Exhibit No. _____
Issues: Applicant, Qualifications, Overview of Nonviable Utility Systems, Capital Structure, Tariffs and Rates, Public Interest
Witness: Josiah Cox
Type of Exhibit: Surrebuttal Testimony
Sponsoring Party: Osage Utility Operating Company, Inc
File Nos.: WA-2019-0185
Date: September 4, 2019

Missouri Public Service Commission

Surrebuttal Testimony

of

Josiah Cox

On Behalf of

Osage Utility Operating Company, Inc

September 4, 2019

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SURREBUTTAL TESTIMONY OF
JOSIAH COX
OSAGE UTILITY OPERATING COMPANY, INC.

WITNESS INTRODUCTION

Q. PLEASE STATE YOUR NAME AND BUSINESS ADDRESS.

A. My name is Josiah Cox. My business address is 500 Northwest Plaza Drive, Suite 500, St. Ann, Missouri, 63074.

Q. ARE YOU THE SAME JOSIAH COX WHO PREVIOUSLY FILED DIRECT TESTIMONY IN THIS CASE ON BEHALF OF OSAGE UTILITY OPERATING COMPANY, INC. (OUOC)?

A. Yes.

PURPOSE

Q. WHAT IS THE PURPOSE OF YOUR SURREBUTTAL TESTIMONY?

A. The purpose of my surrebuttal testimony is to respond to portions of the rebuttal testimonies filed by the Office of the Public Counsel (OPC), Reflections Subdivision Master Association, Inc. (Reflections Association), and Cedar Glen Condominium Owners Association, Inc. (Cedar Glen).

Testimony of OPC witness Keri Roth

Q. HAVE YOU READ THE REBUTTAL TESTIMONY OF OPC WITNESS KERI ROTH?

A. Yes.

Q. AT PAGE 2, LINES 16-22, THROUGH PAGE 5, LINES 1-22, MS. ROTH DISCUSSES HER CRITICISMS OF THE CUSTOMER NOTICE OUOC

PROVIDED TO POTENTIAL CUSTOMERS CURRENTLY SERVED BY THE OSAGE WATER COMPANY SYSTEMS, AS WELL AS THE REFLECTIONS SYSTEMS. IS CUSTOMER NOTICE A REQUIREMENT UNDER THE COMMISSION'S RULES WHEN FILING AN APPLICATION TO ACQUIRE ASSETS?

A. No, it is not. However, OUOC undertook this voluntary action because the Company understands how a change in utility providers can be a concerning time for customers, and customers often receive misinformation from various sources. OUOC wanted to provide information to potential customers, not only to introduce the Company and its operations, but also to make sure they were receiving correct information about the application process.

Q. IS OUOC WILLING TO CONSIDER RECOMMENDATIONS ON HOW THE CUSTOMER NOTICE MIGHT BE IMPROVED?

A. Certainly. While notice is not required, OUOC voluntarily sent out the customer notice and we want that notice to be as helpful to customers as possible. OUOC is willing to discuss and consider any recommendations.

Q. ON PAGE 7, LINES 17-21, THROUGH PAGE 11, LINES 1-19, OPC WITNESS ROTH MENTIONS CSWR'S CASES BEFORE THE COMMISSIONS IN ARKANSAS, TENNESSEE, KENTUCKY AND LOUISIANA TO EVALUATE OUOC'S REQUEST FOR ACQUISITION INCENTIVES IN THIS CASE. DO OTHER STATES HAVE THE SAME STATUTES AND RULES AS THE MISSOURI PUBLIC SERVICE COMMISSION?

A. No. The states of Arkansas, Tennessee, Kentucky, and Louisiana don't have statutes or rules that provide for acquisition premiums, or other incentives, similar to those available under 4 CSR 240-10.085. But the fact OUOC made acquisitions in Missouri prior to the adoption of that rule or that OUOC's affiliates in Arkansas, Tennessee, Kentucky, and Louisiana have made or propose to make acquisitions without premiums similar to those provided in the Commission's rule is not determinative as to application of this Commission rule, nor necessarily representative of the situations in Missouri that drove promulgation of the non-viable utility incentive rule. As of January 30, 2019, the Commission has made available premiums to companies willing to acquire non-viable water and wastewater companies. The decision regarding OUOC's request for a premium in this case should be based solely on that rule and whether OUOC qualifies for a premium under the rule's standards.

For many years, this Commission has wrestled with the problem of how companies like Central States Water Resources ("CSWR") and its affiliates, who have the operating and managerial expertise and the capital necessary to convert small non-viable utilities into utilities that consistently comply with applicable regulations and are able to provide safe and reliable service to customers, can be encouraged to acquire, maintain and operate the many non-viable systems operating in this state. In the workshops the Commission held prior to adoption of 4 CSR 240-10.085, CSWR and other similarly-situated companies argued in favor of incentives because viable utilities aren't likely to invest in non-viable utilities unless it makes business sense to do so.

Consequently, if viable utilities were going to be enticed to invest in non-viable utilities, some investment incentive needed to be provided. That's why the Commission adopted its rule. OUOC shouldn't be penalized for attempting to now take advantage of those incentives just because those same incentives didn't exist in the past and don't currently exist in other states.

In the near future, affiliates of OUOC plan to seek regulatory commission authority to acquire, own, and operate small water and wastewater systems in Texas and North Carolina. Each of those states recently enacted legislation allowing regulators to value rate base for those systems based on the appraised market value of the acquired systems. (Missouri has adopted similar legislation, but it's our understanding that benefit is currently only available to acquisitions by "large water public utilities" (those of 8,000 customers or more)). Would it be fair for regulators in Texas and North Carolina to deny CSWR affiliates in those states the market value rate base available to other acquiring utilities just because their affiliates acquired similar systems in Arkansas, Tennessee, Kentucky, Louisiana, and Missouri where market value treatment isn't available? Of course not. And it's similarly not appropriate for the Commission to deny acquisition incentives in this case just because they haven't been sought previously in Missouri or in other states where premiums aren't available.

But there is perhaps an even more compelling reason to reject the argument Ms. Roth is making in this case on behalf of the OPC. If a utility like OUOC is barred from taking advantage of the incentives available under 4 CSR 240-10.085 then the rule will be rendered a nullity. That's true because I can't

imagine there is any utility who may try to take advantage of that rule in the future that did not make acquisitions in the past when no incentive was available. If those prior acquisitions are a disqualifier – as Ms. Roth seems to argue – then the benefits the rule purports to provide are purely illusory.

Q. AT PAGE 12, LINES 9-23 THROUGH PAGE 13, LINES 1-12, MS. ROTH OPINES THAT OUOC HAS NOT MET ITS BURDEN OF PROOF TO SHOW THAT THE PURCHASE OF THE OSAGE WATER SYSTEMS AND REFLECTIONS SYSTEMS WOULD BE UNLIKELY TO OCCUR WITHOUT THE PROBABILITY OF OBTAINING AN ACQUISITION INCENTIVE. DO YOU AGREE WITH MS. ROTH'S CONCLUSION?

A. No, I do not.

Q. PLEASE EXPLAIN.

A. Ms. Roth states that CSWR bid to purchase the assets of Osage Water Company and then executed the Agreement for Sale of Utility System (Agreement for Sale) before the incentive rule became available. The Agreement for Sale was executed on October 24, 2018. Regulation 4 CSR 240-10.085 became effective January 30, 2019. See Schedule JC-11 attached to my Direct Testimony in this case. Ms. Roth argues that the timeline of events shows the acquisition would occur regardless of the Commission approving a debit acquisition adjustment. What Ms. Roth ignores is that the incentive rule was filed May 30, 2018, so CSWR was aware of the rule's progress through the rulemaking schedule when it placed its bid at the Bankruptcy Court's auction. Further, the language in Paragraph 9 (a) on page 8 of the Agreement for Sale

that contains the conditions precedent for CSWR to close. The protective language reads:

> The PSC and DNR shall have, if necessary, authorized or approved the sale, transfer or disposition of the Assets to Buyer from Seller, the proposed financing, and any schedule of compliance for proposed utility improvement projects for regulatory compliance deemed necessary by Buyer, each in form and substance (including without limitation with respect to *the terms and conditions contained in such approval) acceptable to Buyer in Buyer's sole and absolute discretion.*

(emphasis added). What this language means is that CSWR may choose to not consummate the purchase if the final commission order makes CSWR's acquisition not feasible from an economic standpoint.

Q. COULD THE COMMISSION STILL APPROVE AN ACQUISITION INCENTIVE EVEN IF THE COMMISSION WERE TO ACCEPT OPC'S POSITION THAT OUOC HAS NOT MET ITS BURDEN OF PROOF?

A. Yes. 4 CSR 240-10.085(8) allows the Commission to waive any of the regulation's provisions for good cause shown.

Q. IN YOUR OPINION, WHAT IS THE GOOD CAUSE IN THIS CASE?

A. As I discussed in my Direct Testimony, the Commission found Osage Water Company had been effectively abandoned by its owners and directed Staff to file a petition in circuit court for the appointment of a receiver. In 2005, the Camden County Circuit Court placed Osage Water Company into permanent receivership. Osage Water Company was in receivership up until it filed for Chapter 11 bankruptcy on October 11, 2017. Reflections has a similar troubled history, with the developer defaulting on the development loan in 2012. Great Southern Bank

has held title to the real estate the utility systems are located on since that time. The Osage Water Company and Reflections systems have also had compliance issues with the Missouri Department of Natural Resources throughout the years and require system upgrades. I've included MDNR documentation for each of the systems in **Schedules JC-S1 through JC-S5**. All the while, the customers' needs for safe and adequate utility services over the last fourteen (14) plus years has remained constant. OUOC has the technical, managerial, and financial capability to own and operate the systems and provide safe and adequate service for the customers.

Further, should OUOC not be able to close on the Osage Water Company assets, the Trustee has authority to sell the assets to PWSD #5, LAWWA and MWA as the first back-up bidders, subject to receiving all necessary regulatory approval. And as I will discuss in more detail later, the rebuttal testimony of Mr. Soukenik states that MWA and LAWWA are willing to purchase the Reflections systems as well. The acquisition of these systems by PWSD #5, LAWWA and MWA is not in the public interest. As discussed in detail in the surrebuttal testimony of Todd Thomas, these entities have long histories of non-compliance with MDNR regulations designed to protect the health and welfare of the public and environment. If the Commission grants OUOC the authority it seeks in the Amended Application, OUOC and CSWR have access to adequate capital and are willing and able to invest the capital necessary to bring the water and wastewater systems at issue in this case up to standard and maintain compliance with applicable MDNR regulations.

Q. IS OUOC STILL SEEKING BOTH A RATE OF RETURN PREMIUM ALONG WITH A DEBT ACQUISITION ADJUSTMENT AS PART OF THIS CASE?

A. OUOC originally asked for both a rate of return premium along with a debt acquisition adjustment. After further consideration, and in consideration of the Staff's opposition to the proposed rate of return premium, OUOC will drop its request for a rate of return premium.

Q. WITH THAT CHANGE, DO YOU BELIEVE OUOC'S POSITION IS CONSISTENT WITH THE STAFF'S RECOMMENDATION AND DIRECT TESTIMONY IN THIS CASE?

A. Yes.

Testimony of Cedar Glen witness Kenneth Hulett

Q. HAVE YOU READ THE REBUTTAL TESTIMONY OF CEDAR GLEN WITNESS KENNETH HULETT?

A. Yes.

Q. ON PAGE 2, LINES 21-23, MR. HULETT STATES THAT APPROVAL OF OUOC'S APPLICATION WOULD BE DETRIMENTAL TO THE PUBLIC INTEREST. DO YOU AGREE?

A. No, I do not agree. OUOC'S proposed acquisition of the specified assets of Osage Water Company and the related transactions are not detrimental to the public interest of the State of Missouri.

CSWR Missouri companies Hillcrest Utility Operating Company, Inc. Raccoon Creek Utility Operating Company, Inc. Elm Hills Utility Operating Company, Inc., Confluence Rivers Utility Operating Company, Inc., and Indian Hills Utility

Operating Company, Inc. have acquired small Missouri water and sewer companies, brought capital to improve those systems, upgraded the services provided to customers and delivered safe and adequate service where that was not the case prior to acquisition. CSWR companies have purchased multiple systems in Missouri that were in state appointed receivership, with numerous MDNR violations, and brought those systems back into regulatory compliance for the provision of safe and reliable service.

Q. HAS THE COMMISSION RECENTLY APPLIED THE NOT DETRIMENTAL STANDARD IN RELATION TO OUOC AFFILIATE CONFLUENCE RIVERS UTILITY OPERATING COMPANY, INC.?

A. Yes. The Commission recently applied the standard of "not detrimental to the public interest" in its order for a case involving Confluence Rivers Utility Operating Company, Inc. (Commission Case No. WM-2018-0116 (February 14, 2019)). As the Staff of the Commission reminded parties in an earlier pleading, in the Confluence Rivers order the Commission found that the proposed sale to OUOC's affiliate was not detrimental to the public interest and stated in support as follows:

> Considering the present troubled nature of the systems at issue, the Company's sound track record in rehabilitating similarly situated systems, the Company's ability to acquire, maintain, and operate the systems, and the statutory obligation of the Commission to ensure safe and adequate service, allowing the Company to acquire the Selling Companies' assets per the terms and conditions of the Stipulation will not be detrimental to the public.

The elements referenced by the Commission could easily be applied to this case.

Q. DOES CSWR'S EXPERIENCE NOW EXTEND BEYOND THE STATE OF MISSOURI?

A. Yes. In addition to Missouri, CSWR affiliates own and operate water and sewer systems in Arkansas and this month will close on systems in Kentucky. CSWR affiliates are further in the process of acquiring systems in Tennessee, and Louisiana.

Q. DID THE KENTUCKY PUBLIC SERVICE COMMISSION MAKE FINDINGS CONCERNING CSWR'S EXPERIENCE AND ABILITY TO OWN, IMPROVE AND OPERATE WATER AND SEWER SYSTEMS WHEN IT APPROVED THOSE ACQUISITIONS?

A. Yes. In Kentucky PSC Case No. 2019-00104, the Kentucky PSC concluded that CSWR's affiliate Bluegrass Water Utility Operating Company, LLC, subject to certain conditions, "has the financial, technical, and managerial abilities to provide reasonable service to those persons located in the acquired systems."

Q. ARE THERE IMPROVEMENTS IN SERVICE THAT CUSTOMERS OF OSAGE WATER COMPANY AND THE REFLECTIONS SYSTEMS WILL EXPERIENCE AS A RESULT OF OUOC'S ACQUISITION OF THOSE SYSTEMS?

A. Yes. Most obviously, OUOC will be able to correct and improve the infrastructure of these systems in a way that has not been possible over the last several years. This is especially true as to the Osage Water Company systems, as they have been in receivership and bankruptcy over the past 14 years. Additionally, customers will have multiple channels in which to interact with OUOC. First customers will have a 24-hour phone line to report any utility service issues.

Those service issue calls are then transferred into the computerized maintenance management system (CMMS) and converted into work orders, which creates a history with the reported service issue and works to quickly and efficiently deal with any actual issues for customers. Second OUOC has customer service representatives available during business hours to talk about any customer concerns. Additionally, OUOC will have a utility-specific webpage and dedicated email address that will keep customers informed about their utility service. Mirroring the relevant utility homepage information, OUOC will also have a dedicated social media page in order to offer another avenue of communication with customers about utility matters. The social media account will be manned by customer service representatives that can answer customer questions. Finally, OUOC will also offer online bill paying options to customers including e-checks, debit card, and credit cards.

Q. WOULD YOU SUMMARIZE THE COMPANY'S POSITION AS TO THE PUBLIC INTEREST ASSOCIATED WITH THE PROPOSED TRANSACTIONS?

A. A grant of the requested certificates of convenience and necessity associated with the proposed acquisition of the specified assets of Reflections and the related transactions are in the public interest of the State of Missouri. The assets would be acquired by OUOC and be subject to the jurisdiction of the Commission. OUOC is fully qualified, in all respects, to own and operate the systems to be acquired and to otherwise provide safe and adequate service – something that is not present at the current time. OUOC and CSWR have the resources to rehabilitate the systems it proposes to acquire, and the managerial,

technical, and financial capabilities to safely and adequately operate the systems going forward.

Q. AT PAGE 3, LINES 9-11, MR. HULETT STATES THAT CEDAR GLEN CUSTOMERS WOULD BE BETTER SERVED BY PWSD #5. DO YOU AGREE?

A. No, I do not agree. As discussed in the surrebuttal testimony of Todd Thomas, PWSD # 5 operates only two water and wastewater systems, Clearwater Condominiums (Clearwater) and Cedar Heights. And yet, PWSD #5 has received communication from MDNR at least 13 times over the last four (4) years for notices of violation, findings of non-compliance, or letters of warning related to compliance with MDNR regulations. Also, as of May 14, 2019, PWSD # 5 was in Enforcement for delinquent 2018 and 2019 permit fees.

Q. ON PAGE 6, LINES 1-3, MR. HULETT STATES THAT COST IS JUST ONE OF THE FACTORS THAT INFLUENCE THE VALUE OF A CONDOMINIUM TO A PROSPECTIVE BUYER. IN YOUR EXPERIENCE, WHAT OTHER FACTORS INFLUENCE MARKET VALUES?

A. In my experience in the drinking water industry, having reliable access to safe drinking water is one of the most influential factors on the value of property. Additionally, the Lake of the Ozarks is important for tourism and outdoor recreational activities including boating, swimming and fishing, and the fundamental reason for the location of these condominiums. Many housing units are built near the water and make use of onsite wastewater treatment facilities. As surrounding communities continue to grow and develop, water quality

maintenance in the lake should be an increasingly serious concern. The Missouri State Operating Permits for both Cedar Heights and Clearwater allow the wastewater facilities to discharge effluent into tributaries of Lake of the Ozarks. This means that exceedances of permitted effluent limits, due to ineffective facility management, have real potential to enter the Lake of the Ozark and create events that limit owners use and enjoyment of the lake. The Lake of the Ozarks has had historical issues with water quality based on under treated wastewater, which shows how important investment in water infrastructure is for the community and the state.

Testimony of Reflections witness Anthony Soukenik

Q. HAVE YOU READ THE REBUTTAL TESTIMONY OF REFLECTIONS WITNESS ANTHONY SOUKENIK?

A. Yes.

Q. ON PAGE 3, LINES 3-23, REFLECTIONS STATES IT HAS TERMINATED THE AMENDED AGREEMENT TO SELL THE SYSTEMS ASSETS TO CSWR. WHAT IS OUOC'S RESPONSE?

A. CSWR provided the Reflections entities an opportunity to terminate in January of this year. Those entities chose not to terminate at that time and CSWR advised the Reflections Parties at that time that it would not be for the entities to then later terminate after OUOC had invested time and money in the application process. In response to the purported termination found in rebuttal testimony, CSWR has informed the Reflections entities of its belief that under applicable law those entities no longer have authority to unilaterally terminate the Agreement.

Because CSWR considers the Agreement to remain in full force and effect and no court has invalidated the agreement, OUOC intends to pursue its application for a certificate of convenience and necessity and Commission approval of the acquisition contemplated by the Agreement.

To enforce and protect its rights under the Agreement, on August 15, 2019, CSWR filed a Petition for Injunction & Declaratory Relief against the Reflection Parties in the Circuit Court of Camden County (Case No. 19CM-CC00158). I have attached a copy of the Petition to my testimony as Schedule JC-S6. That case continues and CSWR intends to seek injunctive relief to prevent the Reflections Parties from attempting to sell to any third-party those assets subject to the Agreement. CSWR also has filed a *lis pendens* to inform any potential purchasers of the pending Circuit Court litigation.

Q. ON PAGE 3, LINE 23, CONTINUING ON TO PAGE 4, LINES 1-3, MR. SOUKENIK STATES THAT GREAT SOUTHERN BANK REQUESTED THE REFLECTIONS CCN REQUEST BE BIFURCATED FROM THE OSAGE WATER COMPANY ACQUISITION PROCEEDING AND CSWR/OUOC REFUSED TO DO SO? IS MR. SOUKENIK'S STATEMENT ACCURATE?

A. No. OUOC did not have the power to either grant or deny such a request at the time made. Only the Commission could do so. While OUOC did not move for such bifurcation, it also never filed a pleading opposing Great Southern Bank's request for bifurcation.

Q. ON PAGE 4, LINES 22-23, CONTINUING ONTO PAGE 5, LINE 1, MR. SOUKENIK STATES THAT "THE ASSOCIATIONS AND THE BANK HAD

AGREED TO TRANSFER THE UTILITY SYSTEMS TO CSWR FOR ONE DOLLAR, IN ORDER TO ALLOW RATES TO BE MAINTAINED AT THE MOST ECONOMICAL LEVEL" AND OUOC HAS "SOUGHT TO INCREASE RATES BEYOND WHAT IS REQUIRED TO MAKE THE NEEDED IMPROVEMENTS TO THE SYSTEMS." ARE MR. SOUKENIK'S STATEMENTS ACCURATE?

A. OUOC has no knowledge and cannot speak to what discussions took place between the Associations and the Bank regarding motives for the sale or determination of sale price. However, I can say that OUOC has requested an acquisition incentive, as allowed by Commission regulation 4 CSR 240-10.085, and there is nothing in the agreement that prohibits us from making such a request. Mr. Soukenik's statement also suggests that he is not familiar with the rate making process for regulated utilities. Our application makes clear we intend to maintain current rates for the period immediately following our acquisition of the Reflections assets. But as we have also made clear in our application, the Reflections systems have not been properly operated for many years and are in need of significant investment to bring them into compliance with applicable Commission and Missouri Department of Natural Resources regulations. Therefore, even without an acquisition incentive, rates charged for water and wastewater service to the Reflections Condominiums will have to be increased in the future because, as the Commission is well aware, rates must cover the utility's costs plus an approved rate of return. This having been said, no increase in rates will occur, at any time, until a rate request has been fully vetted by the

Commission, which is required by law to set rates that are fair and reasonable to both the serving utility and its customers.

Q. ON PAGE 5, LINES 2-5, MR. SOUKENIK STATES "THE IMPROVEMENTS DISCUSSED BY OSAGE UTILITY OPERATING COMPANY, INC. INCLUDE ITEMS THAT ARE NOT REQUIRED BY THE MISSOURI DEPARTMENT OF NATURAL RESOURCES ("DNR"); AGAIN ADDING TO THE COSTS THAT WOULD BE RECOVERED THROUGH FUTURE RATES." IS MR. SOUKENIK CORRECT?

A. No, he is not. Attached to my testimony as **Schedule JC-S5** is an August 29, 2017, letter from MDNR to Great Southern Bank detailing a report of inspection and finding the facility in non-compliance with Missouri Safe Drinking Water Regulations. The report includes required actions, along with recommendations.

Q. ON PAGE 5, LINES 5-12, MR. SOUKENIK STATES REFLECTIONS' CONCLUSION THAT IS IN THE PUBLIC INTEREST FOR MWA AND LAWWA TO ACQUIRE THE REFLECTIONS SYSTEMS AND PROVIDE SERVICE. DO YOU AGREE?

A. No, I do not agree. As discussed in the surrebuttal testimony of Todd Thomas, MWA and LAWWA have long histories of non-compliance with MDNR safe drinking water regulations, as well as clean water regulations.

It remains in the public interest for OUOC to acquire the Reflections systems. OUOC will complete the plant improvements necessary to make these systems viable. OUOC has already reached out to MDNR regarding the negotiation of Agreements on Consent to establish reasonable compliance timeframes for any

necessary improvements after the closing. OUOC anticipates further discussions occurring with MDNR.

Q. DOES THIS CONCLUDE YOUR SURREBUTTAL TESTIMONY?

A. Yes, it does.

MISSOURI DEPARTMENT OF NATURAL RESOURCES

NOTICE OF VIOLATION

VIOLATION NUMBER
16091SW

DATE AND TIME ISSUED
April 6, 2015

SOURCE (NAME, ADDRESS, PERMIT NUMBER, LOCATION)
Chelsea Rose Subdivision
Lake Road F-125B, Sunrise Beach in Camden County
Missouri State Operating Permit number MO0111104
SE 1/4, SE 1/4, Sec. 13, T39N, R17W River Reach 10290109-0401

MAILING ADDRESS	CITY	STATE	ZIP CODE
P.O. Box 506	Clinton	MO	64735

NAME OF OWNER OR MANAGER	TITLE OF OWNER OR MANAGER
Osage Water Company	Owner

LAW, REGULATION OR PERMIT VIOLATED
Missouri Clean Water Law Section 644.076.1 and 644.051.1(3), RSMo.

NATURE OF VIOLATION — DATE(S): — TIME(S):

Permittee failed to comply with effluent limits contained in Part "A" of the Missouri State Operating Permit number MO0111104. Permittee exceeded effluent limitations for Ammonia as N for the fourth quarter, October through December 2014.

SIGNATURE (PERSON RECEIVING NOTICE)	SIGNATURE (PERSON ISSUING NOTICE)
Sent Via US Mail	Lana Cypret *Lana Cypret*
TITLE OR POSITION	TITLE OR POSITION
	Technical Assistant / SWRO

DISTRIBUTION: SOURCE CENTRAL OFFICE REGIONAL OFFICE

Schedule JC-S1

STATE OF MISSOURI
Jeremiah W. (Jay) Nixon, Governor Sara Parker Pauley, Director
DEPARTMENT OF NATURAL RESOURCES
dnr.mo.gov

April 6, 2015

NOTICE OF VIOLATION 16091SW
CERTIFIED MAIL # 7014 0150 0001 9539 8599
RETURN RECEIPT REQUESTED

Osage Water Company
Chelsea Rose Subdivision
P.O. Box 506
Clinton, MO 64735

RE: MISSOURI STATE OPERATING PERMIT NUMBER MO0111104

Dear Permittee:

A review of your Discharge Monitoring Report(s) (DMR) for the monitoring period ending in **fourth quarter, October through December 2014** shows that the effluent limitations established in your Missouri State Operating Permit (MSOP) have been exceeded. A Notice of Violation (NOV) number **16091SW** is enclosed for exceedances listed below according to your Missouri State Operating Permit (MSOP) number MO0111104. The effluent limits and the values that have exceeded those effluent limits are listed below.

Outfall	Months	Parameter	Permit Limitations	Reported Values
001	10-12/14	Ammonia as N	4.6 mg/L monthly average	40.03 mg/L
			12.1 mg/L daily maximum	40.03 mg/L

An exceedance of the effluent limitations established in your permit is a violation of the Missouri Clean Water Law, Section 644.051.1(3) and 644.076.1, Clean Water Commission Regulation 10 CSR 20-7 and your MSOP. The facility is responsible for taking appropriate steps to eliminate the violation(s).

Please provide a written response within 15 calendar days of receipt of this letter to the Department of Natural Resources (department) which explains the reason(s) for the non-compliance and what steps your operation has taken or will take to prevent a reoccurrence of the violation(s). The facility will be considered in non-compliance with the violation(s) and our files will reflect the continued non-compliance until the documentation is submitted to this office. If you have already provided this information to the department, you may disregard this request.

We appreciate your cooperation and immediate attention so that violations can be corrected. If you have questions please contact water pollution staff by calling 417-891-4300 or via mail at Missouri Department of Natural Resources, Southwest Regional Office, 2040 W. Woodland, Springfield, MO 65807-5912.

Sincerely,

SOUTHWEST REGIONAL OFFICE

Cynthia S. Davies

Cynthia S. Davies
Regional Director

CSD/lck

Enclosure

029.wpcp.ChelseaRoseSubd.mo0111104.x.2015.04.06.fy15.novdmr.16091sw.lgc

RECEIVED
JUL 2 2 2016
DEQ/SWRO

REPORT OF LOW WATER PRESSURE

Missouri Public Drinking Water Regulation 10CSR60-7.010(2) requires that public water systems notify the Department within 48 hours of a failure to comply with any regulation or monitoring requirement. Since the regulation 10CSR60-4.080(9) requires all public water systems to maintain a minimum pressure of 20 psi, all public water systems must notify the Department when pressures in their system fall below 20 psi.

Use this form to report low pressure events directly to the Department Regional Office in your area.

System Name: Chelsea Rose Subdivision **PWS ID:** 3031244 **County:** Camden

Date Reported: 7/22/16 **Reported By:** Krystal Ryan

Describe Nature of Problem: There was a line break our operators went out to repair. There was some contamination so we issued a boil order, A sample has been taken after the system was chlorinated.

Lowest Pressure Reading: Ø psi **Duration of Low Pressure:** 5 Hrs 30 min

Date & Time of Problem onset: 7/21/16 8am **Number of services Affected:** 33

Location and Area Affected: All of Chelsea Rose Subdivision

Corrective Action Taken: Lake Ozark Water & Sewer has gone out to chlorinate the system and flush through the weekend a boil order was issued and customers were notified. A sample will be taken a second time to see if the water is clean.

Date and Time Customers Notified: 7/21/16 @ 1600 & 7/22/16 @ 1500

Method of Notification:
a phone call was placed to each customer in chelsea Rose.

If notice was done by hand delivery attach a copy of the notice to this sheet.

You may Mail or fax a completed copy of this form to the Missouri Department of Natural Resources Southwest Regional Office; 2040 West Woodland; Springfield, MO 65807. Telephone 417-891-4300; Fax 417-891-4399.

0.29 Pdwp Chelsea Rose Subd. MO3031244.X.2016.07.22.fj17.X.X.rcvd

MC DUFFEY LAB

Missouri State Certified Drinking Water Laboratory

840 Thunder Mountain Road
Camdenton, Mo. 65020

Phone 573 346-2092
Fax 573 346-4676

Lab Number: 00950

Report Date: July 22, 2016

PWS NAME: Chelsea Rose Subdivision
c/o LOWS: 840 Thunder Mtn. Rd.
Camdenton,, MO 65020

PWS ID: MO3031244

COUNTY: Camden

Sample Date	Sample Type	Collection Point	Location ID	Lab Results	Chlorine Total(mg/L)	Chlorine Free(mg/L)
7/21/2016	Special	1725 Oak Bend Rd		P/P		

Signed: Krystal D Ryan 7/22/2016
Analyst Date

Analyses performed in accordance with approved methods described in the Standard Methods for the Examination of Water and Wastewater, 19th Edition

Schedule JC-S1

Missouri Department of NATURAL RESOURCES
dnr.mo.gov
Eric R. Greitens, Governor
Carol S. Comer, Director

April 19, 2018

Ms. Jill D. Olsen, Trustee
Chelsea Rose Subdivision
118 N Conistor Lane Suite B290
Liberty, MO 64068

UNSATISFACTORY FINDINGS

Dear Ms. Olsen:

Staff from the Missouri Department of Natural Resources (Department) conducted an inspection on April 2, 2018 of Chelsea Rose Subdivision public water system (system). The system operates under the public water system identification number MO3031244.

Compliance with Safe Drinking Water Law was evaluated. The enclosed report is being issued with Unsatisfactory Findings for the violations identified. Please refer to the enclosed report for details on findings and required actions. A written response is not required at this time because you have already provided a sufficient response to the unsatisfactory findings. Your actions show that you recognize our mutual goal in providing a quality of life for Missouri's citizens through environmental compliance. The Department appreciates your voluntary efforts to comply with the laws of Missouri and your continued efforts to work with us to improve protection of Missouri citizens and our natural resources.

