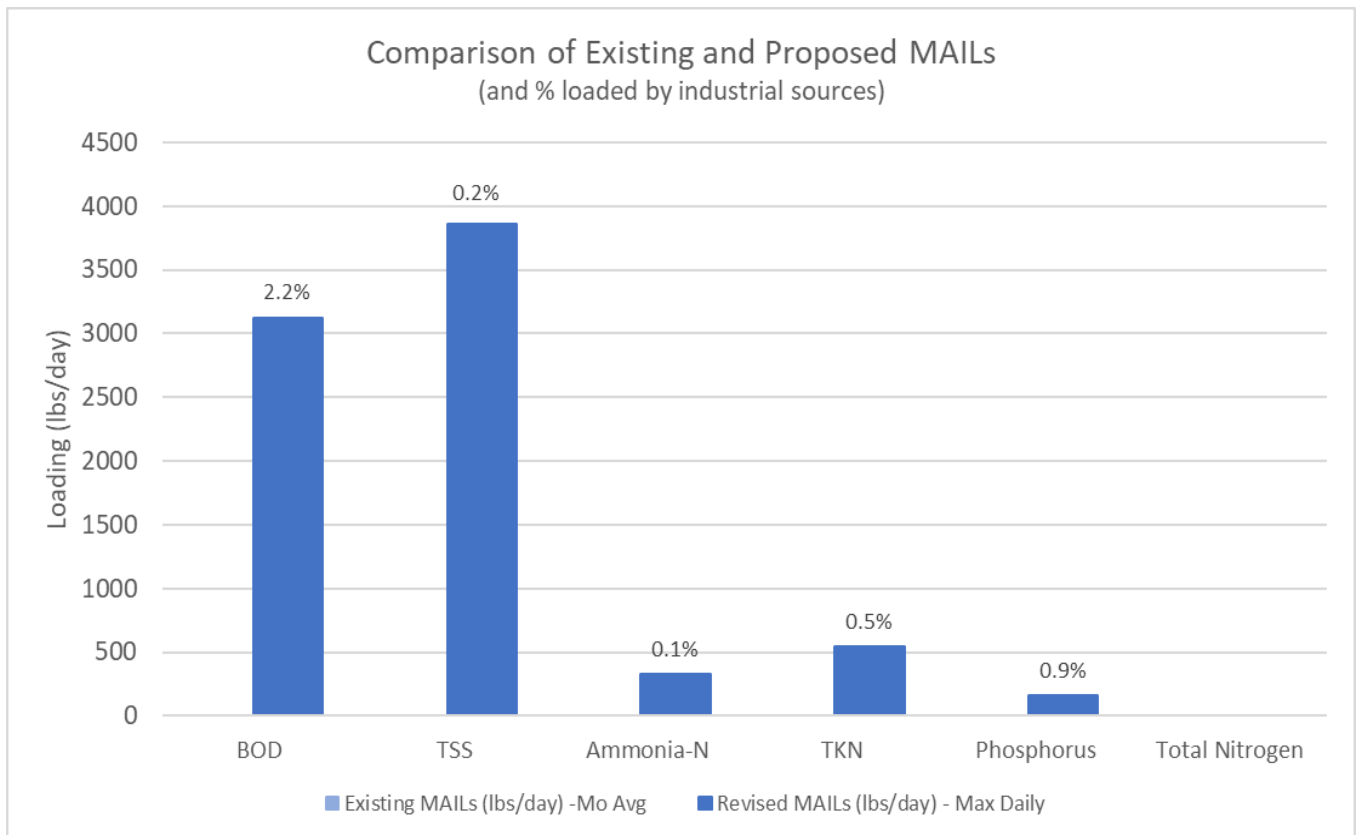
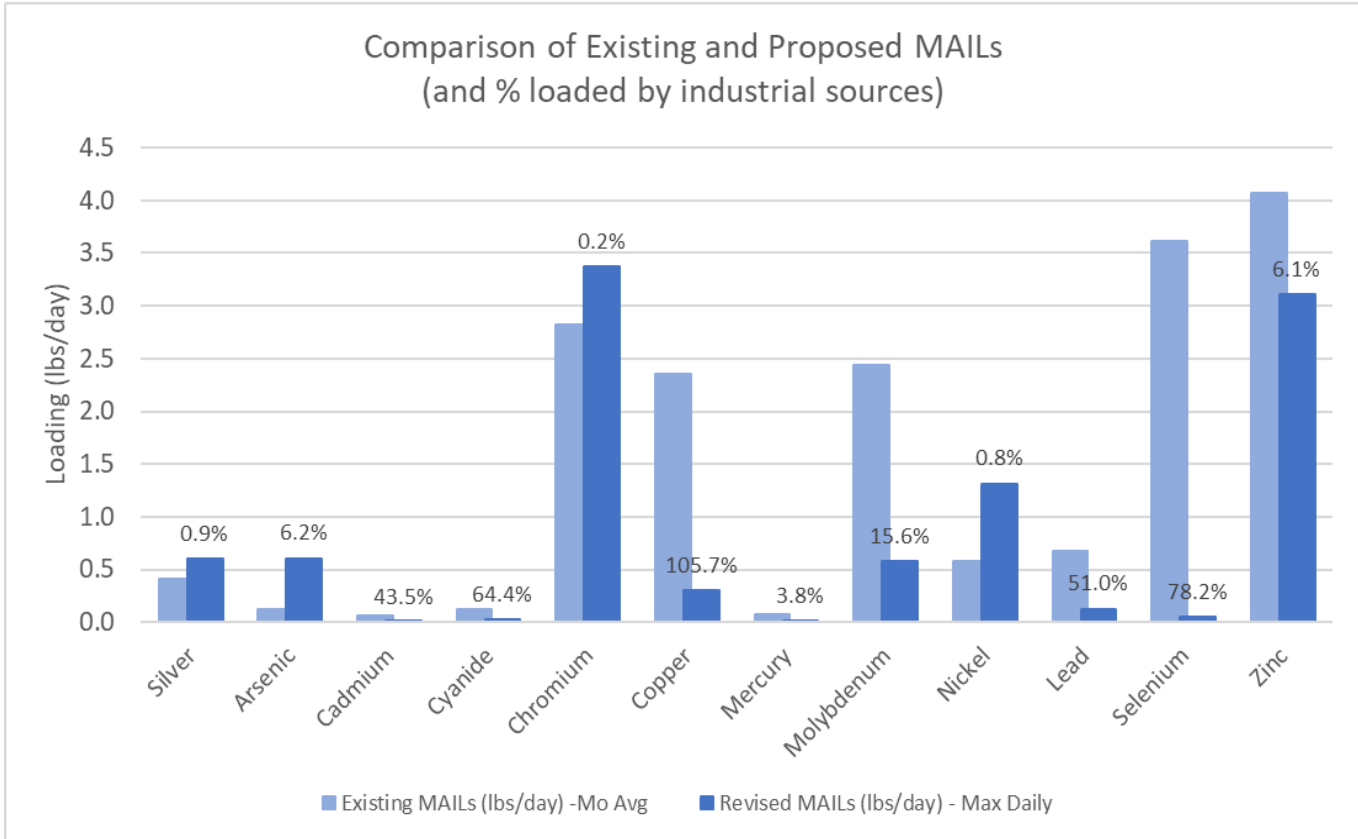


Table 4.2 presents the existing and revised MAILs, MAIL reserved for each pollutant of concern and corresponding uniform concentration (for reference only). The MAIL reserved represents a 10% reserve of the MAIL for each POC and is already taken into account in the revised MAIL. The revised MAILs for the pollutants of concern are higher than current MAILs for silver, arsenic, chromium and nickel (Table 4.2, Figure 4.2).

