



HANNIBAL BOARD OF PUBLIC WORKS

ELECTRIC, WATER AND WASTEWATER

3 INDUSTRIAL LOOP DRIVE
PO BOX 1589
HANNIBAL, MISSOURI 63401-1589
573-221-8050
www.hannibalbpw.org



May 17, 2017

Mr. David Lamb
Acting Director
Water Protection Program
Missouri Department of Natural Resources
P.O. Box 176
Jefferson City, MO 65102-0176

RE: Proposition 1 - Modifications to existing treatment process

Dear Mr. Lamb:

As you are likely aware, on April 4, 2017, City of Hannibal voters passed a petition-led referendum requiring the elimination of chloramine treatment technology that has been used at the City's drinking water treatment plant since September 2015 for control of disinfection byproducts and regulatory compliance. The referendum requires that the chloramine technology, specifically the addition of ammonia, be discontinued within 90 days from the date of the referendum. A copy of the referendum, more commonly known as Prop 1, is enclosed for your information.

The Hannibal City Council conducted a second reading of Proposition 1 on May 16, 2017. On the date of the second reading, the proposition has become a lawfully enacted ordinance. The referendum requires the use of ammonia be discontinued within 90 days of the effective date. If the effective date is May 17, 2017, the 90-day deadline to discontinue ammonia is August 14, 2017.

In order to comply with the requirements of the ordinance, the Hannibal Board of Public Works (HBPW) is considering directing its staff to discontinue the addition of ammonia into the drinking water system on August 15, 2017. This will be accomplished by closing the valve and shutting down the pumps shown in the enclosed pictures. This action will likely result in the future exceedances of the disinfection byproducts standards set forth in 10 CSR 60-4.094. Consequently, the HBPW has engaged the services of Black and Veatch to advise on long-term permit options to comply with both the referendum as well as state and federal safe drinking water requirements. This review will entail a plant optimization evaluation, bench scale testing, distribution water quality evaluations and the review of emerging technologies. It is anticipated that a preliminary report will be submitted to the Missouri Department of Natural Resources by November 2017 at the earliest.

In pertinent part, 10 CSR 60-4.090(2)(I) provides that "Before a community water system makes any significant modifications to its existing treatment process for the purposes of achieving compliance with this rule, the system must obtain departmental approval of its proposed modifications and those safeguards that it will implement to ensure that the microbiological quality of the drinking water served by the system will not be adversely affected by the modifications." As required by this regulation,

HBPW is seeking the Department of Natural Resources' approval to cease the introduction of ammonia (by the August 14 deadline) into its drinking water system to the extent this action constitutes a significant modification to its existing treatment processes for the purposes of achieving compliance with 10 CSR 60-4.090(2)(I). We look forward to your response at your earliest convenience.

Sincerely,



Robert W. Stevenson, P.E.
General Manager

Enclosures

c: Don Willoh, Office of General Counsel, Missouri Department of Natural Resources
Jennifer Hernandez, Assistant Attorney General, Missouri Attorney General's Office
Steve Feeler, Acting DEQ Director, Missouri Department of Natural Resources
Robert J. Brundage, Newman, Comley & Ruth P.C., HBPW env'l counsel

"The mission of the Hannibal Board of Public Works is to provide safe, reliable utility products with excellent customer service at reasonable prices."