If you have any questions or would like to schedule a time to meet with Department staff to discuss compliance requirements, please contact Ms. Sheila Yoder of my staff, by calling 417-891-4300, by email at sheila.yoder@dnr.mo.gov, or via mail at Southwest Regional Office, 2040 West Woodland, Springfield, Missouri 65807-5912.

Sincerely,

SOUTHWEST REGIONAL OFFICE

Mark Rader, Chief
Drinking Water Section

MDR/syl

Enclosure

c: Mr. Jim Busch, Public Service Commission
Ms. Airin Haselwander, Well Installation Section
Public Drinking Water Branch, Monitoring Section
Mr. Tim Ripley, Operator/ Lake Ozark Water & Sewer

029.pdwp.ChelseaRoseSubdivision.x.mo3031244.2018.04.19.fy18.ins.x.sky.doc

Carbon Copy Address Attachment

- Include information for each individual identified in the carbon copy line that is not a MDNR staff member in one of the groups below.
- All DEQ Program staff will receive documents via the exchange drive.
- All SWRO and other MDNR staff will receive documents via email.
- All Basecamp groups will receive documents via Basecamp (technical staff responsibility once final .pdf received). Note that technical staff copying a basecamp group will also carbon copy themselves.

Physical (mailing) Addresses:

Mr. Tim Ripley
Lake Ozark Water & Sewer
840 Thunder Mountain Road
Camdenton, MO 65020

Mr. Jim Bush
Public Service Commission
P.O. Box 360
Jefferson City, MO 65102-0360

Email Addresses: (for those that have indicated this is the preferred method of receipt)

Ms. Airin Haselwander, Well Installation Section
Haselwander, Airin <Airin.Haselwander@dnr.mo.gov>

FAX Numbers: (for those that have indicated this is the preferred method of receipt)

Missouri Department of Natural Resources
Southwest Regional Office/Public Drinking Water Branch
Report of Inspection
Chelsea Rose Subdivision
Camden County, Missouri
Public Water System ID Number MO3031244
April 19, 2018

Introduction

A routine inspection was made by the Missouri Department of Natural Resources (Department) of the community public water system serving Chelsea Rose Subdivision on April 2, 2018. The purpose of the inspection was to determine compliance with Missouri Safe Drinking Water Law and Regulations. The inspection reviewed all eight critical components applicable to the public water system.

The following people were present at the time of the inspection:

Chelsea Rose Subdivision
Mr. Tim Ripley, Operator

Missouri Department of Natural Resources
Ms. Sheila Yoder, Environmental Specialist

Facility Description and History

The system serves 29 metered connections and seven unmetered connections year round in the subdivision and is supplied by a single state approved well. The system is part of a court ordered receivership for Osage Water Company Utilities (which filed bankruptcy in October 2017). The court originally appointed Attorney Gary Cover as receiver. Attorney Jill Olsen is now the Chapter 11 Trustee who contracts with Lake Ozark Water and Sewer to provide operational services. The system has operated without a permit to dispense water since its beginning.

Well #1 is severed from the water system but has not yet been properly 'abandoned'; further information is included on the attached Abandoned Well Report. Well #2 was drilled in 1999 to a depth of 820 feet with 550 feet of six-inch steel casing. The submersible pump is 10 horsepower, rated at 60 gallons per minute and set at 399 feet. There is no treatment of the water. There is an 86-gallon champion bladder tank at well #2. There is a 500-gallon pressure tank in a small building between well #2 and well #1, but it was not in use at the time of the inspection.

The original construction plans from 1990 (#3495-90) specified a 6,600-gallon horizontal pressure tank. The project was delayed, the construction permit was reissued in November 1993 and again in December 1995, the last expiring December 1997. It was activated as a public water system in May 1998 as Chelsea Rose Subdivision-Osage Water Company (OWC). OWC was also issued a notice of violation at that time for construction of a community water system without approval and dispensing water to the public without a permit, after Department personnel observed the construction of water lines in April and May 1998 and 16 homes were being served by a single well that was constructed in 1996. In March 1999 a construction extension was requested, it was approved in April 1999. In June 1999 well #2 was drilled and pressure grout observed by the Department. Original construction plans showed two and three-inch PVC would be installed. The 1999 site plan showed two, four, and six-inch water lines on the map. A 500-gallon pressure tank was added sometime after the June 24, 2005 inspection (unless it was not disclosed) and the March 13, 2012 inspection; this tank was not part of any construction approval. A July 22, 2016 email regarding an *E. coli* boil advisory for the system noted the water and sewer lines were in the same trench. A June 2012 letter from

Mr. Gary Cover indicated the system is unable to conduct flushing in the system due to losing pressure due to lack of storage for the system. The Public Drinking Water Branch Enforcement issued a Notice of Violation in July 2014 for operating without a permit.

Since the last inspection on April 15, 2015 the master meter has been repaired or replaced, the system has filed for bankruptcy, and a Trustee has been appointed.

The system is located in the Lake of the Ozarks Watershed 10290109. The system was historically referred to as F-12 water due to its location on road F-12. It requires an operator properly certified at the DS-1 level. Mr. Tim Ripley is properly certified.

Discussion of Inspection and Observation

I met with Mr. Ripley on April 2, 2018 at Chelsea Rose Subdivision; the inspection was conducted during normal business hours. Upon arrival I discussed the scope and the purpose of the inspection. I looked at the well and pressure tanks and took photos. Mr. Ripley said he had taken the 500-gallon tank off line for the winter because there is no heat or electric in that building, he said he was getting ready to put it back on line, and also said they had received no complaints on low pressure. The well was cycling frequently. I asked if there was a cross connection policy and Mr. Ripley said he wasn't aware of one. I looked at the system records and found the Primacy and Laboratory fees are up-to date, chemical and bacteriological samples were submitted as required.

We discussed that the emergency operation plan and procedures should be evaluated and updated. For more information please see the Model Emergency Operating Plan for Public Water Supplies located at http://www.dnr.mo.gov/env/wpp/eop/index.html.

The system has an abandoned well (#1) that has not been plugged properly as required by the Missouri Well Construction Rule. The rule requires that abandoned wells be disconnected from the distribution system and plugged to prevent contamination from entering the water-bearing formation. Our Well Installation Section will send you a letter with information on plugging the abandoned well. If you have questions regarding this requirement, please contact Ms. Airin Haselwander at 573-368-2196.

Sampling and Monitoring

A sample was not collected during the time of the inspection due to weather conditions.

At the time of inspection there were no monitoring or maximum contaminant level violations during the last 24 months.

Engineering Assessment

No engineering assessment was conducted at the time of this inspection.

Compliance Determination and Required Actions

The facility is not in compliance with Missouri Safe Drinking Water Regulations based on observations made during the inspection.

Unsatisfactory Findings

For all Unsatisfactory Findings listed below, a written response documenting actions taken to correct the violations is required by **May 21, 2018**.

1. The public water system does not have a Permit to Dispense Water to the Public as required by Safe Drinking Water Regulation 10 CSR 60-3.010(2)(A).

This system was referred to the Public Drinking Water Branch for enforcement previously; the ownership and receivership situation has hindered the issue. All public water systems must obtain a permit to dispense water to the public. There is no permit fee. A public water system must submit a permit to dispense application and must meet bacterial and chemical monitoring and maximum contaminant level requirements.

REQUIRED ACTION: Once the ownership issues have been resolved, complete and submit a new application for a permit to dispense and submit it with all required documentation, including a deed to the well property, to: Missouri Department of Natural Resources, Public Drinking Water Branch, Infrastructure, Permits and Engineering Section, P.O. Box 176, Jefferson City, MO 65102, Phone 573-751-5331, Fax: 573-751-3110. For questions concerning any permit enforcement action, please contact Mr. Lance Dorsey with the Public Drinking Water Branch at P.O. Box 176, Jefferson City, MO, 65102; telephone 573-751-5331.

2. The public water system failed to construct the public water system in accordance with approved plans and specifications in violation of Safe Drinking Water Regulation 10 CSR 60-10.010(4). Specifically, the water system failed to construct the storage as proposed and approved by the Department's construction authorization #3495-90. The storage tank was not constructed as approved, small pressure tanks were installed instead. The hydropneumatic (pressure) tanks do not provide adequate storage volume. Plans and specs were also later submitted under review#53782-05 that included a 4,512-gallon ground storage tank and booster pumps but the proposal was voided by Department staff due to a lack of response.

All community public water systems must obtain written authorization (a construction permit) from the Department prior to construction, alteration, or extension of the water system. Any deviation from the approved plans and specifications affecting capacity, hydraulic conditions, operating units, the functioning of water treatment processes, or the quality of water to be delivered must be approved in writing before such changes are made. Revised plans and specifications shall be submitted to the Department for review and approval before any construction work affected by such changes is started.

The public water system shall submit two copies each of engineering report, plans, and specifications along with an application for a new or revised construction permit to the Missouri Department of Natural Resources, Public Drinking Water Branch, P.O. Box 176, Jefferson City, Missouri 65102, 573-751-5331, for construction/completion of the public water system in accordance with the previously-approved engineering report, plans, and specifications.

Recommendations

1. The public water system has not established a cross-connection control program.

The public water system should establish a written cross-connection control program to prevent contamination from being introduced into the system from back-pressure or back-siphonage. This cross-connection control program might include a cross-connection ordinance for cities and towns, a cross-connection clause in the user agreement for private utilities, and an inspection of all potential cross-connection sources such as car washes, school laboratories, beverage bottling plants, sewage treatment plants, facilities with boilers or fire sprinkler systems, mortuaries, irrigation systems, hospitals, and industrial manufacturing plants.

Whenever an unprotected cross-connection is discovered, it must be corrected by the customer installing a Department-approved air gap or backflow prevention device. Air gaps and backflow prevention devices must be tested annually by a certified tester, and results of these tests must be kept in the public water system records for a period of five years and made available to the Department inspector during inspections.

The public water system should establish a cross-connection control program. An example cross-connection control plan and a backflow prevention fact sheet is enclosed. The public water system must ensure all cross-connections have an approved back-flow prevention device and these devices are tested annually. If a back-flow prevention device has not been installed at any connection where there is a cross-connection this can be considered a Significant Deficiency.

2. The pump discharge piping is not equipped with an aboveground check valve.

A well pump discharge check valve is needed to prevent water from the storage tank and distribution system from entering the well. Even wells with submersible pumps that have a check valve in the piping in the well need an above ground pump discharge piping check valve as a safety precaution. The only exception is a pump that discharges directly into the top of an unpressurized storage tank. The Department recommends a check valve should be installed between the well and storage tank.

Signatures

SUBMITTED BY:

Sheila Yoder

Sheila Yoder
Environmental Specialist
Southwest Regional Office

REVIEWED BY:

Kristen Pattinson

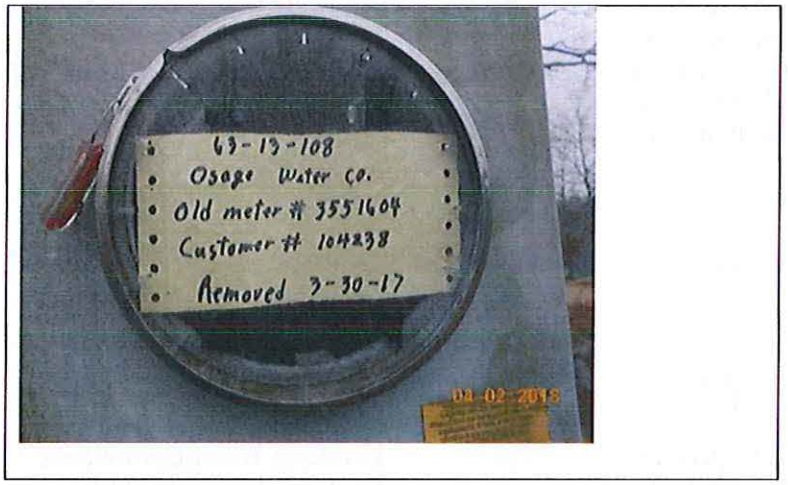
Kristen Pattinson, Chief
Drinking Water Compliance Unit
Southwest Regional Office

Attachments

Photograph Addendum 1 through 3
Cross connection template
Backflow fact sheet

PWS (MO3031244) Chelsea Rose Subdivision
Abandoned Well Report
April 19, 2018

Owner and contact information: PWS is under receivership
GPS Coordinates: Latitude: 38.11412 Longitude: -92.73637
Photographer: Sheila Yoder
Date: April 2, 2018
Comments: Well #1 that has been disconnected from the system



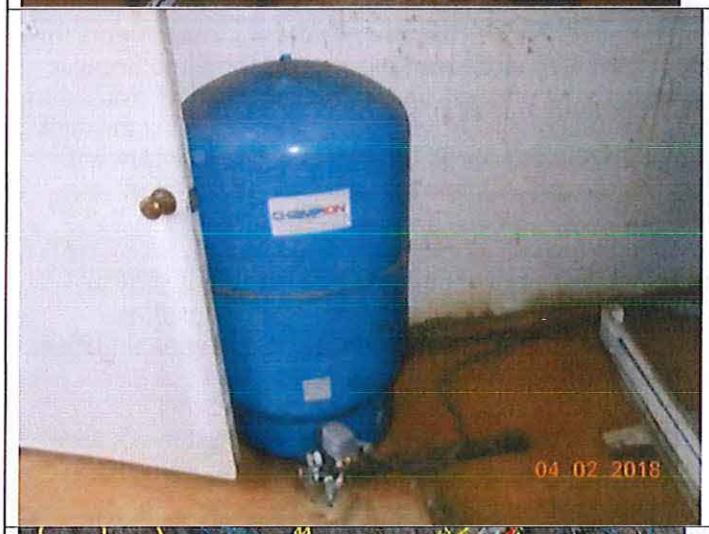
Photographer: Sheila Yoder
Date: April 2, 2018
Comments: Meter outside well #1 showing service date disconnect

MISSOURI DEPARTMENT OF NATURAL RESOURCES
DIVISION OF ENVIRONMENTAL QUALITY

PHOTOGRAPH ADDENDUM

REGIONAL OFFICE
Southwest Regional Office

PHOTOGRAPH #1
TAKEN BY: Sheila Yoder
ENTITY: Chelsea Rose Subd
PERMIT: MO3031244
LOCATION: wellhouse
DESCRIPTION: well #2
DATE TAKEN: April 2, 2018
PROGRAM: Public Drinking Water Branch



PHOTOGRAPH #2
TAKEN BY: Sheila Yoder
ENTITY: Chelsea Rose Subd
PERMIT: MO3031244
LOCATION: wellhouse for well#2
DESCRIPTION: bladder tank
DATE TAKEN: April 2, 2018
PROGRAM: Public Drinking Water Branch

PHOTOGRAPH #3
TAKEN BY: CamdenCoGIS
ENTITY: Chelsea Rose Subd
PERMIT: MO3031244
LOCATION: aerial view well #2
DESCRIPTION: wellhouse local
PROGRAM: Public Drinking Water Branch
Arrow indicates location of well#2

Missouri Department of NATURAL RESOURCES
dnr.mo.gov
Eric R. Greitens, Governor
Carol S. Comer, Director

April 19, 2018

Ms. Jill D. Olsen, Trustee
Chelsea Rose Subdivision
118 N Conistor Lane Suite B290
Liberty, MO 64068

UNSATISFACTORY FINDINGS

Dear Ms. Olsen:

Staff from the Missouri Department of Natural Resources (Department) conducted an inspection on April 2, 2018 of Chelsea Rose Subdivision public water system (system). The system operates under the public water system identification number MO3031244.

Compliance with Safe Drinking Water Law was evaluated. The enclosed report is being issued with Unsatisfactory Findings for the violations identified. Please refer to the enclosed report for details on findings and required actions. A written response is not required at this time because you have already provided a sufficient response to the unsatisfactory findings. Your actions show that you recognize our mutual goal in providing a quality of life for Missouri's citizens through environmental compliance. The Department appreciates your voluntary efforts to comply with the laws of Missouri and your continued efforts to work with us to improve protection of Missouri citizens and our natural resources.

If you have any questions or would like to schedule a time to meet with Department staff to discuss compliance requirements, please contact Ms. Sheila Yoder of my staff, by calling 417-891-4300, by email at sheila.yoder@dnr.mo.gov, or via mail at Southwest Regional Office, 2040 West Woodland, Springfield, Missouri 65807-5912.

Sincerely,

SOUTHWEST REGIONAL OFFICE

Mark Rader, Chief
Drinking Water Section

MDR/syl

Enclosure

c: Mr. Jim Busch, Public Service Commission
Ms. Airin Haselwander, Well Installation Section
Public Drinking Water Branch, Monitoring Section
Mr. Tim Ripley, Operator/ Lake Ozark Water & Sewer

029.pdwp.ChelseaRoseSubdivision.x.mo3031244.2018.04.19.fy18.ins.x.sky.doc

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Haselwander, Airin <Airin.Haselwander@dnr.mo.gov>

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Southwest Regional Office/Public Drinking Water Branch
Report of Inspection
Chelsea Rose Subdivision
Camden County, Missouri
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Recommendations

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Signatures

SUBMITTED BY:

Sheila Yoder

Sheila Yoder
Environmental Specialist
Southwest Regional Office

REVIEWED BY:

Kristen Pattinson

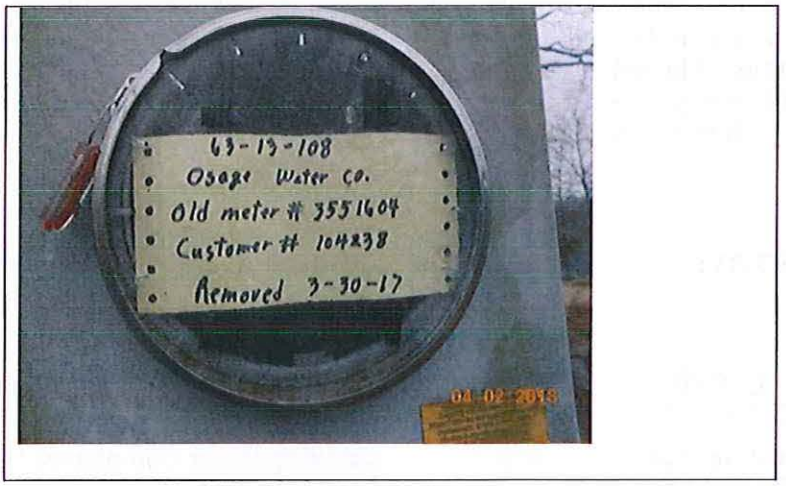
Kristen Pattinson, Chief
Drinking Water Compliance Unit
Southwest Regional Office

Attachments

Photograph Addendum 1 through 3
Cross connection template
Backflow fact sheet

PWS (MO3031244) Chelsea Rose Subdivision
Abandoned Well Report
April 19, 2018

Owner and contact information: PWS is under receivership
GPS Coordinates: Latitude: 38.11412 Longitude: -92.73637
Photographer: Sheila Yoder
Date: April 2, 2018
Comments: Well #1 that has been disconnected from the system



Photographer: Sheila Yoder
Date: April 2, 2018
Comments: Meter outside well #1 showing service date disconnect

MISSOURI DEPARTMENT OF NATURAL RESOURCES
DIVISION OF ENVIRONMENTAL QUALITY

PHOTOGRAPH ADDENDUM

REGIONAL OFFICE
Southwest Regional Office

PHOTOGRAPH #1
TAKEN BY: Sheila Yoder
ENTITY: Chelsea Rose Subd
PERMIT: MO3031244
LOCATION: wellhouse
DESCRIPTION: well #2
DATE TAKEN: April 2, 2018
PROGRAM: Public Drinking Water Branch

PHOTOGRAPH #2
TAKEN BY: Sheila Yoder
ENTITY: Chelsea Rose Subd
PERMIT: MO3031244
LOCATION: wellhouse for well#2
DESCRIPTION: bladder tank
DATE TAKEN: April 2, 2018
PROGRAM: Public Drinking Water Branch

PHOTOGRAPH #3
TAKEN BY: CamdenCoGIS
ENTITY: Chelsea Rose Subd
PERMIT: MO3031244
LOCATION: aerial view well #2
DESCRIPTION: wellhouse local
PROGRAM: Public Drinking Water Branch
Arrow indicates location of well#2

MISSOURI DEPARTMENT OF NATURAL RESOURCES
PUBLIC DRINKING WATER PROGRAM
COMPLIANCE & OPERATIONAL INSPECTION

CLASS 2 INSPECTION FORM

INTERVIEWED >	Jake Cook - Operator	DATE 3/12/2015
ID NUMBER MO3031290	SYSTEM NAME Cimarron Bay Subdivision	COUNTY Camden
ADDRESS	CITY STATE ZIP CODE	TELEPHONE NUMBER

COMMENTS AND RECOMMENDATIONS FOR CORRECTION
The following comments are referenced to the applicable checklist items attached to this form.

135 - PWS does not have a distribution map
213 - Well house does not have adequate lighting
227 - Well casing needs to be vented
229 - PWS does not have a source of emergency power
234 - PWS does not have a well water level monitoring program
435 - 35,000-gal pressure tank has a small leak from a valve on the sight glass assembly.
507 - Not all connections are metered - per last inspection report, the condo units have meters in the building crawl space, but their orientation make them unreadable

Both bacti samples were TC absent.

FREE & TOTAL CHLORINE RESIDUAL 0 & 0 mg/l ☑ Sample Collected & LOCATION Bldg D Harbor Bay

INSPECTOR'S SIGNATURE	TITLE
Donald T. Bell	Env. Spec. III

MO 780-1617 (2-01)

PAGE 1

Schedule JC-S2

COMPLIANCE & OPERATIONAL CHECKLIST

Fill in the appropriate box and if "C", explain in the comment section on the front of this form.

☐ NA **ITEM #1 ADMINISTRATION**

C ok NA

- ☐☑☐ 101. **Permit to Dispense status** 10CSR60-3.010
- ☐☑☐ 102. **Construction permits** 10CSR60-3.010(1)(A)
- ☐☑☐ 103. **Final approvals** 10CSR60-3.010(1)(B)
- ☐☐☑ 104. **Owner supervised program** 10CSR60-10.010(2)(C)
- ☐☑☐ 105. **Certified Chief Operator** 10CSR60-14.010(4)
- ☐☑☐ 106. **Emergency operations plan** 10CSR60-12.010
- ☐☑☐ 107. **Lead ban ordinance** 10CSR60-10.040
- ☐☑☐ 108. **Backflow prevention program** 10CSR60-11.010
- ☐☑☐ 109. **Backflow device records** 10CSR60-11.010(7)(B)
- ☐☑☐ 110. **Primacy fees** 10CSR60-16.010
- ☐☑☐ 111. **Laboratory & administration fees** 10CSR60-16.030
- ☐☑☐ 112. **Coliform sampling plan** 10CSR60-4.020(1)(A)
- ☐☑☐ 113. **Pb/Cu Sampling plan** 10CSR60-15.070
- ☐☐☑ 114. **Turbidity reporting** 10CSR60-7.010(4)
- ☐☐☑ 115. **Disinfection reporting** 10CSR60-7.010(5)
- ☐☑☐ 116. **Private lab coliform results** 10CSR60-7.010
- ☐☑☐ 117. **Public notification requirements** 10CSR60-8.010
- ☐☐☑ 118. **Exemption/ variance requirements** 10CSR60-6.030
- ☐☐☑ 119. **Sludge management permit or plan** 10CSR20-8.170
- ☐☐☑ 120. **NPDES Permit on plant discharge** 10CSR20-6.010(5)
- ☐☑☐ 121. **Monitoring reports due by 10th** 10CSR60-7.010(1)
- ☐☑☐ 122. **Reporting regulation violations** 10CSR60-7.010(2)
- ☐☐☑ 123. **Reporting DBP & IESWTR** 10CSR60-7.010(6)
- ☐☐☑ 124. **Enhanced Filtration & Disinf. Reporting** 10CSR60-7.010(7)
- ☐☐☑ 125. **DBP Monitoring Plan** 10CSR60-4.090(3)
- ☐☑☐ 126. **Reporting for Lead & Copper** 10CSR60-7.020(4)
- ☐☑☐ 127. **Coliform results (5 yrs)** 10CSR60-9.010(1)(A)

C ok NA

- ☐☑☐ 128. **Operational records** 10CSR60-9.010(1)(A)
- ☐☑☐ 129. **Chemical results (10 yrs)** 10CSR60-9.010(1)(A)
- ☐☑☐ 130. **Violation actions (3 yrs)** 10CSR60-9.010(1)(B)
- ☐☑☐ 131. **Inspection Reports (10 yrs)** 10CSR60-9.010(1)(C)
- ☐☐☑ 132. **Variance/exemption records (5 yrs)** 10CSR60-9.010(1)(D)
- ☐☑☐ 133. **CCR** CFR 141.153
- ☐☑☐ 134. **Any system records requested** 10CSR60-9.010(2)
- ☑☐☐ 135. Updated distribution map
- ☐☑☐ 136. Individual valve records
- ☐☐☑ 137. Individual fire hydrant records
- ☐☑☐ 138. Individual flush hydrant records
- ☐☑☐ 139. Main Brk/Leak Repair Program
- ☐☑☐ 140. Valve Maintenance Program
- ☐☑☐ 141. Main Flushing Program
- ☐☑☐ 142. Operational/Maint. records
- ☐☐☐ 143. Other _____

ITEM #2 SOURCE

☐ NA **Groundwater**

C ok NA

- ☐☑☐ 201. **Source of supply approved** 640.115(1)
- ☐☑☐ 202. **Well driller's permit (drilled after 1987)** 10CSR23-1.090
- ☐☑☐ 203. **Construction requirements** 10CSR60-10.010
- ☐☑☐ 204. **Sanitary construction defects** 10CSR60-4.080(5)
- ☐☑☐ 205. **Siting requirements** 10CSR60-10.020
- ☐☑☐ 206. **GWUDI determination** 10CSR60-4.055(1)
- ☐☑☐ 207. **Plugging abandoned wells** 10CSR23-3.110
- ☐☑☐ 208. Adequate number of wells
- ☐☑☐ 209. Weather protection
- ☐☑☐ 210. Security
- ☐☑☐ 211. Floor Drain
- ☐☑☐ 212. Heating/venting/dehumidification
- ☑☐☐ 213. Lighting
- ☐☑☐ 214. Chemicals in well house
- ☐☑☐ 215. Top of well at least:
  - *4' above flood level
  - *above floor 12" min.
  - *above ground 18" min.
  - *approved casing & grout

C ok NA

- ☐☐☑ 216. Grand fathered
- ☐☑☐ 217. Vent screen/down turned
- ☐☑☐ 218. Vent 18" above floor
- ☐☑☐ 219. Vent adequate size
- ☐☑☐ 220. Pump capacity
  - _____ gpm @ _____ psi
  - _____ gpm @ _____ psi
- ☐☑☐ 221. Well meter, operable
- ☐☑☐ 222. Drawdown measuring equip.
- ☐☑☐ 223. Pressure Gauge-operable
- ☐☑☐ 224. Shutoff Valve
- ☐☑☐ 225. Check Valve
- ☐☑☐ 226. Wellhead sealed
- ☑☐☐ 227. Piping condition
- ☐☑☐ 228. Raw water sample tap past check valve
- ☑☐☐ 229. Auxiliary power supply
- ☐☐☐ 230. Pitless Unit, no adapter
- ☐☐☑ 231. Valve vault adequate size, drained, & provide safe access
- ☐☐☑ 232. Vertical Shaft Turbine Pumps Air Release - screened, down turned, 18" above floor
- ☐☑☐ 233. Security
- ☑☐☐ 234. Other DRAW DOWN READINGS

☒ NA **Reservoirs**

C ok NA

- ☐☐☐ 235. **Source of supply approved** 640.115(1)
- ☐☐☐ 236. **Dam safety permit (dams >35' tall)** 10CSR22-2.020(4)
- ☐☐☐ 237. **Dam maintenance & monitoring** 10CSR22-3.030(1)(B)
- ☐☐☐ 238. **Recreational use plan** 10CSR60-10.030
- ☐☐☐ 239. **Siting requirements** 10CSR60-10.020
- ☐☐☐ 240. Quality of water
- ☐☐☐ 241. Capacity adequate for drought
- ☐☐☐ 242. Does system have storage curves
- ☐☐☐ 243. Stadial marker & weekly records
- ☐☐☐ 244. Siltation control structure condition
- ☐☐☐ 245. Watershed management plan
- ☐☐☐ 246. Algae control program
- ☐☐☐ 247. Dam maintenance (mowing, brush, rodents)
- ☐☐☐ 248. Erosion control
- ☐☐☐ 249. No flow obstructions in spillway entrance
- ☐☐☐ 250. Condition of spillway
- ☐☐☐ 251. Spillway discharge condition

COMPLIANCE & OPERATION CHECKLIST

Fill in the appropriate box and if "C", explain in the comment section on the front of this form.

ITEM #2 SOURCE (CONT.)