Table 4.2 Existing vs Proposed MAILs [MO 780-2954 3.6.1]

Pollutant of Concern	Existing MAILs (lbs/day) -Mo Avg	Revised MAILs (lbs/day) - Max Daily	MAIL Reserved (lbs/day)	MAIL Higher or Lower
Silver	0.412	0.606	0.067	Higher
Arsenic	0.122	0.608	0.068	Higher
Cadmium	0.069	0.007	0.001	Lower
Cyanide	0.127	0.024	0.003	Lower
Chromium	2.82	3.37	0.374	Higher
Copper	2.355	0.303	0.034	Lower
Mercury	0.074	0.009	0.001	Lower
Molybdenum	2.44	0.58	0.065	Lower
Nickel	0.58	1.32	0.146	Higher
Lead	0.672	0.127	0.014	Lower
Selenium	3.610	0.049	0.005	Lower
Zinc	4.06	3.11	0.346	Lower
BOD	--	3126	850	Higher
TSS	--	3857	1000	Higher
Ammonia-N	--	328	99	Higher
TKN	--	543	165	NA
Phosphorus	--	164	44	NA
COD	--	--	--	NA
Total Nitrogen	--	--	--	NA
Chloride	--	1034	115	NA
Cyanide (amenable)	--	0.010	0.001	NA
Chromium VI, total	--	0.022	0.002	NA
Phenol	--	96.3	10.7	NA
HEM	--	119	13	NA

Figure 4.2. Existing and Revised MAIL Comparison Graphs



Section 5. Summary of Recommended Local Limits [MO 780-2954 3.7]

Table 5.1 presents the MAILs for pollutants of concern that are recommended to be adopted, updated or omitted and includes the rationale for each. Categorical standards, elevated influent or industrial concentrations compared to background concentrations or are heavily loaded (greater than 60% for metals and greater than 80% for conventional) were all considered in the determination of adopting MAILs. Pollutants of concern listed in the NPDES permit as monitoring only are recommended to be reserved as draft local limits due to the potential of an NPDES limit in the future based on water quality criteria

Table 5.1 Proposed Changes to Local Limits

Pollutant of Concern	Current Local Limit?	Adopt / Update	Reference Only MAHLs (lbs/day)	Max Daily MAILs (lbs/day)	Rationale
Silver	Yes	Omit	0.690	0.606	All NDs at the influent and industries
Arsenic	Yes	Update	0.690	0.608	Elevated industrial concentrations
Cadmium	Yes	Update	0.022	0.007	NPDES permit limit
Cyanide	Yes	Omit	0.084	0.024	Adopt Cyanide (amenable) instead
Chromium	Yes	Update	3.76	3.37	Elevated industrial concentrations
Copper	Yes	Update	0.40	0.303	Elevated influent and Industry POC, NPDES permit limit
Mercury	Yes	Omit	0.011	0.009	All NDs at the influent and not a IU POC
Molybdenum	Yes	Update	0.660	0.581	Elevated influent and industrial concentrations
Nickel	Yes	Update	1.49	1.32	Elevated influent and industrial concentrations
Lead	Yes	Update	0.156	0.127	Elevated influent and industrial concentrations
Selenium	Yes	Omit	0.069	0.049	All NDs at the influent, no industrial contribution
Zinc	Yes	Update	3.69	3.11	Categorical, industrial loading above 5%
BOD	*PD	Adopt	4250	3126	Design Parameter
TSS	*PD	Adopt	5000	3857	Design Parameter
Ammonia-N	No	Omit	495	328	Adopt TKN instead
TKN	No	Adopt	825	543	Design Parameter
Phosphorus	No	Reserve	220	164	Future Regulation
COD	No	Omit	--	--	Collect data for next cycle
Total Nitrogen	No	Reserve	650	--	Future Regulation
Chloride	No	Reserve	1725	738	Recommend monitoring
Cyanide (amenable)	No	Adopt	0.084	0.024	In Lieu of cyanide total
Chromium VI, total	No	Omit	0.025	0.022	Not an industry POC
Phenol	No	Omit	108	96.3	Recommend monitoring
HEM	No	Adopt	303.6	119.0	Recommended, removed from specific prohibitions in code

*Prohibited Discharge

Any pollutants of concern not recommended for adoption are omitted from the summary of local limits presented in Table 5.2. In order to allocate based on the need for the industrial contributors, the MAILs should be implemented in the City code as maximum daily prohibited mass limit. For pollutants of concern listed in the NPDES permit as monitoring only, local limits are recommended to be adopted as reserve/draft limit. Industrial permits should be updated to include the allocated portion of the proposed MAILs, no permits shall be issued for more than five years.

Table 5.2 Summary of Local Limits for Adoption [MO 780-2954 3.6.2]

Pollutant of Concern	Reference Only MAHLs (lbs/day)	Max Daily MAILs (lbs/day)	Reference Only Uniform Concentration (mg/L)	Limiting Criteria for Local Limit
Arsenic	0.690	0.608	0.000	Secndry Inhib
Cadmium	0.02	0.01	0.01	NPDES #
Chromium	3.76	3.37	2.845	Water Quality
Copper	0.40	0.30	0.256	NPDES #
Molybdenum	0.66	0.58	0.491	503 EQ
Nickel	1.49	1.32	1.11	Water Quality
Lead	0.156	0.127	0.108	Water Quality
Zinc	3.69	3.11	2.63	Water Quality
BOD	4250	3126	2640	Design Capacity
TSS	5000	3857	3258	Design Capacity
TKN	825	543	459	Design Capacity
Cyanide (amenable)	0.08	0.02	0.02	Water Quality
HEM	304	119	101	Water Quality
Phosphorus	RESERVED			
Total Nitrogen	RESERVED			
Chloride	RESERVED			

Conclusions and Recommendations:

This technical evaluation updates the City of Sedalia North Plant's local limits in response to recent treatment plant upgrades, the issuance of a new NPDES permit, and updated analytical data from influent, effluent, background, and biosolids samples. Based on the findings of the technical evaluation the following is recommended:

- The City retain and revise arsenic, cadmium, chromium, copper, molybdenum, nickel, lead and zinc as local limits. Lead and Molybdenum have elevated influent and industrial concentrations compared to background concentrations. Copper is overloaded at the plant. There is an NPDES permit limit for copper and cadmium.
- The City adopt BOD, TSS, TKN, HEM and cyanide (amenable) as local limits in the City's ordinance. It is recommended to adopt BOD, TSS and TKN to protect WWTP from NPDES permit violations and maintain quality of biosolids. It is recommended to adopt a local limit for HEM as it was removed from the list of specific prohibitions in the City's legal authority in lieu of a technically derived limit. For cyanide (amenable), there is no influent data and it is assumed that cyanide (amenable) is equal to cyanide (total). Cyanide (total) is non-detect at samples collected at the influent, it has the potential to be heavily loaded with concentrations close to the reporting limit.
- It is recommended to reserve MAILs for phosphorus and total nitrogen as emerging pollutants with the potential to have a NPDES permit limit in the future based on water quality criteria, in addition to reserving an MAIL for chloride. It is also recommended to add COD to the sample plan for influent, effluent and industries with the goal of using COD in lieu of BOD for the next local limit evaluation
- POCs omitted from the revised list of local limits include silver, mercury and selenium. These POCs are non-detects for influent and industry samples.

Overall, the evaluation found that the treatment plant is not significantly loaded with respect to metals or conventional pollutants. However, based on other considerations—such as elevated influent concentrations, presence of industrial contributors, NPDES permit limits and applicable categorical standards—it is recommended that the City revise and adopt updated local limits in its ordinance as Daily Maximum MAILs.

