STATE OF MISSOURI

DEPARTMENT OF NATURAL RESOURCES

MISSOURI CLEAN WATER COMMISSION



MISSOURI STATE OPERATING PERMIT

In compliance with the Missouri Clean Water Law, (Chapter 644 R.S. Mo. as amended, hereinafter, the Law), and the Federal Water Pollution Control Act (Public Law 92-500, 92^{nd} Congress) as amended,

1035 Swabia Ct., Durham, NC 27703

MO-0001341

Same as above

Reichhold, LLC 2

Permit No.

Owner:

Address:

Continuing Authority:

Address:	Same as above
Facility Name: Facility Address:	Reichhold, LLC 2 249 St. Louis Ave., Valley Park MO 63088
Legal Description: UTM Coordinates:	Landgrant #2999, St. Louis County Outfall #001: X=718951, Y= 4269847; Outfall #002: X=718887, Y= 4269780
Receiving Stream: First Classified Stream and ID: USGS Basin & Sub-watershed No.:	Man-Made Conveyance to Meramec River Meramec River (P) (WBID# 2183) 303(d) USGS HUC12 # 07140102-1002 Grand Glaize Creek – Meramec River
is authorized to discharge from the facility of as set forth herein:	described herein, in accordance with the effluent limitations and monitoring requirements
coatings. Outfall #001: Non-contact cooling water; be testing & maintenance of fire protection sys Outfall #002: Stormwater from secondary crunoff. Max Flow: 0.32 MGD; Average Flo	
	stormwater discharges under the Missouri Clean Water Law and the National Pollutant apply to other regulated areas. This permit may be appealed in accordance with Sections w.
August 1, 2018 Effective Date	Edward B. Galbraith, Director, Division of Environmental Quality
June 30, 2023 Expiration Date	Chris Wieberg, Director, Water Profection Program

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A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

OUTFALL #001
wastewater

TABLE A-1 FINAL EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

The permittee is authorized to discharge from outfall(s) with serial number(s) as specified in the application for this permit. The final effluent limitations shall become effective on <u>August 1, 2018</u> and remain in effect until expiration of the permit. Such discharges shall be controlled, limited and monitored by the permittee as specified below:

	**	FINAL E	FFLUENT LIMI	ITATIONS	MONITORING REQUIREMENTS		
EFFLUENT PARAMETERS	Units	DAILY MAXIMUM	WEEKLY AVERAGE	MONTHLY AVERAGE	MEASUREMENT FREQUENCY	Sample Type	
PHYSICAL							
Flow	MGD	*		*	once/month	24 hr. total	
Temperature	°F	90		90	once/month	measured	
CONVENTIONAL							
Chemical Oxygen Demand	mg/L	*		*	once/month	grab	
Chlorine, Total Residual ^Ф	μg/L	*		*	once/month	grab	
Oil & Grease	mg/L	15		10	once/month	grab	
рН $^{\Omega}$	SU	6.5 to 9.0		6.5 to 9.0	once/month	grab	
Total Suspended Solids	mg/L	45		30	once/month	grab	
METALS							
Copper, Total Recoverable	μg/L	*		*	once/month	grab	

MONITORING REPORTS SHALL BE SUBMITTED MONTHLY; THE FIRST REPORT IS DUE SEPTEMBER 28, 2018. THERE SHALL BE NO DISCHARGE OF FLOATING SOLIDS OR VISIBLE FOAM IN OTHER THAN TRACE AMOUNTS.

OUTFALL #002
Stormwater

TABLE A-2 FINAL EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

The permittee is authorized to discharge from outfall(s) with serial number(s) as specified in the application for this permit. The final effluent limitations shall become effective on <u>August 1, 2018</u> and remain in effect until expiration of the permit. Such discharges shall be controlled, limited and monitored by the permittee as specified below:

Y Y	Final Li	MITATIONS	BENCH-	MONITORING REQUIREMENTS		
UNITS	DAILY MAXIMUM	MONTHLY AVERAGE	MARKS	MEASUREMENT FREQUENCY	SAMPLE TYPE	
MGD	*		-	once/month	24 hr. estimate	
inches	*		-	once/month	measured	
mg/L	**		68	once/month	grab	
mg/L	**		147	once/month	grab	
SU	6.5 to 9.0		-	once/month	grab	
mg/L	**		58	once/month	grab	
	inches mg/L mg/L SU	MGD * inches * mg/L ** mg/L ** SU 6.5 to 9.0	MGD * inches * mg/L ** sU 6.5 to 9.0	Units	UNITS DAILY MONTHLY AVERAGE MARKS MEASUREMENT FREQUENCY MGD * - once/month once/month inches * 68 once/month mg/L ** 68 once/month mg/L ** 147 once/month SU 6.5 to 9.0 - once/month	

MONITORING REPORTS SHALL BE SUBMITTED MONTHLY; THE FIRST REPORT IS DUE SEPTEMBER 28, 2018. THERE SHALL BE NO DISCHARGE OF FLOATING SOLIDS OR VISIBLE FOAM IN OTHER THAN TRACE AMOUNTS.

CONVENTIONAL					
Oil and Grease	mg/L	**	10	once/quarter ◊	grab
METALS					
Copper, Total Recoverable	μg/L	*	-	once/quarter ◊	grab

MONITORING REPORTS SHALL BE SUBMITTED QUARTERLY; THE FIRST REPORT IS DUE OCTOBER 28, 2018. THERE SHALL BE NO DISCHARGE OF FLOATING SOLIDS OR VISIBLE FOAM IN OTHER THAN TRACE AMOUNTS.

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A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS (CONTINUED)

- Monitoring requirement only.
- Ω The facility will report the minimum and maximum values. pH is not to be averaged.
- ** Monitoring requirement with associated benchmark. See Special Conditions.
- This permit contains a Total Residual Chlorine (TRC) sampling requirement. Effluent limits are typically below the minimum quantification level (ML) of the most sensitive EPA approved CLTRC methods. The Department has determined the current acceptable ML for total residual chlorine to be 130 μg/L when using the DPD Colorimetric Method #4500 CL G. from Standard Methods for the Examination of Waters and Wastewater. The permittee will conduct analyses in accordance with this method, or equivalent, and report actual analytical values.

♦ Quarterly sampling

	MINIMUM QUARTERLY SAMPLING REQUIREMENTS								
QUARTER	Months	QUARTERLY EFFLUENT PARAMETERS	REPORT IS DUE						
First	January, February, March	Sample at least once during any month of the quarter	April 28 th						
Second	April, May, June	Sample at least once during any month of the quarter	July 28 th						
Third	July, August, September	Sample at least once during any month of the quarter	October 28th						
Fourth	October, November, December	Sample at least once during any month of the quarter	January 28 th						

B. STANDARD CONDITIONS

In addition to specified conditions stated herein, this permit is subject to the attached <u>Part I and Part III</u> standard conditions dated <u>August 1, 2014 and March 1, 2015</u>, respectively, and hereby incorporated as though fully set forth herein.

C. SPECIAL CONDITIONS

- 1. Electronic Discharge Monitoring Report (eDMR) Submission System
 - (a) Discharge Monitoring Reporting Requirements. The permittee must electronically submit compliance monitoring data via the eDMR system. In regards to Standard Conditions Part I, Section B, #7, the eDMR system is currently the only Department approved reporting method for this permit.
 - (b) Programmatic Reporting Requirements. The following reports (if required by this permit) must be electronically submitted as an attachment to the eDMR system until such a time when the current or a new system is available to allow direct input of the data:
 - (1) Any additional report required by the permit excluding bypass reporting.