NA — Groundwater

C ok NA

- 252. Discharge stream erosion
- 253. Discharge stream obstructions
- 254. Emergency spillway condition
- 255. Other _____

NA — Rivers & Streams

C ok NA

- 256. **Source of supply approved** 640.115(1)
- 257. Quality of Water
- 258. Capacity during drought
- 259. Raw water storage capacity & condition
- 260. Coffer dam condition
- 261. Intake protection
- 262. Vandalism control
- 263. Other _____

NA — Intakes

C ok NA

- 264. Adequacy of water withdrawal levels
- 265. Capacity of water inlets
- 266. Water inlets screened
- 267. Condition of intake control valves
- 268. Intake tower condition
- 269. Safety cable on intake hoses
- 270. Floats properly anchored
- 271. Wench and cable condition
- 272. Discharge pipe capacity
- 273. Vandalism control
- 274. Intake protected from flood damage
- 275. Zebra mussel control program
- 276. Other _____

ITEM #3 PUMPING STATIONS

NA — Raw & Finish Water Pumping

C ok NA

- 301. Pumping capacity
- 302. Adequate number of pumps
- 303. Pump operable during flooding
- 304. Sized for pump maintenance
- 305. Pump room access
- 306. Adequate safety equipment
- 307. Heating and venting
- 308. Drains and sumps
- 309. Lighting (int&ext)
- 310. Power supply
- 311. Telemetry & pump control
- 312. Pressure Gauges
- 313. Metering-operable
- 314. Pump piping condition
- 315. Other _____

NA — Finished Water Pumping

C ok NA

- 316. Pressure _____ psi
- 317. Flow _____ gpm
- 318. HP_____; Phase 3__ or 1__
- 319. Other _____

ITEM #4 STORAGE

NA — Unpressurized Storage

C ok NA

- 401. **Storage covered & vented** 10CSR60-4.080(7)
- 402. **Approved chemicals, materials, & coatings** 10CSR60-4.080(8)
- 403. **Sanitary Defects** 10CSR60-4.080(5)
- 404. Adequate capacity
- 405. Overflow
  - *12" to 24" above ground
  - *Screened or flap valve
- 406. Vent screened
- 407. Access hatch locked
  - 2" overlap, 4" to 6" curbing
- 408. Manway
- 409. Access ladder & appurtenances condition
- 410. Exterior paint condition
- 411. Unsealed openings
- 412. Security
- 413. Isolation for maintenance
- 414. Roof watertight & properly drained
- 415. Adequate drain
- 416. Inspection Program
- 417. Protection-vandalism, animals, etc.
- 418. Condition of valve vault
- 419. Sample Tap
- 420. Trees/Brush cleared
- 421. Other _____

NA — Pressure Tanks

C ok NA

- 422. Drain
- 423. Water sight glass
- 424. Manway
- 425. Pressure Gauge
- 426. Compressor
- 427. Air blow off
- 428. Controls
- 429. Exterior paint condition
- 430. Capacity
  - No. of Tanks 1, Dia.____,
  - Circ. ____, Ht/Length 1
  - Volume Ea. 35,000 gal
- 431. Total Capacity 36,000 gal
- 432. Water logged
- 433. Exterior paint condition
- 434. Bladder tank drawdown
  - Capacity ____ ea. ____ gal
  - Capacity ____ ea. ____ gal
  - Capacity ____ ea. ____ gal
- 435. Other Small leak
- 436. Other _____

NA — ITEM #5 DISTRIBUTION

C ok NA

- 501. **Minimum Pressure** 10CSR60-4.080(9)
- 502. **New mains & repairs disinfected** 10CSR60-4.080(6)
- 503. **Main & sewer separation** 10CSR60-10.010(2)
- 504. **Approved Chemicals, materials, & coatings** 10CSR60-4.080(8)
- 505. Water loss ≤ 10%
- 506. Adequate cleanouts, valves, and hydrants to flush system
- 507. Individual customer meter
- 508. Portable shoring available
- 509. Other _____

NA — ITEM #6 MCL/MONITORING

C ok NA

- 601. **Microbiological MCL** 10CSR60-4.020(7)
- 602. **Total Coliform Monitoring** 10CSR60-4.020
- 603. **Inorganic chemicals** 10CSR60-4.030
- 604. **Nitrates/Nitrites** 10CSR60-4.030(2)(C) & (D)
- 605. **Synthetic organic chemicals** 10CSR60-4.040
- 606. **Monthly turbidity MCL** 10CSR60-4.050(2)(A)1 small or 10CSR60-4.050(3)(B)1 large
- 607. **Acute turbidity MCL** 10CSR60-4.050(2)(A)2 small or 10CSR60-4.050(3)(B)2 large
- 608. **Report acute turbidity MCL** 10CSR60-4.050(2)(D) small or 10CSR60-4.050(3)(D) large
- 609. **Continuous turbidity monitoring** 10CSR60-4.040(3)(E)1
- 610. **Disinfection Profiling** 10CSR60-4.055(6)(C)
- 611. **Radio- nuclides** 10CSR60-4.060
- 612. **Secondary contaminants** 10CSR60-4.070

COMPLIANCE & OPERATIONAL CHECKLIST

Fill in the appropriate box and if "C", explain in the comment section on the front of this form.

- ☐ ☐ ☑ 613. **Fluoride supplementation** 10CSR60-4.080(11)
- ☐ ☐ ☑ 614. **Disinfection By-Products (DBP) TTHM & HAA5** 10CSR60-4.090(3)(B)
- ☐ ☐ ☑ 615. **DBP Chlorite** 10CSR60-4.090(3)(B)2
- ☐ ☐ ☑ 616. **DBP Bromate** 10CSR60-4.090(3)(B)3
- ☐ ☐ ☑ 617. **DBP Precursors TOC & Alkalinity** 10CSR60-4.090(3)(D)
- ☐ ☑ ☐ 618. **Volatile organic chemicals** 10CSR60-4.100
- ☐ ☑ ☐ 619. **Unregulated chemicals** 10CSR60-4.110
- ☐ ☑ ☐ 620. **Exceed Pb/Cu levels** 10CSR60-15.020-15.050
- ☐ ☑ ☐ 621. **Operational Monitoring** 10CSR60-4.080(3)
- ☐ ☐ ☑ 622. **Disinfection Requirements** 10CSR60-4.055

☒ NA — ***ITEM #7 DISINFECTION***

C ok NA

- ☐ ☐ ☐ 701. **Minimum residual - entry** 10CSR60-4.055(3)
- ☐ ☐ ☐ 702. **Maximum residual - Dist. System** 10CSR60-4.055(5)
- ☐ ☐ ☐ 703. **Minimum residual - Dist. System** 10CSR60-4.055(4)
- ☐ ☐ ☐ 704. **Cl_2 Monitoring - Dist. System** 10CSR60-4.055(4)(E)
- ☐ ☐ ☐ 705. **Monitoring frequency** 10CSR60-4.055(3)(F)
- ☐ ☐ ☐ 706. **Low residual reporting** 10CSR60-4.055(3)(E)
- ☐ ☐ ☐ 707. **CT study done** 10CSR60-4.055(2)(D)
- ☐ ☐ ☐ 708. **Meeting CT requirement** 10CSR60-4.055(2)(C)
- ☐ ☐ ☐ 709. **Add Cl prior to ammonia** 10CSR60-4.055(3.A)
- ☐ ☐ ☐ 710. **Add Cl prior to filters** 10CSR60-4.055(3.C)
- ☐ ☐ ☐ 711. **Operated/Supervised adequately/Operational Monitoring** 10CSR60-4.080(5)

☒ NA — **Liquid Chlorinator**

C ok NA

- ☐ ☐ ☐ 712. Physical condition of feeder
- ☐ ☐ ☐ 713. Adequate detention
- ☐ ☐ ☐ 714. Corrosion in room
- ☐ ☐ ☐ 715. Adequate feed control
- ☐ ☐ ☐ 716. Adequate venting, heating, lighting
- ☐ ☐ ☐ 717. Security
- ☐ ☐ ☐ 718. Other _____

☒ NA — **Gas Chlorinator**

C ok NA

- ☐ ☐ ☐ 719. Adequate detention
- ☐ ☐ ☐ 720. Separate Cl_2 room
- ☐ ☐ ☐ 721. Interior wall view window
- ☐ ☐ ☐ 722. Panic bar door
- ☐ ☐ ☐ 723. Fan suction near floor
- ☐ ☐ ☐ 724. Inlet near ceiling
- ☐ ☐ ☐ 725. Chains n Cl_2 cylinders
- ☐ ☐ ☐ 726. Cylinders on scales
- ☐ ☐ ☐ 727. Exterior fan/light switch
- ☐ ☐ ☐ 728. SCBA
- ☐ ☐ ☐ 729. Ammonia bottle
- ☐ ☐ ☐ 730. Leak detection/repair kit
- ☐ ☐ ☐ 731. Shower & eye wash
- ☐ ☐ ☐ 732. Hydrocarbons in room
- ☐ ☐ ☐ 733. Sample tap Past Cl_2
- ☐ ☐ ☐ 734. Condition of room
- ☐ ☐ ☐ 735. Security
- ☐ ☐ ☐ 736. Other _____

☒ NA — **Other Types**

C ok NA

- ☐ ☐ ☐ 737. _____
- ☐ ☐ ☐ 738. _____
- ☐ ☐ ☐ 739. _____

☒ NA — ***ITEM #8 TREATMENT***

C ok NA

- ☐ ☐ ☐ 801. **Approved chemicals, materials & coatings** 10CSR60-4.080(8)
- ☐ ☐ ☐ 802. **Aeration** 10CSR60-4.080(5)
- ☐ ☐ ☐ 803. **Chemical Application** 10CSR60-4.080(5)
- ☐ ☐ ☐ 804. **Corrosion Control Treatment** 10CSR60-15.010(4)
- ☐ ☐ ☐ 805. **Mixing** 10CSR60-4.080(5)
- ☐ ☐ ☐ 806. **Settling** 10CSR60-4.080(5)
- ☐ ☐ ☐ 807. **Filtration** 10CSR60-4.080(5)
- ☐ ☐ ☐ 808. **H.S. pumps** 10CSR60-4.080(5)
- ☐ ☐ ☐ 809. **Other pumps** 10CSR60-4.080(5)
- ☐ ☐ ☐ 810. **Control equipment** 10CSR60-4.080(5)
- ☐ ☐ ☐ 811. **Plant water storage** 10CSR60-4.080(5)
- ☐ ☐ ☐ 812. **Operational Monitoring** 10CSR60-4.080(5)
- ☐ ☐ ☐ 813. **Carbon feed room separate/explosion proof** 10CSR60-4.080(5)

☒ NA — **Fluoride**

C ok NA

- ☐ ☐ ☐ 814. **Sample submittal** 10CSR60-4.080(11)

- ☐ ☐ ☐ 815. Adequate lab equipment
- ☐ ☐ ☐ 816. Fluoride pump operable
- ☐ ☐ ☐ 817. Sample tap 100 pipe dia. past feed
- ☐ ☐ ☐ 818. Day tank
- ☐ ☐ ☐ 819. Vented to outside
- ☐ ☐ ☐ 820. Other _____

☒ NA — **Ion Exchange Softening**

C ok NA

- ☐ ☐ ☐ 821. Adequate size
- ☐ ☐ ☐ 822. Condition of softener
- ☐ ☐ ☐ 823. Metered for bypassing
- ☐ ☐ ☐ 824. Condition of salt storage
- ☐ ☐ ☐ 825. Other _____

☒ NA — **Aeration**

C ok NA

- ☐ ☐ ☐ 826. Capacity
- ☐ ☐ ☐ 827. By-passing for maintenance
- ☐ ☐ ☐ 828. Side access & drainage
- ☐ ☐ ☐ 829. Access to inlet distributor
- ☐ ☐ ☐ 830. Condition of air screens
- ☐ ☐ ☐ 831. Access for screen cleaning
- ☐ ☐ ☐ 832. Condition of media or trays
- ☐ ☐ ☐ 833. Condition fan & drive motor
- ☐ ☐ ☐ 834. Condition support structure
- ☐ ☐ ☐ 835. Condition of paint
- ☐ ☐ ☐ 836. Other _____

☒ NA — **Rapid Mixing**

C ok NA

- ☐ ☐ ☐ 837. Mixing detention
- ☐ ☐ ☐ 838. Adequate mixer capacity
- ☐ ☐ ☐ 839. Condition of mixer
- ☐ ☐ ☐ 840. Mixer maintenance
- ☐ ☐ ☐ 841. Other _____

☒ NA — **Flocculation**

C ok NA

- ☐ ☐ ☐ 842. Adequate capacity
- ☐ ☐ ☐ 843. Provisions for cleaning
- ☐ ☐ ☐ 844. Provisions for draining
- ☐ ☐ ☐ 845. Mixer condition
- ☐ ☐ ☐ 846. Mixer capacity
- ☐ ☐ ☐ 847. Mixer access for maintenance
- ☐ ☐ ☐ 848. Short circuiting thru basin
- ☐ ☐ ☐ 849. Condition of basin
- ☐ ☐ ☐ 850. SS testing at taps
- ☐ ☐ ☐ 851. Other _____

☒ NA — **Sedimentation**

C ok NA

- ☐ ☐ ☐ 852. Pre-sed. condition & capacity
- ☐ ☐ ☐ 853. Regular sed. purpose & cap.
- ☐ ☐ ☐ 854. Condition of structure
- ☐ ☐ ☐ 855. Maintain units w/ continuous operation
- ☐ ☐ ☐ 856. Condition Inf. & Eff. facilities

COMPLIANCE & OPERATIONAL CHECKLIST

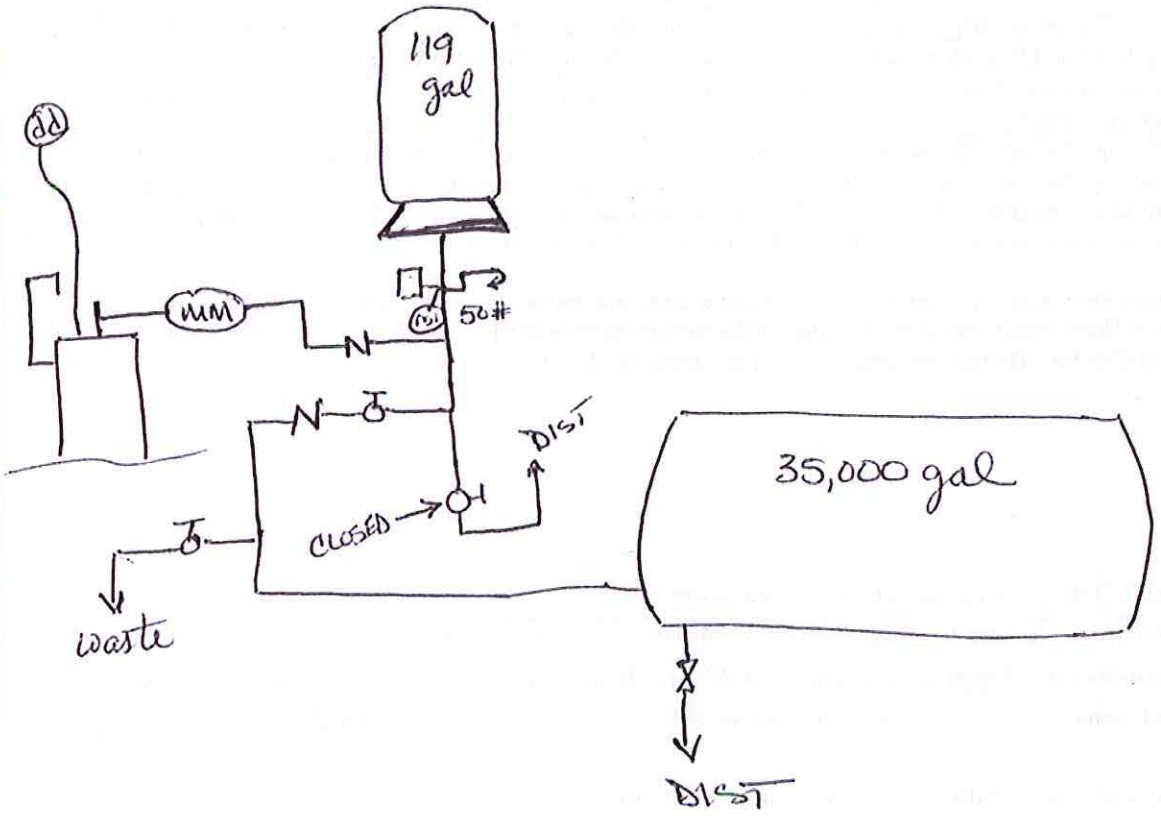
Fill in the appropriate box and if "C", explain in the comment section on the front of this form.

☐☐☐857. Short circuiting in basin	☒ NA	☒ NA
☐☐☐858. Adequacy of sludge removal	C ok NA	C ok NA
☐☐☐859. Condition of sludge equipment	**Filtration**	**Plant Information**
☐☐☐860. Adequacy of sludge lines	☐☐☐862. Appropriate type	☐☐☐870. General Condition
☐☐☐861. Other _____	☐☐☐863. Adequate number for continuous operation	☐☐☐871. Proper Lab equipment
	☐☐☐864. Condition of media	☐☐☐872. Calibration standards
	☐☐☐865. Maintenance Plan	☐☐☐873. Tests according to directions
	☐☐☐866. On-line Turbidimeters on each filter/calibrated	☐☐☐874. Other _____
	☐☐☐867. Backwash rate & duration	☐☐☐875. Other _____
	☐☐☐868. Adequate backwash method	☐☐☐876. Other _____
	☐☐☐869. Other _____	

System Information for 12 Months

Number of Active Services 604
Avg. Daily Produced _____ gal/Purchased _____ gal
Max. Daily Produced _____ gal/Purchased _____ gal
Water Loss UNK %

Population Served 1160
Avg. Daily Supplied to Secondary Systems _____ gal
Max. Daily Supplied to Secondary Systems _____ gal
Total Storage 35,000 gal



MISSOURI DEPARTMENT OF NATURAL RESOURCES
WATER PROTECTION PROGRAM – PUBLIC DRINKING WATER BRANCH

INVESTIGATION OF COLIFORM- POSITIVE SAMPLES REVISED TOTAL COLIFORM RULE

PUBLIC WATER SYSTEM (PWS) INFORMATION

PUBLIC WATER SYSTEM NAME	PUBLIC WATER SYSTEM ID NUMBER	COUNTY
Cimarron Bay Subdivision	MO3031290	Camden
SAMPLE RESULTS RECEIVED VIA	**DATE RECEIVED**	**MONTHLY COMPLIANCE PERIOD (MONTH/YEAR)**
E-mail	10/16/2017	**October 2017**

REVISED TOTAL COLIFORM RULE – DISTRIBUTION SYSTEM TOTAL COLIFORM MONITORING

One set of repeat samples required for each total coliform-positive Routine sample.

Sample Type	Date Collected m/d/yyyy	Lab # (Accession#)	Site ID	Location Address	Coliform Results Absent / Present		☒Chlorine Residual ☐Chloramine (mg/L)	
					TC	E Coli	Free	Total
Routine	10/13/2017	OE139071		11- lot 5 outside tap	P	A		
Repeat – OR	10/19/2017	OE141024		11 – lot 5 outside tap	P	A		0.00
Repeat – UP	10/19/2017	OE141029		14 – Bldg 164 outside tap	P	A		0.00
Repeat – DN	10/19/2017	OE141020		07 – Lot 12	A	A		0.00
GW Source	10/19/2017	OE141022		WL 13121 (Well #1)	A	A		0.00
Other								
Other								
Other								

PWS Contact Called: DAB | Phone # (417) 891-4300 | Date(s): 10/16/2017

Date PWS required to collect repeat samples by: | PWS collect valid repeats within approved timeframe? ☒ Yes ☐ No

1) GW System with population ≤1,000 with one well? ☐ Yes ☐ No | 2) If YES, PWS have disinfection treatment? ☐ Yes ☐ No

3) If YES to (2), do not approve DP Sample. | 4) Dual Purpose Sample approved for this GW System? ☐ Yes ☐ No ☐ Not Applicable

ACTIONS AND OR COMMENTS

10/19/2017 – collected repeat samples; No obvious source of contamination was observed. Water system does not have flush hydrants in the distribution system. Operator has to use standard hose bibs to flush water from the system, but this doesn't generate sufficient velocity to properly removal any scale or sediment in the lines. Also, PWS last inspected and cleaned the interior of the 35,000-gallon pressure tank in 2011. Two of the repeat samples tested positive for total coliform bacteria. The well tested safe.

10/20/2017 – Contacted Betty Boushie at Lake of the Ozarks Water & Sewer with the sample results. Recommended that the operator shock the system with chlorine bleach and run the chlorinated water through the entire distribution system. Once chlorine is out of the system, recommended they take a few special samples before their routine sampling in November.

RTCR TT Exceeded? ☐ No ☒ Yes (Level 1 or 2 Assessment required) | Date of previous RTCR TT exceedance(s):

☐ *E. coli* MCL (1A)Violation ☒ Level 1 TT Trigger-Multiple TC Positives ☐ Level 1 TT Trigger-Failure to Collect All Repeat Samples

☐ Level 2 TT Trigger-Multiple TT Triggers in 12 months (E. coli MCL or 2+ RTCR TT triggers exceeded in 12 months require Level 2 Ass.)

Completed by: Darrell Barber | Date: November 16, 2017 | PDWB notified/copied on: _____ (Date)

c: Scott Weckenborg, Public Drinking Water Program

GROUND WATER RULE – TRIGGERED SOURCE WATER MONITORING (IF APPLICABLE)

1) ☐ Ground Water (GW) System (Go to **#3**) | ☐ Secondary/purchasing water system (Go to **#2**) | ☐ If Surface Water only (**STOP**)

2) If Secondary/purchasing system, is the Primary (wholesale) system(s): ☐ GW (go to **#4**) or ☐ SW (if SW ONLY, no GW: **STOP**)

3) Does GW System provide only 4-Log treatment? ☐ YES (**STOP**) ☐ NO (Triggered source water sampling required. Go to **#6.**)

4) Primary GW system(s) provide only 4-log treatment? ☐ YES (**STOP**) ☐ NO (Triggered source water sampling required. Go to **#5.**)

5) If Primary (seller) is not a 4-log system, the secondary system (purchaser) must notify the Primary of the Coliform sample within 24-hours.

List the Primary (seller) Groundwater System(s) and ID#'s here(if applicable):

Date Primary GW system(s) were notified to collect Triggered Source Water Samples: (Go to **#6**)

6) Triggered Source Water Sample Results

A triggered source water sample is required from EACH well used (normally the day of unsafe sample). Also a source water sample is required for EACH total coliform-positive routine sample. Two wells & one TC-positive = one triggered source water sample from each well unless there are two distribution systems that are completely isolated from one another. Two TC-positive routine samples require two triggered source water samples from each well. List Public Water System name & ID# on top row for a primary (wholesale) system selling to the secondary (consecutive or purchasing) system that had the TC-positive.

Primary PWS Name					Primary PWS Name				
Lab #	Date	Well # or name	Coliform A/P		Lab #	Date	Well # or name	Coliform A/P	
			TC	E. Coli				TC	E. Coli

Any Triggered (TG) source water sample *E. Coli* positive? ☐ Yes ☐ No | If Yes, (Go to **#7**)

7) Regional Office issue Boil Water Order/Advisory requiring Tier 1 public notice for detection of *E. coli* in source water? ☐ Yes ☐ No

If any TG source water sample was *E. coli positive*, was Corrective Action Required? ☐ Yes ☐ No

If Yes, date the system notified to take Corrective Action: ____

If no, collect 5 Additional (Confirmation) source water samples. (Go to **#8**)

8) Additional (Confirmation) Source Water Sample Results (if required)

Primary PWS Name					Primary PWS Name				
Lab #	Date	Well # or name	Coliform A/P		Lab #	Date	Well # or name	Coliform A/P	
			TC	E. Coli				TC	E. Coli

Any of the 5 Confirmation source water sample *E. Coli* positive? ☐ Yes ☐ No | Corrective Action required? ☐ Yes ☐ No

If Yes, date the system notified to take Corrective Action: ____

(Attach additional copies of this page if necessary)

MISSOURI DEPARTMENT OF NATURAL RESOURCES
PUBLIC DRINKING WATER PROGRAM
COMPLIANCE & OPERATIONAL INSPECTION

CLASS 2 INSPECTION FORM

INTERVIEWED >	TIM RIPLEY	DATE 10/13/2017
ID NUMBER MO3031290	SYSTEM NAME CIMARRON BAY SUBDIVISION	COUNTY CAMDEN

ADDRESS | CITY | STATE | ZIP CODE | TELEPHONE NUMBER

COMMENTS AND RECOMMENDATIONS FOR CORRECTION
The following comments are referenced to the applicable checklist items attached to this form.

135/136. - Needs Maps of distribution system & valve records
209. - Well house needs repairs - entry door & threshold are in disrepair and parts of the ceiling are being held in place with boards wedged against the floor
227. - Well casing needs to be painted
229. - PWS does not have a source of emergency electrical power
213. - Better lighting is needed in well house - currently using a clip-on reflector light
234. - PWS needs to establish well water level monitoring program
435. - PWS needs to establish a tank inspection & cleaning program - interior of tank was last inspected & cleaned ± 7 years ago.
506. - Flush hydrants are needed in distribution system
507. - Customer connections are not metered
601. - LVI (Oct 2017)

BACTI SAMPLE RESULTS

10-13-2017	SITE #11 - (LOT #5)	TC +	
10-19-2017	SITE #11 (LOT #5)	TC +	Repeats
10-19-2017	SITE #14 (Bldg 164)	TC +	
10-19-2017	SITE #07 (LOT #12)	TC ABSENT	
10-19-2017	WL13191 (WELL #1)	TC ABSENT	

FREE & TOTAL CHLORINE RESIDUAL Ø & Ø mg/l ☑ Sample Collected & LOCATION SEE ABOVE

INSPECTOR'S SIGNATURE | TITLE ENV. SPEC. III

MO 780-1617 (2-01) PAGE 1

Schedule JC-S2

COMPLIANCE & OPERATIONAL CHECKLIST

Fill in the appropriate box and if "C", explain in the comment section on the front of this form.

☐ NA **ITEM #1 ADMINISTRATION**

C ok NA

- ☐ ☑ ☐ 101. **Permit to Dispense status** 10CSR60-3.010
- ☐ ☑ ☐ 102. **Construction permits** 10CSR60-3.010(1)(A)
- ☐ ☑ ☐ 103. **Final approvals** 10CSR60-3.010(1)(B)
- ☐ ☐ ☑ 104. **Owner supervised program** 10CSR60-10.010(2)(C)
- ☐ ☑ ☐ 105. **Certified Chief Operator** 10CSR60-14.010(4)
- ☐ ☑ ☐ 106. **Emergency operations plan** 10CSR60-12.010
- ☐ ☑ ☐ 107. **Lead ban ordinance** 10CSR60-10.040
- ☐ ☑ ☐ 108. **Backflow prevention program** 10CSR60-11.010
- ☐ ☑ ☐ 109. **Backflow device records** 10CSR60-11.010(7)(B)
- ☐ ☑ ☐ 110. **Primacy fees** 10CSR60-16.010
- ☐ ☑ ☐ 111. **Laboratory & administration fees** 10CSR60-16.030
- ☐ ☑ ☐ 112. **Coliform sampling plan** 10CSR60-4.020(1)(A)
- ☐ ☑ ☐ 113. **Pb/Cu Sampling plan** 10CSR60-15.070
- ☐ ☐ ☑ 114. **Turbidity reporting** 10CSR60-7.010(4)
- ☐ ☐ ☑ 115. **Disinfection reporting** 10CSR60-7.010(5)
- ☐ ☑ ☐ 116. **Private lab coliform results** 10CSR60-7.010
- ☐ ☑ ☐ 117. **Public notification requirements** 10CSR60-8.010
- ☐ ☐ ☑ 118. **Exemption/ variance requirements** 10CSR60-6.030
- ☐ ☐ ☑ 119. **Sludge management permit or plan** 10CSR20-8.170
- ☐ ☐ ☑ 120. **NPDES Permit on plant discharge** 10CSR20-6.010(5)
- ☐ ☑ ☐ 121. **Monitoring reports due by 10th** 10CSR60-7.010(1)
- ☐ ☑ ☐ 122. **Reporting regulation violations** 10CSR60-7.010(2)
- ☐ ☐ ☑ 123. **Reporting DBP & IESWTR** 10CSR60-7.010(6)
- ☐ ☐ ☑ 124. **Enhanced Filtration & Disinf. Reporting** 10CSR60-7.010(7)
- ☐ ☐ ☑ 125. **DBP Monitoring Plan** 10CSR60-4.090(3)
- ☐ ☑ ☐ 126. **Reporting for Lead & Copper** 10CSR60-7.020(4)
- ☐ ☑ ☐ 127. **Coliform results (5 yrs)** 10CSR60-9.010(1)(A)

C ok NA

- ☐ ☑ ☐ 128. **Operational records** 10CSR60-9.010(1)(A)
- ☐ ☑ ☐ 129. **Chemical results (10 yrs)** 10CSR60-9.010(1)(A)
- ☐ ☑ ☐ 130. **Violation actions (3 yrs)** 10CSR60-9.010(1)(B)
- ☐ ☑ ☐ 131. **Inspection Reports (10 yrs)** 10CSR60-9.010(1)(C)
- ☐ ☐ ☑ 132. **Variance/exemption records (5 yrs)** 10CSR60-9.010(1)(D)
- ☐ ☑ ☐ 133. **CCR** CFR 141.153
- ☐ ☑ ☐ 134. **Any system records requested** 10CSR60-9.010(2)

- ☑ ☐ ☐ 135. Updated distribution map
- ☑ ☐ ☐ 136. Individual valve records
- ☐ ☐ ☑ 137. Individual fire hydrant records
- ☐ ☐ ☑ 138. Individual flush hydrant records
- ☐ ☑ ☐ 139. Main Brk/Leak Repair Program
- ☐ ☑ ☐ 140. Valve Maintenance Program
- ☐ ☑ ☐ 141. Main Flushing Program
- ☐ ☑ ☐ 142. Operational/Maint. records
- ☐ ☐ ☐ 143. Other _____

ITEM #2 SOURCE

☐ NA **Groundwater**

C ok NA

- ☐ ☑ ☐ 201. **Source of supply approved** 640.115(1)
- ☐ ☑ ☐ 202. **Well driller's permit (drilled after 1987)** 10CSR23-1.090
- ☐ ☑ ☐ 203. **Construction requirements** 10CSR60-10.010
- ☐ ☑ ☐ 204. **Sanitary construction defects** 10CSR60-4.080(5)
- ☐ ☑ ☐ 205. **Siting requirements** 10CSR60-10.020
- ☐ ☑ ☐ 206. **GWUDI determination** 10CSR60-4.055(1)
- ☐ ☑ ☐ 207. **Plugging abandoned wells** 10CSR23-3.110

- ☐ ☑ ☐ 208. Adequate number of wells
- ☑ ☐ ☐ 209. Weather protection
- ☐ ☑ ☐ 210. Security
- ☐ ☑ ☐ 211. Floor Drain
- ☐ ☑ ☐ 212. Heating/venting/dehumidification
- ☑ ☐ ☐ 213. Lighting
- ☐ ☑ ☐ 214. Chemicals in well house
- ☐ ☑ ☐ 215. Top of well at least:
  - *4' above flood level
  - *above floor 12" min.
  - *above ground 18" min.
  - *approved casing & grout

C ok NA

- ☐ ☐ ☑ 216. Grand fathered
- ☐ ☑ ☐ 217. Vent screen/down turned
- ☐ ☑ ☐ 218. Vent 18" above floor
- ☐ ☑ ☐ 219. Vent adequate size
- ☐ ☑ ☐ 220. Pump capacity
  _____ gpm @ _____ psi
  _____ gpm @ _____ psi
- ☐ ☑ ☐ 221. Well meter, operable
- ☐ ☑ ☐ 222. Drawdown measuring equip.
- ☐ ☑ ☐ 223. Pressure Gauge-operable
- ☐ ☑ ☐ 224. Shutoff Valve
- ☐ ☑ ☐ 225. Check Valve
- ☐ ☑ ☐ 226. Wellhead sealed
- ☑ ☐ ☐ 227. Piping condition
- ☐ ☑ ☐ 228. Raw water sample tap past check valve
- ☑ ☐ ☐ 229. Auxiliary power supply
- ☐ ☐ ☑ 230. Pitiless Unit, no adapter
- ☐ ☐ ☑ 231. Valve vault adequate size, drained, & provide safe access
- ☐ ☐ ☑ 232. Vertical Shaft Turbine Pumps Air Release - screened, down turned, 18" above floor
- ☐ ☑ ☐ 233. Security
- ☑ ☐ ☐ 234. Other DRAW DOWN READINGS

☒ NA **Reservoirs**

C ok NA

- ☐ ☐ ☐ 235. **Source of supply approved** 640.115(1)
- ☐ ☐ ☐ 236. **Dam safety permit (dams >35' tall)** 10CSR22-2.020(4)
- ☐ ☐ ☐ 237. **Dam maintenance & monitoring** 10CSR22-3.030(1)(B)
- ☐ ☐ ☐ 238. **Recreational use plan** 10CSR60-10.030
- ☐ ☐ ☐ 239. **Siting requirements** 10CSR60-10.020

- ☐ ☐ ☐ 240. Quality of water
- ☐ ☐ ☐ 241. Capacity adequate for drought
- ☐ ☐ ☐ 242. Does system have storage curves
- ☐ ☐ ☐ 243. Stadial marker & weekly records
- ☐ ☐ ☐ 244. Siltation control structure condition
- ☐ ☐ ☐ 245. Watershed management plan
- ☐ ☐ ☐ 246. Algae control program
- ☐ ☐ ☐ 247. Dam maintenance (mowing, brush, rodents)
- ☐ ☐ ☐ 248. Erosion control
- ☐ ☐ ☐ 249. No flow obstructions in spillway entrance
- ☐ ☐ ☐ 250. Condition of spillway
- ☐ ☐ ☐ 251. Spillway discharge condition

COMPLIANCE & OPERATION CHECKLIST

Fill in the appropriate box and if "C", explain in the comment section on the front of this form.

