

## Mattingly, Jacque

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**From:** Haskell, Chris  
**Content:** Friday, May 15, 1998 10:27 AM  
**To:** Dell'Orco, Louis  
**Cc:** 'Levins, William P.'; 'Holmes, Dale'; 'Mullins, Jr., Rob'; 'Jacque Mattingly'  
**Subject:** EMAIL PUBLIC COMMENT

### MEMORANDUM FROM ENVIRONMENTAL PROJECTS INFORMATION OFFICER

To: Deputy PM  
CC: Legal, Admin. Asst.

Below the dotted line is email received, dated 11 MAY 98, after SLDS public comment period ended.  
Please record this as appropriate.

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Date: Mon, 11 May 1998 15:11:55 GMT From: "John Madras" <jmadras@mail.state.mo.us> <Picture> To: ChristopherHask@usa.net  
Subject: Comment on SLDS FS/PP <Picture: Show envelope information>

This is a comment on the document released April 8, 1998. The deadline for comment was May 8, which was a state holiday; hopefully you will still accept it today. The project officer is listed as R. L. Mullins, Jr.

The main comment of the Department of Natural Resources, Water Pollution

Control Program, is that there needs to be considerable detail in the section on ARARs. While that section generally recognizes the authority of

the federal clean water act and the state clean water law, and the

summary of the state water quality standards, the substantive requirements include some aspects that may generally be perceived as administrative. The best example is the preparation of a permit application including characterization of the water to be discharged, which while appearing to be

a completely administrative function, is actually the basis for establishing the technology or water quality based limitations that are applicable to the site. For this particular site we would expect that storm water would be a major concern, and one that would be processed through the permit system for the purpose of establishing applicable limits. Any process waste water would be managed through the Metropolitan St. Louis Sewer District.

We encourage the Corps of Engineers to work closely with staff of this program to meet the requirements of the water laws. The Permit Section (Mark Ort) may be reached at (573) 751-6825; the Planning Section (here)

may be reached at (573) 751-7428.

We appreciate your consideration.

John Madras  
Chief Planning Section  
Water Pollution Control Program  
Missouri Department of Natural Resources