Appendices
[MO 780-2954 3.8]

Appendix A. Technical Evaluation Part 1[MO 780-2954 3.1]



MISSOURI DEPARTMENT OF NATURAL RESOURCES
 WATER PROTECTION PROGRAM, WATER POLLUTION CONTROL BRANCH
 INDUSTRIAL PRETREATMENT PROGRAM
**TECHNICAL EVALUATION OF LOCAL LIMITS (40 CFR 122.44(j)(2)(ii))
 AND DETAILED TECHNICAL REEVALUATION OF LOCAL LIMITS 40
 CFR 403.5(c)(1))**

FOR OFFICE USE ONLY	
PERMIT ID NUMBER	
DATE RECEIVED	

GENERAL INSTRUCTIONS FOR COMPLETING THIS FORM ARE AVAILABLE BELOW.

PART I. LOCAL LIMIT REVIEW: TECHNICAL EVALUATION REPORT

Federal and state regulations require a periodic review of local limits, and publicly owned treatment works (POTW) with approved programs must continue to develop local limits as necessary per 40 CFR 403.5(c)(1)1. Pursuant to 40 CFR 122.44(j)(2)(ii), federal regulations require a written technical evaluation of the need to revise local limits following each permit issuance or re-issuance. These periodic local limit reviews are a required condition of your Missouri National Pollutant Discharge Elimination System (NPDES) permit(s). Part I of this form addresses the local limits review for one POTW and its permit. Because POTW site-specific conditions change, Section 2.0 of this form provides a list of factors that may indicate the need for a more detailed technical re-evaluation of local limits using Part II of this form. Reference Document: 2004 EPA Local Limits Development Guidance.

¹Note: Missouri state regulations at 10 CSR 20-6.100 incorporate the federal 40 CFR 403 pretreatment regulations by reference; therefore, only the federal regulations will be cited in this form.

1.0 BASIC INFORMATION

1.1 POTW NAME/CONTROL AUTHORITY: City of Sedalia

1.2 NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM (NPDES) MISSOURI STATE OPERATING PERMIT

PERMIT NO. MO-0023027	EXPIRATION DATE October 31, 2028	WWTP NAME Sedalia North WWTP	
PERMITTED DESIGN FLOW (MGD) 2.5 MGD	AVERAGE ACTUAL FLOW (MGD) 1.2 MGD	POPULATION EQUIVALENT (Design/Actual) 25,000/11,624 (Service area: 3,845)	BIOSOLIDS DISPOSAL METHOD Composting

1.3 LOCAL LIMIT REPORT WITH LETTER

1.3.1 Date Technical Evaluation is Due: May 1, 2024, September 1, 2024 and February 28, 2025

1.3.2 Entity Performing Local Limit Analysis: City of Sedalia

1.3.3 Region VII Spreadsheet Version: V2.3

1.4 CONTACT PERSON FOR POTW:

NAME Ben Maness	TITLE Wastewater Manager	TELEPHONE NUMBER WITH AREA CODE 573-645-0366	EMAIL bmaness@sedalia.com
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1.5 SIGNATORY AUTHORIZATION FOR POTW (if different):

NAME William Bracken	TITLE Utilities Director	TELEPHONE NUMBER WITH AREA CODE 660-827-3000	EMAIL wbracken@sedalia.com
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2.0 POTW BASIS FOR EVALUATION

2.1 IDENTIFIED FACTORS MAY WARRANT A DETAILED TECHNICAL REEVALUATION OF LOCAL LIMITS:

<input checked="" type="checkbox"/> Change in Water Quality Criteria	<input type="checkbox"/> Plant Conditions: Increase/Decrease of Hydraulic Loading
<input type="checkbox"/> Change in Sludge Quality Criteria	<input type="checkbox"/> Change in Biosolids Disposal Method
<input type="checkbox"/> Plant Conditions: Increased Design Capacity	<input checked="" type="checkbox"/> POTW Operational/Performance Problems
<input checked="" type="checkbox"/> Plant Conditions: Other Design Modifications	<input checked="" type="checkbox"/> Changes in Industrial User Contributions (Flows or characteristics)
<input type="checkbox"/> Outfall Relocation (Different Receiving Stream)	<input checked="" type="checkbox"/> Addition or Removal of NPDES Permit Limit
<input type="checkbox"/> Change in Air Pollution Control Permit	<input type="checkbox"/> New NPDES Whole Effluent Toxicity Testing Requirement
<input type="checkbox"/> Significant increase or decrease in Biosolid production	

2.2 WRITTEN DETAILED DESCRIPTION OF THE ABOVE REASON(S) FOR COMPLETING OR NOT COMPLETING A TECHNICAL REEVALUATION:

A new north plant is currently in the design stage and must be in use by the end of 2028. New permit limits have also been implemented with the new permit cycle which began November 1, 2023 and will end October 31, 2028. There were chronic permitted effluent limitation violations during the last permit cycle. As well, new industrial users have been identified and their discharge characteristics may change the industrial loading present. A Part II evaluation does need to be completed; however, before finalizing updated local limits the industrial contributors and corresponding POCs need to be confirmed.

3.0 POTW PRETREATMENT PROGRAM DESCRIPTION OF PROCEDURES AND DATA

3.1 INDUSTRIAL WASTE SURVEY (40 CFR 403.8(f)(2)(i))

3.1.1 Date Industrial Waste Survey (IWS) was last performed: Ongoing- majority in August 2023

3.1.2 Pursuant to 40 CFR 403.8(f)(6) date of approved industrial users list: In-progress Goal: Turn in with 2025 annual report.



Updated list of industrial users meeting the requirement of 40 CFR 403.3(v)(1) and (v)(3) is attached separately for approval because the POTW has not provided the updated list to the approval authority.

3.1.3 Summary of IWS Process/Findings of IWS including any newly identified significant industrial users (attachment of a table is required for a detailed findings discussion per 40 CFR 403.8(f)(2)(i) and (ii)):

See attached table. However, this list will continue to change as the IWS process continues. In 2023 more than 58 surveys were returned; from the original list approximately 16 have been identified as either currently permitted or needing further evaluation.

3.1.3 Industrial Waste Survey Schedule per 40 CFR 403.8(f)(2)(iii):

An IWS is currently underway; categorical determinations and other significant industrial users are being identified. Before local limits are updated, we need to identify the nondomestic flows from SIUs for the wastewater treatment plant.

3.2 SIGNIFICANT INDUSTRIAL USER COMPLIANCE WITH PRETREATMENT STANDARDS AND SIGNIFICANT NONCOMPLIANCE DETERMINATION

POTW Annual Report attached, Summary:

The 2023 Annual Report is attached once for all three WWTP Local Limits Evaluation Part 1.

Two users were found to be in Significant Non-Compliance in 2023. Sierra Bullets (Permit No. 010120-05) (discharges to the North WWTP) and Central Missouri Landfill (Permit No. 010120-0) which discharges to the Central WWTP. Both were found to be in SNC for multiple permit limit exceedences.

3.3 FREQUENCY AND PROCESS OF INDUSTRIAL LOAD EVALUATION/MASS BALANCE WITH HEADWORKS

A mass balance is being incorporated into the Pretreatment Program procedures. Industry data is being summarized so that it can be compared to the overall loading at each WWTP.

3.4 BIOSOLIDS: DESCRIPTION OF HOW BIOSOLIDS MONITORING DATA IS USED IN THE POTW PRETREATMENT PROGRAM

The sludge from North WWTP is combined with sludge from Central and Southeast WWTP's once it reaches the biosolids facility. The only analysis conducted on each individual load is for total solids and total volatile solids. Therefore it is hard to use the biosolids data in reference to each individual plant, as it is tested as a whole (once composted). The current biosolids testing does not indicate any overloading. Separate sampling is being incorporated into the sample plan going forward with the intention of doing a mass balance for each WWTP.

3.5 DOES THE POTW MONITORING FOLLOW 40 CFR 136 SAMPLE COLLECTION AND ANALYSIS REQUIREMENTS?

Yes or No Also, describe those Pollutant of Concern (POCs) sampled in house versus use of a contract laboratory below.

All samples are collected and analyzed following the requirements of 40 CFR 136.

Currently all POC samples are sent to a contracted lab (Engineering Survey and Services). However conventional pollutants such as BOD, TSS and Ammonia are completed in house.