ITEM #2 SOURCE (CONT.)

Groundwater — NA

C ok NA

- 252. Discharge stream erosion
- 253. Discharge stream obstructions
- 254. Emergency spillway condition
- 255. Other _____

Rivers & Streams — NA

C ok NA

- 256. **Source of supply approved** 640.115(1)
- 257. Quality of Water
- 258. Capacity during drought
- 259. Raw water storage capacity & condition
- 260. Coffer dam condition
- 261. Intake protection
- 262. Vandalism control
- 263. Other _____

Intakes — NA

C ok NA

- 264. Adequacy of water withdrawal levels
- 265. Capacity of water inlets
- 266. Water Inlets screened
- 267. Condition of intake control valves
- 268. Intake tower condition
- 269. Safety cable on intake hoses
- 270. Floats properly anchored
- 271. Wench and cable condition
- 272. Discharge pipe capacity
- 273. Vandalism control
- 274. Intake protected from flood damage
- 275. Zebra mussel control program
- 276. Other _____

ITEM #3 PUMPING STATIONS

Raw & Finish Water Pumping — NA

C ok NA

- 301. Pumping capacity
- 302. Adequate number of pumps
- 303. Pump operable during flooding
- 304. Sized for pump maintenance
- 305. Pump room access
- 306. Adequate safety equipment
- 307. Heating and venting
- 308. Drains and sumps
- 309. Lighting (int&ext)
- 310. Power supply
- 311. Telemetry & pump control
- 312. Pressure Gauges
- 313. Metering-operable
- 314. Pump piping condition
- 315. Other _____

Finished Water Pumping — NA

C ok NA

- 316. Pressure _____ psi
- 317. Flow _____ gpm
- 318. HP_____; Phase 3__ or 1__
- 319. Other _____

ITEM #4 STORAGE

Unpressurized Storage — NA

C ok NA

- 401. **Storage covered & vented** 10CSR60-4.080(7)
- 402. **Approved chemicals, materials, & coatings** 10CSR60-4.080(8)
- 403. **Sanitary Defects** 10CSR60-4.080(5)
- 404. Adequate capacity
- 405. Overflow
  - *12" to 24" above ground
  - *Screened or flap valve
- 406. Vent screened
- 407. Access hatch locked
  - 2" overlap, 4" to 6" curbing
- 408. Manway
- 409. Access ladder & appurtenances condition
- 410. Exterior paint condition
- 411. Unsealed openings
- 412. Security
- 413. Isolation for maintenance
- 414. Roof watertight & properly drained
- 415. Adequate drain
- 416. Inspection Program
- 417. Protection-vandalism, animals, etc.
- 418. Condition of valve vault
- 419. Sample Tap
- 420. Trees/Brush cleared
- 421. Other _____

Pressure Tanks — NA

C ok NA

- 422. Drain
- 423. Water sight glass
- 424. Manway
- 425. Pressure Gauge
- 426. Compressor
- 427. Air blow off
- 428. Controls
- 429. Exterior paint condition
- 430. Capacity
  - No. of Tanks 1, Dia.____,
  - Circ. ___, Ht/Length 1
  - Volume Ea. 35,000 gal
- 431. Total Capacity 35,000 gal
- 432. Water logged
- 433. Exterior paint condition
- 434. Bladder tank drawdown
  - Capacity ____ ea. ____ gal
  - Capacity ____ ea. ____ gal
  - Capacity ____ ea. ____ gal
- 435. Other TANK INSPECTION PROGRAM
- 436. Other _____

ITEM #5 DISTRIBUTION

NA

C ok NA

- 501. **Minimum Pressure** 10CSR60-4.080(9)
- 502. **New mains & repairs disinfected** 10CSR60-4.080(6)
- 503. **Main & sewer separation** 10CSR60-10.010(2)
- 504. **Approved Chemicals, materials, & coatings** 10CSR60-4.080(8)
- 505. Water loss ≤ 10%
- 506. Adequate cleanouts, valves, and hydrants to flush system
- 507. Individual customer meter
- 508. Portable shoring available
- 509. Other _____

ITEM #6 MCL/MONITORING

NA

C ok NA

- 601. **Microbiological MCL** 10CSR60-4.020(7)
- 602. **Total Coliform Monitoring** 10CSR60-4.020
- 603. **Inorganic chemicals** 10CSR60-4.030
- 604. **Nitrates/Nitrites** 10CSR60-4.030(2)(C) & (D)
- 605. **Synthetic organic chemicals** 10CSR60-4.040
- 606. **Monthly turbidity MCL** 10CSR60-4.050(2)(A)1 small or 10CSR60-4.050(3)(B)1 large
- 607. **Acute turbidity MCL** 10CSR60-4.050(2)(A)2 small or 10CSR60-4.050(3)(B)2 large
- 608. **Report acute turbidity MCL** 10CSR60-4.050(2)(D) small or 10CSR60-4.050(3)(D) large
- 609. **Continuous turbidity monitoring** 10CSR60-4.040(3)(E)1
- 610. **Disinfection Profiling** 10CSR60-4.055(6)(C)
- 611. **Radio- nuclides** 10CSR60-4.060
- 612. **Secondary contaminants** 10CSR60-4.070

COMPLIANCE & OPERATIONAL CHECKLIST

Fill in the appropriate box and if "C", explain in the comment section on the front of this form.

- ☐☐☑ 613. **Fluoride supplementation** 10CSR60-4.080(11)
- ☐☐☑ 614. **Disinfection By-Products (DBP) TTHM & HAA5** 10CSR60-4.090(3)(B)
- ☐☐☑ 615. **DBP Chlorite** 10CSR60-4.090(3)(B)2
- ☐☐☑ 616. **DBP Bromate** 10CSR60-4.090(3)(B)3
- ☐☐☑ 617. **DBP Precursors TOC & Alkalinity** 10CSR60-4.090(3)(D)
- ☐☑☐ 618. **Volatile organic chemicals** 10CSR60-4.100
- ☐☑☐ 619. **Unregulated chemicals** 10CSR60-4.110
- ☐☑☐ 620. **Exceed Pb/Cu levels** 10CSR60-15.020-15.050
- ☐☑☐ 621. **Operational Monitoring** 10CSR60-4.080(3)
- ☐☐☑ 622. **Disinfection Requirements** 10CSR60-4.055

☒ NA — ***ITEM #7 DISINFECTION***

C ok NA

- ☐☐☐ 701. **Minimum residual - entry** 10CSR60-4.055(3)
- ☐☐☐ 702. **Maximum residual - Dist. System** 10CSR60-4.055(5)
- ☐☐☐ 703. **Minimum residual - Dist. System** 10CSR60-4.055(4)
- ☐☐☐ 704. **Cl_2 Monitoring - Dist. System** 10CSR60-4.055(4)(E)
- ☐☐☐ 705. **Monitoring frequency** 10CSR60-4.055(3)(F)
- ☐☐☐ 706. **Low residual reporting** 10CSR60-4.055(3)(E)
- ☐☐☐ 707. **CT study done** 10CSR60-4.055(2)(D)
- ☐☐☐ 708. **Meeting CT requirement** 10CSR60-4.055(2)(C)
- ☐☐☐ 709. **Add Cl prior to ammonia** 10CSR60-4.055(3.A)
- ☐☐☐ 710. **Add Cl prior to filters** 10CSR60-4.055(3.C)
- ☐☐☐ 711. **Operated/Supervised adequately/Operational Monitoring** 10CSR60-4.080(5)

☑ NA — **Liquid Chlorinator**

C ok NA

- ☐☐☐ 712. Physical condition of feeder
- ☐☐☐ 713. Adequate detention
- ☐☐☐ 714. Corrosion in room
- ☐☐☐ 715. Adequate feed control
- ☐☐☐ 716. Adequate venting, heating, lighting
- ☐☐☐ 717. Security
- ☐☐☐ 718. Other _____

☒ NA — **Gas Chlorinator**

C ok NA

- ☐☐☐ 719. Adequate detention
- ☐☐☐ 720. Separate Cl_2 room
- ☐☐☐ 721. Interior wall view window
- ☐☐☐ 722. Panic bar door
- ☐☐☐ 723. Fan suction near floor
- ☐☐☐ 724. Inlet near ceiling
- ☐☐☐ 725. Chains n Cl_2 cylinders
- ☐☐☐ 726. Cylinders on scales
- ☐☐☐ 727. Exterior fan/light switch
- ☐☐☐ 728. SCBA
- ☐☐☐ 729. Ammonia bottle
- ☐☐☐ 730. Leak detection/repair kit
- ☐☐☐ 731. Shower & eye wash
- ☐☐☐ 732. Hydrocarbons in room
- ☐☐☐ 733. Sample tap Past Cl_2
- ☐☐☐ 734. Condition of room
- ☐☐☐ 735. Security
- ☐☐☐ 736. Other _____

☒ NA — **Other Types**

C ok NA

- ☐☐☐ 737. _____
- ☐☐☐ 738. _____
- ☐☐☐ 739. _____

☒ NA — ***ITEM #8 TREATMENT***

C ok NA

- ☐☐☐ 801. **Approved chemicals, materials & coatings** 10CSR60-4.080(8)
- ☐☐☐ 802. **Aeration** 10CSR60-4.080(5)
- ☐☐☐ 803. **Chemical Application** 10CSR60-4.080(5)
- ☐☐☐ 804. **Corrosion Control Treatment** 10CSR60-15.010(4)
- ☐☐☐ 805. **Mixing** 10CSR60-4.080(5)
- ☐☐☐ 806. **Settling** 10CSR60-4.080(5)
- ☐☐☐ 807. **Filtration** 10CSR60-4.080(5)
- ☐☐☐ 808. **H.S. pumps** 10CSR60-4.080(5)
- ☐☐☐ 809. **Other pumps** 10CSR60-4.080(5)
- ☐☐☐ 810. **Control equipment** 10CSR60-4.080(5)
- ☐☐☐ 811. **Plant water storage** 10CSR60-4.080(5)
- ☐☐☐ 812. **Operational Monitoring** 10CSR60-4.080(5)
- ☐☐☐ 813. **Carbon feed room separate/explosion proof** 10CSR60-4.080(5)

☒ NA — **Fluoride**

C ok NA

- ☐☐☐ 814. **Sample submittal** 10CSR60-4.080(11)
- ☐☐☐ 815. Adequate lab equipment
- ☐☐☐ 816. Fluoride pump operable
- ☐☐☐ 817. Sample tap 100 pipe dia. past feed
- ☐☐☐ 818. Day tank
- ☐☐☐ 819. Vented to outside
- ☐☐☐ 820. Other _____

☒ NA — **Ion Exchange Softening**

C ok NA

- ☐☐☐ 821. Adequate size
- ☐☐☐ 822. Condition of softener
- ☐☐☐ 823. Metered for bypassing
- ☐☐☐ 824. Condition of salt storage
- ☐☐☐ 825. Other _____

☒ NA — **Aeration**

C ok NA

- ☐☐☐ 826. Capacity
- ☐☐☐ 827. By-passing for maintenance
- ☐☐☐ 828. Side access & drainage
- ☐☐☐ 829. Access to inlet distributor
- ☐☐☐ 830. Condition of air screens
- ☐☐☐ 831. Access for screen cleaning
- ☐☐☐ 832. Condition of media or trays
- ☐☐☐ 833. Condition fan & drive motor
- ☐☐☐ 834. Condition support structure
- ☐☐☐ 835. Condition of paint
- ☐☐☐ 836. Other _____

☒ NA — **Rapid Mixing**

C ok NA

- ☐☐☐ 837. Mixing detention
- ☐☐☐ 838. Adequate mixer capacity
- ☐☐☐ 839. Condition of mixer
- ☐☐☐ 840. Mixer maintenance
- ☐☐☐ 841. Other _____

☒ NA — **Flocculation**

C ok NA

- ☐☐☐ 842. Adequate capacity
- ☐☐☐ 843. Provisions for cleaning
- ☐☐☐ 844. Provisions for draining
- ☐☐☐ 845. Mixer condition
- ☐☐☐ 846. Mixer capacity
- ☐☐☐ 847. Mixer access for maintenance
- ☐☐☐ 848. Short circuiting thru basin
- ☐☐☐ 849. Condition of basin
- ☐☐☐ 850. SS testing at taps
- ☐☐☐ 851. Other _____

☒ NA — **Sedimentation**

C ok NA

- ☐☐☐ 852. Pre-sed. condition & capacity
- ☐☐☐ 853. Regular sed. purpose & cap.
- ☐☐☐ 854. Condition of structure
- ☐☐☐ 855. Maintain units w/ continuous operation
- ☐☐☐ 856. Condition Inf. & Eff. facilities

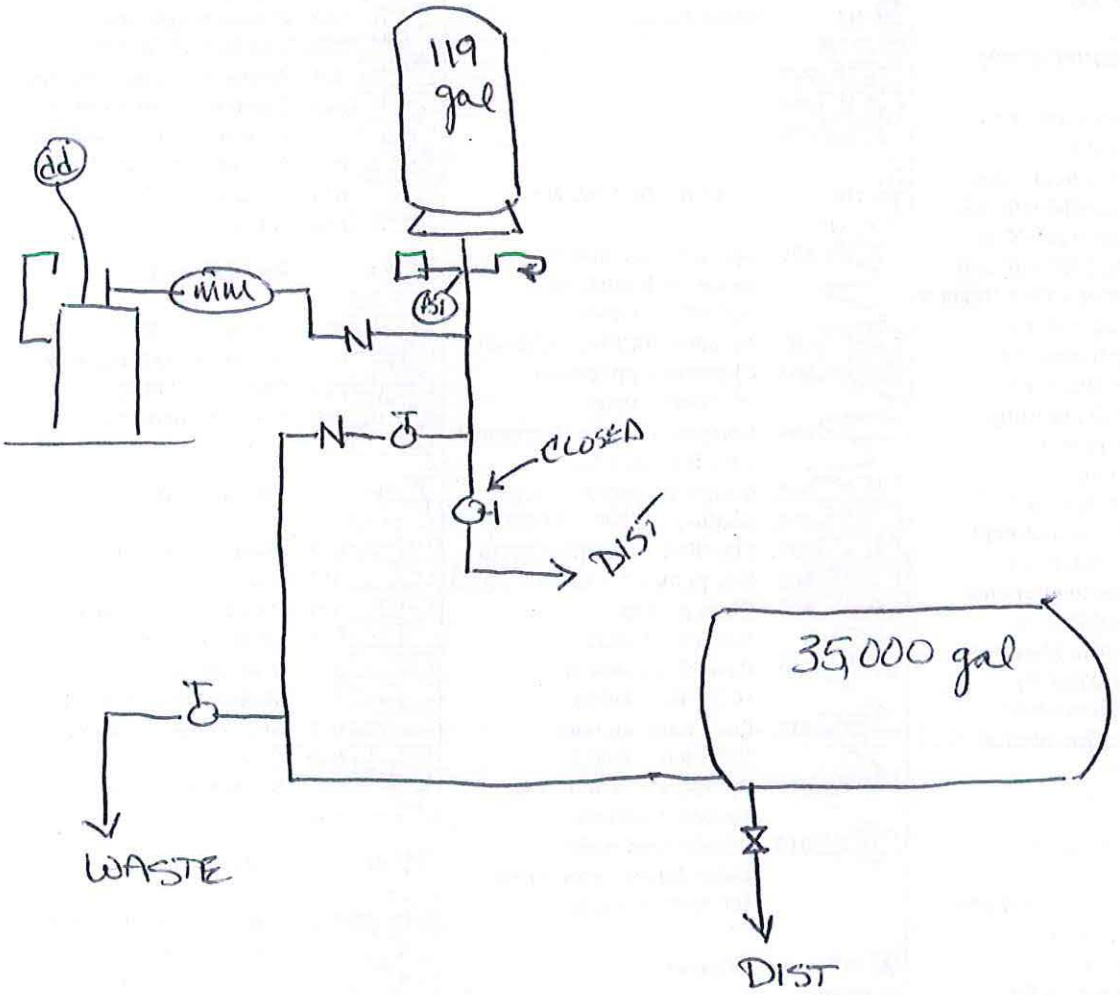
COMPLIANCE & OPERATIONAL CHECKLIST

Fill in the appropriate box and if "C", explain in the comment section on the front of this form.

857. Short circuiting in basin	NA — Filtration	NA — Plant Information
858. Adequacy of sludge removal	C ok NA	C ok NA
859. Condition of sludge equipment	862. Appropriate type	870. General Condition
860. Adequacy of sludge lines	863. Adequate number for continuous operation	871. Proper Lab equipment
861. Other _____	864. Condition of media	872. Calibration standards
	865. Maintenance Plan	873. Tests according to directions
	866. On-line Turbidimeters on each filter/calibrated	874. Other _____
	867. Backwash rate & duration	875. Other _____
	868. Adequate backwash method	876. Other _____
	869. Other _____	

System Information for 12 Months

Number of Active Services: 92
Population Served: 1160
Avg. Daily Produced: _____ gal/Purchased _____ gal
Max. Daily Produced: _____ gal/Purchased 0 gal
Water Loss: UNK %
Avg. Daily Supplied to Secondary Systems: 0 gal
Max. Daily Supplied to Secondary Systems: 0 gal
Total Storage: 35,000 gal



MISSOURI DEPARTMENT OF NATURAL RESOURCES
PUBLIC DRINKING WATER PROGRAM

COMPLIANCE & OPERATIONAL INSPECTION

CLASS 2 INSPECTION FORM

INTERVIEWED >	Jim Heppler - Operator	DATE 2/5/2015
ID NUMBER MO3071205	SYSTEM NAME Cedar Glen Condominiums	COUNTY Camden

ADDRESS | CITY | STATE | ZIP CODE | TELEPHONE NUMBER

COMMENTS AND RECOMMENDATIONS FOR CORRECTION
The following comments are referenced to the applicable checklist items attached to this form.

207- Abandoned well has not been properly plugged
208- PWS needs a second well (served more than 500 people)
227- Well casing and piping needs to be permitted
229- PWS does not have a source of emergency power
234- PWS has not established a well water level monitoring program
429- Exterior of storage tank needs to be cleaned & painted
430-431 - Use of hydropneumatic storage not recommended as the only storage for systems serving more than 50 connections
435- PWS has not established a tank inspection & cleaning program
506- Flush hydrants are needed
507- Approximately 40 of the 214 connections aren't metered
509- Plastic valves greater than 3 inches don't meet AWWA standards

FREE & TOTAL CHLORINE RESIDUAL 0 & 0 mg/l ☑ Sample Collected & LOCATION Bldg 306 (end)

INSPECTOR'S SIGNATURE	TITLE
Randall Earl	Env. Spec. III

MO 780-1617 (2-01)

Schedule JC-S3

COMPLIANCE & OPERATIONAL CHECKLIST

Fill in the appropriate box and if "C", explain in the comment section on the front of this form.

☐ NA **ITEM #1 ADMINISTRATION**

C ok NA

☐☑☐ 101. **Permit to Dispense status** 10CSR60-3.010
☐☑☐ 102. **Construction permits** 10CSR60-3.010(1)(A)
☐☑☐ 103. **Final approvals** 10CSR60-3.010(1)(B)
☐☐☑ 104. **Owner supervised program** 10CSR60-10.010(2)(C)
☐☑☐ 105. **Certified Chief Operator** 10CSR60-14.010(4)
☐☑☐ 106. **Emergency operations plan** 10CSR60-12.010
☐☑☐ 107. **Lead ban ordinance** 10CSR60-10.040
☐☑☐ 108. **Backflow prevention program** 10CSR60-11.010
☐☑☐ 109. **Backflow device records** 10CSR60-11.010(7)(B)
☐☑☐ 110. **Primacy fees** 10CSR60-16.010
☐☑☐ 111. **Laboratory & administration fees** 10CSR60-16.030
☐☑☐ 112. **Coliform sampling plan** 10CSR60-4.020(1)(A)
☐☑☐ 113. **Pb/Cu Sampling plan** 10CSR60-15.070
☐☐☑ 114. **Turbidity reporting** 10CSR60-7.010(4)
☐☐☑ 115. **Disinfection reporting** 10CSR60-7.010(5)
☐☑☐ 116. **Private lab coliform results** 10CSR60-7.010
☐☑☐ 117. **Public notification requirements** 10CSR60-8.010
☐☐☑ 118. **Exemption/ variance requirements** 10CSR60-6.030
☐☐☑ 119. **Sludge management permit or plan** 10CSR20-8.170
☐☐☑ 120. **NPDES Permit on plant discharge** 10CSR20-6.010(5)
☐☐☑ 121. **Monitoring reports due by 10th** 10CSR60-7.010(1)
☐☑☐ 122. **Reporting regulation violations** 10CSR60-7.010(2)
☐☐☑ 123. **Reporting DBP & IESWTR** 10CSR60-7.010(6)
☐☐☑ 124. **Enhanced Filtration & Disinf. Reporting** 10CSR60-7.010(7)
☐☐☑ 125. **DBP Monitoring Plan** 10CSR60-4.090(3)
☐☑☐ 126. **Reporting for Lead & Copper** 10CSR60-7.020(4)
☐☑☐ 127. **Coliform results (5 yrs)** 10CSR60-9.010(1)(A)

C ok NA

☐☑☐ 128. **Operational records** 10CSR60-9.010(1)(A)
☐☑☐ 129. **Chemical results (10 yrs)** 10CSR60-9.010(1)(A)
☐☑☐ 130. **Violation actions (3 yrs)** 10CSR60-9.010(1)(B)
☐☑☐ 131. **Inspection Reports (10 yrs)** 10CSR60-9.010(1)(C)
☐☑☐ 132. **Variance/exemption records (5 yrs)** 10CSR60-9.010(1)(D)
☐☑☐ 133. **CCR** CFR 141.153
☐☑☐ 134. **Any system records requested** 10CSR60-9.010(2)

☐☑☐ 135. Updated distribution map
☐☑☐ 136. Individual valve records
☐☐☑ 137. Individual fire hydrant records
☐☑☐ 138. Individual flush hydrant records
☐☑☐ 139. Main Brk/Leak Repair Program
☐☑☐ 140. Valve Maintenance Program
☐☑☐ 141. Main Flushing Program
☐☑☐ 142. Operational/Maint. records
☐☐☐ 143. Other _____

ITEM #2 SOURCE

☐ NA **Groundwater**

C ok NA

☐☑☐ 201. **Source of supply approved** 640.115(1)
☐☑☐ 202. **Well driller's permit (drilled after 1987)** 10CSR23-1.090
☐☑☐ 203. **Construction requirements** 10CSR60-10.010
☐☑☐ 204. **Sanitary construction defects** 10CSR60-4.080(5)
☐☑☐ 205. **Siting requirements** 10CSR60-10.020
☐☑☐ 206. **GWUDI determination** 10CSR60-4.055(1)
☑☐☐ 207. **Plugging abandoned wells** 10CSR23-3.110

☑☐☐ 208. Adequate number of wells
☐☑☐ 209. Weather protection
☐☑☐ 210. Security
☐☑☐ 211. Floor Drain
☐☑☐ 212. Heating/venting/dehumidification
☐☑☐ 213. Lighting
☐☑☐ 214. Chemicals in well house
☐☑☐ 215. Top of well at least:
*4' above flood level
*above floor 12" min.
*above ground 18" min.
*approved casing & grout

C ok NA

☐☐☑ 216. Grand fathered
☐☑☐ 217. Vent screen/down turned
☐☑☐ 218. Vent 18" above floor
☐☑☐ 219. Vent adequate size
☐☑☐ 220. Pump capacity
_____ gpm @ _____ psi
_____ gpm @ _____ psi
☐☑☐ 221. Well meter, operable
☐☑☐ 222. Drawdown measuring equip.
☐☑☐ 223. Pressure Gauge-operable
☐☑☐ 224. Shutoff Valve
☐☑☐ 225. Check Valve
☐☑☐ 226. Wellhead sealed
☑☐☐ 227. Piping condition
☐☑☐ 228. Raw water sample tap past check valve
☑☐☐ 229. Auxiliary power supply
☐☐☑ 230. Pitless Unit, no adapter
☐☐☑ 231. Valve vault adequate size, drained, & provide safe access
☐☐☑ 232. Vertical Shaft Turbine Pumps Air Release - screened, down turned, 18" above floor
☐☑☐ 233. Security
☑☐☐ 234. Other DRAWDOWN READINGS

☒ NA **Reservoirs**

C ok NA

☐☐☐ 235. **Source of supply approved** 640.115(1)
☐☐☐ 236. **Dam safety permit (dams >35' tall)** 10CSR22-2.020(4)
☐☐☐ 237. **Dam maintenance & monitoring** 10CSR22-3.030(1)(B)
☐☐☐ 238. **Recreational use plan** 10CSR60-10.030
☐☐☐ 239. **Siting requirements** 10CSR60-10.020

☐☐☐ 240. Quality of water
☐☐☐ 241. Capacity adequate for drought
☐☐☐ 242. Does system have storage curves
☐☐☐ 243. Stadial marker & weekly records
☐☐☐ 244. Siltation control structure condition
☐☐☐ 245. Watershed management plan
☐☐☐ 246. Algae control program
☐☐☐ 247. Dam maintenance (mowing, brush, rodents)
☐☐☐ 248. Erosion control
☐☐☐ 249. No flow obstructions in spillway entrance
☐☐☐ 250. Condition of spillway
☐☐☐ 251. Spillway discharge condition

COMPLIANCE & OPERATION CHECKLIST

Fill in the appropriate box and if "C", explain in the comment section on the front of this form.

ITEM #2 SOURCE (CONT.)

Groundwater — NA

C ok NA

- 252. Discharge stream erosion
- 253. Discharge stream obstructions
- 254. Emergency spillway condition
- 255. Other _____

Rivers & Streams — NA

C ok NA

- 256. **Source of supply approved** 640.115(1)
- 257. Quality of Water
- 258. Capacity during drought
- 259. Raw water storage capacity & condition
- 260. Coffer dam condition
- 261. Intake protection
- 262. Vandalism control
- 263. Other _____

Intakes — NA

C ok NA

- 264. Adequacy of water withdrawal levels
- 265. Capacity of water inlets
- 266. Water Inlets screened
- 267. Condition of intake control valves
- 268. Intake tower condition
- 269. Safety cable on intake hoses
- 270. Floats properly anchored
- 271. Wench and cable condition
- 272. Discharge pipe capacity
- 273. Vandalism control
- 274. Intake protected from flood damage
- 275. Zebra mussel control program
- 276. Other _____

ITEM #3 PUMPING STATIONS

Raw & Finish Water Pumping — NA

C ok NA

- 301. Pumping capacity
- 302. Adequate number of pumps
- 303. Pump operable during flooding
- 304. Sized for pump maintenance
- 305. Pump room access
- 306. Adequate safety equipment
- 307. Heating and venting
- 308. Drains and sumps
- 309. Lighting (int&ext)
- 310. Power supply
- 311. Telemetry & pump control
- 312. Pressure Gauges
- 313. Metering-operable
- 314. Pump piping condition
- 315. Other _____

Finished Water Pumping — NA

C ok NA

- 316. Pressure _____ psi
- 317. Flow _____ gpm
- 318. HP _____; Phase 3__ or 1__
- 319. Other _____

ITEM #4 STORAGE

Unpressurized Storage — NA

C ok NA

- 401. **Storage covered & vented** 10CSR60-4.080(7)
- 402. **Approved chemicals, materials, & coatings** 10CSR60-4.080(8)
- 403. **Sanitary Defects** 10CSR60-4.080(5)
- 404. Adequate capacity
- 405. Overflow
  - *12" to 24" above ground
  - *Screened or flap valve
- 406. Vent screened
- 407. Access hatch locked
  - 2" overlap, 4" to 6" curbing
- 408. Manway
- 409. Access ladder & appurtenances condition
- 410. Exterior paint condition
- 411. Unsealed openings
- 412. Security
- 413. Isolation for maintenance
- 414. Roof watertight & properly drained
- 415. Adequate drain
- 416. Inspection Program
- 417. Protection-vandalism, animals, etc.
- 418. Condition of valve vault
- 419. Sample Tap
- 420. Trees/Brush cleared
- 421. Other _____

Pressure Tanks — NA

C ok NA

- 422. Drain
- 423. Water sight glass
- 424. Manway
- 425. Pressure Gauge
- 426. Compressor
- 427. Air blow off
- 428. Controls
- 429. Exterior paint condition
- 430. Capacity
  - No. of Tanks 1, Dia. ____,
  - Circ. ____, Ht/Length 1
  - Volume Ea. 35,000 gal
- 431. Total Capacity 35,000 gal
- 432. Water logged
- 433. Exterior paint condition
- 434. Bladder tank drawdown
  - Capacity ____ ea. ____ gal
  - Capacity ____ ea. ____ gal
  - Capacity ____ ea. ____ gal
- 435. Other TANK INSPECTION PROGRAM
- 436. Other _____

ITEM #5 DISTRIBUTION

NA

C ok NA

- 501. **Minimum Pressure** 10CSR60-4.080(9)
- 502. **New mains & repairs disinfected** 10CSR60-4.080(6)
- 503. **Main & sewer separation** 10CSR60-10.010(2)
- 504. **Approved Chemicals, materials, & coatings** 10CSR60-4.080(8)
- 505. Water loss ≤ 10%
- 506. Adequate cleanouts, valves, and hydrants to flush system
- 507. Individual customer meter
- 508. Portable shoring available
- 509. Other PLASTIC BALL VALVES

ITEM #6 MCL/MONITORING

NA

C ok NA

- 601. **Microbiological MCL** 10CSR60-4.020(7)
- 602. **Total Coliform Monitoring** 10CSR60-4.020
- 603. **Inorganic chemicals** 10CSR60-4.030
- 604. **Nitrates/Nitrites** 10CSR60-4.030(2)(C) & (D)
- 605. **Synthetic organic chemicals** 10CSR60-4.040
- 606. **Monthly turbidity MCL** 10CSR60-4.050(2)(A)1 small or 10CSR60-4.050(3)(B)1 large
- 607. **Acute turbidity MCL** 10CSR60-4.050(2)(A)2 small or 10CSR60-4.050(3)(B)2 large
- 608. **Report acute turbidity MCL** 10CSR60-4.050(2)(D) small or 10CSR60-4.050(3)(D) large
- 609. **Continuous turbidity monitoring** 10CSR60-4.040(3)(E)1
- 610. **Disinfection Profiling** 10CSR60-4.055(6)(C)
- 611. **Radio- nuclides** 10CSR60-4.060
- 612. **Secondary contaminants** 10CSR60-4.070

COMPLIANCE & OPERATIONAL CHECKLIST

Fill in the appropriate box and if "C", explain in the comment section on the front of this form.

