



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

Creating Solutions Across Jurisdictional Boundaries

March 22, 2019

Chris Wieberg, Program Director  
Water Protection Program  
Missouri Department of Natural Resources  
P.O. Box 176  
Jefferson City, MO 65102-0176

RE: 208 Plan Amendment for the Lower Meramec System Recommendation

Dear Mr. Wieberg,

In 1978, as the 208 Water Quality Management regional planning agency for the St. Louis metropolitan area (Franklin, Jefferson, St. Charles and St. Louis counties and the City of St. Louis), East-West Gateway Council of Governments (EWG) and a team of consultants prepared the St. Louis, Missouri Water Quality Management (208) Plan [208 Plan]. The 208 Plan provided a framework for establishing control strategies to address both point and non-point pollution problems and also contained recommendations for residual waste (sludge) management. The 208 Plan was approved by the U.S. Environmental Protection Agency (EPA) in 1979.

As part of its responsibility as 208 Water Quality regional planning agency, EWG aids and cooperates with designated management agencies to assure that responsibilities under the 208 Plan are carried out in a technically and financially feasible manner. Management agencies may substitute alternative plans or methodologies strategy from what was recommended in the 208 Plan if the alternative strategy has been demonstrated to be cost effective, meets all effluent permit limitations, and meets all applicable in-stream water quality criteria.

The management agencies of the Metropolitan St. Louis Sewer District (MSD) and the Northeast Public Sewer District (NPSD) have been communicating with EWG concerning facility planning efforts, current operations and the process to amend the Lower Meramec System point source recommendation, and the residual waste control recommendation from the 208 Plan. MSD and NPSD have prepared a report, *Proposed Amendments to the 1978 St Louis Missouri Water Quality Management 208 Plan: Lower Meramec River Basin-March 15, 2019*, which describes the current situation in each district and delineates the water quality status and economic benefits for an amendment to the Lower Meramec System point source recommendation and the residual waste control measure

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recommendation. The Rock Creek Public Sewer District (RCPSD) was also involved in the preparation of this report and the amendment recommendations.

*The Proposed Amendments to the 1978 St Louis Missouri Water Quality Management 208 Plan: Lower Meramec River Basin* shows that it is more cost-effective to maintain the wastewater treatment facilities owned and operated by MSD, NPSD and RCPSD within the footprint of the Lower Meramec System area than it is to implement the original 1978 208 Plan point source recommendation for this area. These facilities currently meet applicable state in-stream water quality standards and effluent permit limitations. With this amendment, each district will be able to implement their facility and operational plans and continue activities to provide services to their residents in a cost-effective manner while continuing satisfying water quality and effluent requirements.

The March 2019 document also shows it is more effective to allow for processing of residual waste from MSD facilities in the Lower Meramec System to occur at MSD's Bissell Point and Lemay wastewater treatment facilities and that NPSD and RCPSD will continue their own residual waste efforts. Each district will continue to be responsible for residual waste efforts.

EWG is in support of the request by the Metropolitan St. Louis Sewer District, the Northeast Public Sewer District and the Rock Creek Public Sewer District that the original 1978 Lower Meramec System area point source recommendation and the residual waste management recommendation be amended.

Thank you for the opportunity to express our support for these amendments to the *1978 St. Louis, Missouri Water Quality Management (208) Plan*.

Sincerely,



Mary Grace Lewandowski, AICP  
Director of Community Planning

Cc: Jay Hoskins  
Bob Hembrook  
Don Daniel