 After such a system has been made available by the Department, required data shall be directly input into the system by the next report due date.
 - (c) Other actions. The following shall be submitted electronically after such a system has been made available by the Department:
 - (1) General Permit Applications/Notices of Intent to discharge (NOIs);
 - (2) Notices of Termination (NOTs);
 - (3) No Exposure Certifications (NOEs);
 - (4) Low Erosivity Waivers and Other Waivers from Stormwater Controls (LEWs); and
 - (5) Bypass reporting.
 - (d) Electronic Submissions. To access the eDMR system, use the following link in your web browser: https://edmr.dnr.mo.gov/edmr/E2/Shared/Pages/Main/Login.aspx.
 - (e) Waivers from Electronic Reporting. The permittee must electronically submit compliance monitoring data and reports unless a waiver is granted by the department in compliance with 40 CFR Part 127. The permittee may obtain an electronic reporting waiver by first submitting an eDMR Waiver Request Form: http://dnr.mo.gov/forms/780-2692-f.pdf. The Department will either approve or deny this electronic reporting waiver request within 120 calendar days. Only permittees with an approved waiver request may submit monitoring data and reports on paper to the Department for the period that the approved electronic reporting waiver is effective.

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C. SPECIAL CONDITIONS (CONTINUED)

- 2. The purpose of the Stormwater Pollution Prevention Plan (SWPP) and the Best Management Practices (BMPs) listed herein is the prevention of pollution of waters of the state. A deficiency of a BMP means it was not effective preventing pollution [10 CSR 20-2.010(56)] of waters of the state, and corrective actions means the facility took steps to eliminate the deficiency.
- 3. The facility's SIC code(s) or description is found in 40 CFR 122.26(b)(14) and/or 10 CSR 20-6.200(2) hence shall implement a SWPPP which must be prepared and implemented upon permit issuance. The SWPPP must be kept on-site and should not be sent to the Department unless specifically requested. The SWPPP must be reviewed and updated every five years or as site conditions change (see Part III: Antidegradation Analysis and SWPPP sections in the fact sheet). The permittee shall select, install, use, operate, and maintain the Best Management Practices prescribed in the SWPPP in accordance with the concepts and methods described in: *Developing Your Stormwater Pollution Prevention Plan, A Guide for Industrial Operators*, (EPA 833-B-09-002) published by the EPA in February 2009 (www.epa.gov/npdes/pubs/industrial_swppp_guide.pdf). The SWPPP must include:
 - (a) A listing of specific contaminants and their control measures (or BMPs) and a narrative explaining how BMPs are implemented to control and minimize the amount of contaminants potentially entering stormwater.
 - (b) The SWPPP must include a schedule for once per month site inspections and brief written reports. The inspection report must include precipitation information for the entire period since last inspection, as well as observations and evaluations of BMP effectiveness. Throughout coverage under this permit, the facility must perform ongoing SWPPP review and revision to incorporate any site condition changes.
 - i. Operational deficiencies must be corrected within seven (7) calendar days.
 - ii. Minor structural deficiencies must be corrected within fourteen (14) calendar days.
 - iii. Major structural deficiencies must be reported to the regional office within seven (7) days of discovery. The initial report shall consist of the deficiency noted, the proposed remedies, the interim or temporary remedies (including the general timing of the placement of the interim measures), and an estimate of the timeframe needed to wholly complete the repairs or construction. The permittee will work with the regional office to determine the best course of action, including but not limited to temporary structures to control stormwater runoff. The facility shall correct the major structural deficiency as soon as reasonably achievable.
 - iv. All actions taken to correct the deficiencies shall be included with the written report, including photographs.
 - v. Inspection reports must be kept on site with the SWPPP and maintained for a period of five (5) years. These must be made available to Department and EPA personnel upon request.
 - (c) A provision for designating an individual to be responsible for environmental matters.
 - (d) A provision for providing training to all personnel involved in material handling and storage, and housekeeping of maintenance and cleaning areas. Proof of training shall be submitted on request of the Department.
- 4. This permit stipulates pollutant benchmarks applicable to your discharge. The benchmarks do not constitute direct numeric effluent limitations; therefore, a benchmark exceedance alone is not a permit violation. Benchmark monitoring and visual inspections shall be used to determine the overall effectiveness of SWPPP and to assist you in knowing when additional corrective action may be necessary to protect water quality. If a sample exceeds a benchmark concentration you must review your SWPPP and your BMPs to determine what improvements or additional controls are needed to reduce that pollutant in your stormwater discharge(s).

Any time a benchmark exceedance occurs a Corrective Action Report (CAR) must be completed. A CAR is a document that records the efforts undertaken by the facility to improve BMPs to meet benchmarks in future samples. CARs must be retained with the SWPPP and available to the Department upon request. If the efforts taken by the facility are not sufficient and subsequent exceedances of a benchmark occur, the facility must contact the Department if a benchmark value cannot be achieved. Failure to take corrective action to address a benchmark exceedance and failure to make measureable progress towards achieving the benchmarks is a permit violation.

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C. SPECIAL CONDITIONS (CONTINUED)

- 5. Permittee shall adhere to the following minimum Best Management Practices (BMPs):
 - (a) Prevent the spillage or loss of fluids, oil, grease, fuel, etc. from vehicle maintenance, equipment cleaning, or warehouse activities and thereby prevent the contamination of stormwater from these substances.
 - (b) Provide collection facilities and arrange for proper disposal of waste products including but not limited to petroleum waste products, and solvents.
 - (c) Store all paint, solvents, petroleum products and petroleum waste products (except fuels), and storage containers (such as drums, cans, or cartons) so that these materials are not exposed to stormwater or provide other prescribed BMPs such as plastic lids and/or portable spill pans to prevent the commingling of stormwater with container contents. Commingled water may not be discharged under this permit. Provide spill prevention control, and/or management sufficient to prevent any spills of these pollutants from entering waters of the state. Any containment system used to implement this requirement shall be constructed of materials compatible with the substances contained and shall also prevent the contamination of groundwater. Any spills should be noted in the SWPPP.
 - (d) Provide good housekeeping practices on the site to keep trash from entry into waters of the state.
 - (e) Provide sediment and erosion control sufficient to prevent or control sediment loss off of the property
 - (f) Ensure adequate provisions are provided to prevent and to protect embankments from erosion.
- 6. To protect the general criteria found at 10 CSR 20-7.031(4), before releasing water accumulated in secondary containment areas, it must be examined for hydrocarbon odor and presence of sheen. If the presence of odor or sheen is indicated, the water shall be treated using an appropriate method or disposed of in accordance with legally approved methods, such as being sent to a wastewater treatment facility. Following treatment, the water shall be tested for oil and grease, benzene, toluene, ethylbenzene, and xylene using 40 CFR part 136 methods. All pollutant levels must be below the most protective, applicable standards for the receiving stream, found in 10 CSR 20-7.031 Table A. Records of all testing and treatment of water accumulated in secondary containment shall be stored in the SWPPP to be available on demand to Department and EPA personnel.
- 7. The full implementation of this operating permit, which includes implementation of any applicable schedules of compliance, shall constitute compliance with all applicable federal and state statutes and regulations in accordance with §644.051.16, RSMo, and the CWA section 402(k); however, this permit may be reopened and modified, or alternatively revoked and reissued to comply with any applicable effluent standard or limitation issued or approved under Sections 301(b)(2)(C) and (D), §304(b)(2), and §307(a) (2) of the Clean Water Act, if the effluent standard or limitation so issued or approved contains different conditions or is otherwise more stringent than any effluent limitation in the permit; or controls any pollutant not limited in the permit.
- 8. All outfalls and permitted features must be clearly marked in the field.
- 9. Changes in Discharges of Toxic Pollutant
 - In addition to the reporting requirements under §122.41(1), all existing manufacturing, commercial, mining, and silvicultural dischargers must notify the Director as soon as they know or have reason to believe:
 - (a) That an activity has occurred or will occur which would result in the discharge, on a routine or frequent basis, of any toxic pollutant which is not limited in the permit, if that discharge will exceed the highest of the following notification levels:
 - (1) One hundred micrograms per liter (100 μ g/L);
 - (2) Two hundred micrograms per liter (200 µg/L) for acrolein and acrylonitrile;
 - (3) Five hundred micrograms per liter (500 µg/L) for 2,4-dinitrophenol and for 2-methyl-4, 6-dinitrophenol;
 - (4) One milligram per liter (1 mg/L) for antimony;
 - (5) Five (5) times the maximum concentration value reported for the pollutant in the permit application in accordance with 40 CFR 122.21(g)(7); or
 - (6) The notification level established by the Department in accordance with 40 CFR 122.44(f).
 - (b) That any activity has occurred or will occur which would result in any discharge, on a non-routine or infrequent basis, of a toxic pollutant which is not limited in the permit, if that discharge will exceed the highest of the following "notification levels":
 - (1) Five hundred micrograms per liter (500 µg/l);
 - (2) One milligram per liter (1 mg/l) for antimony;
 - (3) Ten (10) times the maximum concentration value reported for that pollutant in the permit application in accordance with §122.21(g)(7).
 - (4) The level established by the Director in accordance with §122.44(f).
- Report as no-discharge when a discharge does not occur during the report period. It is a violation of this permit to report nodischarge when a discharge has occurred.