- ☐ ☐ ☑ 613. **Fluoride supplementation** 10CSR60-4.080(11)
- ☐ ☐ ☑ 614. **Disinfection By-Products (DBP) TTHM & HAA5** 10CSR60-4.090(3)(B)
- ☐ ☐ ☑ 615. **DBP Chlorite** 10CSR60-4.090(3)(B)2
- ☐ ☐ ☑ 616. **DBP Bromate** 10CSR60-4.090(3)(B)3
- ☐ ☐ ☑ 617. **DBP Precursors TOC & Alkalinity** 10CSR60-4.090(3)(D)
- ☐ ☑ ☐ 618. **Volatile organic chemicals** 10CSR60-4.100
- ☐ ☑ ☐ 619. **Unregulated chemicals** 10CSR60-4.110
- ☐ ☑ ☐ 620. **Exceed Pb/Cu levels** 10CSR60-15.020-15.050
- ☐ ☑ ☐ 621. **Operational Monitoring** 10CSR60-4.080(3)
- ☐ ☐ ☑ 622. **Disinfection Requirements** 10CSR60-4.055

☒ NA ***ITEM #7 DISINFECTION***

C ok NA

- ☐ ☐ ☐ 701. **Minimum residual - entry** 10CSR60-4.055(3)
- ☐ ☐ ☐ 702. **Maximum residual - Dist. System** 10CSR60-4.055(5)
- ☐ ☐ ☐ 703. **Minimum residual - Dist. System** 10CSR60-4.055(4)
- ☐ ☐ ☐ 704. **Cl_2 Monitoring - Dist. System** 10CSR60-4.055(4)(E)
- ☐ ☐ ☐ 705. **Monitoring frequency** 10CSR60-4.055(3)(F)
- ☐ ☐ ☐ 706. **Low residual reporting** 10CSR60-4.055(3)(E)
- ☐ ☐ ☐ 707. **CT study done** 10CSR60-4.055(2)(D)
- ☐ ☐ ☐ 708. **Meeting CT requirement** 10CSR60-4.055(2)(C)
- ☐ ☐ ☐ 709. **Add Cl prior to ammonia** 10CSR60-4.055(3.A)
- ☐ ☐ ☐ 710. **Add Cl prior to filters** 10CSR60-4.055(3.C)
- ☐ ☐ ☐ 711. **Operated/Supervised adequately/Operational Monitoring** 10CSR60-4.080(5)

☒ NA **Liquid Chlorinator**

C ok NA

- ☐ ☐ ☐ 712. Physical condition of feeder
- ☐ ☐ ☐ 713. Adequate detention
- ☐ ☐ ☐ 714. Corrosion in room
- ☐ ☐ ☐ 715. Adequate feed control
- ☐ ☐ ☐ 716. Adequate venting, heating, lighting
- ☐ ☐ ☐ 717. Security
- ☐ ☐ ☐ 718. Other _____

☒ NA **Gas Chlorinator**

C ok NA

- ☐ ☐ ☐ 719. Adequate detention
- ☐ ☐ ☐ 720. Separate Cl_2 room
- ☐ ☐ ☐ 721. Interior wall view window
- ☐ ☐ ☐ 722. Panic bar door
- ☐ ☐ ☐ 723. Fan suction near floor
- ☐ ☐ ☐ 724. Inlet near ceiling
- ☐ ☐ ☐ 725. Chains n Cl_2 cylinders
- ☐ ☐ ☐ 726. Cylinders on scales
- ☐ ☐ ☐ 727. Exterior fan/light switch
- ☐ ☐ ☐ 728. SCBA
- ☐ ☐ ☐ 729. Ammonia bottle
- ☐ ☐ ☐ 730. Leak detection/repair kit
- ☐ ☐ ☐ 731. Shower & eye wash
- ☐ ☐ ☐ 732. Hydrocarbons in room
- ☐ ☐ ☐ 733. Sample tap Past Cl_2
- ☐ ☐ ☐ 734. Condition of room
- ☐ ☐ ☐ 735. Security
- ☐ ☐ ☐ 736. Other _____

☒ NA **Other Types**

C ok NA

- ☐ ☐ ☐ 737. _____
- ☐ ☐ ☐ 738. _____
- ☐ ☐ ☐ 739. _____

☒ NA ***ITEM #8 TREATMENT***

C ok NA

- ☐ ☐ ☐ 801. **Approved chemicals, materials & coatings** 10CSR60-4.080(8)
- ☐ ☐ ☐ 802. **Aeration** 10CSR60-4.080(5)
- ☐ ☐ ☐ 803. **Chemical Application** 10CSR60-4.080(5)
- ☐ ☐ ☐ 804. **Corrosion Control Treatment** 10CSR60-15.010(4)
- ☐ ☐ ☐ 805. **Mixing** 10CSR60-4.080(5)
- ☐ ☐ ☐ 806. **Settling** 10CSR60-4.080(5)
- ☐ ☐ ☐ 807. **Filtration** 10CSR60-4.080(5)
- ☐ ☐ ☐ 808. **H.S. pumps** 10CSR60-4.080(5)
- ☐ ☐ ☐ 809. **Other pumps** 10CSR60-4.080(5)
- ☐ ☐ ☐ 810. **Control equipment** 10CSR60-4.080(5)
- ☐ ☐ ☐ 811. **Plant water storage** 10CSR60-4.080(5)
- ☐ ☐ ☐ 812. **Operational Monitoring** 10CSR60-4.080(5)
- ☐ ☐ ☐ 813. **Carbon feed room separate/explosion proof** 10CSR60-4.080(5)

☒ NA **Fluoride**

C ok NA

- ☐ ☐ ☐ 814. **Sample submittal** 10CSR60-4.080(11)
- ☐ ☐ ☐ 815. Adequate lab equipment
- ☐ ☐ ☐ 816. Fluoride pump operable
- ☐ ☐ ☐ 817. Sample tap 100 pipe dia. past feed
- ☐ ☐ ☐ 818. Day tank
- ☐ ☐ ☐ 819. Vented to outside
- ☐ ☐ ☐ 820. Other _____

☐ NA **Ion Exchange Softening**

C ok NA

- ☐ ☐ ☐ 821. Adequate size
- ☐ ☐ ☐ 822. Condition of softener
- ☐ ☐ ☐ 823. Metered for bypassing
- ☐ ☐ ☐ 824. Condition of salt storage
- ☐ ☐ ☐ 825. Other _____

☒ NA **Aeration**

C ok NA

- ☐ ☐ ☐ 826. Capacity
- ☐ ☐ ☐ 827. By-passing for maintenance
- ☐ ☐ ☐ 828. Side access & drainage
- ☐ ☐ ☐ 829. Access to inlet distributor
- ☐ ☐ ☐ 830. Condition of air screens
- ☐ ☐ ☐ 831. Access for screen cleaning
- ☐ ☐ ☐ 832. Condition of media or trays
- ☐ ☐ ☐ 833. Condition fan & drive motor
- ☐ ☐ ☐ 834. Condition support structure
- ☐ ☐ ☐ 835. Condition of paint
- ☐ ☐ ☐ 836. Other _____

☒ NA **Rapid Mixing**

C ok NA

- ☐ ☐ ☐ 837. Mixing detention
- ☐ ☐ ☐ 838. Adequate mixer capacity
- ☐ ☐ ☐ 839. Condition of mixer
- ☐ ☐ ☐ 840. Mixer maintenance
- ☐ ☐ ☐ 841. Other _____

☒ NA **Flocculation**

C ok NA

- ☐ ☐ ☐ 842. Adequate capacity
- ☐ ☐ ☐ 843. Provisions for cleaning
- ☐ ☐ ☐ 844. Provisions for draining
- ☐ ☐ ☐ 845. Mixer condition
- ☐ ☐ ☐ 846. Mixer capacity
- ☐ ☐ ☐ 847. Mixer access for maintenance
- ☐ ☐ ☐ 848. Short circuiting thru basin
- ☐ ☐ ☐ 849. Condition of basin
- ☐ ☐ ☐ 850. SS testing at taps
- ☐ ☐ ☐ 851. Other _____

☒ NA **Sedimentation**

C ok NA

- ☐ ☐ ☐ 852. Pre-sed. condition & capacity
- ☐ ☐ ☐ 853. Regular sed. purpose & cap.
- ☐ ☐ ☐ 854. Condition of structure
- ☐ ☐ ☐ 855. Maintain units w/ continuous operation
- ☐ ☐ ☐ 856. Condition Inf. & Eff. facilities

COMPLIANCE & OPERATIONAL CHECKLIST

Fill in the appropriate box and if "C", explain in the comment section on the front of this form.

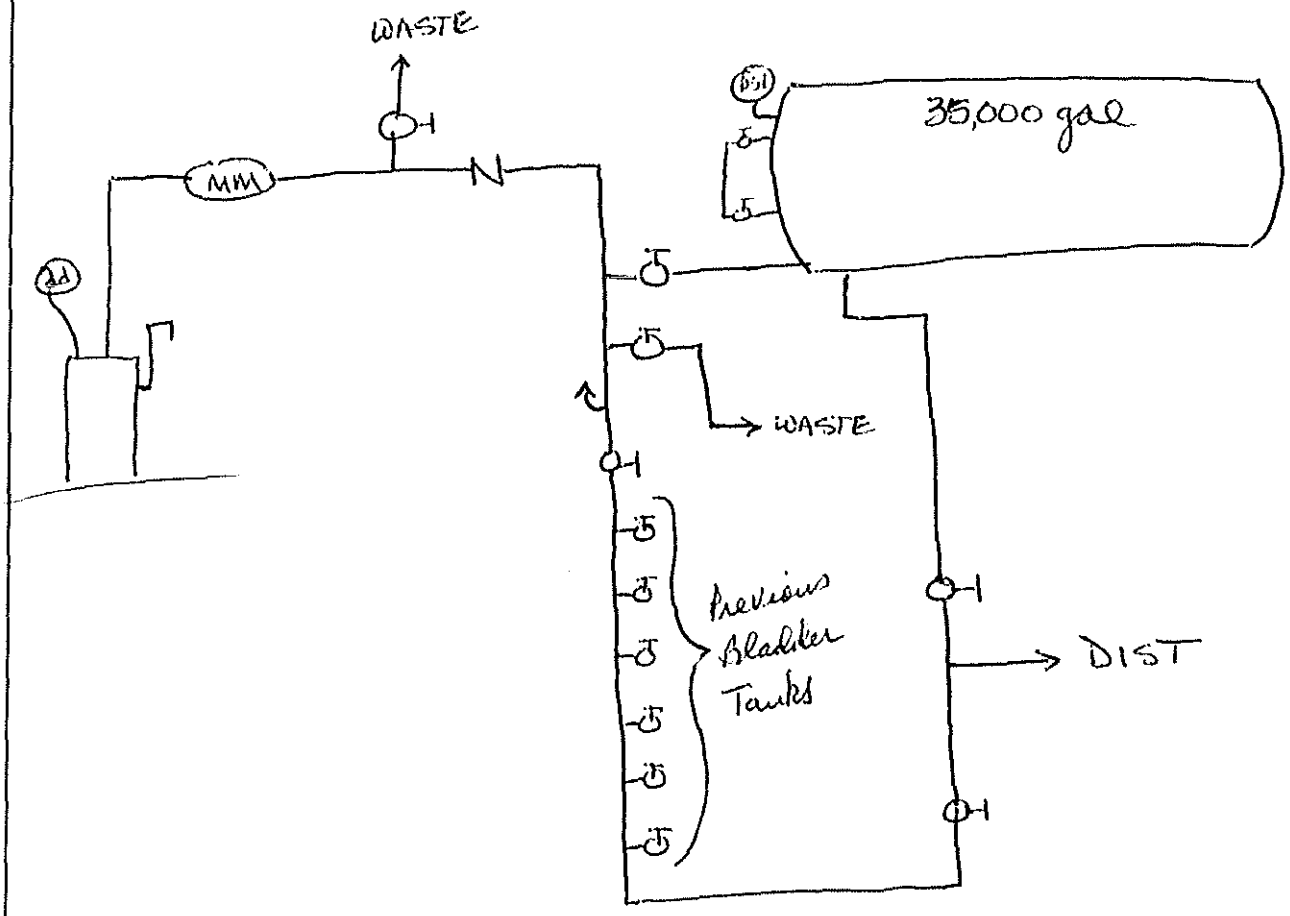
857. Short circuiting in basin	NA	Filtration
858. Adequacy of sludge removal	C	ok NA
859. Condition of sludge equipment		862. Appropriate type
860. Adequacy of sludge lines		863. Adequate number for continuous operation
861. Other _____		864. Condition of media
		865. Maintenance Plan
		866. On-line Turbidimeters on each filter/calibrated
		867. Backwash rate & duration
		868. Adequate backwash method
		869. Other _____

NA	Plant Information
C	ok NA
	870. General Condition
	871. Proper Lab equipment
	872. Calibration standards
	873. Tests according to directions
	874. Other _____
	875. Other _____
	876. Other _____

System Information for 12 Months

Number of Active Services 214
Avg. Daily Produced _____ gal/Purchased _____ gal
Max. Daily Produced _____ gal/Purchased _____ gal
Water Loss 1111S. %

Population Served 535
Avg. Daily Supplied to Secondary Systems 0 gal
Max. Daily Supplied to Secondary Systems 0 gal
Total Storage 35,000 gal



MISSOURI DEPARTMENT OF NATURAL RESOURCES
PUBLIC DRINKING WATER PROGRAM
COMPLIANCE & OPERATIONAL INSPECTION

CLASS 2 INSPECTION FORM

INTERVIEWED >	Jim Heppler - Operator	DATE 8/24/2017
ID NUMBER MO3071205	SYSTEM NAME Cedar Glen Condominiums	COUNTY Camden
ADDRESS	CITY STATE ZIP CODE	TELEPHONE NUMBER

COMMENTS AND RECOMMENDATIONS FOR CORRECTION
The following comments are referenced to the applicable checklist items attached to this form.

208 - PWS needs a second well (Serves more than 500 people)
227 - Well Casing & Piping needs to be painted
229 - PWS does not have a source of emergency electrical power
234 - PWS has not established a well water level monitoring program
429 - Exterior of 35,000-gal hydropneumatic pressure tank needs to be cleaned and painted
430/431 - Use of hydropneumatic storage not recommended as the only storage for systems serving more than 50 connections. This PWS serves 214 connections
435 - PWS has not established a tank inspection & cleaning program
436 - Trees/brush need to be removed or cut back around storage tank & well House. Particularly the large Sycamore tree that is leaning over the top of the well house
506 - Flush hydrants are needed in the distribution system
507 - Approximately 40 of the 214 connections aren't metered
509 - Piping in the well house includes 4" PVC piping & valves

Bacti sample collected from sample site 02 was TC absent

FREE & TOTAL CHLORINE RESIDUAL _____ & 0 mg/l ☑ Sample Collected & LOCATION 02 (Bldg 172)

INSPECTOR'S SIGNATURE	TITLE
Donald Bal	ENV. SPEC. III

MO 780-1617 (2-01)

Schedule JC-S3

COMPLIANCE & OPERATIONAL CHECKLIST

Fill in the appropriate box and if "C", explain in the comment section on the front of this form.

☐ NA *ITEM #1 ADMINISTRATION*

C ok NA

☐☑☐ 101. **Permit to Dispense status** 10CSR60-3.010
☐☑☐ 102. **Construction permits** 10CSR60-3.010(1)(A)
☐☑☐ 103. **Final approvals** 10CSR60-3.010(1)(B)
☐☐☑ 104. **Owner supervised program** 10CSR60-10.010(2)(C)
☐☑☐ 105. **Certified Chief Operator** 10CSR60-14.010(4)
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☐☑☐ 126. **Reporting for Lead & Copper** 10CSR60-7.020(4)
☐☑☐ 127. **Coliform results (5 yrs)** 10CSR60-9.010(1)(A)

C ok NA

☐☑☐ 128. **Operational records** 10CSR60-9.010(1)(A)
☐☑☐ 129. **Chemical results (10 yrs)** 10CSR60-9.010(1)(A)
☐☑☐ 130. **Violation actions (3 yrs)** 10CSR60-9.010(1)(B)
☐☑☐ 131. **Inspection Reports (10 yrs)** 10CSR60-9.010(1)(C)
☐☑☐ 132. **Variance/exemption records (5 yrs)** 10CSR60-9.010(1)(D)
☐☑☐ 133. **CCR** CFR 141.153
☐☑☐ 134. **Any system records requested** 10CSR60-9.010(2)

☐☑☐ 135. Updated distribution map
☐☑☐ 136. Individual valve records
☐☐☑ 137. Individual fire hydrant records
☐☐☑ 138. Individual flush hydrant records
☐☑☐ 139. Main Brk/Leak Repair Program
☐☑☐ 140. Valve Maintenance Program
☐☑☐ 141. Main Flushing Program
☐☑☐ 142. Operational/Maint. records
☐☐☐ 143. Other _____

ITEM #2 SOURCE

☐ NA **Groundwater**

C ok NA

☐☑☐ 201. **Source of supply approved** 640.115(1)
☐☑☐ 202. **Well driller's permit (drilled after 1987)** 10CSR23-1.090
☐☑☐ 203. **Construction requirements** 10CSR60-10.010
☐☑☐ 204. **Sanitary construction defects** 10CSR60-4.080(5)
☐☑☐ 205. **Siting requirements** 10CSR60-10.020
☐☑☐ 206. **GWUDI determination** 10CSR60-4.055(1)
☐☑☐ 207. **Plugging abandoned wells** 10CSR23-3.110

☑☐☐ 208. Adequate number of wells
☐☑☐ 209. Weather protection
☐☑☐ 210. Security
☐☑☐ 211. Floor Drain
☐☑☐ 212. Heating/venting/dehumidification
☐☑☐ 213. Lighting
☐☑☐ 214. Chemicals in well house
☐☑☐ 215. Top of well at least:
*4' above flood level
*above floor 12" min.
*above ground 18" min.
*approved casing & grout

C ok NA

☐☐☑ 216. Grand fathered
☐☑☐ 217. Vent screen/down turned
☐☑☐ 218. Vent 18" above floor
☐☑☐ 219. Vent adequate size
☐☑☐ 220. Pump capacity
_____ gpm @ _____ psi
_____ gpm @ _____ psi
☐☑☐ 221. Well meter, operable
☐☑☐ 222. Drawdown measuring equip.
☐☑☐ 223. Pressure Gauge-operable
☐☑☐ 224. Shutoff Valve
☐☑☐ 225. Check Valve
☐☑☐ 226. Wellhead sealed
☑☐☐ 227. Piping condition
☐☑☐ 228. Raw water sample tap past check valve
☑☐☐ 229. Auxiliary power supply
☐☐☑ 230. Pitless Unit, no adapter
☐☐☑ 231. Valve vault adequate size, drained, & provide safe access
☐☐☑ 232. Vertical Shaft Turbine Pumps Air Release - screened, down turned, 18" above floor
☐☑☐ 233. Security
☑☐☐ 234. Other DRAWDOWN READINGS

☒ NA **Reservoirs**

C ok NA

☐☐☐ 235. **Source of supply approved** 640.115(1)
☐☐☐ 236. **Dam safety permit (dams >35' tall)** 10CSR22-2.020(4)
☐☐☐ 237. **Dam maintenance & monitoring** 10CSR22-3.030(1)(B)
☐☐☐ 238. **Recreational use plan** 10CSR60-10.030
☐☐☐ 239. **Siting requirements** 10CSR60-10.020

☐☐☐ 240. Quality of water
☐☐☐ 241. Capacity adequate for drought
☐☐☐ 242. Does system have storage curves
☐☐☐ 243. Stadial marker & weekly records
☐☐☐ 244. Siltation control structure condition
☐☐☐ 245. Watershed management plan
☐☐☐ 246. Algae control program
☐☐☐ 247. Dam maintenance (mowing, brush, rodents)
☐☐☐ 248. Erosion control
☐☐☐ 249. No flow obstructions in spillway entrance
☐☐☐ 250. Condition of spillway
☐☐☐ 251. Spillway discharge condition

COMPLIANCE & OPERATION CHECKLIST

Fill in the appropriate box and if "C", explain in the comment section on the front of this form.

ITEM #2 SOURCE (CONT.)

☒ NA **Groundwater**
C ok NA
☐☐☒ 252. Discharge stream erosion
☐☐☐ 253. Discharge stream obstructions
☐☐☐ 254. Emergency spillway condition
☐☐☐ 255. Other _____

☒ NA **Rivers & Streams**
C ok NA
☐☐☒ 256. **Source of supply approved** 640.115(1)
☐☐☐ 257. Quality of Water
☐☐☐ 258. Capacity during drought
☐☐☐ 259. Raw water storage capacity & condition
☐☐☐ 260. Coffer dam condition
☐☐☐ 261. Intake protection
☐☐☐ 262. Vandalism control
☐☐☐ 263. Other _____

☒ NA **Intakes**
C ok NA
☐☐☐ 264. Adequacy of water withdrawal levels
☐☐☐ 265. Capacity of water inlets
☐☐☐ 266. Water Inlets screened
☐☐☐ 267. Condition of intake control valves
☐☐☐ 268. Intake tower condition
☐☐☐ 269. Safety cable on intake hoses
☐☐☐ 270. Floats properly anchored
☐☐☐ 271. Wench and cable condition
☐☐☐ 272. Discharge pipe capacity
☐☐☐ 273. Vandalism control
☐☐☐ 274. Intake protected from flood damage
☐☐☐ 275. Zebra mussel control program
☐☐☐ 276. Other _____

ITEM #3 PUMPING STATIONS

☒ NA **Raw & Finish Water Pumping**
C ok NA
☐☐☐ 301. Pumping capacity
☐☐☐ 302. Adequate number of pumps
☐☐☐ 303. Pump operable during flooding
☐☐☐ 304. Sized for pump maintenance
☐☐☐ 305. Pump room access
☐☐☐ 306. Adequate safety equipment
☐☐☐ 307. Heating and venting
☐☐☐ 308. Drains and sumps
☐☐☐ 309. Lighting (int&ext)
☐☐☐ 310. Power supply
☐☐☐ 311. Telemetry & pump control
☐☐☐ 312. Pressure Gauges
☐☐☐ 313. Metering-operable
☐☐☐ 314. Pump piping condition
☐☐☐ 315. Other _____

☒ NA **Finished Water Pumping**
C ok NA
☐☐☐ 316. Pressure _____ psi
☐☐☐ 317. Flow _____ gpm
☐☐☐ 318. HP _____; Phase 3__ or 1__
☐☐☐ 319. Other _____

ITEM #4 STORAGE

☒ NA **Unpressurized Storage**
C ok NA
☐☐☐ 401. **Storage covered & vented** 10CSR60-4.080(7)
☐☐☐ 402. **Approved chemicals, materials, & coatings** 10CSR60-4.080(8)
☐☐☐ 403. **Sanitary Defects** 10CSR60-4.080(5)
☐☐☐ 404. Adequate capacity
☐☐☐ 405. Overflow
*12" to 24" above ground
*Screened or flap valve
☐☐☐ 406. Vent screened
☐☐☐ 407. Access hatch locked
2" overlap, 4" to 6" curbing
☐☐☐ 408. Manway
☐☐☐ 409. Access ladder & appurtenances condition
☐☐☐ 410. Exterior paint condition
☐☐☐ 411. Unsealed openings
☐☐☐ 412. Security
☐☐☐ 413. Isolation for maintenance
☐☐☐ 414. Roof watertight & properly drained
☐☐☐ 415. Adequate drain
☐☐☐ 416. Inspection Program
☐☐☐ 417. Protection-vandalism, animals, etc.
☐☐☐ 418. Condition of valve vault
☐☐☐ 419. Sample Tap
☐☐☐ 420. Trees/Brush cleared
☐☐☐ 421. Other _____

☐ NA **Pressure Tanks**
C ok NA
☐☑☐ 422. Drain
☐☑☐ 423. Water sight glass
☐☑☐ 424. Manway
☐☑☐ 425. Pressure Gauge
☐☑☐ 426. Compressor
☐☑☐ 427. Air blow off
☐☑☐ 428. Controls
☑☐☐ 429. Exterior paint condition
☑☐☐ 430. Capacity
No. of Tanks 1, Dia. ____,
Circ. ____, Ht/Length 1
Volume Ea. 35,000 gal
☑☐☐ 431. Total Capacity 35,000 gal
☐☑☐ 432. Water logged
☐☐☐ 433. Exterior paint condition
☐☐☑ 434. Bladder tank drawdown
Capacity ____ ea. ____ gal
Capacity ____ ea. ____ gal
Capacity ____ ea. ____ gal
☑☐☐ 435. Other TANK INSPECT/CLEAN
☑☐☐ 436. Other TREES/BRUSH NEAR TANK & WELL HOUSE

☐ NA **ITEM #5 DISTRIBUTION**
C ok NA
☐☑☐ 501. **Minimum Pressure** 10CSR60-4.080(9)
☐☑☐ 502. **New mains & repairs disinfected** 10CSR60-4.080(6)
☐☑☐ 503. **Main & sewer separation** 10CSR60-10.010(2)
☐☑☐ 504. **Approved Chemicals, materials, & coatings** 10CSR60-4.080(8)
☐☑☐ 505. Water loss ≤ 10%
☑☐☐ 506. Adequate cleanouts, valves, and hydrants to flush system
☑☐☑ 507. Individual customer meter
☐☑☐ 508. Portable shoring available
☑☐☐ 509. Other 4" PVC VALVES IN WELL HOUSE

☐ NA **ITEM #6 MCL/MONITORING**
C ok NA
☐☑☐ 601. **Microbiological MCL** 10CSR60-4.020(7)
☐☑☐ 602. **Total Coliform Monitoring** 10CSR60-4.020
☐☑☐ 603. **Inorganic chemicals** 10CSR60-4.030
☐☑☐ 604. **Nitrates/Nitrites** 10CSR60-4.030(2)(C) & (D)
☐☑☐ 605. **Synthetic organic chemicals** 10CSR60-4.040
☐☐☑ 606. **Monthly turbidity MCL** 10CSR60-4.050(2)(A)1 small
or 10CSR60-4.050(3)(B)1 large
☐☐☑ 607. **Acute turbidity MCL** 10CSR60-4.050(2)(A)2 small
or 10CSR60-4.050(3)(B)2 large
☐☐☑ 608. **Report acute turbidity MCL** 10CSR60-4.050(2)(D) small
or 10CSR60-4.050(3)(D) large
☐☐☑ 609. **Continuous turbidity monitoring** 10CSR60-4.040(3)(E)1
☐☐☑ 610. **Disinfection Profiling** 10CSR60-4.055(6)(C)
☐☑☐ 611. **Radio- nuclides** 10CSR60-4.060
☐☑☐ 612. **Secondary contaminants** 10CSR60-4.070

COMPLIANCE & OPERATIONAL CHECKLIST

Fill in the appropriate box and if "C", explain in the comment section on the front of this form.

- ☐ ☐ ☑ 613. **Fluoride supplementation** 10CSR60-4.080(11)
- ☐ ☐ ☑ 614. **Disinfection By-Products (DBP) TTHM & HAA5** 10CSR60-4.090(3)(B)
- ☐ ☐ ☑ 615. **DBP Chlorite** 10CSR60-4.090(3)(B)2
- ☐ ☐ ☑ 616. **DBP Bromate** 10CSR60-4.090(3)(B)3
- ☐ ☐ ☑ 617. **DBP Precursors TOC & Alkalinity** 10CSR60-4.090(3)(D)
- ☐ ☑ ☐ 618. **Volatile organic chemicals** 10CSR60-4.100
- ☐ ☑ ☐ 619. **Unregulated chemicals** 10CSR60-4.110
- ☐ ☑ ☐ 620. **Exceed Pb/Cu levels** 10CSR60-15.020-15.050
- ☐ ☑ ☐ 621. **Operational Monitoring** 10CSR60-4.080(3)
- ☐ ☐ ☑ 622. **Disinfection Requirements** 10CSR60-4.055

☒ NA — C ok NA — ***ITEM #7 DISINFECTION***

- ☐ ☐ ☐ 701. **Minimum residual - entry** 10CSR60-4.055(3)
- ☐ ☐ ☐ 702. **Maximum residual - Dist. System** 10CSR60-4.055(5)
- ☐ ☐ ☐ 703. **Minimum residual - Dist. System** 10CSR60-4.055(4)
- ☐ ☐ ☐ 704. **Cl_2 Monitoring - Dist. System** 10CSR60-4.055(4)(E)
- ☐ ☐ ☐ 705. **Monitoring frequency** 10CSR60-4.055(3)(F)
- ☐ ☐ ☐ 706. **Low residual reporting** 10CSR60-4.055(3)(E)
- ☐ ☐ ☐ 707. **CT study done** 10CSR60-4.055(2)(D)
- ☐ ☐ ☐ 708. **Meeting CT requirement** 10CSR60-4.055(2)(C)
- ☐ ☐ ☐ 709. **Add Cl prior to ammonia** 10CSR60-4.055(3.A)
- ☐ ☐ ☐ 710. **Add Cl prior to filters** 10CSR60-4.055(3.C)
- ☐ ☐ ☐ 711. **Operated/Supervised adequately/Operational Monitoring** 10CSR60-4.080(5)

☒ NA — C ok NA — **Liquid Chlorinator**

- ☐ ☐ ☐ 712. Physical condition of feeder
- ☐ ☐ ☐ 713. Adequate detention
- ☐ ☐ ☐ 714. Corrosion in room
- ☐ ☐ ☐ 715. Adequate feed control
- ☐ ☐ ☐ 716. Adequate venting, heating, lighting
- ☐ ☐ ☐ 717. Security
- ☐ ☐ ☐ 718. Other _____

☒ NA — C ok NA — **Gas Chlorinator**

- ☐ ☐ ☐ 719. Adequate detention
- ☐ ☐ ☐ 720. Separate Cl_2 room
- ☐ ☐ ☐ 721. Interior wall view window
- ☐ ☐ ☐ 722. Panic bar door
- ☐ ☐ ☐ 723. Fan suction near floor
- ☐ ☐ ☐ 724. Inlet near ceiling
- ☐ ☐ ☐ 725. Chains n Cl_2 cylinders
- ☐ ☐ ☐ 726. Cylinders on scales
- ☐ ☐ ☐ 727. Exterior fan/light switch
- ☐ ☐ ☐ 728. SCBA
- ☐ ☐ ☐ 729. Ammonia bottle
- ☐ ☐ ☐ 730. Leak detection/repair kit
- ☐ ☐ ☐ 731. Shower & eye wash
- ☐ ☐ ☐ 732. Hydrocarbons in room
- ☐ ☐ ☐ 733. Sample tap Past Cl_2
- ☐ ☐ ☐ 734. Condition of room
- ☐ ☐ ☐ 735. Security
- ☐ ☐ ☐ 736. Other _____

☒ NA — C ok NA — **Other Types**

- ☐ ☐ ☐ 737. _____
- ☐ ☐ ☐ 738. _____
- ☐ ☐ ☐ 739. _____

☒ NA — C ok NA — ***ITEM #8 TREATMENT***

- ☐ ☐ ☐ 801. **Approved chemicals, materials & coatings** 10CSR60-4.080(8)
- ☐ ☐ ☐ 802. **Aeration** 10CSR60-4.080(5)
- ☐ ☐ ☐ 803. **Chemical Application** 10CSR60-4.080(5)
- ☐ ☐ ☐ 804. **Corrosion Control Treatment** 10CSR60-15.010(4)
- ☐ ☐ ☐ 805. **Mixing** 10CSR60-4.080(5)
- ☐ ☐ ☐ 806. **Settling** 10CSR60-4.080(5)
- ☐ ☐ ☐ 807. **Filtration** 10CSR60-4.080(5)
- ☐ ☐ ☐ 808. **H.S. pumps** 10CSR60-4.080(5)
- ☐ ☐ ☐ 809. **Other pumps** 10CSR60-4.080(5)
- ☐ ☐ ☐ 810. **Control equipment** 10CSR60-4.080(5)
- ☐ ☐ ☐ 811. **Plant water storage** 10CSR60-4.080(5)
- ☐ ☐ ☐ 812. **Operational Monitoring** 10CSR60-4.080(5)
- ☐ ☐ ☐ 813. **Carbon feed room separate/explosion proof** 10CSR60-4.080(5)

☒ NA — C ok NA — **Fluoride**

- ☐ ☐ ☐ 814. **Sample submittal** 10CSR60-4.080(11)
- ☐ ☐ ☐ 815. Adequate lab equipment
- ☐ ☐ ☐ 816. Fluoride pump operable
- ☐ ☐ ☐ 817. Sample tap 100 pipe dia. past feed
- ☐ ☐ ☐ 818. Day tank
- ☐ ☐ ☐ 819. Vented to outside
- ☐ ☐ ☐ 820. Other _____

☒ NA — C ok NA — **Ion Exchange Softening**

- ☐ ☐ ☐ 821. Adequate size
- ☐ ☐ ☐ 822. Condition of softener
- ☐ ☐ ☐ 823. Metered for bypassing
- ☐ ☐ ☐ 824. Condition of salt storage
- ☐ ☐ ☐ 825. Other _____

☒ NA — C ok NA — **Aeration**

- ☐ ☐ ☐ 826. Capacity
- ☐ ☐ ☐ 827. By-passing for maintenance
- ☐ ☐ ☐ 828. Side access & drainage
- ☐ ☐ ☐ 829. Access to inlet distributor
- ☐ ☐ ☐ 830. Condition of air screens
- ☐ ☐ ☐ 831. Access for screen cleaning
- ☐ ☐ ☐ 832. Condition of media or trays
- ☐ ☐ ☐ 833. Condition fan & drive motor
- ☐ ☐ ☐ 834. Condition support structure
- ☐ ☐ ☐ 835. Condition of paint
- ☐ ☐ ☐ 836. Other _____

☒ NA — C ok NA — **Rapid Mixing**

- ☐ ☐ ☐ 837. Mixing detention
- ☐ ☐ ☐ 838. Adequate mixer capacity
- ☐ ☐ ☐ 839. Condition of mixer
- ☐ ☐ ☐ 840. Mixer maintenance
- ☐ ☐ ☐ 841. Other _____

☒ NA — C ok NA — **Flocculation**

- ☐ ☐ ☐ 842. Adequate capacity
- ☐ ☐ ☐ 843. Provisions for cleaning
- ☐ ☐ ☐ 844. Provisions for draining
- ☐ ☐ ☐ 845. Mixer condition
- ☐ ☐ ☐ 846. Mixer capacity
- ☐ ☐ ☐ 847. Mixer access for maintenance
- ☐ ☐ ☐ 848. Short circuiting thru basin
- ☐ ☐ ☐ 849. Condition of basin
- ☐ ☐ ☐ 850. SS testing at taps
- ☐ ☐ ☐ 851. Other _____

☒ NA — C ok NA — **Sedimentation**

- ☐ ☐ ☐ 852. Pre-sed. condition & capacity
- ☐ ☐ ☐ 853. Regular sed. purpose & cap.
- ☐ ☐ ☐ 854. Condition of structure
- ☐ ☐ ☐ 855. Maintain units w/ continuous operation
- ☐ ☐ ☐ 856. Condition Inf. & Eff. facilities

COMPLIANCE & OPERATIONAL CHECKLIST

Fill in the appropriate box and if "C", explain in the comment section on the front of this form.