3.6 HAULED WASTE		
3.6.1 Describe Hauled Waste Program and Current Legal Authority Hauled waste is currently not accepted at North Plant.		
3.6.2 Hauled Waste City Code Citation	Sec. 60-300 to Sec 60-325, (Ord. No. 9837, § 1, 2-7-2011)	
3.6.3 Is Hauled Waste Currently Accepted?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
3.6.4 Is Hazardous Waste 40 CFR 261 Accepted?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
3.6.5 Is Any Landfill Leachate Accepted?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
3.6.6 Hauled Waste Determination.	<input checked="" type="checkbox"/> Not significant per 40 CFR 403.3(v)(3). No haulers after evaluation are significant. <input type="checkbox"/> Significant, included in Section 3.1.3, <i>IWS summary table</i> .	
4.0 PRETREATMENT PROGRAM MONITORING		
4.1 SAMPLING PLAN SUMMARY TO ENSURE EFFECTIVENESS OF PRETREATMENT PROGRAM		
Expanded effluent samples will be paired with an influent sample for POCs. Annual or at least three rounds of expanded effluent testing will be completed as required during this permit cycle. An annual priority pollutants on biosolids will be completed. Background samples will be taken to confirm what pollutants are elevated at the head works. The influent monitoring results will be compared to background concentrations. The influent loads will also be calculated and compared to current MAILs.		
4.2 INFLUENT SAMPLING LOCATION		
Headworks		
4.3 WHOLE EFFLUENT TOXICITY (WET) TEST		
4.3.1 Date of Last Acute WET Test	July 26, 2024 to July 28, 2024	
4.3.2 Date of Last Chronic WET test	April 22, 2024 to April 26, 2024	
4.3.3 Explain any issues or findings of the WET tests: No issues were found with the WET tests. All three Sedalia WWTPs met requirements.		
4.4 EXPANDED EFFLUENT (Priority Pollutant Scan) TESTING		
4.4.1 Dates of last three (3) Expanded Effluent Testing Events		
Most Recent refer to most recent NPDES renewal app	2nd Most Recent	3rd Most Recent
4.4.2 Explain detections of any expanded effluent test results. Detections for Aluminum, Antimony, Chromium VI, Copper, Iron, Nickel and Zinc were found. North plant receives the majority of industry discharge which includes metal finishing, iron and steel manufacturing and copper forming facilities. Chloroform also had a result of 7.1 ug/L which is commonly used in the laboratory.		
4.5. BIOSOLIDS PRIORITY POLLUTANT TESTING		
4.5.1 Dates of last three (3) Priority Pollutant Testing of Biosolids (Required for all POTWs with a Pretreatment Program in NPDES permit Standard Conditions, Part III)		
Most Recent Not Completed	2nd Most Recent Not Completed	3rd Most Recent Not Completed
4.5.2. Explain detections of any biosolids priority pollutant test results. A complete priority pollutant testing has not been completed.		
4.6. ADDITIONAL PROGRAM MONITORING		
Testing for Chromium, Copper, Cyanide, Lead, Mercury, Nickel, Selenium and Zinc are tested on a monthly basis after the sludge from all three plants has been mixed together and processed as compost. These results have never been above limits. However, priority pollutants testing will be conducted annually starting in 2025.		

5.0 SUMMARY OF POCs – MAY BE ADDED TO DETAILED LOCAL LIMIT REEVALUATION

A local limit evaluation was performed by Barr Engineering in 2020; the conclusions from this report were that the current local limits were deemed adequate. The 2020 evaluation identified Total Antimony, Chloride, Total Boron, Fluoride, Oil and Grease, Total Phenols, Total Chlorine, and Sulfate + Chloride in addition to typical POCs of metals, cyanide, and conventional pollutants.

6.0 SUMMARY OF CURRENT LOCAL LIMITS

6.1 CITY ORDINANCE

6.1.1 Date Local Limits Last Adopted in City Ordinance	February 22, 2022
6.1.2 City Code Citation/Reference for Local Limits	Ordinance No. 11524 60-195 (C) 1-4
6.1.3 Date Local Limits Were Last Evaluated, if unknown, place NA	2020

6.2 CURRENT ADOPTED LOCAL LIMITS: CHECK ALL THAT APPLY.

<input type="checkbox"/> Adopted as Uniform Concentrations	<input checked="" type="checkbox"/> Adopted as Maximum Allowable Industrial Loads (MAILs) *
<input type="checkbox"/> Adopted as Maximum Daily Limits	<input type="checkbox"/> Adopted as Maximum Daily Loads
<input type="checkbox"/> Adopted as Monthly Average Limits	<input type="checkbox"/> Adopted as Monthly Average Loads
<input type="checkbox"/> Local Limits are Currently Adopted outside the sewer use ordinance	
<input type="checkbox"/> No Local Limits for Metals are Currently Adopted	

6.3 CURRENT LOCAL LIMITS IN ORDINANCE OR OTHERWISE ADOPTED

Parameter	Local Limit	MAIL	Units	Adopted?	Limiting AHL ¹ Criteria	Allocation Method and Notes
Silver, Total (T)	mg/L	0.412	lbs.da	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Water Quality	uniform, based on need and flow
Arsenic, T	mg/L	0.122	lbs/da	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	503 NA	uniform, based on need, based on flow
Cadmium, T	mg/L	0.069	lbs/da	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Water Quality	uniform, based on need and flow
Cyanide, T	mg/L	0.127	lbs/da	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Water Quality	uniform, based on need and flow
Chromium, T	mg/L	2.822	lbs/da	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Water Quality	uniform, based on need and flow
Copper, T	mg/L	2.355	lbs/da	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	NPDES #	uniform, based on need and flow
Mercury, T	mg/L	0.074	lbs/da	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Water Quality	uniform, based on need and flow
Molybdenum, T	mg/L	2.44	lbs/da	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	503 NA	uniform based on need and flow
Nickel, T	mg/L	0.577	lbs/da	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	503 NA	uniform based on need and flow
Lead, T	mg/L	0.358	lbs/da	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Water Quality	uniform based on need and flow
Selenium, T	mg/L	0.672	lbs/da	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	503 NA	uniform based on need and flow
Zinc, T	mg/L	4.063	lbs/da	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	503 NA	uniform based on need and flow
Hexavalent Chromium, Dissolved	mg/L	N/A		<input type="checkbox"/> Yes <input type="checkbox"/> No		
Chromium, Trivalent	mg/L	N/A		<input type="checkbox"/> Yes <input type="checkbox"/> No		
pH ²	mg/L			<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No		
Oil & Grease Total <input type="checkbox"/> Nonpolar <input type="checkbox"/> Polar ³ <input checked="" type="checkbox"/>	100 mg/L			<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	NPDES #	Animal fats oil & grease limited to 100 mg/L in the prohibited discharge standards.
Parameter	Local Limit	MAIL	Units	Adopted?	Limiting AHL ¹ Criteria	Allocation Method and Notes
BOD	mg/L	300	mg/L	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	WWTP Design	Sec. 60-195(b)(2)c
TSS	mg/L	350	mg/L	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	WWTP Design	Sec. 60-195(b)(2)c
TKN	mg/L			<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Quality	
COD	mg/L			<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No		
Ammonia-N	mg/L			<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Quality	
Phosphorus	mg/L			<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Quality	
Boron				<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Quality	
Chloride				<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Quality	
Fluoride				<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Water Quality	

¹AHL = allowable headworks loading, ² Prohibited Discharge Standard, ³ Polar HEM determined by the difference between total HEM and SGT-HEM or nonpolar.

* Note: MAILs are applied to industries. if categorical limits are more stringent then the categorical limit is in the permit. The City is in the process of confirming allocations to ensure that the MAILs are not over-allocated.

6.3.1 Background for the additional local limits above beyond EPAs 15 National Pollutants of Concern

No local limits have been adopted based on the most recent evaluation.