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C. SPECIAL CONDITIONS (CONTINUED)

11. Reporting of Non-Detects

- (a) An analysis conducted by the permittee or their contracted laboratory shall be conducted in such a way that the precision and accuracy of the analyzed result can be enumerated.
- (b) The permittee shall not report a sample result as "non-detect" without also reporting the detection limit of the test. Reporting as "non-detect" without also including the detection limit will be considered failure to report, which is a violation of this permit.
- (c) The permittee shall report the "non-detect" result using the less than sign and the minimum detection limit (e.g. <10).
- (d) Where the permit contains a Minimum Level (ML) and the permittee is granted authority in the permit to report zero in lieu of the < ML for a specified parameter (conventional, priority pollutants, metals, etc.), then zero (0) is to be reported for that parameter.
- (e) See Standard Conditions Part I, Section A, #4 regarding proper detection limits used for sample analysis.
- (f) When calculating monthly averages, one-half of the minimum detection limit (MDL) should be used instead of a zero. Where all data are below the MDL, the "<MDL" shall be reported as indicated in item (C).
- 12. It is a violation of the Missouri Clean Water Law to fail to pay fees associated with this permit (644.055 RSMo).

MISSOURI DEPARTMENT OF NATURAL RESOURCES FACT SHEET FOR THE PURPOSE OF RENEWAL OF MO-0001341 REICHHOLD LLC 2

The Federal Water Pollution Control Act ("Clean Water Act" Section 402 Public Law 92-500 as amended) established the National Pollution Discharge Elimination System (NPDES) permit program. This program regulates the discharge of pollutants from point sources into the waters of the United States, and the release of stormwater from certain point sources. All such discharges are unlawful without a permit (Section 301 of the "Clean Water Act"). After a permit is obtained, a discharge not in compliance with all permit terms and conditions is unlawful. Missouri State Operating Permits (MSOPs) are issued by the Director of the Missouri Department of Natural Resources (Department) under an approved program, operating in accordance with federal and state laws (Federal "Clean Water Act" and "Missouri Clean Water Law" Section 644 as amended). MSOPs are issued for a period of five (5) years unless otherwise specified for less.

As per [40 CFR Part 124.8(a)] and [10 CSR 20-6.020(1)(A)2.] a factsheet shall be prepared to give pertinent information regarding the applicable regulations, rationale for the development of effluent limitations and conditions, and the public participation process for the Missouri State Operating Permit (MSOP or operating permit) listed below. A factsheet is not an enforceable part of an operating permit.

Part I. FACILITY INFORMATION

Facility Type: Categorical Industrial

Facility SIC Code(s): 2821
Facility NAICS Code: 325211
Application Date: 01/03/2018
Modification Date: 05/27/2015
Expiration Date: 06/30/2018

FACILITY DESCRIPTION:

Reichhold is located in the city of Valley Park MO. The first permit for Reichhold, Inc was issued by EPA in 1974 and the Missouri Department of Natural Resources issued the first permit on January 27, 1975. Reichhold manufactures protective and decorative synthetic liquid resins used by their customers as coatings. This facility has two outfalls; outfall #001 is non-contact cooling water, cooling tower blowdown, boiler blowdown, water softener demineralizer regeneration, and stormwater runoff, and outfall #002 which is only stormwater runoff and water from secondary containment; and testing and maintenance of fire protection test water. Raw materials used at this site are butyl acetate, butylamine, dimethyl amine, ethylene diamine, triethylamine, cyclohexane, trimethylamine and xylene.

PERMITTED FEATURES TABLE:

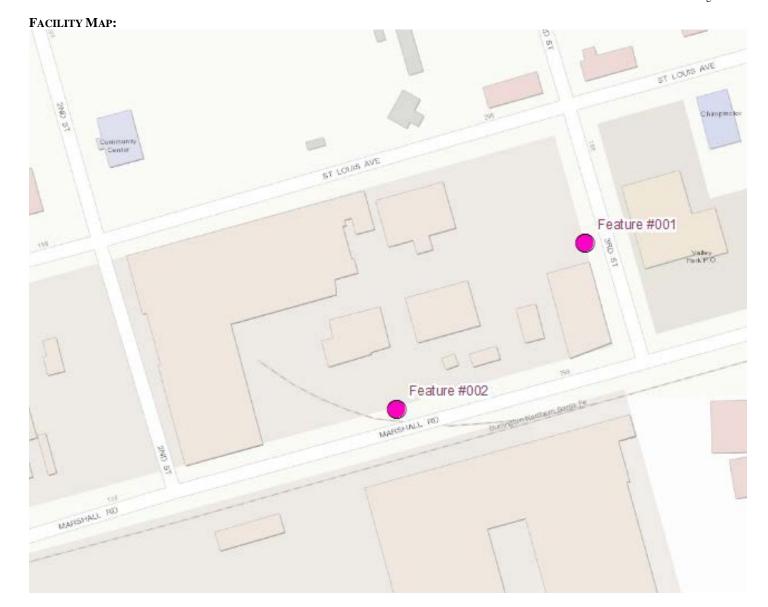
OUTFALL	AVERAGE FLOW	DESIGN FLOW	TREATMENT LEVEL	Effluent type
#001	0.19 MGD	1.2 MGD	best management practices	non-contact cooling water, cooling tower blowdown, boiler blowdown, water softener demineralizer regeneration, and stormwater runoff
#002	0.05 MGD	0.32 MGD	best management practices	stormwater, fire protection testing water