857. Short circuiting in basin
858. Adequacy of sludge removal
859. Condition of sludge equipment
860. Adequacy of sludge lines
861. Other ____________

Filtration (NA)

C ok NA

862. Appropriate type
863. Adequate number for continuous operation
864. Condition of media
865. Maintenance Plan
866. On-line Turbidimeters on each filter/calibrated
867. Backwash rate & duration
868. Adequate backwash method
869. Other ____________

Plant Information (NA)

C ok NA

870. General Condition
871. Proper Lab equipment
872. Calibration standards
873. Tests according to directions
874. Other ____________
875. Other ____________
876. Other ____________

System Information for 12 Months

Number of Active Services 214

Avg. Daily Produced ________ gal/Purchased 0 gal

Max. Daily Produced ________ gal/Purchased 0 gal

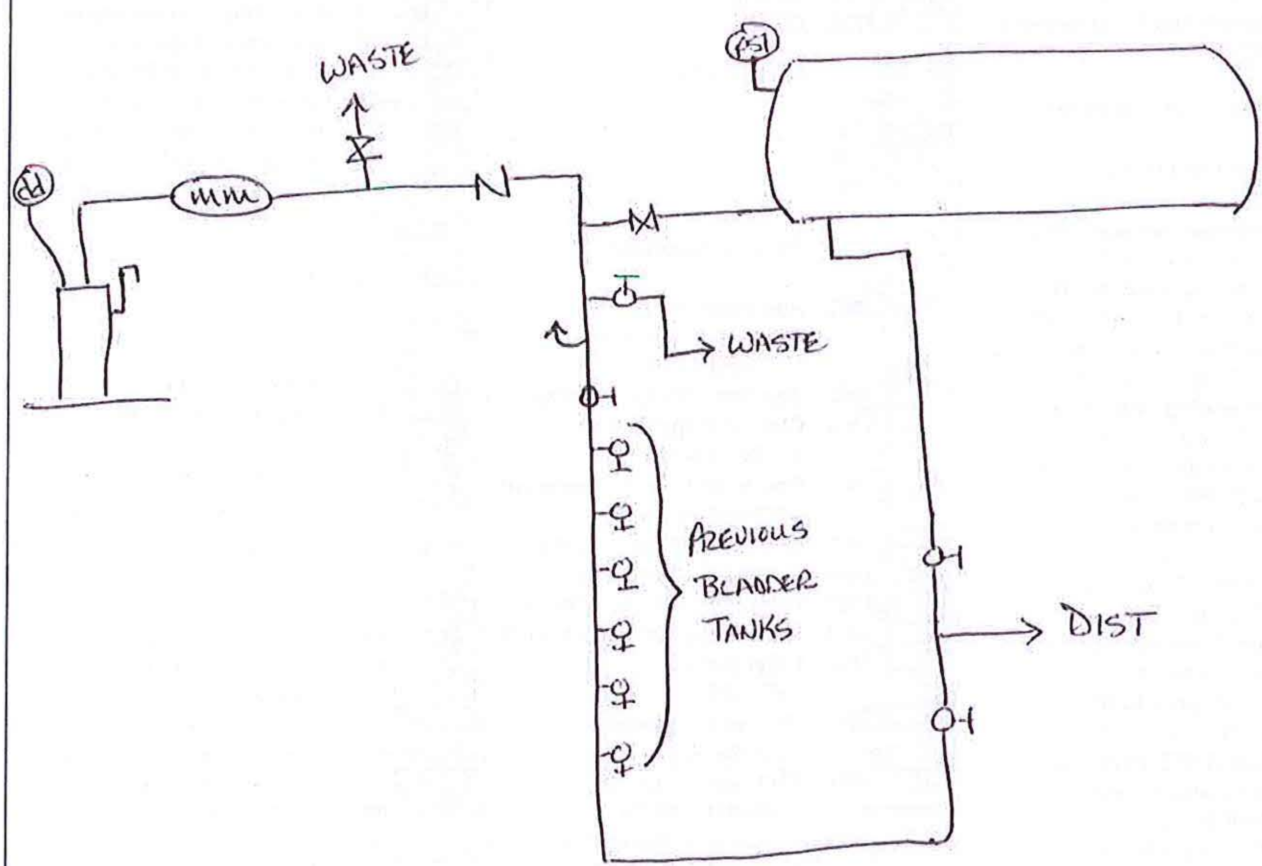
Water Loss ________ %

Population Served 535

Avg. Daily Supplied to Secondary Systems 0 gal

Max. Daily Supplied to Secondary Systems 0 gal

Total Storage 35,000 gal



Schedule JC-S3

STATE OF MISSOURI
Jeremiah W. (Jay) Nixon, Governor • Sara Parker Pauley, Director
DEPARTMENT OF NATURAL RESOURCES
www.dnr.mo.gov

November 4, 2014

NOTICE OF VIOLATION NUMBER 15747SW
CERTIFIED MAIL NUMBER 7014 1820 0001 6466 0817
RETURN RECEIPT REQUESTED

Mr. Gary V. Cover
Osage Water Company
P.O. Box 506
Clinton, MO 64735

RE: NPDES PERMIT NUMBER MO0123170

Dear Mr. Cover:

This letter is in response to sample results taken during the June 10, 2014 compliance inspection conducted by the Department of Natural Resources (department). Please find enclosed a Report of Laboratory Analysis for samples collected during the site visit. Notice of Violation number 15747SW is enclosed for effluent limit violations. The table below explains the violations that occurred:

SITE VISIT DATE	PARAMETER	OUTFALL	PERMIT LIMIT	REPORTED VALUE
6/10/2014	E. coli	001	126 colonies/100mL monthly avg. 630 colonies/100 mL daily max.	>2419.6

Exceeding this limitation is a violation of the Missouri Department of Natural Resources Regulation 10 CSR 20-7.015 "Effluent Regulations" and NPDES permit conditions. This Notice of Violation is for a major exceedance of one of the parameters identified above and shall serve as official notification of this noncompliance.

Since the inspection, the operator has sent in additional sample results that are within the permitted parameters. The sludge report for 2013 has also been received by the department.

Based on your response, the department wishes to acknowledge your return to compliance for violations cited in the abovementioned Notice of Violation and the previously sent Letter of Warning.

Please note that this letter does not relieve you from liability for violations noted during the department's original inspection, nor does it relieve you from liability as a result of any future non-compliance.

Please be reminded that you are required to maintain compliance with your Missouri State Operating Permit and all applicable statutes and regulations. If you have any questions or if we can be of assistance to you in your efforts to achieve compliance, please contact Ms. Laura M. Gerson, of my staff, by calling 573-348-4028 or via mail at Southwest Regional Office, 2040 West Woodland, Springfield, Missouri 65807-5912.

As always, the department seeks to achieve the highest level of environmental protection, to the ultimate benefit of this state and its citizens. We appreciate your attention to our environmental concerns and your return to compliance.

Sincerely,

SOUTHWEST REGIONAL OFFICE

Cynthia Davies
Regional Director

CD/lgk

Enclosure – Sample Results

c: Mr. Jim Heppler, Lake of the Ozarks Water and Sewer
Public Service Commission

029.wpcp.OsageWaterCoKK.mo0123170.x.2014.11.04.fy15.nov_rtc.15747SW.lmg

MISSOURI DEPARTMENT OF NATURAL RESOURCES

NOTICE OF VIOLATION

VIOLATION NUMBER
15747SW

DATE AND TIME ISSUED
11/04/2014

SOURCE (NAME, ADDRESS, PERMIT NUMBER, LOCATION)
Osage Water Company, KK WWTF
P.O. Box 506
MO0123170

MAILING ADDRESS	CITY	STATE	ZIP CODE
P.O. Box 506	Clinton	MO	64735

NAME OF OWNER OR MANAGER	TITLE OF OWNER OR MANAGER
Gary Cover	Receiver

LAW, REGULATION OR PERMIT VIOLATED
Missouri State Operating Permit (MSOP) MO0123170
Missouri Clean Water Law Section 644.076.1 and 644.051.1(3), RSMo.

NATURE OF VIOLATION — DATE(S): — TIME(S):

Permittee failed to comply with effluent limits contained in Part "A" of the Missouri State Operating Permit number MO0134244 by exceeding the limits set forth for *e. coli*.

SIGNATURE (PERSON RECEIVING NOTICE)	SIGNATURE (PERSON ISSUING NOTICE)
Sent Via US Mail	Laura Gerson Laura Gerson
TITLE OR POSITION	TITLE OR POSITION
	Environmental Specialist/SWRO

Schedule JC-S4

DISTRIBUTION: SOURCE CENTRAL OFFICE REGIONAL OFFICE

Missouri Department of Natural Resources
Environmental Services Program

Order ID 140610007 **Program, Contact:** WPC Brittnie Brauner

Report Date: 06/24/2014 **LDPR/JobCode:** FEINS

RECEIVED
JUN 25 2014
DEQ/SWRO

Schedule: QC4

Sample: AC28830

Customer #: 1410252

Facility ID: MO0123170 **Site:** Osage Water Comp. KK WWTF
County: Camden **Sample Reference ID:**
Collector: LAURA GERSON **Affiliation:** SWRO **Collect Date:** 6/10/2014 1:25:00PM
Entry Point:
Sample Comment: Grab; outfall 001.
Precision

UTM-Easting	Northing
0524891E	4221573N

Test	Parameter	Result	Qualifier	Units	Method
Biochemical Oxygen Demand	Biochemical Oxygen Demand	20.5		mg/L	SM 5210-B
E. coli - IDEXX	E. coli - IDEXX	>2419.6		mpn/100ml	SM 9223B
Field Dissolved Oxygen	Field Dissolved Oxygen	3.02		mg/L	SM 4500-O-G
Field pH	Field pH	6.99		pH Units	EPA 150.1
Field Temperature	Field Temperature	21.6 C			EPA 170.1
Total Residual Chlorine	Total Residual Chlorine	0.05		mg/L	Field Dependent
Total Suspended Solids (TSS) / NFR	Total Suspended Solids (TSS) / NFR	6.00		mg/L	SM 2540-D

The analysis of this sample was performed in accordance with procedures approved or recognized by the U.S Environmental Protection Agency.

Lori Dunmire for Chris Boldt

Chris Boldt, Laboratory Manager
Environmental Services Program
Division of Environmental Quality

Qualifier Descriptions

01 Improper collection method
02 Improper preservation
03 Exceeded holding time
04 Analyzed by Contract Laboratory
05 Estimated value, detected below PQL
06 Estimated value, QC data outside limits
07 Estimated value, analyte outside calibration range
08 Analyte present in blank at > 1/2 reported value
09 Sample was diluted during analysis
10 Laboratory error
11 Estimated value, matrix interference
12 Insufficient quantity
13 Estimated value, true result is >= reported value
14 Estimated value, non-homogeneous sample
15 No Result - Failed Quality Controls Requirements
16 Not analyzed - related analyte not detected
17 Results in dry weight
18 Sample pH is outside the acceptable range
19 Estimated value
20 Not analyzed - Instrument failure
21 No result - spectral interference
22 pH was performed at the Laboratory
23 Contract Lab specific qualifier - see sample comments
24 No result - matrix interference
25 No Result: Excessive Chlorination
26 No Result: Excessive Dechlorination
ND Not detected at reported value

029. wpcp. Osage Water Comp KKWWTF. MO0123170 · x. 2014.06.25. ltr14. sam. x a rcvd

140610007

Facility Name: Osage Water Company, KK

Permit Number: MO-0123170

Inspection Date: June 10, 2014

MoCWIS number: 23993
Concern Number:
ACE Number:

Report Date: November 4, 2014

Inspector Name: Laura M. Gerson

County: Camden

Unsatisfactory Features

Response Due: September 8, 2014

1. Missing sludge report
2.
3.
4.
5.
6.

Response Received:

Facility's Response

	Satisfactory	Unsatisfactory
1. Received sludge report	☒	☐
2.	☐	☐
3.	☐	☐
4.	☐	☐
5.	☐	☐
6.	☐	☐

RTC ☒ Admin Closed ☐ Referred to Jake ☐ Referred to Enforcement ☐ Date_____

Date Referred to Jake: _____

Comments: _____

	YES	NO	N/A
MoCWIS updated	☒	☐	☐
Original copy of the facility's response attached	☐	☒	☐
Initialed/Highlighted concern form attached	☐	☐	☒
Electronic copy of this form on Tina's N drive	☒	☐	☐
RTC letter drafted	☒	☐	☐
Geohydrolic Evaluation Form/Lagoon checklist if applicable	☐	☐	☒

STATE OF MISSOURI
Jeremiah W. (Jay) Nixon, Governor Sara Parker Pauley, Director
DEPARTMENT OF NATURAL RESOURCES
dnr.mo.gov

July 31, 2014

Mr. Gary Cover
Osage Water Company
P.O. Box 506
Clinton, MO 64735

Dear Mr. Cover:

Enclosed is the Report of Inspection for the community water system serving Eagle Woods Subdivision in Camden County. This report is believed to be self-explanatory and I trust you will direct your attention to the recommendations contained therein.

As an existing water system that is being signed up as a public water system, the integrity of the system and quality of water served is unknown and cannot be addressed by this initial inspection. As routine monitoring of this water system occurs, this information will be determined.

A *Compliance Agreement* will be mailed to Ms. Denise Jordan (well owner) in the near future to address the water system's well, which is not compliant with current state and federal regulations. The department has adopted a "Subdivision Policy" that provides water systems such as yours an opportunity to comply with Safe Drinking Water requirements. If you take advantage of this opportunity, the department will allow continued use of this non-compliant well. If you decide not to take advantage of this opportunity the department will require you to either construct a new well to state standards or connect to a department-approved water system. The department may also initiate legal action, including appropriate penalties if necessary, to obtain compliance with these requirements.

Unless otherwise requested within the report, all correspondence and questions should be directed to Mr. Darrell Barber of this office by calling 573-348-0875 or via mail at the Southwest Regional Office, 2040 West Woodland, Springfield, MO 65807-5912.

Sincerely,

SOUTHWEST REGIONAL OFFICE

Mark Rader, Chief
Drinking Water Section

MDR/dbl

Enclosures

c: Mr. Jim Busch, Missouri Public Service Commission
Mr. Clinton Finn, Southwest Regional Office
Ms. Denise Jordan, Well Owner
Ms. Misty Lange, Public Drinking Water Branch
Mr. Chad Stout, Lake of the Ozarks Water and Sewer

MISSOURI DEPARTMENT OF NATURAL RESOURCES
REPORT OF INSPECTION
COMMUNITY PUBLIC WATER SYSTEM
EAGLE WOODS SUBDIVISION
CAMDEN COUNTY, MISSOURI
PUBLIC WATER SYSTEM ID NUMBER MO5030015

July 31, 2014

INTRODUCTION

A routine inspection was made of the community public water system serving Eagle Woods Subdivision by Mr. Darrell Barber of the Missouri Department of Natural Resources (department) Southwest Regional Office on June 11. Mr. Chad Stout and Mr. Jacob Cook, Operators, were present representing the facility during the inspection. The purpose of the inspection was to determine compliance with Missouri Safe Drinking Water Law and Regulations and to activate the system as a public water supply.

DISCUSSION

The system serves approximately 85 people in the Eagle Woods Subdivision through 34 residential connections. The system operates year round.

Well #1 is a multi-family well drilled in 1998 to a depth of 400 feet with 6-inch PVC casing to a depth of 100 feet. The well is equipped with a submersible pump. The water is disinfected with a liquid sodium hypochlorite solution. Storage is provided by two 4,500-gallon ground storage tanks. System pressure is maintained by two 5-horsepower booster pumps rated at 60 gallons per minute and three 119-gallon bladder tanks. The ground storage tanks are also equipped with a small recirculating pump located in the well house to prevent freezing or stagnation of the water in the ground storage tanks.

Eagle Woods Subdivision was developed by Mr. Ron Westenhaver of Summit Investments, LLC. Mr. Westenhaver constructed the distribution system, Well #1, and a second multi-family well, which is no longer used by the subdivision. In 2002, Eagle Woods discontinued using the two multi-family wells and contracted with Environmental Utilities, LLC to provide wholesale water service to Eagle Woods via the adjacent Golden Glade water system owned by Environmental Utilities. The two multi-family wells previously serving Eagle Woods were turned over to the two parcel owners where the wells are located. Wastewater treatment for Eagle Woods and Golden Glade subdivisions is provided by a single wastewater treatment facility owned by Osage Water Company. Mr. Greg Williams is a principle in Osage Water Company and Environmental Utilities, LLC. In August 2007, after the Missouri Public Service Commission (PSC) initiated a receivership case against Osage Water Company, Environmental Utilities discontinued providing water to Eagle Woods.

Mr. Gary Cover is the PSC-appointed receiver in charge of managing the assets of Osage Water Company. On August 22, 2007, Mr. Cover filed a petition in Camden County Circuit Court on behalf of Osage Water Company seeking a temporary restraining order against Environmental Utilities. The September 14, 2007, court docket entry states the parties reached an agreement for Environmental Utilities to continue supplying water to Eagle Woods until February 2008. Osage Water Company submitted an application for a construction permit on December 31, 2007, to add two 4,500-gallon ground storage tanks, two booster pumps and chlorination to one of the multi-family wells previously used by Eagle Woods. The application stated the modifications were temporary until funds could be raised to drill a new state-approved well. An approval to construct (Review No. 54366-07) was issued by the department on February 1, 2008. The temporary modifications approved by Review No. 54366-07 were still in use on June 11. It appears the department was not notified once modifications were constructed so a final construction inspection could be conducted. Please submit a Statement of Work Complete form to Mr. Clinton Finn at the Southwest Regional Office so a final construction inspection can be scheduled.

The multi-family well supplying water for Eagle Woods (Well #1) is owned by Ms. Denise Jordan. Osage Water Company pays a monthly lease to Ms. Jordan for the use of Well #1 and the land needed for the well house and storage tanks.

The system requires a DS-II operator's license. Mr. Chad Stout possesses the adequate DS-II operator's license needed.

Two drinking water samples were collected from the outside hose bib at 6425 Eagle Crossing and submitted for microbiological analysis. The samples tested Total Coliform positive or "not safe". The free chlorine entering the distribution system was below detection limits and the total residual chlorine level in the system was 0.12 mg/L at the time of the inspection. The operator had checked the chlorine residuals on June 10, all parameters were within acceptable ranges, and the equipment appeared to be functioning properly. However, upon our arrival on June 11, the chlorinator was no longer injecting chlorine into the system. The operator determined a check valve in the injector quill assembly was stuck and not allowing the chlorine solution to be injected into the water system. The operator repaired the faulty valve during the inspection.

The following unsatisfactory features were noted with comments and recommendations for correction, and are organized into categories as noted below.

UNSATISFACTORY FEATURES

The Ground Water Rule specifies eight elements integral to an effective inspection of a public water system. The eight elements are: Source (protection, physical components, and condition);

Treatment; Distribution System; Finished Water Storage; Pumps, Pump Facilities, and Control; Monitoring, Reporting, and Data Verification; Water System Management and Operations; and Operator Compliance with State Requirements. Your public water system was evaluated for compliance with these eight elements and the following list of deficiencies comprises the findings of this inspection.

Significant Deficiencies

Significant Deficiencies cause, or have the potential to cause, the introduction of contaminants into water delivered to customers.

1. No Significant Deficiencies were cited as a result of this inspection.

Violations of Missouri Safe Drinking Water Regulations

These violations can result in enforcement action if repeated or not corrected. Some violations are more serious than others, and this is explained in the comments.

2. The well is not equipped with a sample tap located prior to treatment for source water sampling as required by Safe Drinking Water Regulation 10 CSR 60-4.025(3)(E).

A sample tap is needed to collect samples directly from the well prior to treatment so that distribution and source problems can be distinguished from each other. Locating the sample tap at a point where positive pressure is maintained makes it possible to collect samples without starting the pump each time. Samples collected before treatment reveals the condition of the raw source water.

Install a source water sample tap, which must be located to insure that untreated well water can be collected. The best source water sample tap location has a check valve between it and the point of chlorination. If the tap is not isolated from the chlorine injection point, then only collect source water samples when the well is running.

3. The public water system dispensed water without obtaining a written permit to dispense water in violation of Safe Drinking Water Regulation 10 CSR 60-3.010.

All public water systems must obtain a permit to dispense water to the public. There is no permit fee. A public water system must submit a permit to dispense application and must meet bacterial and chemical monitoring and maximum contaminant level requirements.

Submit the completed application for a permit to dispense and all required documentation, including a deed to the well property, to: Missouri Department of Natural Resources, Public Drinking Water Branch, Infrastructure, Permits and Engineering Section, P.O. Box 176,

Jefferson City, MO 65102, Phone 573-751-5331, Fax: 573-751-3110.

4. The well was not constructed in accordance with the Design Guide, Part 3.2, as required by Safe Drinking Water Regulation 10 CSR 60-3.010(1) and was either drilled or made to serve as a community water system after the October 1, 1979, grandfather deadline. The water system is utilizing a multi-family well that was constructed in 1998. After a five year lapse in use, the multi-family well was placed back in operation in late 2007 or early 2008 and has been in continuous operation since that time.

Subdivision wells drilled after the October 1, 1979, grandfather date that do not meet Design Guide standards, and pre-October 1, 1979, wells that are not in continuous operation or not serving community water systems until after that date but before January 1, 2013, are considered non-compliant but can continue to be used to supply a community public water system if the water supplier enters into a *Compliance Agreement* with the department and routine bacteriological samples remain safe. If the maximum contaminant level is exceeded or monitoring violations occur, then according to this agreement the well must be replaced with a state-approved well meeting Design Guide standards, a state-approved treatment system must be installed, or connection to another department-approved water system must be established.

Sign and return the *Compliance Agreement*, which will be mailed in the near future, within 15 calendar days of the date it is received.

Additional Regulatory Requirements

In addition to the regulatory violations listed above, there are other specific regulatory requirements that the public water system will be expected to comply with. As a newly activated public water system, the water system had not had an opportunity to address these requirements at the time of the inspection. Failure to address the items listed below may result in the items being cited as violations during future inspections or enforcement actions being initiated.

5. The public water system must develop a written total coliform bacteria sample siting plan as required by Safe Drinking Water Regulation 10 CSR 60-4.020(1)(A).

The regulations require each system to have a written plan that outlines bacteriological sampling points. The Microbiological Sample Siting Plan enclosed with this report will guide you in completion of an approved sampling plan.

Submit a written coliform sample siting plan to this office and keep a copy in your permanent water records. If you have further questions regarding completion of a sample siting plan, contact the Southwest Regional Office for assistance.

6. The public water system must establish a cross-connection control program as outlined in Safe Drinking Water Regulation 10 CSR 60-11.010.

Public water systems shall be designed and maintained to prevent contamination from being introduced into the system from back-pressure or back-siphonage. This cross-connection control program should include a cross-connection ordinance for cities and towns, a cross-connection clause in the user agreement for private utilities, and an inspection of all potential cross-connection sources such as car washes, school laboratories, beverage bottling plants, sewage treatment plants, facilities with boilers or fire sprinkler systems, mortuaries, irrigation systems, hospitals, and industrial manufacturing plants.

Whenever an unprotected cross-connection is discovered, it must be corrected by the customer installing a department-approved air gap or backflow prevention device. Air gaps and backflow prevention devices must be tested annually by a certified tester, and results of these tests must be kept in the public water system records for a period of five years and made available to the department inspector during inspections.

Establish a cross-connection control program.

7. The public water system must establish a lead plumbing ban program as outlined in Safe Drinking Water Regulation 10 CSR 60-10.040.

Missouri Safe Drinking Water Regulations require that as of January 1, 1989, materials used in the construction, expansion, modification, or improvement of a public water system or customer water system shall be lead free. Solder and flux containing not more than 0.2% lead and pipe fittings containing not more than 8.0% lead shall be considered lead free. Each public water system should develop a lead plumbing ban program including a lead plumbing ban ordinance for cities and towns, a lead plumbing ban clause in the user agreement for private utilities, and an inspection of new plumbing to ensure compliance.

As of January 4, 2014, the definition of lead free concerning the wetted surfaces of pipes, pipe fittings, plumbing fittings, and fixtures has changed in the Federal Safe Drinking Water Act to allow no more than a weighted average of 0.25% lead (there has been no change to the definition of lead free concerning solder and flux). It is no longer legal to sell or install components that fail to meet the new definition of lead free. Excluded from this are components used exclusively for non-potable service and for distribution gate valves that are two inches or greater in diameter. This law also applies to plumbers, homeowners and others who may install or repair plumbing, which may require changes to local building or plumbing codes to ensure compliance. Missouri regulations do not currently include this update to Federal law; however, the department strongly encourages you to incorporate the federal changes into any lead plumbing ban established.

Included with this report is the most recent update of the Summary of The Reduction of Lead in Drinking Water Act and Frequently Asked Questions.

Establish a lead plumbing ban program.

8. The community public water system commenced operation after October 1, 1999 and therefore must establish minimum Technical, Managerial and Financial (TMF) capacity requirements as required by Safe Drinking Water Regulation 10 CSR 60-3.030.

Minimum Technical Capacity Requirements shall include: conforming to the department's Standards for Community Public Water Supplies; having a sufficient number of operators certified as required in 10 CSR 60-14 to provide proper operation and maintenance of the system; having and maintaining an updated distribution system map showing, at a minimum, the size and location of all waterlines, valves, hydrants, storage facilities, pumping facilities, and water sources.

Minimum Managerial Capacity Requirements shall include: having an organization chart that shows every position that provides any drinking water function; having a designated person(s) who will receive customer environmental concerns; having a written rate structure and service fees; holding at least one public meeting prior to changing the rate structure or service fees; designating a person(s) to deal with compliance-related issues in accordance with the public drinking water regulations in 10 CSR 60.

Minimum Financial Capacity Requirements shall include: adherence to standard accounting practices; developing and implementing a system of collection of water fees that includes disconnection of service for non-payment or other measures for obtaining payment of fees; developing an annual budget showing public water system revenues and expenditures prepared at the end of each fiscal year; preparing a five-year capital improvement budget and capital improvement plan that will be updated annually; developing an operating reserve equal to or greater than one-tenth of the annual operations and maintenance budget to be used for operating and maintenance expenses only.

Demonstrate compliance with minimum TMF capacity requirements. The enclosed checklist may be used as a guide for items required to demonstrate compliance.

9. The public water system must develop and implement an emergency operation plan as required by Safe Drinking Water Regulation 10 CSR 60-12.010.

Each community public water system must develop and implement a plan for assuring, to the extent practicable, continuous water service under emergency conditions. This emergency

operation plan must include designation of a coordinator and key personnel to be on call under emergency conditions, designation of personnel authorized to expend funds under emergency conditions, a list of quarterly updated home and office telephone numbers of the coordinator, key operational personnel, state and local assistance sources, a list of alternative water systems which could be made available if the basic system were incapacitated, an inventory of emergency equipment, and written emergency procedures including those for tank truck disinfection and protection, installation of emergency chlorinators, and disinfection of trucked water.

The emergency operation plan is located at: http://www.dnr.mo.gov/env/wpp/eop/. Please complete and submit to the Southwest Regional Office, Attn: Darrell Barber. For a hard copy, please contact our office by calling 417-891-4300.

10. The public water system must develop and implement a Disinfection Byproduct Monitoring Plan as required by Safe Drinking Water Regulation 10 CSR 60-4.090(3).