7.0 NEW OR REVISED NPDES PERMIT LIMITS

List any new or revised POTW NPDES Permit Limitations

Parameter	Mo. Avg. Limit	Units	Max Daily Limit	Units	Needs revised or new local limit?
Ammonia (Jan/Nov)	1.3-3.1	mg/L	10.1 to 12.1	mg/L	
Oil and Grease	10	mg/L	15	mg/L	
Cadmium	1.0	ug/L	3.3	ug/L	
Copper	22.9	ug/L	45.1	ug/L	Revised

7.1 Include a summary of any monitoring issues for listed parameters.

The City is working with the contract lab to ensure sufficiently sensitive reporting limits relative to the permit limits.

7.2 List any compliance issues during the POTW's last NPDES Permit Cycle.

Please refer to the attached summary of the NPDES violations for the North WWTP.

8.0 APPROVED LOCAL LIMIT ANALYSIS COMPARED TO CURRENT CONDITIONS

WWTP Average Actual Flow – Previous Study (MGD)	1.294 (2020)	Population from Previous Study	8,250(2020 study)
WWTP Average Actual Flow (MGD) - Current Conditions	1.2	Current Population	3,845
Non-Domestic Flow (MGD) – Previous Study	0.891	No. SIUs – Previous	3SIUs Nucor Steel, Sierra Bullets, Stanley B&D
Non-Domestic Flow – Current Conditions (MGD) <i>Subtract industrial flows from average actual flows</i>	TBD	No. SIUs - Current	TBD- IWS Still in process.

9.0 CURRENT LOADING COMPARED TO MAHL - INFLUENT MONITORING AND ANALYSIS

Date Range of Influent Data:		2021-2024					
Pollutant of Concern (total)	2013/2020 Previous Study ¹ MAHL (lbs/day)	Average Current Headworks Loading (lbs/day)	Maximum Current Headworks Loading (lbs/day)	# of NDs / # of Samples	2013 Average % current loading of Previous MAHL	(optional) Preliminary MAHL (lbs/day)	(optional) Average % of Re-Calculated MAHL
Silver, Total (T)	4.81/1.26	0.019	0.019	7/7	0.4%		
Arsenic, T	1.54/1.07	0.028	0.032	7/7	2%		
Cadmium, T	0.02/0.04	0.028	0.032	7/7	141% (Nondetects)		
Cyanide, T	2.11/0.17	0.028	0.032	7/7	1.3%		
Chromium, T _{III}	21.07/20.29						
Copper, T	19.72/1.39	0.204	0.568	1/7	1%		
Mercury, T	1.71/0.03	0.001	0.001	7/7	0.1%		
Molybdenum, T	2.71/0.14	0.649	0.649	7/7	24%		
Nickel, T	17.88/1.83	0.065	0.065	7/7	0.4%		
Lead, T	31.84/0.50	0.034	0.045	6/7	0.01%		
Selenium, T	4.17/0.15	0.032	0.032	7/7	0.8%		
Zinc, T	6.32/11.72	0.271	0.551	1/7	4%		
Cr-VI, diss.							
BOD	4872	1,976	13,624	0/111	5%		
TSS	104,532/6274	5,289	48,915	0/208	5%		
Oil & Grease Total <input type="checkbox"/> Nonpolar <input checked="" type="checkbox"/> Polar ² <input type="checkbox"/>	100 mg/L mg/L mg/L						
Optional Parameters; Fill in Additional as Applicable (Not part of the 15 National POCs)							
COD							
TKN		218	863	0/42			
Ammonia-N		99	1233	0.199	10%		
Phosphorus, T		34	169	0/43			
Aluminum, T							
Phenol							

¹ Note: If MAHLs from the previous analysis are unavailable, please use current conditions to create MAHLs. ²HEM determined by the difference between total HEM or polar and SGT-HEM or nonpolar.

9.1 Discuss MAHL Comparison to Current Loading

The City of Sedalia has performed monitoring events of the wastewater treatment plant to evaluate current loading. As summarized above, loading for each parameter is reflected in the table.

Please note that when the last local limit evaluation was performed in 2020, the local limits were not updated including the corresponding allowable headworks and allowable industrial loads.

The data is currently limited by nondetects which result in higher % loadings. Several metals are 7/7 nondetect results.

Also, note that the comparison of average to maximum daily loads has some variability especially for conventional pollutants and nutrients.

10.0 CURRENT BIOSOLIDS DATA – AVERAGE AND MAXIMUM BIOSOLIDS CONCENTRATIONS

10.1 Date(s) of current biosolids data: Refer to sample plan, no data is available for individual plants.

10.2 Indicate the average and maximum biosolids concentration for the previous permit cycle. Also, indicate the number of samples upon which the analysis is based.

Pollutant of Concern	No. Nondetects/ No. Biosolids Samples	Average (mg/kg)	Maximum (mg/kg)	Back-Calculated Influent Concentration (mg/L)	Actual Measured Influent Concentration (mg/L)	Influent Concentration Used For Updated Local Limits (mg/L)
Silver, Total (T)	not	summarized				
Arsenic, T						
Cadmium, T						
Cyanide, T						
Chromium, T						
Copper, T						
Mercury, T						
Molybdenum, T						
Nickel, T						
Lead, T						
Selenium, T						
Zinc, T						
Trivalent Chromium	See total chrome					
Hexavalent Chromium						
Ammonia-N						

10.3 Biosolids Priority Pollutant Testing – Summarize any detections only below. Indicate the average and maximum biosolids concentration for the previous permit cycle. If all pollutants were non-detections, please indicated that below.

not tested					

10.4 Discussion of back-calculated results above.

not evaluated (recommendation for additional monitoring).

11.0 LOCAL LIMIT TECHNICAL EVALUATION SUMMARY - NEED TO REVISE CONCLUSIONS

11.1 Are POTW influent actual flows different from the previous local limit evaluation? Higher Lower

If flows have changed significantly (typically greater than 20% actual hydraulic flows), reevaluate local limits.

11.2 Are industry total flows higher or lower than the previous local limit evaluation? Higher Lower

If Yes, re-evaluate local limits.

11.3 Are industries having trouble meeting limits? i.e., are violations issued? Yes No

If yes, consider re-evaluating local limits to determine basis, factors of safety, current loading considerations, etc.

11.4 Are any current pollutant loadings (metals) more than 60% loaded? (% of MAHL) Yes No

Confirm that the elevated loading is attributed to the permitted industrial user(s) and/or domestic contributions. In addition, check to see whether industries are the contributor or combined with another source.

11.5 Are any current pollutant loadings (conventional) more than 80% loaded? (% of MAHL) Yes No

If yes, ensure the loading is attributed to domestic and/or identified industrial contributions. If yes, 80% is a rule of thumb, plant design varies, and POTW may have successful compliance history, thus not merit reevaluation.

11.6 Is there a pollutant loading which is not accounted for between the domestic loading and the industry loading compared to headworks loading? Yes No

under evaluation

If Yes, ensure current industrial users' monitoring frequency are adequate to determine compliance and confirm that contributions are not coming from an unidentified industrial discharger.

11.7 Confirm that a current IWS has recently been performed (or as documented above, that an on-going IWS evaluation is conducted). Yes No

If No, must be completed before the technical evaluation can be considered complete.

11.8 Were any new Pollutants of Concern identified from the IWS process, expanded effluent testing, or biosolids priority pollutant testing requirements? Yes No

If Yes, include in the relevant sections of the report where preliminary MAHLs and MAILs are compared to currently adopted local limits (this was an optional evaluation in Section 9.0). Highly recommended, if Yes. Transfer POCs for a re-evaluation.

11.9 Do the biosolids results correlate to the headworks concentrations? Yes No

If No, confirm monitoring frequencies are adequate. refer to next steps

11.10 Any NPDES permit limit violations attributed to capacity issues or a slug event? Yes No

If Yes, was the cause of the event identified (explain below). Use the space below to explain any of the above.