FACILITY PERFORMANCE HISTORY & COMMENTS:

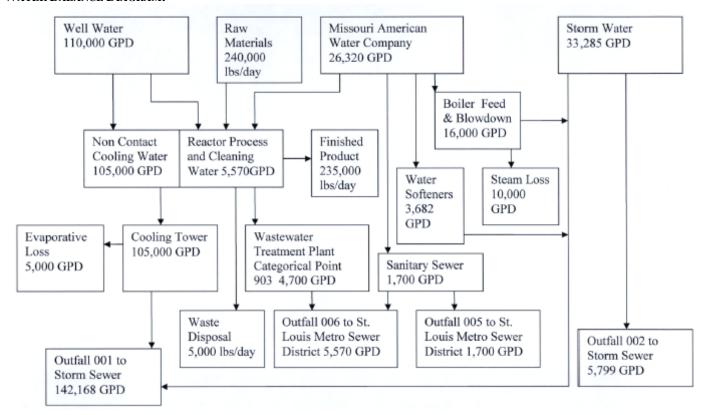
The electronic discharge monitoring reports were reviewed for the last five years. The following exceedances were noted.

PF No.	Monitoring Ending Date	Parameter	Unit	Limit	Limit	Reported	Limit	Limit	Reported
001	12/31/2016	Oil and grease	mg/L	15	Daily Max.	23	10	Monthly Avg.	14
001	04/30/2016	pН	SU	6.5	Minimum	6.62	9	Maximum	9.2
001	11/30/2016	Total Suspended Solids	mg/L	45	Daily Max.	50	30	Monthly Avg.	50
002	12/31/2017	BOD	mg/L	45	Daily Max.	120	30	Monthly Avg.	120
002	12/31/2016	BOD	mg/L	45	Daily Max.	49	30	Monthly Avg.	49
002	01/31/2015	BOD	mg/L	45	Daily Max.	34	30	Monthly Avg.	34
002	02/28/2014	BOD	mg/L	45	Daily Max.	240	30	Monthly Avg.	240
002	01/31/2014	BOD	mg/L	45	Daily Max.	130	30	Monthly Avg.	130
002	03/31/2013	BOD	mg/L	45	Daily Max.	59	30	Monthly Avg.	59
002	12/31/2017	pH	SU	6.5	Minimum	10	9.0	Maximum	10
002	12/31/2017	Total Suspended Solids	mg/L	45	Daily Max.	57	30	Monthly Avg.	57
002	10/31/2015	Total Suspended Solids	mg/L	45	Daily Max.	49	30	Monthly Avg.	49
002	03/31/2015	Total Suspended Solids	mg/L	45	Daily Max.	53	30	Monthly Avg.	53
002	02/28/2014	Total Suspended Solids	mg/L	45	Daily Max.	66	30	Monthly Avg.	66
002	07/31/2013	Total Suspended Solids	mg/L	45	Daily Max.	69	30	Monthly Avg.	69
002	04/30/2013	Total Suspended Solids	mg/L	45	Daily Max.	68	30	Monthly Avg.	39
002	03/31/2013	Total Suspended Solids	mg/L	45	Daily Max.	57	30	Monthly Avg.	57

There is not a recent inspection found for this facility.



WATER BALANCE DIAGRAM:



MAJOR WATER USER:

Any surface or groundwater user with a water source and the equipment necessary to withdraw or divert 100,000 gallons (or 70 gallons per minute) or more per day combined from all sources from any stream, river, lake, well, spring, or other water source is considered a major water user in Missouri. All major water users are required by law to register water use annually (Missouri Revised Statues Chapter 256.400 Geology, Water Resources and Geodetic Survey Section). https://dnr.mo.gov/pubs/pub2337.htm
✓ Applicable; this facility is a major water user and is registered with the state.

Part II. RECEIVING WATERBODY INFORMATION

RECEIVING WATER BODY'S WATER QUALITY:

The Meramec River has water quality data available; please see below.

303(D) LIST:

Section 303(d) of the federal Clean Water Act requires each state identify waters not meeting water quality standards and for which adequate water pollution controls have not been required. Water quality standards protect such beneficial uses of water as whole body contact (such as swimming), maintaining fish and other aquatic life, and providing drinking water for people, livestock, and wildlife. The 303(d) list helps state and federal agencies keep track of impaired waters not addressed by normal water pollution control programs. http://dnr.mo.gov/env/wpp/waterquality/303d/303d.htm

- ✓ Applicable; the Meramec River is listed on the 2018 Missouri 303(d) list for E. coli and lead.
- ✓ This facility is not considered a source of the above listed pollutant(s) or considered to contribute to the impairment.

TOTAL MAXIMUM DAILY LOAD (TMDL):

A TMDL is a calculation of the maximum amount of a given pollutant that a water body can absorb before its water quality is affected; hence, the purpose of a TMDL is to determine the pollutant loading a specific waterbody can assimilate without exceeding water quality standards. If a water body is determined to be impaired as listed on the 303(d) list, then a watershed management plan or TMDL may be developed. The TMDL shall include the WLA calculation. http://dnr.mo.gov/env/wpp/tmdl/

✓ Not applicable; this facility is not associated with a TMDL.

APPLICABLE DESIGNATIONS OF WATERS OF THE STATE:

As per Missouri's Effluent Regulations [10 CSR 20-7.015(1)(B)], the waters of the state are divided into the following seven categories. Each category lists effluent limitations for specific parameters, which are presented in each outfall's effluent limitation table and further discussed in the derivation & discussion of limits section.

Missouri or Mississippi River:	
Lake or Reservoir:	
Losing:	
Metropolitan No-Discharge:	
Special Stream:	
Subsurface Water:	
All Other Waters:	\boxtimes

RECEIVING WATERBODY TABLE:

OUTFALL	Waterbody Name	CLASS	WBID	DESIGNATED USES*	DISTANCE TO SEGMENT	12-DIGIT HUC
#001 & #002	Man-Made Conveyance to Meramec River	n/a	n/a	n/a	0.0 mi	07140102-1002 Grand Glaize
#001 & #002	Meramec River	P	2183	HHP, IND, IRR, LWW, SCR, WBC-A, WWH (AQL)	0.2 mi	Creek – Meramec River

n/a not applicable

WBID = Waterbody IDentification: Missouri Use Designation Dataset 8-20-13 MUDD V1.0 data can be found as an ArcGIS shapefile on MSDIS at ftp://msdis.missouri.edu/pub/Inland_Water_Resources/MO_2014_WQS_Stream_Classifications_and_Use_shp.zip

* As per 10 CSR 20-7.031 Missouri Water Quality Standards, the Department defines the Clean Water Commission's water quality objectives in terms of "water uses to be maintained and the criteria to protect those uses." The receiving stream and 1st classified receiving stream's beneficial water uses to be maintained are in the receiving stream table in accordance with [10 CSR 20-7.031(1)(C)].

Uses which may be found in the receiving streams table, above:

10 CSR 20-7.031(1)(C)1.:

AQL = Protection of aquatic life (Current narrative use(s) are defined to ensure the protection and propagation of fish shellfish and wildlife, which is further subcategorized as: WWH = Warm Water Habitat; CLH = Cool Water Habitat; CDH = Cold Water Habitat; EAH = Ephemeral Aquatic Habitat; MAH = Modified Aquatic Habitat; LAH = Limited Aquatic Habitat. This permit uses AQL effluent limitations in 10 CSR 20-7.031 Table A for all habitat designations unless otherwise specified.)

