



Missouri Department of dnr.mo.gov

NATURAL RESOURCES

Eric R. Greitens, Governor

Carol S. Comer, Director

May 30, 2017

Robert Stevenson, General Manager
Hannibal Board of Public Works
City of Hannibal
3 Industrial Loop Drive
P.O. Box 1589
Hannibal, MO 63401

RE: Hannibal, MO2010344, Marion County

Dear Mr. Stevenson:

Thank you for your letter dated May 17, 2017, explaining the current status of the city of Hannibal's ordinance, Proposition 1, related to the elimination of ammonia in the drinking water supply. The letter, in addition to providing an update on the status of the ordinance, also asks for the department's approval for the Hannibal Board of Public Works (HBPW) to cease the introduction of ammonia into the drinking water system by August 14, 2017. This date reflects the 90 day timeframe established by the ordinance for the removal of ammonia from the drinking water system based on the date that the ordinance became effective.

As you stated in your letter, HBPW began using chloramine treatment technology in September of 2015 to address noncompliance with the Stage 2 Disinfectants and Disinfection Byproducts (DBP) Rule, 10 CSR 60-4.094. Since making that change, the city has been in compliance with this rule. Your letter also acknowledges that discontinuing the use of this technology will very likely result in future exceedances of the DBP rule. The department has similar concerns.

HBPW has not submitted to the department a plan that evaluates any modification from the use of ammonia in its existing water treatment process. The department cannot approve a request to modify a treatment process until a water system submits a plan that proposes an alternative treatment process, along with the safeguards it will take to ensure the modification will not adversely affect water quality. As such, the department cannot approve HBPW's request to cease the introduction of ammonia into its drinking water system, as currently proposed.

While Proposition 1 seeks to prohibit the use of ammonia, chloramines (ammonia) are an approved treatment technology allowed under state and federal law. For HBPW to cease the use of its approved chloramine treatment process, HBPW will have to submit a plan that proposes an alternative treatment process that can demonstrate compliance with the DBP maximum contaminant levels. Please keep in mind, that in order to determine the effectiveness of any new treatment changes proposed, pilot testing should be performed. Please note that pilot studies shall have protocols, including proposed testing parameters, approved by the department prior to initiating the pilot study. See Regulation 10 CSR 60-4.090(2)(1).



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Mr. Stevenson
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If you are adversely affected by this decision, you may be entitled to an appeal before the Administrative Hearing Commission (AHC) pursuant to Section 621.250, RSMO. To appeal, you must file a petition with the AHC within thirty days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by any method other than register mail or certified mail, it will be deemed filed on the date it is received by the AHC. Contact information for the AHC is: Administrative Hearing Commission, United States Post Office Building, Third Floor, 131 West High Street, P.O. Box 1557, Jefferson City, MO 65102, Phone: 573-751-2422, Fax: 573-751-5018, and Website: <http://www.oa.mo.gov/ahc>.

Thank you for your attention to this matter. If you should have any questions or concerns related to this letter, please contact Mr. Maher Jaafari, P.E, of my staff at P.O. Box 176, Jefferson City, MO 65102 or telephone at 573- 751-1127 or by email at maher.jaafari@dnr.mo.gov.

Sincerely,

WATER PROTECTION PROGRAM



David J. Lamb
Acting Director

DJL/eh

c: PDWB Compliance & Enforcement Section
Northeast Regional Office