As of January 1, 2004, all community and non-transient non-community public water systems using groundwater that add a chemical disinfectant to the water must develop and implement a plan to monitor for total trihalomethanes and other disinfection by-products. These contaminants are a family of chlorinated and brominated chemicals produced when chlorine reacts with organic matter in water, and which are known to increase the risk of cancer. The current standards set by the department are associated with little risk and are the levels currently considered safe.

Work to identify location(s) within the distribution system that represent the maximum residence time of the water in distribution during the month of the warmest water temperature. It is at these locations that the greatest concentration of disinfection by-products will be found. If you have questions or need assistance, contact Mr. Todd Eichholz, Missouri Department of Natural Resources, Public Drinking Water Branch, P.O. Box 176, Jefferson City, MO 65102, or by calling 573-751-4090.

Department Recommendations

These deficiencies are important and the public water system should give serious consideration to correction. However, these deficiencies are not normally subject to enforcement action unless the department determines that these are contributing to the failure of the public water system to provide an adequate volume of safe water to customers at sufficient pressure.

11. The public water system failed to maintain a minimum free chlorine residual of 0.5 mg/L at the well and failed to maintain a minimum total chlorine residual of 0.2 mg/L in the distribution as required by the Safe Drinking Water Regulation 10 CSR 60-4.055.

Due to a malfunction of a check valve in the chlorinator injector quill assembly, there was no

detectable chlorine residual in the water system at the well house (after detention). The total chlorine residual was 0.12 mg/L at 6425 Eagle Crossing.

The operator repaired the malfunctioning check valve during the inspection. No further action is required.

12. The well is not equipped with a means of measuring water levels.

A well should be equipped with a means of measuring the water level, which is normally a draw down tube and gauge. The tube is blown free of water with an air tank or hand pump. The gauge will read the feet of water standing over the pump. When the pump is started, the gauge reading will decline as the well water level falls and the feet of water over the pump decreases. When the gauge stabilizes, this will represent the feet of water over the pump at pumping condition. If the depth of the pump setting is known, these readings can be converted to static water level and pumping water level. These water levels tend to decline during prolonged droughts and during periods of heavy pumping by all wells in the vicinity. Decline of an adequate water level over the pump may result in pumping of accumulated oil from oil lubricated vertical turbine pump and may result in pumping of air and ultimate pump failure. It is important to have wells equipped with draw-down tubes and gauges and to periodically measure and record the static and pumping water levels. Draw-down tubes can only be installed when the pump is pulled.

The department recommends installing a draw-down tube and gauge the next time the well pump is pulled for repair or replacement.

13. Dead end mains are not equipped with flush hydrants.

All dead end mains should be eliminated by looping where practical. If these cannot be eliminated, each dead end main should be equipped with a flush hydrant to allow stale or contaminated water to be eliminated.

The department recommends installing flush hydrants at each dead end main.

14. The public water system is not maintaining an adequate map of the distribution system and records on valves and hydrants.

The public water system should maintain a map showing the location of every main along with other buried utilities (sewers, gas lines, cables, etc.) that could affect excavation for repairs. The map should show the nominal size, material of construction, class, and SDR or DR for each main. Note that Class 200 AWWA C900 PVC pipe and Class 200 ASTM D2241 PVC pipe have different dimensions so different fittings are needed for repairs so each Class 200 PVC main

must be properly identified. The map should show the location of each valve, fire hydrant, and flush hydrant and each should be identified (numbered). Each valve should have a separate sheet showing the identifications, location, type, size, manufacturer, model number, number of turns to close, direction of rotation, and space to show exercising records, repairs needed, and repairs made with dates. Each hydrant should have a separate sheet showing identification, location, type, manufacturer, model number, nozzle sizes, fire flow rating, standard color and space to show testing, and repairs needed and repairs made with dates. The map, valve records, and hydrant records should be updated after every new addition. Ideally, a master map and records should be kept in the permanent public water system records and working copies (photo reduced if needed) provided to each employee who makes repairs.

Maintain an adequate distribution system map.

15. The public water system does not have an adequate tank interior inspection and cleaning program.

The public water system should have a tank interior inspection and cleaning program with the following elements: a) Each tank interior should be inspected and cleaned every two to five years depending on silt build up; b) the type and general condition of the interior paint should be determined, especially on any paint that appears to be high in lead or chromium; c) glass-coated interiors should be inspected for cracking, corrosion and other signs of coating deterioration (spalling, cracking, leaking, etc.); d) if rusting is present, determine the approximate percent of rusted area, the extent, nature and depth of pitting, and the condition of the remaining coating (chalking, blistering, loose, blotchy, etc.); and, e) concrete structures should be inspected for signs of deterioration (spalling, cracking, leaking, etc.). All work shall be conducted in a clean and sanitary manner, and all surfaces shall be thoroughly cleaned and disinfected before a storage facility is returned to service. It is the responsibility of the public water system to either conduct or require water quality tests to demonstrate the good sanitary condition of the tank interior before it is returned to service. Follow all environmental laws and rules to dispose of chlorinated water, sludge debris and other wastes.

Develop and institute an adequate tank interior inspection and cleaning program.

16. The storage tank piping is not sufficiently valved to permit bypassing. Specifically, the bladder tanks are not equipped with isolation valves.

The storage tanks should be designed and constructed to allow tanks and reservoirs to be taken offline, drained, cleaned, repaired, and painted without causing a loss of pressure in the distribution system. This should include bypass piping and sufficient valves to the storage tank to permit continuous operation of the system even with the tanks offline.

SUBMITTED BY:

Darrell Barber
Environmental Specialist

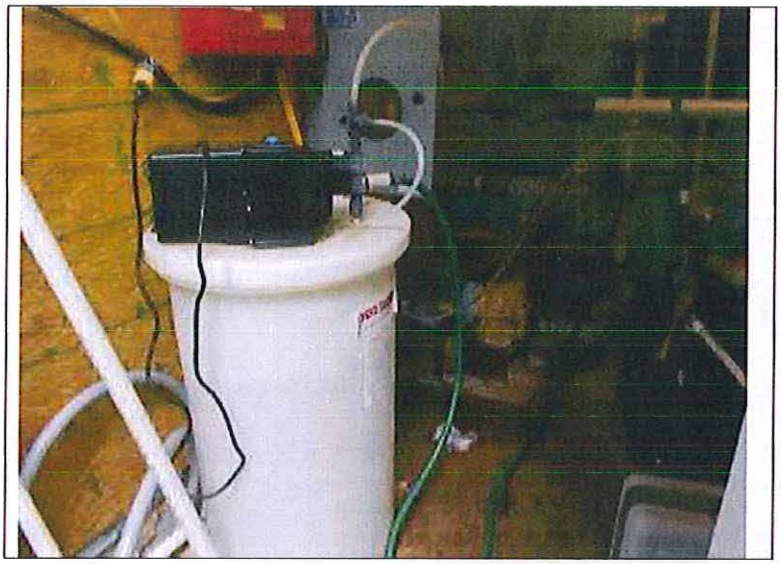
APPROVED BY:

Randy Bradley, Chief
Drinking Water Inspection Unit

Location: Eagle Woods Subdivision
Photographer: Darrell Barber
Photograph Date: June 11, 2014
Comments: Well, three 119-gallon bladder tanks and related piping.

Location: Eagle Woods Subdivision
Photographer: Darrell Barber
Photograph Date: June 11, 2014
Comments: Booster pumps (5-hp) and related piping.

Location: Eagle Woods Subdivision
Photographer: Darrell Barber
Photograph Date: June 11, 2014
Comments: Well house and two 4,500-gallon ground storage tanks.



Location: Eagle Woods Subdivision
Photographer: Darrell Barber
Photograph Date: June 11, 2014
Comments: Chem-Tech (Series 200) chemical feed pump, 25-gallon chlorine solution tank and related piping.

Mr. Chad Stout
Lake of the Ozarks Water and Sewer
840 Thunder Mountain Road
Camdenton, MO 65020

Ms. Denise Jordan
6507 Red Fox Lane
Osage Beach, MO 65065

Missouri Department of Natural Resources
Environmental Services Program

Order ID 140610007 **Program, Contact:** WPC Brittnie Brauner

Report Date: 06/24/2014 **LDPR/JobCode:** FEINS

RECEIVED
JUN 25 2014
DEQ/SWRO

Schedule JC-S4

Sample: AC28830

Customer #: 1410252

Facility ID: MO0123170 **Site:** Osage Water Comp. KK WWTF
County: Camden **Sample Reference ID:**
Collector: LAURA GERSON **Affiliation:** SWRO **Collect Date:** 6/10/2014 1:25:00PM
Entry Point:
Sample Comment: Grab; outfall 001.

UTM-Easting	Northing	Precision
1524891E	4221573N	

Test	Parameter	Result	Qualifier	Units	Method
Biochemical Oxygen Demand	Biochemical Oxygen Demand	20.5		mg/L	SM 5210-B
E. coli - IDEXX	E. coli - IDEXX	>2419.6		mpn/100ml	SM 9223B
Field Dissolved Oxygen	Field Dissolved Oxygen	3.02		mg/L	SM 4500-O-G
Field pH	Field pH	6.99		pH Units	EPA 150.1
Field Temperature	Field Temperature	21.6 C			EPA 170.1
Total Residual Chlorine	Total Residual Chlorine	0.05		mg/L	Field Dependent
Total Suspended Solids (TSS) / NFR	Total Suspended Solids (TSS) / NFR	6.00		mg/L	SM 2540-D

The analysis of this sample was performed in accordance with procedures approved or recognized by the U.S Environmental Protection Agency.

Lori Dunnie for Chris Boldt

Chris Boldt, Laboratory Manager
Environmental Services Program
Division of Environmental Quality

Qualifier Descriptions

01 Improper collection method
02 Improper preservation
03 Exceeded holding time
04 Analyzed by Contract Laboratory
05 Estimated value, detected below PQL
06 Estimated value, QC data outside limits
07 Estimated value, analyte outside calibration range
08 Analyte present in blank at > 1/2 reported value
09 Sample was diluted during analysis
10 Laboratory error
11 Estimated value, matrix interference
12 Insufficient quantity
13 Estimated value, true result is >= reported value
14 Estimated value, non-homogeneous sample
15 No Result - Failed Quality Controls Requirements
16 Not analyzed - related analyte not detected
17 Results in dry weight
18 Sample pH is outside the acceptable range
19 Estimated value
20 Not analyzed - Instrument failure
21 No result - spectral interference
22 pH was performed at the Laboratory
23 Contract Lab specific qualifier - see sample comments
24 No result - matrix interference
25 No Result: Excessive Chlorination
26 No Result: Excessive Dechlorination
ND Not detected at reported value

029. wpcp. Osage Water Comp KKWWTF. MO0123170 · x · 2014.06.25. ltr14. sam. x. rcvd

140610007

STATE OF MISSOURI
Jeremiah W. (Jay) Nixon, Governor Sara Parker Pauley, Director
DEPARTMENT OF NATURAL RESOURCES
dnr.mo.gov

June 21, 2016

Osage Water Company
PO Box 506
Mr. Gary Cover
Clinton, MO 64735

Dear Mr. Cover:

Missouri State Operating Permit (MSOP) MO0123170 was issued to Osage Water Company for the Osage Water Company-KK in Camden County. This permit sets forth specific effluent limitations, monitoring requirements, and specific permit conditions regarding the facility. Review of your Discharge Monitoring Report(s) for the **monitoring period(s) ending in January to March 2016** shows that the effluent limitations established in your MSOP have been exceeded. An exceedance of the effluent limitations established in your permit is a violation of the Missouri Clean Water Law (MCWL), Sections 644.051.1(3) and 644.076.1; Clean Water Commission Regulations 10 CSR 20-7; and your MSOP. The violations are listed on the enclosed Discharge Monitoring Report Exceedance List.

By **July 26, 2016**, please submit a written response to the address below which explains the reason(s) for the violation(s) and what steps you have taken or will take to prevent further violation(s) of the MCWL. As always, the department is willing to meet with you to discuss the violation(s) and the actions necessary to bring your facility into compliance. If you would like to schedule a meeting or have questions, please contact water pollution staff at 417-891-4300, by mail at 2040 W. Woodland, Springfield, MO 65807-5912, or by email at ronda.crabtree@dnr.mo.gov.

If you have already provided this information, the department appreciates your efforts to return your facility to compliance.

Sincerely,

SOUTHWEST REGIONAL OFFICE

Kevin Hess, Chief
Water Pollution Section

KH/rck

Enclosure: Discharge Monitoring Report Exceedance List

029.wpcp.OsageWaterCoKK.mo0123170.x.2016.06.21.fy16.dmrexcmd.x.ryc

Osage Water Company-KK
Camden County
MO0123170

DISCHARGE MONITORING REPORT EXCEEDANCE LIST

Outfall	Monitoring End Date	Parameter	Units	Permit Limitations	Reported Values
001	3/31/2016	Nitrogen, ammonia total (as N)	mg/L	1.9 - Monthly Avg.	4.89

MISSOURI DEPARTMENT OF NATURAL RESOURCES
PUBLIC DRINKING WATER PROGRAM
COMPLIANCE & OPERATIONAL INSPECTION

CLASS 2 INSPECTION FORM

INTERVIEWED >	Jim Heppler - Operator	DATE 4-27-2017
ID NUMBER MO5030015	SYSTEM NAME Eagle Woods Subd.	COUNTY Camden

ADDRESS | CITY | STATE | ZIP CODE | TELEPHONE NUMBER

COMMENTS AND RECOMMENDATIONS FOR CORRECTION
The following comments are referenced to the applicable checklist items attached to this form.

101. - PWS does not have a permit to dispense water
106. - PWS does not have an Emergency Operations Plan
108. - PWS does not have a Cross Connection Control Program
135/136. - Need distribution system map & valve records
143. - TMF
201/203. - Non-compliant well - successfully completed NCWA 1/22/2015
222. - Well is not equipped with drawdown measuring equipment
229. - PWS does not have a source of emergency power
315. - Booster pumps are not equipped with isolation valves
406. - Improper design of vents on ground storage tanks
410. - Exteriors of ground storage tanks need painted
416. - Tank inspection & cleaning program needed
420. - Trees & brush growing around tanks (honeysuckle vine on ladder)
435. - Bladder tanks aren't equipped with isolation values
103. - Final Construction Inspection needed for Ground Storage tanks, booster pumps & Chlorination system installed in 2008

Free Chlorine at well House 0.72 mg/L

Bacti sample collected from site 01 (6425 Eagle Crossing) was safe.
Free Chlorine & Total Chlorine residuals noted below

FREE & TOTAL CHLORINE RESIDUAL 0.67 & 0.79 mg/l ☑ Sample Collected & LOCATION 6425 EAGLE CROSSING

INSPECTOR'S SIGNATURE	TITLE
	ENV. SPEC. III

COMPLIANCE & OPERATIONAL CHECKLIST

Fill in the appropriate box and if "C", explain in the comment section on the front of this form.

☐ NA **ITEM #1 ADMINISTRATION**

C ok NA

- ☑ ☐ ☐ 101. **Permit to Dispense status** 10CSR60-3.010
- ☐ ☑ ☐ 102. **Construction permits** 10CSR60-3.010(1)(A)
- ☑ ☑ ☐ 103. **Final approvals** 10CSR60-3.010(1)(B)
- ☐ ☐ ☑ 104. **Owner supervised program** 10CSR60-10.010(2)(C)
- ☐ ☑ ☐ 105. **Certified Chief Operator** 10CSR60-14.010(4)
- ☑ ☐ ☐ 106. **Emergency operations plan** 10CSR60-12.010
- ☐ ☑ ☐ 107. **Lead ban ordinance** 10CSR60-10.040
- ☑ ☐ ☐ 108. **Backflow prevention program** 10CSR60-11.010
- ☐ ☐ ☑ 109. **Backflow device records** 10CSR60-11.010(7)(B)
- ☐ ☑ ☐ 110. **Primacy fees** 10CSR60-16.010
- ☐ ☑ ☐ 111. **Laboratory & administration fees** 10CSR60-16.030
- ☐ ☑ ☐ 112. **Coliform sampling plan** 10CSR60-4.020(1)(A)
- ☐ ☑ ☐ 113. **Pb/Cu Sampling plan** 10CSR60-15.070
- ☐ ☐ ☑ 114. **Turbidity reporting** 10CSR60-7.010(4)
- ☐ ☑ ☐ 115. **Disinfection reporting** 10CSR60-7.010(5)
- ☐ ☑ ☐ 116. **Private lab coliform results** 10CSR60-7.010
- ☐ ☑ ☐ 117. **Public notification requirements** 10CSR60-8.010
- ☐ ☐ ☑ 118. **Exemption/ variance requirements** 10CSR60-6.030
- ☐ ☐ ☑ 119. **Sludge management permit or plan** 10CSR20-8.170
- ☐ ☐ ☑ 120. **NPDES Permit on plant discharge** 10CSR20-6.010(5)
- ☐ ☑ ☐ 121. **Monitoring reports due by 10th** 10CSR60-7.010(1)
- ☐ ☑ ☐ 122. **Reporting regulation violations** 10CSR60-7.010(2)
- ☐ ☐ ☑ 123. **Reporting DBP & IESWTR** 10CSR60-7.010(6)
- ☐ ☐ ☑ 124. **Enhanced Filtration & Disinf. Reporting** 10CSR60-7.010(7)
- ☐ ☑ ☐ 125. **DBP Monitoring Plan** 10CSR60-4.090(3)
- ☐ ☑ ☐ 126. **Reporting for Lead & Copper** 10CSR60-7.020(4)
- ☐ ☑ ☐ 127. **Coliform results (5 yrs)** 10CSR60-9.010(1)(A)

C ok NA

- ☐ ☑ ☐ 128. **Operational records** 10CSR60-9.010(1)(A)
- ☐ ☑ ☐ 129. **Chemical results (10 yrs)** 10CSR60-9.010(1)(A)
- ☐ ☑ ☐ 130. **Violation actions (3 yrs)** 10CSR60-9.010(1)(B)
- ☐ ☑ ☐ 131. **Inspection Reports (10 yrs)** 10CSR60-9.010(1)(C)
- ☐ ☐ ☑ 132. **Variance/exemption records (5 yrs)** 10CSR60-9.010(1)(D)
- ☐ ☑ ☐ 133. **CCR** CFR 141.153
- ☐ ☑ ☐ 134. **Any system records requested** 10CSR60-9.010(2)
- ☑ ☐ ☐ 135. Updated distribution map
- ☑ ☐ ☐ 136. Individual valve records
- ☐ ☐ ☑ 137. Individual fire hydrant records
- ☐ ☑ ☐ 138. Individual flush hydrant records
- ☐ ☑ ☐ 139. Main Brk/Leak Repair Program
- ☐ ☑ ☐ 140. Valve Maintenance Program
- ☐ ☑ ☐ 141. Main Flushing Program
- ☐ ☑ ☐ 142. Operational/Maint. records
- ☑ ☐ ☐ 143. Other TMF

ITEM #2 SOURCE

☐ NA **Groundwater**

C ok NA

- ☑ ☐ ☐ 201. **Source of supply approved** 640.115(1)
- ☐ ☑ ☐ 202. **Well driller's permit (drilled after 1987)** 10CSR23-1.090
- ☑ ☐ ☐ 203. **Construction requirements** 10CSR60-10.010
- ☐ ☑ ☐ 204. **Sanitary construction defects** 10CSR60-4.080(5)
- ☐ ☑ ☐ 205. **Siting requirements** 10CSR60-10.020
- ☐ ☑ ☐ 206. **GWUDI determination** 10CSR60-4.055(1)
- ☐ ☑ ☐ 207. **Plugging abandoned wells** 10CSR23-3.110
- ☐ ☑ ☑ 208. Adequate number of wells
- ☐ ☑ ☑ 209. Weather protection
- ☐ ☑ ☐ 210. Security
- ☐ ☑ ☑ 211. Floor Drain
- ☐ ☑ ☑ 212. Heating/venting/dehumidification
- ☐ ☑ ☐ 213. Lighting
- ☐ ☑ ☑ 214. Chemicals in well house
- ☐ ☑ ☐ 215. Top of well at least:
  - *4' above flood level
  - *above floor 12" min.
  - *above ground 18" min.
  - *approved casing & grout

C ok NA

- ☐ ☐ ☑ 216. Grand fathered
- ☐ ☑ ☐ 217. Vent screen/down turned
- ☐ ☑ ☐ 218. Vent 18" above floor
- ☐ ☑ ☐ 219. Vent adequate size
- ☐ ☑ ☐ 220. Pump capacity
  - _____ gpm @ _____ psi
  - _____ gpm @ _____ psi
- ☐ ☑ ☐ 221. Well meter, operable
- ☑ ☐ ☐ 222. Drawdown measuring equip.
- ☐ ☑ ☐ 223. Pressure Gauge-operable
- ☐ ☑ ☐ 224. Shutoff Valve
- ☐ ☑ ☐ 225. Check Valve
- ☐ ☑ ☐ 226. Wellhead sealed
- ☐ ☑ ☐ 227. Piping condition
- ☐ ☑ ☐ 228. Raw water sample tap past check valve
- ☑ ☐ ☐ 229. Auxiliary power supply
- ☐ ☐ ☑ 230. Pitless Unit, no adapter
- ☐ ☐ ☑ 231. Valve vault adequate size, drained, & provide safe access
- ☐ ☐ ☑ 232. Vertical Shaft Turbine Pumps Air Release - screened, down turned, 18" above floor
- ☐ ☑ ☐ 233. Security
- ☐ ☐ ☐ 234. Other _____

☒ NA **Reservoirs**

C ok NA

- ☐ ☐ ☒ 235. **Source of supply approved** 640.115(1)
- ☐ ☐ ☒ 236. **Dam safety permit (dams >35' tall)** 10CSR22-2.020(4)
- ☐ ☐ ☐ 237. **Dam maintenance & monitoring** 10CSR22-3.030(1)(B)
- ☐ ☐ ☐ 238. **Recreational use plan** 10CSR60-10.030
- ☐ ☐ ☒ 239. **Siting requirements** 10CSR60-10.020
- ☐ ☐ ☐ 240. Quality of water
- ☐ ☐ ☐ 241. Capacity adequate for drought
- ☐ ☐ ☐ 242. Does system have storage curves
- ☐ ☐ ☒ 243. Stadial marker & weekly records
- ☐ ☐ ☐ 244. Siltation control structure condition
- ☐ ☐ ☐ 245. Watershed management plan
- ☐ ☐ ☐ 246. Algae control program
- ☐ ☐ ☐ 247. Dam maintenance (mowing, brush, rodents)
- ☐ ☐ ☒ 248. Erosion control
- ☐ ☐ ☐ 249. No flow obstructions in spillway entrance
- ☐ ☐ ☐ 250. Condition of spillway
- ☐ ☐ ☐ 251. Spillway discharge condition

COMPLIANCE & OPERATION CHECKLIST

Fill in the appropriate box and if "C", explain in the comment section on the front of this form.

ITEM #2 SOURCE (CONT.)

Groundwater — NA

C ok NA

- 252. Discharge stream erosion
- 253. Discharge stream obstructions
- 254. Emergency spillway condition
- 255. Other _____

Rivers & Streams — NA

C ok NA

- **256. Source of supply approved** 640.115(1)
- 257. Quality of Water
- 258. Capacity during drought
- 259. Raw water storage capacity & condition
- 260. Coffer dam condition
- 261. Intake protection
- 262. Vandalism control
- 263. Other _____

Intakes — NA

C ok NA

- 264. Adequacy of water withdrawal levels
- 265. Capacity of water inlets
- 266. Water Inlets screened
- 267. Condition of intake control valves
- 268. Intake tower condition
- 269. Safety cable on intake hoses
- 270. Floats properly anchored
- 271. Wench and cable condition
- 272. Discharge pipe capacity
- 273. Vandalism control
- 274. Intake protected from flood damage
- 275. Zebra mussel control program
- 276. Other _____

ITEM #3 PUMPING STATIONS

Raw & Finish Water Pumping — NA

C ok NA

- 301. Pumping capacity
- 302. Adequate number of pumps
- 303. Pump operable during flooding
- 304. Sized for pump maintenance
- 305. Pump room access
- 306. Adequate safety equipment
- 307. Heating and venting
- 308. Drains and sumps
- 309. Lighting (int&ext)
- 310. Power supply
- 311. Telemetry & pump control
- 312. Pressure Gauges
- 313. Metering-operable
- 314. Pump piping condition
- 315. Other ISOLATION VALVES FOR PUMPS

Finished Water Pumping — NA

C ok NA

- 316. Pressure _____ psi
- 317. Flow _____ gpm
- 318. HP _____; Phase 3__ or 1__
- 319. Other _____

ITEM #4 STORAGE

Unpressurized Storage — NA

C ok NA

- **401. Storage covered & vented** 10CSR60-4.080(7)
- **402. Approved chemicals, materials, & coatings** 10CSR60-4.080(8)
- **403. Sanitary Defects** 10CSR60-4.080(5)
- 404. Adequate capacity
- 405. Overflow
  - *12" to 24" above ground
  - *Screened or flap valve
- 406. Vent screened (IMPROPER VENT)
- 407. Access hatch locked
  - 2" overlap, 4" to 6" curbing
- 408. Manway
- 409. Access ladder & appurtenances condition
- 410. Exterior paint condition
- 411. Unsealed openings
- 412. Security
- 413. Isolation for maintenance
- 414. Roof watertight & properly drained
- 415. Adequate drain
- 416. Inspection Program
- 417. Protection-vandalism, animals, etc.
- 418. Condition of valve vault
- 419. Sample Tap
- 420. Trees/Brush cleared
- 421. Other _____

Pressure Tanks — NA

C ok NA

- 422. Drain
- 423. Water sight glass
- 424. Manway
- 425. Pressure Gauge
- 426. Compressor
- 427. Air blow off
- 428. Controls
- 429. Exterior paint condition
- 430. Capacity
  - No. of Tanks 3, Dia.____,
  - Circ. ___, Ht/Length 1
  - Volume Ea. 119 gal
- 431. Total Capacity 357 gal
- 432. Water logged
- 433. Exterior paint condition
- 434. Bladder tank drawdown
  - Capacity _____ ea. _____ gal
  - Capacity _____ ea. _____ gal
  - Capacity _____ ea. _____ gal
- 435. Other ISOLATION
- 436. Other _____

ITEM #5 DISTRIBUTION

NA

C ok NA

- **501. Minimum Pressure** 10CSR60-4.080(9)
- **502. New mains & repairs disinfected** 10CSR60-4.080(6)
- **503. Main & sewer separation** 10CSR60-10.010(2)
- **504. Approved Chemicals, materials, & coatings** 10CSR60-4.080(8)
- 505. Water loss ≤ 10%
- 506. Adequate cleanouts, valves, and hydrants to flush system
- 507. Individual customer meter
- 508. Portable shoring available
- 509. Other _____

ITEM #6 MCL/MONITORING

NA

C ok NA

- **601. Microbiological MCL** 10CSR60-4.020(7)
- **602. Total Coliform Monitoring** 10CSR60-4.020
- **603. Inorganic chemicals** 10CSR60-4.030
- **604. Nitrates/Nitrites** 10CSR60-4.030(2)(C) & (D)
- **605. Synthetic organic chemicals** 10CSR60-4.040
- **606. Monthly turbidity MCL** 10CSR60-4.050(2)(A)1 small or 10CSR60-4.050(3)(B)1 large
- **607. Acute turbidity MCL** 10CSR60-4.050(2)(A)2 small or 10CSR60-4.050(3)(B)2 large
- **608. Report acute turbidity MCL** 10CSR60-4.050(2)(D) small or 10CSR60-4.050(3)(D) large
- **609. Continuous turbidity monitoring** 10CSR60-4.040(3)(E)1
- **610. Disinfection Profiling** 10CSR60-4.055(6)(C)
- **611. Radio- nuclides** 10CSR60-4.060
- **612. Secondary contaminants** 10CSR60-4.070

COMPLIANCE & OPERATIONAL CHECKLIST

Fill in the appropriate box and if "C", explain in the comment section on the front of this form.