10 CSR 20-7.031(1)(C)2.: Recreation in and on the water

WBC = Whole Body Contact recreation where the entire body is capable of being submerged;

WBC-A = Whole body contact recreation supporting swimming uses and has public access;

WBC-B = Whole body contact recreation supporting swimming;

SCR = Secondary Contact Recreation (like fishing, wading, and boating).

10 CSR 20-7.031(1)(C)3. to 7.:

HHP (formerly HHF) = Human Health Protection as it relates to the consumption of fish;

IRR = Irrigation for use on crops utilized for human or livestock consumption;

LWW = Livestock and wildlife watering (Current narrative use is defined as LWP = Livestock and Wildlife Protection);

 $\label{eq:DWS} \textbf{DWS} = \textbf{Drinking Water Supply;}$

IND = Industrial water supply

10 CSR 20-7.031(1)(C)8-11.: Wetlands (10 CSR 20-7.031 Table A currently does not have corresponding habitat use criteria for these defined uses)

WSA = Storm- and flood-water storage and attenuation; WHP = Habitat for resident and migratory wildlife species;

WRC = Recreational, cultural, educational, scientific, and natural aesthetic values and uses; WHC = Hydrologic cycle maintenance.

10 CSR 20-7.031(6): GRW = Groundwater

MIXING CONSIDERATIONS:

RECEIVING STREAM LOW-FLOW VALUES:

OUTEALI	OUTFALL RECEIVING STREAM (C, P)	Low-Flow Values (CFS)					
OUTFALL		1Q10	7Q10	30Q10			
#001	Meramec River (P)	414.2	419.86	425.83			

Low flow values were obtained from USGS Gaging Station near Pacific, MO. Data were obtained from 7/1/2014 through 4/2/2018 and were calculated using a Departmentally developed spreadsheet (available upon request).

MIXING CONSIDERATIONS TABLE: MERAMEC RIVER - DEFAULTS

MIXING ZONE (CFS) (CHRONIC) [10 CSR 20-7.031(5)(A)4.B.(II)(a)]			ZONE OF INITIAL DILUTION (CFS) (ACUTE) [10 CSR 20-7.031(5)(A)4.B.(II)(b)]			
1Q10	7Q10	30Q10	1Q10	7Q10	30Q10	
103.55	104.97	106.46	10.4	10.5	10.6	

ZID cannot be more than 10 times the facility design flow. DF = 1.2 MGD = 1.856 CFS

RECEIVING STREAM MONITORING REQUIREMENTS:

No receiving water monitoring requirements are recommended at this time.

Part III. RATIONALE AND DERIVATION OF EFFLUENT LIMITATIONS & PERMIT CONDITIONS

ALTERNATIVE EVALUATIONS FOR NEW FACILITIES:

As per [10 CSR 20-7.015(4)(A)], discharges to losing streams shall be permitted only after other alternatives including land application, discharges to a gaining stream and connection to a regional wastewater treatment facility have been evaluated and determined to be unacceptable for environmental and/or economic reasons.

✓ Not applicable; the facility does not discharge to a losing stream as defined by [10 CSR 20-2.010(36)] & [10 CSR 20-7.031(1)(N)], or is an existing facility.

ANTI-BACKSLIDING:

Federal Regulations [CWA §303(d)(4); CWA §402(c); 40 CFR Part 122.44(l)] require a reissued permit to be as stringent as the previous permit with some exceptions. Backsliding (a less stringent permit limitation) is only allowed under certain conditions.

- ✓ Limitations in this operating permit for the reissuance conform to the anti-backsliding provisions of Section 402(o) of the Clean Water Act, and 40 CFR Part 122.44.
 - ✓ Information is available which was not available at the time of permit issuance (other than revised regulations, guidance, or test methods) which would have justified the application of a less stringent effluent limitation.
 - Five years of DMR data support removal of limitations at outfall #001 as there is no reasonable potential: BOD-5 (limits were applied in error)
 - Five years of DMR data support removal of monitoring at outfall #001 as there is no reasonable potential: Ammonia as N (no statistical RP); benzene, ethylbenzene, toluene, xylene, and total toxic organics (no RP per RPD)
 - Per a memorandum issued by the EPA entitled *Interim Guidance for Performance-Based Reductions of NPDES Permit Monitoring Frequencies* (4/19/1996), the Department has found the permittee eligible for reduced monitoring frequency. Stormwater on site is controlled through a number of mechanisms including a SWPPP. A decreased sampling frequency is warranted for oil and grease on outfall #002.
 - ✓ The Department determined technical mistakes or mistaken interpretations of law were made in issuing the permit under section 402(a)(1)(b).
 - Five years of DMR data were supplied to the permit writer which support conversions of some limits on outfall #002 to benchmarks. The previous permit limits for outfall #002 were established in error, based on limits for domestic or process wastewater, however, this is a stormwater-only outfall. This renewal establishes limits and benchmarks appropriate for stormwater discharges. There will be no changes to industrial activities onsite or the composition of the stormwater discharge as a result of this renewal. The benchmark concentrations and required corrective actions within this permit are protective of the receiving stream's uses to be maintained. Monthly averages were not implemented for outfall #002 in this permit as the discharge consists of only stormwater which is not continuous pursuant to 40 CFR 122.45(d). Further, average monthly limitations are impracticable measures of non-continuous stormwater discharges because they vary widely in frequency, magnitude, and duration. This permit applies only acute short-term or daily maximum measures which represent stormwater discharges which are acute and sporadic in nature. Discharges of industrial stormwater rarely persist for long durations, making them impracticable to assess using measures with long term exposures or averaging periods. Last, the instream water quality target remains unchanged and the conditions of this permit are protective of both narrative and numeric water quality criteria.
 - The previous permit contained a specific set of prohibitions related to general criteria found in 10 CSR 20-7.031(4); however, there was no determination as to whether the discharges have reasonable potential to cause or contribute to excursion of those general water quality standards in the previous permit. Federal regulations 40 CFR 122.44(d)(1)(iii) requires that in instances were reasonable potential (RP) to cause or contribute to an exceedance of a water quality standard exists, a numeric limitation must be included in the permit. Rather than conducting the appropriate RP determination and establishing numeric effluent limitations for specific pollutant parameters, the previous permit simply placed the prohibitions in the permit. These conditions were removed from the permit. Appropriate reasonable potential determinations were conducted for each general criterion listed in 10 CSR 20-7.031(4) and effluent limitations were placed in the permit for those general criteria where it was determined the discharge had reasonable potential to cause or contribute to excursions of the general criteria. Specific effluent limitations were not included for those general criteria where it was determined that the discharges will not cause or contribute to excursions of general criteria. Removal of the prohibitions does not reduce the protections of the permit or allow for impairment of the receiving stream. The permit maintains sufficient effluent limitations, monitoring requirements and best management practices to protect water quality.

ANTIDEGRADATION REVIEW:

For process water discharge with new, altered, or expanding discharges, the Department is to document, by means of antidegradation review, if the use of a water body's available assimilative capacity is justified. In accordance with Missouri's water quality regulations for antidegradation [10 CSR 20-7.031(3)], degradation may be justified by documenting the socio-economic importance of a discharge after determining the necessity of the discharge. Facilities must submit the antidegradation review request to the Department prior to establishing, altering, or expanding discharges. See http://dnr.mo.gov/env/wpp/permits/antideg-implementation.htm

✓ Not applicable; the facility has not submitted information proposing expanded or altered process water discharge; no further degradation proposed therefore no further review necessary.

