



**EAST-WEST GATEWAY**  
**Council of Governments**

Creating Solutions Across Jurisdictional Boundaries

April 28, 2006

Mr. Jim Gulliford  
Regional Administrator  
U.S. Environmental Protection Agency Region 7  
901 N 5<sup>th</sup> St  
Kansas City, KS 66101

Dear Regional Administrator Gulliford:

In the 1978 St. Louis, Missouri Water Quality Management (208) Plan, the City of Festus in Jefferson County was designated as a management agency for the Festus/Crystal City Facility Planning Area (FPA). With this designation, it was responsible for the planning, design, construction, operation and maintenance of the proposed wastewater treatment facility and Mississippi River outfall. In the management agency agreement signed by the City of Festus, provision is made for analysis of alternative treatment and discharge options which are consistent with the overall goals, objectives, and policies of the original 208 Water Quality Management Plan.

Since the completion of the 208 Water Quality Management Plan in 1978, the Festus/Crystal City Sewage Commission have aggressively pursued the planning and construction of a new wastewater treatment facility. The East-West Gateway Council of Governments (EWGCOG), as part of its responsibility as the 208 regional planning agency has agreed to aid and cooperate with the management agency to assure that its responsibilities are carried out in a technically and financially feasible manner. As noted above, the management agency may substitute an alternative treatment and discharge system than what was identified in the 208 Water Quality Management Plan if the alternative system has been demonstrated to be cost-effective, meets all effluent permit limitations and meets all applicable in-stream water quality criteria.

The Festus/Crystal City Sewage Commission has recently completed a study which indicates that the recently constructed wastewater treatment plant is meeting or exceeding its NPDES permit requirements and the new facility is producing effluent that has consistently low levels of ammonia/nitrogen, suspended solids and BODs (see attachment). Furthermore, the Commission has also agreed to disinfect the wastewater effluent to meet the bacterial standards in Plattin Creek.

EWGCOG, in its capacity as the 208 Water Quality Management Agency is, therefore, requesting that the original St. Louis 208 Water Quality Management Plan be amended to eliminate the requirements for the construction of a pump station and outfall sewer discharging to the Mississippi River and to allow for the direct discharge into Plattin Creek from the new Festus/Crystal City wastewater treatment plant with disinfection.

Should have any questions, please do not hesitate to call.

Sincerely,

*Steve Nagle*

Steve Nagle  
Director of Planning

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