The wastewater treatment plants are heavily loaded for conventional pollutants; metal issues may be attributed to not having sufficiently sensitive reporting limits.

11.11 New or revised NPDES permit limits that will necessitate a reevaluation of local limits?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
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If Yes, use the space below to explain any of the above.

12.0 STATEMENT OF THE NEED TO REVISE LOCAL LIMITS (OR DETERMINATION THAT THE LOCAL LIMITS ARE ADEQUATE)

This evaluation determined that a local limit update is needed or otherwise determined to be beneficial to the POTW. Part II is required to be completed as the next step.

This evaluation determines that the current local limits (or no local limits) adequately protect the POTW and the POTW will retain the current local limits (or no local limits). End of Technical Evaluation of the Need to Update Local Limits.

13.0 ATTACHMENTS

- | | | |
|-------------------------------------|----|---|
| <input checked="" type="checkbox"/> | 1. | Most recent Industrial Waste Survey Summary Table. <i>Table provided below.</i> |
| <input checked="" type="checkbox"/> | 2. | Previous Local Limit Evaluation – Data and Summary Pages or Other Summary |
| <input type="checkbox"/> | 3. | Region VII Spreadsheet Input and Output (for MAHL comparison and current conditions) |
| <input checked="" type="checkbox"/> | 4. | Most recent POTW Pretreatment Annual Report |
| <input type="checkbox"/> | 5. | Raw Analytical Data (Contract Laboratory Reports) – <i>Will be provided upon request.</i> |
| <input type="checkbox"/> | 6. | Other |
| <input type="checkbox"/> | 7. | Other |

14.0 SUMMARY OF FUTURE ACTIONS/SAMPLING PLANS/NEXT STEPS/PROPOSED SCHEDULE

The City will begin to complete POC testing on individual sludge loads leaving each individual WWTP. Priority pollutant testing will be conducted on sludge as required by the permit. An increase in domestic background sampling will be completed.

A Part II local limit evaluation is recommended after plant improvements are completed and after all nondomestic discharges have been evaluated for SIU status.

OPTIONAL QUESTIONS REGARDING MILITARY SERVICE

Have you or an immediate family member ever served in the U.S. Armed Forces?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
If yes, would you like information about military-related services in Missouri?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No

15.0 CERTIFICATION OF A DULY AUTHORIZED REPRESENTATIVE OF THE POTW

"I certify under penalty of law that this document and all attachments were prepared under direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations"

Authorized Representative Signature 	Date 2/27/2025
--	-------------------

Duly Authorized Representative Name William Bracken	Duly Authorized Representative Title Utilities Director
--	--

Email Contact of Duly Authorized Representative: wbracken@cityofsedalia.com

SIUs That Discharge to North Plant

SIU Name	SIC/NAICS	Categorical Standard or Other SIU Status	Principal Product	Pollutants of Concern	Regulated Flow (GPD)	Compliance and Permit Status
Sierra Bullets	NAICS 332992 SIC 3482	40 CFR 468.15, 40 CFR 471.15 and 40 CFR 471.85	Small Arms Projectiles	Copper Lead	25,000	Compliant
Stanley Black and Decker	SIC 3469 NAICS 332439	40 CFR 433	Toolboxes	Anitmony, Arsenic, Cadmium, Chromium, Copper, Cyanide, Lead, Mercury, Nicke, Oil and Grease Selenium, Silver, Zinc	90,000	Compliant
Nucor	SIC 3312 NAICS 331111	40 CFR 420	Rebar	Arsenic, Chromium, Copper, Lead, Mercury, Nickel, Zinc	160,000	Compliant
St. Joe Plastics	NAICS 562920/42 3930	TBD	Plastic Shreddings	TBD	TBD	N/A
Pro Energy	SIC 7699 NAICS 811310	TBD	Turbine Parts/Rep air	TBD	TBD	N/A

North- NPDES Violations
01/2022: Nitrogen, ammonia total [as N]
02/2022: Nitrogen, ammonia total [as N]
03/2022: Copper, total recoverable
04/2022: Solids, total suspended
06/2022: Oil and grease [soxhlet extr.] tot. Copper, total recoverable
09/2022: Copper, total recoverable
10/2022: Nitrogen, ammonia total [as N]
11/2022: BOD, 5-day, 20 deg. C Solids, total suspended Nitrogen, ammonia total [as N]
12/2022: BOD, 5-day, 20 deg. C Solids, total suspended Nitrogen, ammonia total [as N]
01/2023: Nitrogen, ammonia total [as N]
02/2023: Solids, total suspended Nitrogen, ammonia total [as N]
03/2023: Nitrogen, ammonia total [as N] Copper, total recoverable
04/2023: BOD, 5-day, 20 deg. C Solids, total suspended Nitrogen, ammonia total [as N]
05/2023: BOD, 5-day, 20 deg. C Solids, total suspended Nitrogen, ammonia total [as N]
06/2023: Solids, total suspended Nitrogen, ammonia total [as N] Copper, total recoverable
07/2023: Solids, total suspended Nitrogen, ammonia total [as N]
08/2023: Solids, total suspended Nitrogen, ammonia total [as N]
09/2023: Nitrogen, ammonia total [as N] Copper, total recoverable
10/2023: Nitrogen, ammonia total [as N]
11/2023: Nitrogen, ammonia total [as N] Copper, total recoverable
12/2023: Solids, total suspended Nitrogen, ammonia total [as N] Copper, total recoverable
01/2024: BOD, 5-day, 20 deg. C Solids, total suspended Nitrogen, ammonia total [as N]
02/2024: Nitrogen, ammonia total [as N] Copper, total recoverable
03/2024: Nitrogen, ammonia total [as N] Copper, total recoverable
04/2024: BOD, 5-day, 20 deg. C Solids, total suspended Nitrogen, ammonia total [as N]
05/2024: Solids, total suspended
06/2024: Solids, total suspended Copper, total recoverable
07/2024: Solids, total suspended Copper, total recoverable
08/2024: Solids, total suspended Nitrogen, ammonia total [as N] Copper, total recoverable
09/2024: Copper, total recoverable
10/2024: Copper, total recoverable
11/2024: BOD, 5-day, 20 deg. C Solids, total suspended Nitrogen, ammonia total [as N] Copper, total recoverable

Table 8 North WWTP – MAHL Results

Parameter	Previous MAHL (lb/d)	Calculated MAHL (lb/d)	Influent Loading as a % of Calculated MAHL	Limiting Criteria ^[1]
Aluminum	NA	22.78	44%	Water quality
Antimony	NA	51.80	0.05%	Water quality
Arsenic	1.54	1.07	1.9%	Sludge loading
Cadmium	0.02	0.04	41%	Water quality
Chromium III (total)	21.07	20.29	0.25%	Water quality
Chromium VI	NA	0.290	16%	Water quality
Copper	19.72	1.39	67%	Water quality (MSOP limit)
Cyanide	2.11	0.17	11%	Water quality
Iron	NA	79.9	32%	Water quality
Lead	31.84	0.50	40%	Water quality
Mercury	1.71	0.03	6.4%	Water quality
Molybdenum	2.71	0.14	282%	Sludge loading
Nickel	17.88	1.83	12.5%	Sludge loading
Selenium	4.17	0.15	49%	Sludge loading
Silver	4.81	1.26	0.52%	Water quality
Zinc	6.32	11.72	17%	Sludge loading
Ammonia, as NH ₃	1,025	292	69%	WWTP design
BOD ₅	43,687	6,274	63%	WWTP design
Chlorine, Total Residual	NA	0.119	164%	Water quality
Fluoride	NA	43.17	10%	Water quality
Oil and grease	NA	2,453	25%	Water quality (MSOP limit)
Phenols, Total	NA	211	0.20%	Water quality
Phosphorus	NA	7.37	700%	Water quality
Sulfate	NA	NA	NA	NA
Total Nitrogen	NA	168	254%	Water quality
TSS	104,532	6,274	150%	WWTP design

Note:

1. 6 mg/L (estimated) was used as a projected water quality criterion for total nitrogen. 0.5 mg/L (estimated) was used as a projected water quality criterion for total phosphorus.