For stormwater discharges with new, altered, or expanding discharges, the stormwater BMP chosen for the facility, through the antidegradation analysis performed by the facility, must be implemented and maintained at the facility. Failure to implement and maintain the chosen BMP alternative is a permit violation; see SWPPP.

✓ Applicable; the facility must review and maintain stormwater BMPs as appropriate.

BENCHMARKS:

When a permitted feature or outfall consists of only stormwater, a benchmark may be implemented at the discretion of the permit writer. Benchmarks require the facility to monitor, and if necessary, replace and update stormwater control measures. Benchmark concentrations are not effluent limitations. A benchmark exceedance, therefore, is not a permit violation; however, failure to take corrective action is a violation of the permit. Benchmark monitoring data is used to determine the overall effectiveness of control measures and to assist the permittee in knowing when additional corrective actions may be necessary to comply with the limitations of the permit.

Because of the fleeting nature of stormwater discharges, the Department, under the direction of EPA guidance, has determined monthly averages are capricious measures of stormwater discharges. The *Technical Support Document for Water Quality Based Toxics Control* (EPA/505/2-90-001; 1991) Section 3.1 indicates most procedures within the document apply only to water quality based approaches, not end-of-pipe technology-based controls. Hence, stormwater only outfalls will generally only contain a maximum daily limit (MDL), benchmark, or monitoring requirement determined by the site specific conditions including the receiving water's current quality. While inspections of the stormwater BMPs occur monthly, facilities with no compliance issues are usually expected to sample stormwater quarterly.

Numeric benchmark values are based on water quality standards or other stormwater permits including guidance forming the basis of Environmental Protection Agency's (EPA's) *Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity* (MSGP). Because precipitation events are sudden and momentary, benchmarks based on state or federal standards or recommendations use the Criteria Maximum Concentration (CMC) value, or acute standard. The CMC is the estimate of the highest concentration of a material in surface water to which an aquatic community can be exposed briefly without resulting in an unacceptable effect. The CMC for aquatic life is intended to be protective of the vast majority of the aquatic communities in the United States.

✓ Applicable; this facility has stormwater-only outfalls with benchmark constraints. The benchmarks listed are consistently achieved in stormwater discharges by a variety of other industries with SWPPs.

COMPLIANCE AND ENFORCEMENT:

Enforcement is the action taken by the Water Protection Program (WPP) to bring an entity into compliance with the Missouri Clean Water Law, its implementing regulations, and/or any terms and conditions of an operating permit. The primary purpose of the enforcement activity in the WPP is to resolve violations and return the entity to compliance.

✓ Not applicable; the permittee/facility is not currently under Water Protection Program enforcement action.

EFFLUENT LIMITATION GUIDELINE:

Effluent Limitation Guidelines, or ELGs, are found at 40 CFR 400-499. These are limitations established by the EPA based on the SIC code and the type of work a facility is conducting. Most ELGs are for process wastewater and some address stormwater. All are technology based limitations which must be met by the applicable facility at all times.

✓ The facility does not have an associated ELG.

GROUNDWATER MONITORING:

Groundwater is a water of the state according to 10 CSR 20-7.015(1)11, and is subject to regulations at 10 CSR 20-7.015(7) and 10 CSR 20-7.031(6) and must be protected accordingly.

✓ This facility is not required to monitor groundwater for the water protection program.

REASONABLE POTENTIAL ANALYSIS (RPA):

Federal regulation [40 CFR Part 122.44(d)(1)(i)] requires effluent limitations for all pollutants that are (or may be) discharged at a level causing or have the reasonable potential to cause (or contribute to) an in-stream excursion above narrative or numeric water quality standards. If the permit writer determines any given pollutant has the reasonable potential to cause or contribute to an instream excursion above the WQS, the permit must contain effluent limits for that pollutant [40 CFR Part 122.44(d)(1)(iii)].

✓ Applicable; an RPA was conducted on appropriate parameters and was conducted as per (TSD, EPA/505/2-90-001, Section 3.3.2). A more detailed version including calculations of this RPA is available upon request. See Wasteload Allocations (WLA) for Limits in this section.

PARAMETER	CMC	RWC Acute	CCC	RWC Chronic	N	MAX/MIN	CV	MF	RP
Ammonia as Nitrogen (Summer) mg/L	12.1	0.31	1.5	0.05	8	0.62/0.1	0.6	3.30	NO
Ammonia as Nitrogen (Winter) mg/L	12.1	0.53	3.1	0.07	9	1.1/0.01	0.6	3.20	NO

Units are (µg/L) unless otherwise noted.

n/a Not Applicable

number of samples; if the number of samples is 10 or greater, then the CV value must be used in the WQBEL for the applicable constituent.

CV Coefficient of Variation (CV) is calculated by dividing the Standard Deviation of the sample set by the mean of the same sample set.

CCC continuous chronic concentration
CMC continuous maximum concentration

RWC Receiving Water Concentration: concentration of a toxicant or the parameter in the receiving water after mixing (if applicable)

MF Multiplying Factor; 99% confidence level and 99% probability basis

RP Reasonable Potential: an effluent is projected or calculated to cause an excursion above a water quality standard based on a number of factors

including, as a minimum, the four factors listed in 40 CFR 122.44(d)(1)(ii).

- ✓ Not applicable for outfall #002; an RPA was not conducted for this facility. This permit establishes permit limits and benchmarks for stormwater. The Department has determined stormwater is not a continuous discharge and is therefore not necessarily dependent on mathematical RPAs. However, the permit writer completed an RPD, a reasonable potential determination, using best professional judgment for all of the appropriate parameters in this permit. An RPD consists of reviewing application data and/or discharge monitoring data for the last five years and comparing those data to narrative or numeric water quality criteria.
- ✓ Permit writers use the Department's permit writer's manual (https://dnr.mo.gov/env/wpp/permits/manual/permit-manual.htm), the EPA's permit writer's manual (https://www.epa.gov/npdes/npdes-permit-writers-manual), program policies, and best professional judgment. For each parameter in each permit, the permit writer carefully considers all applicable information regarding: technology based effluent limitations, effluent limitation guidelines, water quality standards, stream flows and uses, and all applicable site specific information and data gathered by the permittee through discharge monitoring reports and renewal (or new) application sampling. Best professional judgment is based on the experience of the permit writer, cohorts in the Department and resources at the EPA, research, and maintaining continuity of permits if necessary. For stormwater permits, the permit writer is required per 10 CSR 6.200(6)(B)2 to consider: A. application and other information supplied by the permittee; B. effluent guidelines; C. best professional judgment of the permit writer; D. water quality; and E. BMPs. Part V provides specific decisions related to this permit.

SCHEDULE OF COMPLIANCE (SOC):

A schedule of remedial measures included in a permit, including an enforceable sequence of interim requirements (actions, effluent limits, operations, or milestone events) leading to compliance with the Missouri Clean Water Law, its implementing regulations, and/or the terms and conditions of an operating permit. SOCs are allowed under 40 CFR 122.47 providing certain conditions are met. ✓ Not applicable; this permit does not contain a SOC.