☐☐☑ 613. **Fluoride supplementation** 10CSR60-4.080(11)
☐☑☐ 614. **Disinfection By-Products (DBP) TTHM & HAA5** 10CSR60-4.090(3)(B)
☐☑☐ 615. **DBP Chlorite** 10CSR60-4.090(3)(B)2
☐☑☐ 616. **DBP Bromate** 10CSR60-4.090(3)(B)3
☐☑☐ 617. **DBP Precursors TOC & Alkalinity** 10CSR60-4.090(3)(D)
☐☑☐ 618. **Volatile organic chemicals** 10CSR60-4.100
☐☑☐ 619. **Unregulated chemicals** 10CSR60-4.110
☐☑☐ 620. **Exceed Pb/Cu levels** 10CSR60-15.020-15.050
☐☑☐ 621. **Operational Monitoring** 10CSR60-4.080(3)
☐☑☐ 622. **Disinfection Requirements** 10CSR60-4.055

☐ NA ***ITEM #7 DISINFECTION***
C ok NA
☐☑☐ 701. **Minimum residual - entry** 10CSR60-4.055(3)
☐☑☐ 702. **Maximum residual - Dist. System** 10CSR60-4.055(5)
☐☑☐ 703. **Minimum residual - Dist. System** 10CSR60-4.055(4)
☐☑☐ 704. **Cl_2 Monitoring - Dist. System** 10CSR60-4.055(4)(E)
☐☑☐ 705. **Monitoring frequency** 10CSR60-4.055(3)(F)
☐☑☐ 706. **Low residual reporting** 10CSR60-4.055(3)(E)
☐☐☑ 707. **CT study done** 10CSR60-4.055(2)(D)
☐☐☑ 708. **Meeting CT requirement** 10CSR60-4.055(2)(C)
☐☐☑ 709. **Add Cl prior to ammonia** 10CSR60-4.055(3.A)
☐☐☑ 710. **Add Cl prior to filters** 10CSR60-4.055(3.C)
☐☑☐ 711. **Operated/Supervised adequately/Operational Monitoring** 10CSR60-4.080(5)

☐ NA **Liquid Chlorinator**
C ok NA
☐☑☐ 712. Physical condition of feeder
☐☑☐ 713. Adequate detention
☐☑☐ 714. Corrosion in room
☐☑☐ 715. Adequate feed control
☐☑☐ 716. Adequate venting, heating, lighting
☐☑☐ 717. Security
☐☐☐ 718. Other _____

☒ NA **Gas Chlorinator**
C ok NA
☐☐☐ 719. Adequate detention
☐☐☐ 720. Separate Cl_2 room
☐☐☐ 721. Interior wall view window
☐☐☐ 722. Panic bar door
☐☐☐ 723. Fan suction near floor
☐☐☐ 724. Inlet near ceiling
☐☐☐ 725. Chains n Cl_2 cylinders
☐☐☐ 726. Cylinders on scales
☐☐☐ 727. Exterior fan/light switch
☐☐☐ 728. SCBA
☐☐☐ 729. Ammonia bottle
☐☐☐ 730. Leak detection/repair kit
☐☐☐ 731. Shower & eye wash
☐☐☐ 732. Hydrocarbons in room
☐☐☐ 733. Sample tap Past Cl_2
☐☐☐ 734. Condition of room
☐☐☐ 735. Security
☐☐☐ 736. Other _____

☒ NA **Other Types**
C ok NA
☐☐☐ 737. _____
☐☐☐ 738. _____
☐☐☐ 739. _____

☒ NA ***ITEM #8 TREATMENT***
C ok NA
☐☐☐ 801. **Approved chemicals, materials & coatings** 10CSR60-4.080(8)
☐☐☐ 802. **Aeration** 10CSR60-4.080(5)
☐☐☐ 803. **Chemical Application** 10CSR60-4.080(5)
☐☐☐ 804. **Corrosion Control Treatment** 10CSR60-15.010(4)
☐☐☐ 805. **Mixing** 10CSR60-4.080(5)
☐☐☐ 806. **Settling** 10CSR60-4.080(5)
☐☐☐ 807. **Filtration** 10CSR60-4.080(5)
☐☐☐ 808. **H.S. pumps** 10CSR60-4.080(5)
☐☐☐ 809. **Other pumps** 10CSR60-4.080(5)
☐☐☐ 810. **Control equipment** 10CSR60-4.080(5)
☐☐☐ 811. **Plant water storage** 10CSR60-4.080(5)
☐☐☐ 812. **Operational Monitoring** 10CSR60-4.080(5)
☐☐☐ 813. **Carbon feed room separate/explosion proof** 10CSR60-4.080(5)

☒ NA **Fluoride**
C ok NA
☐☐☐ 814. **Sample submittal** 10CSR60-4.080(11)

☐☐☐ 815. Adequate lab equipment
☐☐☐ 816. Fluoride pump operable
☐☐☐ 817. Sample tap 100 pipe dia. past feed
☐☐☐ 818. Day tank
☐☐☐ 819. Vented to outside
☐☐☐ 820. Other _____

☒ NA **Ion Exchange Softening**
C ok NA
☐☐☐ 821. Adequate size
☐☐☐ 822. Condition of softener
☐☐☐ 823. Metered for bypassing
☐☐☐ 824. Condition of salt storage
☐☐☐ 825. Other _____

☒ NA **Aeration**
C ok NA
☐☐☐ 826. Capacity
☐☐☐ 827. By-passing for maintenance
☐☐☐ 828. Side access & drainage
☐☐☐ 829. Access to inlet distributor
☐☐☐ 830. Condition of air screens
☐☐☐ 831. Access for screen cleaning
☐☐☐ 832. Condition of media or trays
☐☐☐ 833. Condition fan & drive motor
☐☐☐ 834. Condition support structure
☐☐☐ 835. Condition of paint
☐☐☐ 836. Other _____

☒ NA **Rapid Mixing**
C ok NA
☐☐☐ 837. Mixing detention
☐☐☐ 838. Adequate mixer capacity
☐☐☐ 839. Condition of mixer
☐☐☐ 840. Mixer maintenance
☐☐☐ 841. Other _____

☒ NA **Flocculation**
C ok NA
☐☐☐ 842. Adequate capacity
☐☐☐ 843. Provisions for cleaning
☐☐☐ 844. Provisions for draining
☐☐☐ 845. Mixer condition
☐☐☐ 846. Mixer capacity
☐☐☐ 847. Mixer access for maintenance
☐☐☐ 848. Short circuiting thru basin
☐☐☐ 849. Condition of basin
☐☐☐ 850. SS testing at taps
☐☐☐ 851. Other _____

☒ NA **Sedimentation**
C ok NA
☐☐☐ 852. Pre-sed. condition & capacity
☐☐☐ 853. Regular sed. purpose & cap.
☐☐☐ 854. Condition of structure
☐☐☐ 855. Maintain units w/ continuous operation
☐☐☐ 856. Condition Inf. & Eff. facilities

COMPLIANCE & OPERATIONAL CHECKLIST

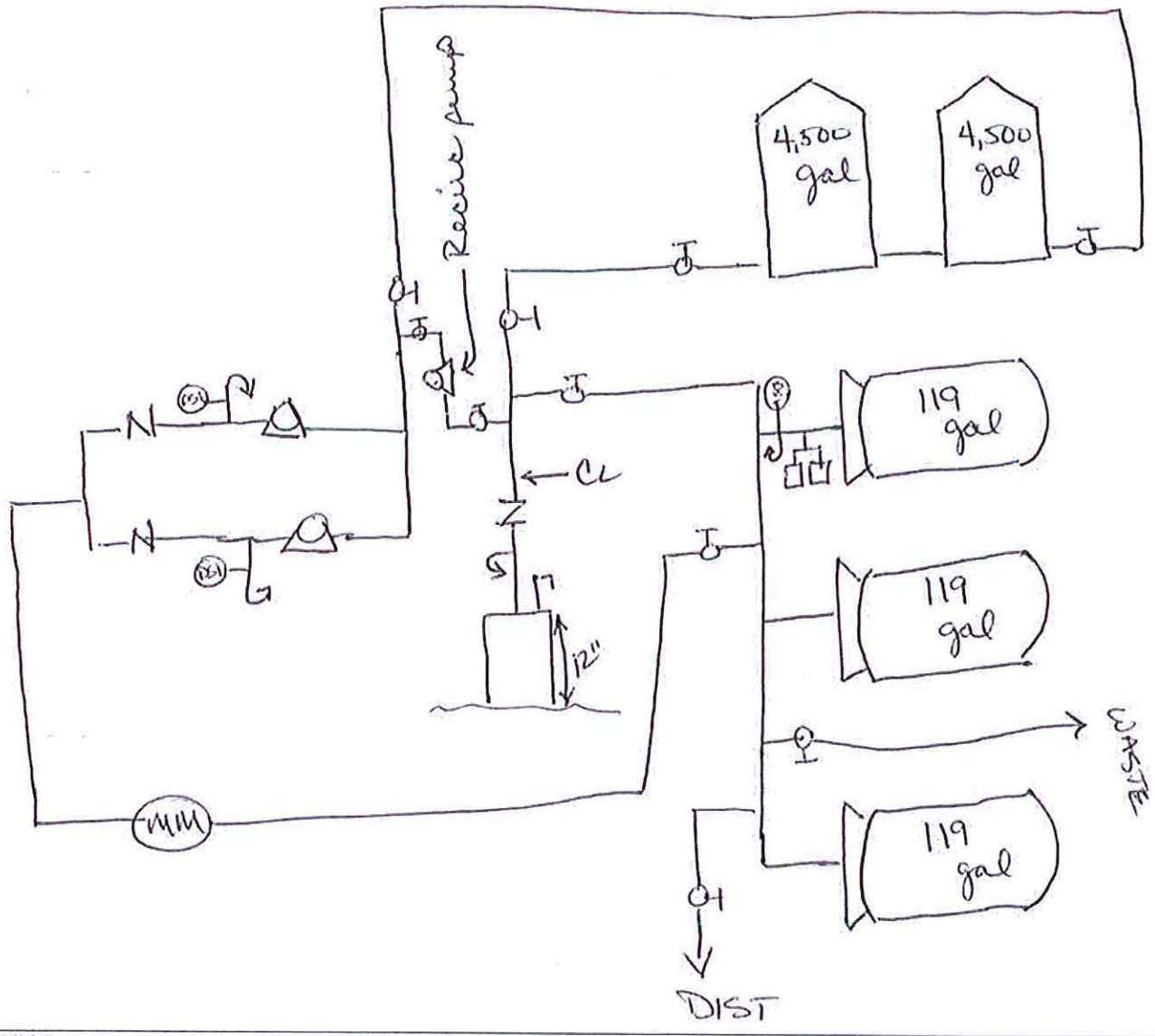
Fill in the appropriate box and if "C", explain in the comment section on the front of this form.

857. Short circuiting in basin	NA / C / ok / NA — **Filtration**	NA / C / ok / NA — **Plant Information**
858. Adequacy of sludge removal	862. Appropriate type	870. General Condition
859. Condition of sludge equipment	863. Adequate number for continuous operation	871. Proper Lab equipment
860. Adequacy of sludge lines	864. Condition of media	872. Calibration standards
861. Other _____	865. Maintenance Plan	873. Tests according to directions
	866. On-line Turbidimeters on each filter/calibrated	874. Other _____
	867. Backwash rate & duration	875. Other _____
	868. Adequate backwash method	876. Other _____
	869. Other _____	

System Information for 12 Months

Number of Active Services 34
Avg. Daily Produced 4,500 gal/Purchased _____ gal
Max. Daily Produced _____ gal/Purchased _____ gal
Water Loss _____ %

Population Served 85
Avg. Daily Supplied to Secondary Systems 0 gal
Max. Daily Supplied to Secondary Systems 0 gal
Total Storage 9,000 gal



Missouri Department of NATURAL RESOURCES
dnr.mo.gov
Eric R. Greitens, Governor
Carol S. Comer, Director

August 29, 2017

Ms. Jessica Braden
Great Southern Bank
P.O. Box 68
Springfield, MO 65801

UNSATISFACTORY FINDINGS
RESPONSE REQUIRED

Dear Ms. Braden:

Staff from the Missouri Department of Natural Resources (Department) conducted an inspection on August 9, 2017, of the Reflections Condos public water system (system). The system operates under the public water system identification number MO3071337. Compliance with Safe Drinking Water Law was evaluated.

Please refer to the enclosed report for details of identified Unsatisfactory Findings and required actions. **A written response documenting actions taken to correct the violations is required by the date specified in the report.**

The Department records will document continued non-compliance of the environmental laws and regulations until the required actions are completed. Please understand that ongoing violations of laws will result in a follow-up inspection. In addition, enforcement actions, including the assessment of monetary penalties, may be pursued.

This system was referred to the Public Drinking Water Branch for enforcement on October 7, 2009. Additional comments may be forthcoming from the Public Drinking Water Branch following receipt and review of this report. For questions concerning this enforcement action, please contact Mr. Lance Dorsey with the Public Drinking Water Branch at P.O. Box 176, Jefferson City, MO, 65102; telephone 573-751-5331.

If you have any questions or would like to schedule a time to meet with Department staff to discuss compliance requirements, please contact Mr. Darrell Barber of this office by calling

417-891-4300, by email at darrell.barber@dnr.mo.gov, or via mail at Southwest Regional Office, 2040 West Woodland, Springfield, Missouri 65807-5912.

Sincerely,
SOUTHWEST REGIONAL OFFICE

Mark Rader, Chief
Drinking Water Section

MDR/dbw

Enclosure

c: Mr. Lance Dorsey, Public Drinking Water Branch
Mr. Brian Fredrick, Water Resource Center
Ms. Brandy Gelber, Public Drinking Water Branch
Ms. Airin Haselwander, Wellhead Protection Section
Mr. Tim Ripley, Sampler – Lake of the Ozarks Water & Sewer
Reflections Condominium Owners Association, Inc.

029.pdwp.ReflectionsCondos.mo3071337.x.2017.08.29.fy18.ins.x.dab

Carbon Copy Address Attachment
Include each individual identified in the carbon copy line in one of the groups below.

Physical Addresses:

Mr. Tim Ripley
Lake of the Ozarks Water & Sewer
840 Thunder Mountain Rd
Camdenton, MO 65020

Reflections Condominium Owners Association, Inc.
c/o Professional Management Group, Inc.
P. O. Box 2409
Lake Ozark, MO 65049

Email Addresses: (for those that have indicated this is the preferred method of receipt; also for SWRO staff – list names only)

Mr. Brian Fredrick, Water Resource Center
Ms. Airin Haselwander, Wellhead Protection Section

Exchange Drive: (simply list the individuals)

Mr. Lance Dorsey, Public Drinking Water Branch
Ms. Brandy Gelber, Public Drinking Water Branch

Missouri Department of Natural Resources
Southwest Regional Office/Public Drinking Water Branch
Report of Inspection
Reflections Condos
Camden County, Missouri
Public Water System ID Number MO3071337
August 29, 2017

Introduction

A routine inspection was made by the Missouri Department of Natural Resources (Department) of the transient non-community public water system serving Reflections Condos on August 9, 2017. The purpose of the inspection was to determine compliance with Missouri Safe Drinking Water Law and Regulations. The inspection reviewed all eight critical components applicable to the public water system.

The following people were present at the time of the inspection:

Reflections Condos
Mr. Tim Ripley, Sampler – Lake of the Ozarks Water & Sewer, 573-346-2092

Missouri Department of Natural Resources:
Mr. Darrell Barber, Environmental Specialist

Facility Description and History

The system serves approximately 50 people in the condominium complex through 52 connections. The system is supplied by a single state-approved well and operates year-round.

The well was drilled in 2001 to a depth of 900 feet with six-inch casing to a depth of 440 feet. The submersible pump is set at 357 feet and is rated at 125 gallons per minute. There is no treatment of the water. System pressure and storage are provided by seven Well-X-Trol model WX-350 bladder type pressure tanks.

Reflections Condos was referred to the Public Drinking Water Branch on October 7, 2009 for violations of Missouri Safe Drinking Water Law (Section 640.115 RSMo) and Missouri Safe Drinking Water Regulation (10 CSR 60-10.010 and 10 CSR 60-3.010). As documented below, the violations that led to this referral have not been corrected.

No changes occurred since the last inspection on January 9, 2013.

The system is located in the Lake of the Ozarks Watershed (10290109).

There is an abandoned well located approximately 135 feet from the public water system's well. This well is located on property that is not owned by the public water system or the condominium owner's association. However, due to the potential for the abandoned well to serve

as a contamination source that could contaminate the public water system's well, the public water system should consider working with the owner of the abandoned well and the Department's Wellhead Protection Program to properly plug the abandoned well. For guidance on properly plugging the well, please contact Ms. Airin Haselwander in the Wellhead Protection Section at 573-368-2196.

Discussion of Inspection and Observation

I contacted Mr. Tim Ripley on August 3, 2017, to schedule a compliance and operations inspection for August 9. The inspection was conducted during normal business hours.

Upon arrival I met with Mr. Tim Ripley and discussed the scope and the purpose of the inspection. I followed Mr. Ripley to the well house and reviewed the well and the bladder tanks. Photos were taken of the system components. Upon completion of the inspection, I collected a bacteriological sample from sample site 04.

I reviewed the records for the system, and they were adequate.

The system is a registered major water user (ID No. 51538494). More information about major water users and on-line registration is available at http://dnr.mo.gov/geology/wrc/mwu-forms.htm. If you have questions regarding major water user or annual reporting requirements, please call Mr. Brian Fredrick at 417-891-4392.

Sampling and Monitoring

One drinking water sample was collected from the outside faucet on the condominium building at 748 Pershing Dr. (sample site 04) and was submitted for microbiological analysis to the Missouri State Public Health Laboratory. The sample tested total coliform absent or "safe". No chlorine residuals were detected within the distribution system as expected for an untreated facility.

There were no monitoring or maximum contaminant level violations during the last 24 months.

Compliance Determination and Required Actions

The facility is not in compliance with Missouri Safe Drinking Water Regulations based on observations made during the inspection.

Unsatisfactory Findings

For all Unsatisfactory Findings listed below, a written response documenting actions taken to correct the violations is required by **September 29, 2017.**

1. The public water system does not have a permit to dispense water as required by Safe Drinking Water Regulation 10 CSR 60-3.010(2)(A).

All public water systems must obtain a permit to dispense water to the public. There is no permit fee. A public water system must submit a permit to dispense application and must meet bacterial and chemical monitoring and maximum contaminant level requirements.

REQUIRED ACTION: Complete the enclosed application for a permit to dispense and submit it with all required documentation, including a deed to the well property, to: Missouri Department of Natural Resources, Public Drinking Water Branch, Infrastructure, Permits and Engineering Section, P.O. Box 176, Jefferson City, MO 65102, Phone 573-751-5331, Fax: 573-751-3110.

2. The public water system failed to construct the public water system in accordance with approved plans and specifications in violation of Safe Drinking Water Regulation 10 CSR60-10.010(4). Specifically, the water system failed to construct the standpipe storage tank as proposed and approved by the Department's August 6, 2009, construction authorization (project number 54556-09). Additionally, the water system failed to reconstruct the water main as proposed and approved by the Department's November 28, 2007, construction authorization (project number 54327-07).

All community public water systems must obtain written authorization (a construction permit) from the Department prior to construction, alteration, or extension of the water system. Any deviation from the approved plans and specifications affecting capacity, hydraulic conditions, operating units, the functioning of water treatment processes, or the quality of water to be delivered must be approved in writing before such changes are made. Revised plans and specifications shall be submitted to the Department for review and approval before any construction work affected by such changes is started.

Within 90 calendar days of the date of this report, the public water system shall submit two copies each of the previously-approved engineering report, plans, and specifications along with an application for a new construction permit to the Missouri Department of Natural Resources, Public Drinking Water Branch, P.O. Box 176, Jefferson City, Missouri 65102, 573-751-5331, for construction/completion of the public water system in accordance with the previously-approved engineering report, plans, and specifications. Specifically, the water system shall construct the previously approved standpipe storage tank and reconstruct the water main.

Recommendations

1. The hydropneumatic (pressure) tanks do not provide adequate storage volume. Also, the use of hydropneumatic storage as the only source of storage is not appropriate for the size of the water system.

Hydropneumatic (pressure) tanks are acceptable as the only storage facilities for small water systems with 50 or fewer connections. The gross volume for hydropneumatic storage should be 35 gallons per capita and a usable volume of 6.25 gallons per capita. Since the system has a design population of approximately 156 people (three persons per dwelling unit) the usable hydropneumatic tank capacity should be 975 gallons, while the actual capacity is 245.7 gallons. This calculation is based on the specifications for a WX-350 model tank, which provides 35.1 gallons drawdown at 40/60 cut in and cut out pressures (7 tanks X 35.1 gallons = 245.7 gallons). The minimum storage capacity for non-hydropneumatic systems, not providing fire protection, shall be equal to the average daily consumption. Note: the recommended storage volume does not include any allowance for future development of the condominium complex.

Continued use of hydropneumatic storage as the only means of storage is not recommended. There may be other options that are more appropriate for this system. Please consult your engineer to determine a more specific solution to address your storage needs. A construction permit must be obtained to construct the additional storage needed for this public water system. To obtain this construction permit, submit two copies of an engineering report, plans, and specifications each bearing the seal of a professional engineer registered in Missouri along with an application for a construction permit to Missouri Department of Natural Resources, Public Drinking Water Branch, P.O. Box 176, Jefferson City, MO 65102, 573-751-5331.

2. The water system has piping components that do not comply with AWWA standards. Specifically, the piping in the well house includes sections of four-inch solvent-welded plastic pipe.

AWWA standards require all piping larger than two inches to be bolted-flanged mechanical joint, threaded or fusion welded pipe. Plastic piping is more susceptible to failure over time and should be replaced.

The Department recommends replacing the plastic piping in the well house.

Signatures

SUBMITTED BY:

Darrell Barber
Environmental Specialist
Southwest Regional Office

REVIEWED BY:

Judith Charlton, Chief
Drinking Water Inspection Unit
Southwest Regional Office

Attachments

Photograph Addendum 1 through 4
Permit to Dispense Application for Transient Noncommunity Water Systems

MISSOURI DEPARTMENT OF NATURAL RESOURCES
DIVISION OF ENVIRONMENTAL QUALITY

PHOTOGRAPH ADDENDUM

REGIONAL OFFICE
Southwest Regional Office

PHOTOGRAPH# 1
TAKEN BY: Darrell Barber
ENTITY: Reflections Condos
PERMIT: MO3071337
LOCATION: Inside well house
DESCRIPTION: Well #1 and related discharge piping.
DATE TAKEN: August 9, 2017
PROGRAM: Public Drinking Water Branch

PHOTOGRAPH# 2
TAKEN BY: Darrell Barber
ENTITY: Reflections Condos
PERMIT: MO3071337
LOCATION: Inside well house
DESCRIPTION: Seven (7) 119-gallon bladder tanks. Piping in well house includes four inch solvent-welded PVC piping, which is not recommended. Storage was not constructed per the approved plans and specifications.
DATE TAKEN: August 9, 2017
PROGRAM: Public Drinking Water Branch

PHOTOGRAPH# 3
TAKEN BY: Darrell Barber
ENTITY: Reflections Condos
PERMIT: MO3071337
LOCATION: Parking lot by garages and condo buildings.
DESCRIPTION: Water main is suspended over the side of the rock bluff – was not properly buried as required by the approved plans and specifications.
DATE TAKEN: August 9, 2017
PROGRAM: Public Drinking Water Branch

PHOTOGRAPH# 4
TAKEN BY: Darrell Barber
ENTITY: Reflections Condos
PERMIT: MO3071337
LOCATION: Southeast of well house
DESCRIPTION: Abandoned well approximately 135 feet from the public water system well for Reflections Condos. The abandoned well is not located on property owned by Great Southern Bank or Reflections Condominium Owners Association, Inc.
DATE TAKEN: August 9, 2017
PROGRAM: Public Drinking Water Branch

Kathleen Spero
Abandoned Well Report
August 9, 2017

Owner and contact information: Kathleen Spero property (adjacent to Reflections Condominiums) near 370 Pershing Dr., Sunrise Beach, MO
GPS Coordinates: Latitude: 38.13091 Longitude: -92.821043
Photographer: Darrell Barber
Date: August 9, 2017
Comments: Abandoned private well located on a parcel owned by Kathleen Spero, which is adjacent to a PWS well for Reflections Condominiums (MO3071337).

IN THE CIRCUIT COURT OF CAMDEN COUNTY, MISSOURI

CENTRAL STATES WATER RESOURCES, INC. Plaintiff, v. GREAT SOUTHERN BANK 14309 Highway 13 Reeds Spring, MO 65737 REFLECTIONS SUBDIVISION MASTER ASSOCIATION, INC. 120 S Central Ave., Suite 1600 Saint Louis, MO 63105 and REFLECTIONS CONDOMINIUM OWNERS ASSOCIATION, INC. 3524 Osage Beach Pkwy PO Box 2409 Lake Ozark, MO 65049 Defendants.	)	No.

PETITION FOR INJUNCTION & DECLARATORY RELIEF

Comes now, Plaintiff, Central States Water Resources, Inc. ("Plaintiff"), and, for its Petition, states the following:

Facts Common to All Counts

1. Plaintiff is a Missouri corporation with its principal offices located at 500 Northwest Plaza Drive, Suite 500, Saint Ann, St. Louis County, Missouri 63074.

2. Defendant Great Southern Bank is a Missouri corporation. According to records filed with the Missouri Secretary of State, the address of Great Southern Bank's registered agent is 14309 Highway 13, Reeds Spring, MO 65737. The same records

indicate that Great Southern Bank's principal offices are located at 1451 E. Battlefield, Springfield, Greene County, MO 65810.

3. Defendant Reflections Subdivision Master Association, Inc. ("Association") is a Missouri nonprofit corporation. According to records filed with the Missouri Secretary of State, the address of the Association's registered agent is 120 S Central Ave., Suite 1600, Saint Louis, MO 63105. The Association is a homeowner's association for homes located in Camden County, Missouri.

4. Defendant Reflections Condominium Owners Association, Inc. ("COA") is a Missouri nonprofit corporation. According to records filed with the Missouri Secretary of State, the address of COA's registered agent is 3524 Osage Beach Pkwy, PO Box 240, Lake Ozark, MO 65049. The COA is a condominium owners association for condominiums located in Camden County, Missouri.

5. This court has jurisdiction to hear this action pursuant to § 478.070, RSMo, and Article V, Section 14 of the Missouri Constitution.

6. Venue is proper before this court pursuant to § 508.010.2(2), RMo, as multiple defendants reside in Camden County, Missouri.

7. Abba Development Company, L.L.C. ("the Developer") developed the Reflections subdivision located in Camden County and recorded the "Declaration of Restrictions for Reflections Subdivision" with the Camden County, Missouri Recorder of Deeds on or about March 5, 2002. The Declaration of Restrictions charged the Association with operating water and sewer facilities (the "System").

8. The Developer also constructed three condominium buildings containing a total of fifty units. The owners of those condominiums are the members of the COA.

9. The Developer then defaulted on a development loan it had with Great Southern Bank. Great Southern Bank took and continues to hold title to the real estate then held by the Developer, including the parcels where the System is located.

10. Pursuant to Section 16.1.5 of the Declaration of Restrictions, the Association is required to convey the sewer system to any public authority, municipal corporation, or private corporation certificated by the Public Service Commission of Missouri, as soon as practical, to perform functions related to the construction, maintenance, extension, operation, repair, improvement, and regulation thereof.

11. Plaintiff is a corporation certificated by the Public Service Commission to provide water and sewer services.

12. On or about October 11, 2018, Plaintiff, Great Southern Bank, and the Association entered into an agreement to transfer the System to Plaintiff for the purchase price of $1.

13. On or about December 4, 2018, Plaintiff, Great Southern Bank, the Association, and the COA entered into an Amended and Restated Agreement for Sale of Utility System ("Agreement") superseding the October 11, 2018 agreement (a copy of which is attached hereto as Exhibit A). In the Agreement, the three Defendants agreed to sell the System to Plaintiff at a closing to take place no later of forty-five days after the effective date of any necessary regulatory authority approval.

14. The Agreement provided that should closing not occur by December 31, 2018, the Defendants (by the vote of at least two of Great Southern Bank, the Association, and the COA) could terminate the Agreement by giving Plaintiff and any non-consenting Defendant written notice of termination.

15. Closing did not occur by December 31, 2018, and has not yet occurred, as the Missouri Public Service Commission has not yet provided necessary regulatory approval due to actions by intervenors in the regulatory case designed to delay or deny approval.

16. On January 3, 2019, James A. Beckemeier, legal counsel for Plaintiff, sent an email notice to all three Defendants and the Defendants' legal counsels. In the email, Mr. Beckemeier confirmed that closing did not occur by December 31, 2018, and requested that the Defendants inform Plaintiff within fifteen days whether they wished to terminate the Agreement.

17. In that email, Mr. Beckemeier informed the Defendants that if they did not respond within fifteen days of the notice, Plaintiff would consider the right to terminate the Agreement as being waived.

18. None of the Defendants informed Plaintiff that it wished to terminate the Agreement within fifteen days of the notice.

19. On or about August 2, 2019 – nearly seven months after receiving the initial notice from Mr. Beckemeier - Sue Schultz, counsel for Great Southern Bank and the Association, sent Josiah Cox, President of Plaintiff, a notice informing Mr. Cox that the Defendants had unanimously voted to terminate the Agreement because closing had not occurred by December 31, 2018.

Count I - Injunctive Relief

20. Plaintiff incorporates by reference its allegations in paragraphs 1 to 19 as if fully set forth herein.

21. The Defendants failed to act promptly or in a reasonable time by failing to provide notice of their desire to terminate the Agreement until approximately seven months after Mr. Beckemeier requested they inform Plaintiff of their decision on whether to terminate the Agreement.

22. Unless Defendants are enjoined from terminating the Agreement, Plaintiff will suffer immediate and irreparable harm in that Plaintiff will lose its right to receive the System it contracted to purchase. Upon information and belief, the Defendants intend to soon sell the System to a different utility company.

23. Plaintiff has no adequate remedy at law in that an award of damages could not adequately compensate Plaintiff for the injury caused by losing its right to receive the System it contracted to purchase.

24. In order to preserve status quo and to allow Plaintiff to close on the purchase of the System in accordance with the terms of the Agreement, Plaintiff seeks temporary, preliminary and permanent injunctive relief prohibiting Defendants from terminating the Agreement and prohibiting Defendants from selling the System to any party other than Plaintiff or Plaintiff's assigns in violation of the terms of the Agreement.

25. Defendants will not be harmed by the granting of the injunctive relief being sought.

26. The public will not be harmed by the granting of the injunctive relief being sought, and the issuance of such injunctive relief is in the public interest.

27. Accordingly, Plaintiff requests that the Court enter a temporary, preliminary and permanent injunction enjoining Defendants from terminating the

Agreement and prohibiting Defendants from selling the System to any party other than Plaintiff or Plaintiff's assigns in violation of the terms of the Agreement.

WHEREFORE, Plaintiff respectfully requests a temporary, preliminary and permanent injunction against Defendants prohibiting Defendants from terminating the Amended and Restated Agreement for Sale of Utility System dated December 14, 2018 and prohibiting Defendants from selling the System to any party other than Plaintiff or Plaintiff's assigns in violation of the terms of the Agreement. Plaintiff further requests any additional relief the Court deems proper under the circumstances.

Count II – Declaratory Relief

28. Plaintiff incorporates by reference its allegations in paragraphs 1 to 27 as if fully set forth herein.

29. The Agreement provided a right for the Defendants to terminate the Agreement if the purchase did not close on or before December 31, 2018.

30. When the purchase did not close on or before December 31, 2018, the Defendants failed to act in good faith or within a reasonable time to terminate the Agreement by failing to provide notice of their desire to terminate the Agreement until approximately seven months after Mr. Beckemeier requested they inform Plaintiff of their decision on whether to terminate the Agreement.

31. Plaintiff has acted diligently to perform all conditions and obligations of the Plaintiff under the Agreement, has incurred significant costs related to due diligence, entitlement review and seeking regulatory approval for the purchase of the System and upon the approval of the regulatory bodies of the State of Missouri, stands ready, willing and able to close on the purchase of the System.

32. Plaintiff seeks a declaration from this Court that Defendants were dilatory in exercising their option to terminate the Agreement in that they waited over seven months from the time that such right vested and from when Plaintiff, by and through counsel, notified Defendants that they must exercise such right in a reasonable time, and as a result of Defendants' failure to terminate the Agreement in a reasonable time, such right to terminate was thereby waived.

33. Plaintiff seeks a further declaration from this Court that Defendants' attempt to terminate the Agreement was a breach of the Agreement, and in accordance with Section 25 of the Agreement, awards Plaintiff its attorneys' fees and costs to bring this action.

34. Plaintiff has no adequate remedy at law in that an award of damages could not adequately compensate Plaintiff for the injury caused by losing its right to receive the System it contracted to purchase.

WHEREFORE, Plaintiff respectfully requests that this Court find that Defendants have waived their right to terminate the Agreement due to their failure to exercise such right within a reasonable time of December 31, 2018; that Defendants' attempt to terminate the Agreement was a breach of the Agreement; that the notice of termination sent by Defendants is null and void and that Plaintiff is entitled to an award of its attorneys' fees and costs to bring this action. Plaintiff further requests any additional relief the Court deems proper under the circumstances.

BRYDON, SWEARENGEN & ENGLAND, P.C.

BY: /s/ Johnny K.. Richardson
Johnny K. Richardson #28744
Stephen A. Rehagen #70319
312 East Capitol Avenue
P.O. Box 456
Jefferson City, MO 65102
(573) 635-7166 (Telephone)
(573) 635-3847 (Facsimile)
johnny@brydonlaw.com
srehagen@brydonlaw.com
ATTORNEYS FOR PLAINTIFF

VERIFICATION

STATE OF MISSOURI)
) ss.
COUNTY OF ST. LOUIS)

I, Josiah Cox, the President for Central States Water Resources, Inc., being duly authorized and sworn on my oath, state that the matters set forth in the above Petition are true and correct according to the best of my knowledge, information and belief.

Subscribed and sworn to before me this 15th day of August, 2019.

Notary Public

NOTARY PUBLIC NOTARY SEAL STATE OF MISSOURI

F. SHABNAM NOURAIE
My Commission Expires
Jan. 16, 2021
St. Louis County
Commission # 12421180