Appendix B. Industrial Waste Survey

Industrial User	Address	WWTP	Permit Status	SIU Status	Most Recent Site Visit	NAICS Code	Principal Products	Process Discharge Total	Sewer Flow Total	Source Industrial Waste Discharge
Starline Brass	1300 W. Henry St. Sedalia, MO 65301	North	New combined permit 1/1/2026	CIU - § 468.15	Inspection 4/28/2025	332992	Cartridge casings	10,300gpd		Copper forming
Stanley Black and Decker (formerly Waterloo Industries, Inc.)	1500 Waterloo Rd. Sedalia, MO 65301	North	Permitted	CIU - § 433.17	Inspection 4/28/2025	332439	Metal Storage Cabinets- 5,500 cabinets	88,089gpd	26,000 GPD	Ecoat Parts Washer / Ecoat / Powder Paint Washer / Various sources
Maxion Wheels	3610 W. Main St. Sedalia, MO 65301	Central	Permitted	CIU - § 433.17	Inspection 9/11/2024	336390	Steel Wheels	146,440gpd	200,000	Wastewater Treatment Facility
Nucor Steel Sedalia	500 Rebar Rd Sedalia, MO 65301	North	Permitted	CIU - § 420.46, § 420.66	8/5/2024	331111	Carbon Steel Rebar- 1,232.87 tons / Slag- 147.95 tons / Mill Scale- 15.93 tons	310,475gpd	161,113gpd	CCM Primary Closed Cooling / CCM Tertiary + HU Non- Contact Cooling / LF + Transformer Non-Cooling / Fume Treatment Plant Non- Contact Cooling / EAF + Transformer + SVC Non- Contact Cooling / Ecs Non- Contact Cooling / Plate Heat Exchangers Non-Contact Cooling / Rolling Mill + Induction Furnace Non- Contact Cooling / CCM Primary Emergency Circuit / CCM Tertiary Emergency Circuit / Continuous Charging Emergency Circuit / Induction Furnace Emergency Circuit / CCM Secondary Contact Cooling / CCM Tertiary Contact Cooling / QTB/Spooler Line Contact Cooling / Finishing Stands Contact Cooling / Rough Stands Contact Cooling
Sierra Bullets	1400 W. Henry St. Sedalia, MO 65301	North	Permitted with Starline	CIU - § 468.15	Inspection- 4/28/2025	332992	Small arms Projectiles- 800,000each	21,745gpd	23,000gpd	Copper forming
Waste Corporation of Missouri	24461 Oak Grove Lane Sedalia, MO 65301	Central	Permitted	SIU - Potential to impact POTW	6/12/2025	562212	N/A	36,000gpd	36,140gpd	Leachate
St. Joseph Plastics	1500 Sedalia Rd. Sedalia, MO 65301	North	New permit 1/1/2026	SIU based on anticipated flow; Pretreatment required	1/23/2025	562920 / 423930	Polypropylene (PCR)- 15,000lbs	5,757gpd	12,000	Friction Washing & Drying / Hydrocyclone Separation / Seperated Waste drainage / Wash tank Weekly Draining
MPW	3205 W Main St. Sedalia, MO 65301	Central	New permit 1/1/2026	SIU > 25,000 GPD Potential to impact POTW	7/18/2025	339999	Resin regeneration from ion exchange mobile units	85,100gpd	150,000	Process water from Resin Regeneration
PROENERGY	2001 Pro Energy Blvd. Sedalia, MO 65301	Central	New permit 1/1/2026	CIU - § 433.17	7/18/2025	811310	Repair & Upfit generation and transmission equipment	0gpd	2950gpd	N/A
Bothwell Memorial Hospital	601 E 14th Sedalia, MO 65301	North	NA	Not SIU; Not CIU	2/29/2024	N/A	Medical products	12,250gpd	115,670gpd	N/A

Industrial User	Address	WWTP	Permit Status	SIU Status	Most Recent Site Visit	NAICS Code	Principal Products	Process Discharge Total	Sewer Flow Total	Source Industrial Waste Discharge
De Long's Inc.	131 Harding Ave. Sedalia, MO 65301	SE	NA	Not SIU; Not CIU No discharge	11/30/2023	332312	Steel / 12 tons	0gpd	163	N/A
Duke Manufacturing	601 Duke Dr. Sedalia, MO 65301	Central	NA	Not SIU; Not CIU	7/17/2025	332999	Food serving Units-varies / Stainless tables-40 units / Ovens-10 units / Warming units-varies	1,236gpd	2,817	Auto Pain Washer / Floor Scrubber / Compressor Discharge / Deburr Operation
Gardner Denver Machine	305 N. State Fair Blvd. Sedalia, MO 65301	Central	NA	Not SIU; Not CIU Closed system, No discharge	7/18/2025	333912	8 Air Compressors / 90 Blowers	0gpd	15,000	N/A
Missouri Pressed Metals	1200 E Boonville St. Sedalia, MO 65301	SE	NA	Not SIU; Not CIU No discharge of process wastewater.	7/17/2025	332999	Bushings, bearings & structural parts	0.06gpd	396gpd	N/A
Owens Corning Group	2700 W. 16th Sedalia, MO 65301	Central	NA	Not SIU; Not CIU	7/17/2025	32721	Cellulated Glass Insulation- 27,897lbs	1,100gpd	20,480gpd	Mold Coating
Quality Rubber	415 Metallic Rd. Sedalia, MO 65301	Central	NA	Not SIU; Not CIU	7/17/2025	30 sub D	Latex Rubber pads/sponges-150lbs	190gpd	3,513gpd	Boiler / Autoclave condensation
Sedalia Tool & Mfg	1400 Sedalia Rd. Sedalia, MO 65301		NA	Not SIU; Not CIU	NA	33271	Various metal parts for local manufacturing- 200parts	0gpd	154gpd	N/A
Wire Co WorldGroup	24150 Oak Grove Ln. Sedalia, MO 65301	Central	NA	Not SIU; Not CIU	7/17/2025		Wire rope; some plastic coated	0gpd		N/A

Appendix C. Current Effective NPDES Permit [MO 780-2954 3.3]

(Available Upon Request)

Appendix D. Previous Detailed Technical Local Limit Evaluation [MO 780-2954 3.2]

(See Technical Re-Evaluation of Local Limits: Central WWTP Report)

Appendix E. Region VII Spreadsheet Data [MO 780-2954 3.8.2]

LOCAL LIMITS CALCULATOR

11/12/2025

City: **Sedalia North WWTP** NPDES #: **MO-0023027**

State: **MO** 0.171582401

Plant	Non SIU Flow, MGD: 0.685	Flow To Digstr: MGD: NA	
Data:	TOTAL Flow, MGD: 0.827	Sludge to Disposal, MGD: NA	
	7Q10, MGD: 0.0000	Sludge to Disposal, %Solids: NA	
	Stream Hardness, mg/l: 0	Site Use, Years: NA	
	Sludge Quality Level: EQ	Site Size, Acres: NA	