SPILL REPORTING:

Per 10 CSR 24-3.010, any emergency involving a hazardous substance must be reported to the Department's 24 hour Environmental Emergency Response hotline at (573) 634-2436 at the earliest practicable moment after discovery. The Department may require the submittal of a written report detailing measures taken to clean up a spill. These reporting requirements apply whether or not the spill results in chemicals or materials leaving the permitted property or reaching waters of the state. This requirement is in addition to the noncompliance reporting requirement found in Standard Conditions Part I. http://dnr.mo.gov/env/esp/spillbill.htm

SLUDGE - DOMESTIC BIOSOLIDS:

Biosolids are solid materials resulting from domestic wastewater treatment meeting federal and state criteria for beneficial use (i.e. fertilizer). Sewage sludge is solid, semi-solid, or liquid residue generated during the treatment of domestic sewage in a treatment works; including but not limited to, domestic septage; scum or solids removed in primary, secondary, or advanced wastewater treatment process; and material derived from sewage sludge. Sewage sludge does not include ash generated during the firing of sewage sludge in a sewage sludge incinerator or grit and screening generated during preliminary treatment of domestic sewage in a treatment works. Additional information: http://extension.missouri.edu/main/DisplayCategory.aspx?C=74 (WQ422 through WQ449).

✓ Not applicable; this condition is not applicable to the permittee for this facility.

SLUDGE - INDUSTRIAL:

Industrial sludge is solid, semi-solid, or liquid residue generated during the treatment of industrial process wastewater in a treatment works; including but not limited to, scum or solids removed in primary, secondary, or advanced wastewater treatment process; scum and solids filtered from water supplies and backwashed; and a material derived from industrial sludge.

✓ Sludge is removed by contract hauler. Standard Conditions Part III is attached.

STORMWATER PERMITTING:

A standard mass-balance equation cannot be calculated for stormwater from this facility because the stormwater flow and flow in the receiving stream cannot be determined for conditions on any given day. The amount of stormwater discharged from the facility will vary based on previous rainfall, soil saturation, humidity, detention time, BMPs, surface permeability, etc. Flow in the receiving stream will vary based on climatic conditions, size of watershed, amount of surfaces with reduced permeability (houses, parking lots, and the like) in the watershed, hydrogeology, topography, etc. Decreased permeability increases the flash of the stream.

It is likely sufficient rainfall to cause a discharge for four continuous days from a facility will also cause some significant amount of flow in the receiving stream. Chronic WQSs are based on a four-day exposure (except ammonia, which is based on a thirty day exposure). In the event a discharge does occur from this facility for four continuous days, some amount of flow will occur in the receiving stream. This flow will dilute stormwater discharges from a facility. For these reasons, most industrial stormwater facilities have limited potential to cause a violation of chronic water quality standards in the receiving stream.

Sufficient rainfall to cause a discharge for one hour or more from a facility would not necessarily cause significant flow in a receiving stream. Acute WQSs are based on a one hour of exposure, and must be protected at all times in unclassified streams, and within mixing zones of class P streams [10 CSR 20-7.031(4) and (5)(4)4.B.]. Therefore, industrial stormwater facilities with toxic contaminants do have the potential to cause a violation of acute WQSs if those toxic contaminants occur in sufficient amounts.

It is due to the items stated above staff are unable to perform statistical Reasonable Potential Analysis (RPA). However, staff will use their best professional judgment in determining if a facility has a potential to violate Missouri's Water Quality Standards.

STORMWATER POLLUTION PREVENTION PLAN (SWPPP):

In accordance with 40 CFR 122.44(k), Best Management Practices (BMPs) must be used to control or abate the discharge of pollutants when: 1) Authorized under section 304(e) of the Clean Water Act (CWA) for the control of toxic pollutants and hazardous substances from ancillary industrial activities; 2) Authorized under section 402(p) of the CWA for the control of stormwater discharges; 3) Numeric effluent limitations are infeasible; or 4) the practices are reasonably necessary to achieve effluent limitations and standards or to carry out the purposes and intent of the CWA. In accordance with the EPA's *Developing Your Stormwater Pollution Prevention Plan, A Guide for Industrial Operators*, (Document number EPA 833-B-09-002) [published by the United States Environmental Protection Agency (USEPA) in February 2009], BMPs are measures or practices used to reduce the amount of pollution entering waters of the state from a permitted facility. BMPs may take the form of a process, activity, or physical structure. Additionally in accordance with the Stormwater Management, a SWPPP is a series of steps and activities to 1) identify sources of pollution or contamination, and 2) select and carry out actions which prevent or control the pollution of storm water discharges.

A SWPPP must be prepared by the permittee if the SIC code is found in 40 CFR 122.26(b)(14) and/or 10 CSR 20-6.200(2). A SWPPP may be required of other facilities where stormwater has been identified as necessitating better management. The purpose of a SWPPP is to comply with all applicable stormwater regulations by creating an adaptive management plan to control and mitigate stream pollution from stormwater runoff. Developing a SWPPP provides opportunities to employ appropriate BMPs to minimize the risk of pollutants being discharged during storm events. The following paragraph outlines the general steps the permittee should take to determine which BMPs will work to achieve the benchmark values or limits in the permit. This section is not intended to be all encompassing or restrict the use of any physical BMP or operational and maintenance procedure assisting in pollution control. Additional steps or revisions to the SWPPP may be required to meet the requirements of the permit.

Areas which should be included in the SWPPP are identified in 40 CFR 122.26(b)(14). Once the potential sources of stormwater pollution have been identified, a plan should be formulated to best control the amount of pollutant being released and discharged by each activity or source. This should include, but is not limited to, minimizing exposure to stormwater, good housekeeping measures, proper facility and equipment maintenance, spill prevention and response, vehicle traffic control, and proper materials handling. Once a plan has been developed the facility will employ the control measures determined to be adequate to achieve the benchmark values discussed above. The facility will conduct monitoring and inspections of the BMPs to ensure they are working properly and reevaluate any BMP not achieving compliance with permitting requirements. For example, if sample results from an outfall show values of TSS above the benchmark value, the BMP being employed is deficient in controlling stormwater pollution. Corrective action should be taken to repair, improve, or replace the failing BMP. This internal evaluation is required at least once per month but should be continued more frequently if BMPs continue to fail. If failures do occur, continue this trial and error process until appropriate BMPs have been established.

For new, altered, or expanded stormwater discharges, the SWPPP shall identify reasonable and effective BMPs while accounting for environmental impacts of varying control methods. The antidegradation analysis must document why no discharge or no exposure options are not feasible. The selection and documentation of appropriate control measures shall serve as an alternative analysis of technology and fulfill the requirements of antidegradation [10 CSR 20-7.031(3)]. For further guidance, consult the antidegradation implementation procedure (http://dnr.mo.gov/env/wpp/docs/AIP050212.pdf).

Alternative Analysis (AA) evaluation of the BMPs is a structured evaluation of BMPs that are reasonable and cost effective. The AA evaluation should include practices that are designed to be: 1) non-degrading; 2) less degrading; or 3) degrading water quality. The glossary of AIP defines these three terms. The chosen BMP will be the most reasonable and effective management strategy while ensuring the highest statutory and regulatory requirements are achieved and the highest quality water attainable for the facility is discharged. The AA evaluation must demonstrate why "no discharge" or "no exposure" is not a feasible alternative at the facility. This structured analysis of BMPs serves as the antidegradation review, fulfilling the requirements of 10 CSR 20-7.031(3) Water Quality Standards and Antidegradation Implementation Procedure (AIP), Section II.B.