Add Pollutant	NPDES Limit	Removal Efficiencies		Domestic Level	MO WQS	Reserve Factor	Avg. Infl mg/L	AS Inhibition	Digestion Inhibition
		Primary	Plant						
Ag	NA	20%	66%	0.0025	0.0340	10%	0.0029	0.3	NA
As	NA	NA	0%	0.0025	0.1500	10%	0.0025	0.1	NA
Cd*	0.001	15%	68%	0.0025	NA	10%	0.0025	1.0	NA
CN	NA	27%	59%	0.01	0.0050	10%	0.0051	0.1	NA
Cr*	NA	27%	55%	0.0025	0.2450	10%	0.0025	1.0	NA
Cu*	0.0229	22%	61%	0.0118	NA	10%	0.0482	1.0	NA
Hg	NA	10%	50%	0.0002	0.0008	10%	0.0002	0.1	NA
Mo	NA	NA	50%	0.0025	NA	10%	0.0209	NA	NA
Ni*	NA	14%	29%	0.0051	0.1535	10%	0.0082	1.0	NA
Pb*	NA	57%	29%	0.0025	0.0161	10%	0.0073	0.1	NA
Se	NA	NA	50%	0.0025	0.0050	10%	0.0025	NA	NA
Zn*	NA	27%	34%	0.0414	0.3509	10%	0.0587	1.0	NA
Cl	NA		16%	158.27	250.0	10%	226.0		
CNAmen	NA		59%	0.004	0.005	10%	NO DATA		
Hex_Chrome	NA			0.009	0.011	10%	NO DATA		
Phenol	NA		84%	0.14	2.5	10%	0.5		
Total_Nitroge	NA		20%	23.90	16.0	10%	23.8		
HEM	NA		89%	29.99	5.0	10%	NO DATA		

*HARDNESS DEPENDENT

	DW Design		Domestic Sources lbs/day	Expansion Factor	Avg. Infl mg/L	Avg. Infl lbs/day
	Daily avg lbs/day	Maximum lbs/day				
BOD	4,250	-	274	20%	257.20	1774.6
TSS	5,000	-	143	20%	117.50	810.7
TKN	825	840	117	20%	27.82	192.0
P,total	220	220	12	20%	4.51	31.1
Ammonia	495	584	68	20%	14.8	102.4

NOTE: all values mg/l unless noted

Domestic Sources Estimator					
Pop:	8,250 persons		Domestic conc *	% IU Contr.	
	lbs/cap/day	lbs/day	Dom flow * 8.34	to Design	
BOD	0.17	1,402.50	274.36	9%	
TSS	0.2	1,650.00	142.89	13%	
TKN	0.033	272.25	116.60	9%	
P,total	0.0088	72.60	12.06	9%	
Ammonia	0.0198	163.35	68.02	-12%	

Domestic Wastewater Characteristics

SUMMARY OF MASS LOADINGS FOR SEDALIA NORTH WWTP, MO

Parameter	Domestic/commcl Sources		LOCAL LIMIT Maximum Allowable Industrial Load (MAIL)		lbs. Reserve	Maximum Allowable Headwrks Load (MAHL) lbs	Headworks ACTUAL Avg.Load lbs	Current Loading as % of MAHL	Limiting Criteria
	lbs.	% of limit	lbs.	% of MAHL					
	Ag	0.017	2%	0.606					
As	0.014	2%	0.608	88%	0.068	0.69	0.017	2.5%	Secndry Inhib
Cd	0.014	66%	0.007	30%	0.001	0.02	0.017	80%	NPDES #
CN	0.057	68%	0.024	29%	0.003	0.08	0.035	42%	Water Quality
Cr	0.014	0%	3.367	90%	0.3742	3.76	0.017	0%	Water Quality
Cu	0.067	17%	0.303	75%	0.034	0.40	0.332	82%	NPDES #
Hg	0.001	11%	0.009	80%	0.001	0.01	0.001	13%	Water Quality
Mo	0.014	2%	0.581	88%	0.065	0.66	0.144	22%	503 EQ
Ni	0.029	2%	1.317	88%	0.146	1.49	0.057	4%	Water Quality
Pb	0.014	9%	0.127	82%	0.014	0.16	0.050	32%	Water Quality
Se	0.014	21%	0.049	71%	0.005	0.07	0.017	25%	Water Quality
Zn	0.237	6%	3.112	84%	0.346	3.69	0.405	11%	Water Quality
Cl	905	44%	1034	50%	114.9	2053	1559	76%	Water Quality
Hex_Chrome		0%	0.02	90%	0.00	0.02	NA	#N/A	Water Quality
CNAmen	0.02	28%	0.057	65%	0.006	0.09	NA	#N/A	Water Quality
Phenol	0.77	1%	96.33	89%	10.70	107.81	3.519	3%	Water Quality
Total_Nitrogen	136.61	98%	1.949	1%	0.217	138.77	164.21	118%	Water Quality
HEM	171.42	56%	119.000	39%	13.222	303.65	NA	#N/A	Water Quality

TOXIC POLLUTANTS SUMMARY

UNIFORM CONCENTRATION LIMIT

If APPLIED		
Parameter	empty	Uniform Conc. (mg/L)
Silver	Ag	0.512
Arsenic	As	0.000
Cadmium	Cd	0.006
Cyanide	CN	0.021
Chromium	Cr	2.845
Copper	Cu	0.256
Mercury	Hg	0.007
Molybdenum	Mo	0.491
Nickel	Ni	1.112
Lead	Pb	0.108
Selenium	Se	0.042
Zinc	Zn	2.629
Chloride	Cl	873.4
Chromium IV, total	Hex_Chrome	0.019
CNAmen	CNAmen	0.048
Phenol	Phenol	81.371
	Total_Nitrogen	1.646
	HEM	100.519

MIDDLE TIER THRESHOLD
lb/day

Ag	0.0001
As	0.0001
Cd	0.0000
CN	0.0000
Cr	0.0004
Cu	0.0000
Hg	0.0000
Mo	0.0001
Ni	0.0001
Pb	0.0000
Se	0.0000
Zn	0.0004

Conventional Pollutants/Nutrients - Long Term Average Limits

Based on Design Daily Average Criteria

	Domestic/commcl Sources		LOCAL LIMIT Maximum Allowable Industrial Load (MAIL)		lbs. Reserve	Maximum Allowable Headwrks Load (MAHL) Avg.lbs	Headworks ACTUAL Avg.Load lbs	Current Loading as % of MAHL
	lbs.	% of limit	lbs.	% of MAHL				
	BOD	274	6%	3126				
TSS	143	3%	3857	77%	1000	5000	811	16%
TKN	117	14%	543	66%	165	825	192	23%
P,total	12	5%	164	75%	44	220	31	14%
Ammonia-N	68	14%	328	66%	99	495	102	21%

Conventional Pollutants/Nutrients - Daily Maximum Limits

Based on Peak Design Criteria

	Domestic/commcl Sources		LOCAL LIMIT Maximum Allowable Industrial Load (MAIL)		lbs. Reserve	Maximum Allowable Headwrks Load (MAHL) Peak,lbs	Headworks ACTUAL Avg.Load lbs	Current Loading as % of MAHL
	lbs.	% of limit	lbs.	% of MAHL				
	BOD	274	NA	NA				
TSS	143	NA	NA	NA	0	0	811	NA
TKN	117	14%	555	66%	168	840	192	23%
P,total	12	5%	164	75%	44	220	31	14%

Conventional Pollutants/Nutrients Uniform Concentration Limits

Flow for SIUs Receiving Limits, mgd: 0.1419492

Parameter	Daily Max	
	Col. Utility Max (mg)	Mo. Avg. (mg/L)
BOD	NA	2640
TSS	NA	3258
TKN	469	459
P,total	138	138
Ammonia	NA	277

Appendix F. Raw Analytical Data [MO 780-2954 3.3]
(Available Upon Request)

Amended
City Council Meeting Agenda
Monday, May 4, 2026 – 6:30 p.m.
City Hall, 200 South Osage, Sedalia MO

The City Council Meeting Agenda for Monday, May 4, 2026, is being amended to include the addition of the following new liquor license for Council Approval:

LIQUOR LICENSES

New

Paige Shearer dba The Local Tap, 700 South Ohio, Yeager's Bike Night, 3001 South Limit, May 8, 2026, 6:00 p.m. – 10 p.m. – \$15.00