If parameter-specific numeric exceedances continue to occur and the permittee feels there are no practicable or cost-effective BMPs which will sufficiently reduce a pollutant concentration in the discharge to the benchmark values established in the permit, the permittee can submit a request to re-evaluate the benchmark values. This request needs to include 1) a detailed explanation of why the facility is unable to comply with the permit conditions and unable to establish BMPs to achieve the benchmark values; 2) financial data of the company and documentation of cost associated with BMPs for review and 3) the SWPPP, which should contain adequate documentation of BMPs employed, failed BMPs, corrective actions, and all other required information. This will allow the Department to conduct a cost analysis on control measures and actions taken by the facility to determine cost-effectiveness of BMPs. The request shall be submitted in the form of an operating permit modification; the application is found at: http://dnr.mo.gov/forms/index.html.

Applicable; a SWPPP shall be developed and implemented for this facility.

VARIANCE:

Per the Missouri Clean Water Law §644.061.4, variances shall be granted for such period of time and under such terms and conditions as shall be specified by the commission in its order. The variance may be extended by affirmative action of the commission. In no event shall the variance be granted for a period of time greater than is reasonably necessary for complying with the Missouri Clean Water Law §§644.006 to 644.141 or any standard, rule or regulation promulgated pursuant to Missouri Clean Water Law §§644.006

✓ Not applicable; this permit is not drafted under premise of a petition for variance.

WASTELOAD ALLOCATIONS (WLA) FOR LIMITS:

As per [10 CSR 20-2.010(78)], the WLA is the amount of pollutant each discharger is allowed to discharge into the receiving stream without endangering water quality. Two general types of effluent limitations, technology-based effluent limits (TBELs) and water quality based effluent limits (WQBELs) are reviewed. If one limit does not provide adequate protection for the receiving waters, then the other must be used.

Applicable; wasteload allocations were calculated where relevant using water quality criteria or water quality model results and by applying the dilution equation below:

$$C = \frac{\left(Cs \times Qs\right) + \left(Ce \times Qe\right)}{\left(Qe + Qs\right)}$$
 (EPA/505/2-90-001, Section 4.5.5)

Where C = downstream concentration

Cs = upstream concentration

Qs = upstream flow

Ce = effluent concentration

Qe = effluent flow

- Acute wasteload allocations designated as daily maximum limits (MDL) were determined using applicable water quality criteria (CMC: criteria maximum concentration) and stream volume of flow at the edge of the zone of initial dilution (ZID).
- Chronic wasteload allocations designated as monthly average limits (AML) were determined using applicable chronic water quality criteria (CCC: criteria continuous concentration) and stream volume of flow at the edge of the mixing zone (MZ).
- Water quality based MDL and AML effluent limitations were calculated using methods and procedures outlined in USEPA's Technical Support Document For Water Quality-based Toxics Control or TSD EPA/505/2-90-001; 3/1991.
- Number of Samples "n": In accordance with the TSD for water quality-based permitting, effluent quality is determined by the underlying distribution of daily values, which is determined by the Long Term Average (LTA) associated with a particular Wasteload Allocation (WLA) and by the Coefficient of Variation (CV) of the effluent concentrations. Increasing or decreasing the monitoring frequency does not affect this underlying distribution or treatment performance which should be, at a minimum, targeted to comply with the values dictated by the WLA. Therefore, it is recommended the actual planned

frequency of monitoring normally be used to determine the value of "n" for calculating the AML. However, in situations where monitoring frequency is once per month or less, a higher value for "n" must be assumed for AML derivation purposes. Thus, the statistical procedure being employed using an assumed number of samples is "n = 4" at a minimum. For total ammonia as nitrogen, "n = 30" is used.

WLA MODELING:

Permittees may submit site specific studies to better determine the site specific wasteload allocations applied in permits.

✓ Not applicable; a WLA study was either not submitted or determined not applicable by Department staff.

WATER QUALITY STANDARDS:

Per 10 CSR 20-7.031(4), general criteria shall be applicable to all waters of the state at all times including mixing zones. Additionally, 40 CFR 122.44(d)(1) directs the Department to establish in each NPDES permit to include conditions to achieve water quality established under Section 303 of the Clean Water Act, including state narrative criteria for water quality.

WHOLE EFFLUENT TOXICITY (WET) TEST:

A WET test is a quantifiable method to determine discharges from the facility cause toxicity to aquatic life by itself, in combination with, or through synergistic responses, when mixed with receiving stream water.

✓ Not applicable; at this time, the permittee is not required to conduct WET testing for this facility.

Part IV. EFFLUENT LIMITS DETERMINATION

Effluent limitations derived and established for this permit are based on current operations of the facility. Effluent means both process water and stormwater. Any flow through the outfall is considered a discharge and must be sampled and reported as provided below. Future permit action due to facility modification may contain new operating permit terms and conditions that supersede the terms and conditions, including effluent limitations, of this operating permit. Daily maximums and monthly averages are required under 40 CFR 122.45(d)(1) for continuous discharges not from a POTW.

GENERAL CRITERIA CONSIDERATIONS:

In accordance with 40 CFR 122.44(d)(1), effluent limitations shall be placed into permits for pollutants which have been determined to cause, have the reasonable potential to cause, or to contribute to an excursion above any State water quality standard, including State narrative criteria for water quality. The rule further states pollutants which have been determined to cause, have the reasonable potential to cause, or contribute to an excursion above a narrative criterion within an applicable State water quality standard, the permit shall contain a numeric effluent limitation to protect that narrative criterion. The previous permit included the narrative criteria as specific prohibitions placed upon the discharge. These prohibitions were included in the permit absent any discussion of the discharge's reasonable potential to cause or contribute to an excursion of the criterion. In order to comply with this regulation, the permit writer has completed a reasonable potential determination on whether the discharge has reasonable potential to cause, or contribute to an excursion of the general criteria listed in 10 CSR 20-7.031(4). These specific requirements are listed below followed by derivation and discussion (the lettering matches that of the rule itself, under 10 CSR 20-7.031(4)). In instances where reasonable potential exists, the permit includes numeric limitations to address the reasonable potential. In instances where reasonable potential does not exist the permit includes monitoring of the discharges potential to impact the receiving stream's narrative criteria. Finally, all of the previous permit narrative criteria prohibitions have been removed from the permit given they are addressed by numeric limits where reasonable potential exists. It should also be noted that Section 644.076.1, RSMo as well as Section D – Administrative Requirements of Standard Conditions Part I of this permit state that it shall be unlawful for any person to cause or permit any discharge of water contaminants from any water contaminant or point source located in Missouri that is in violation of sections 644.006 to 644.141 of the Missouri Clean Water Law or any standard, rule, or regulation promulgated by the commission.

- (A) Waters shall be free from substances in sufficient amounts to cause the formation of putrescent, unsightly or harmful bottom deposits or prevent full maintenance of beneficial uses.
 - For all outfalls, there is no RP for putrescent bottom deposits preventing full maintenance of beneficial uses because nothing disclosed by the permittee at renewal for these outfalls indicates putrescent wastewater would be discharged from the facility.
 - For outfall #001, there is no RP for unsightly or harmful bottom deposits preventing full maintenance of beneficial uses because nothing disclosed by the permittee indicates solids will be present in sufficient amounts to cause or contribute to unsightly or harmful bottom deposits; this outfall has a TSS limitations; however, it is based on technology for the processes involved.
 - For outfall #002, there is no RP for unsightly or harmful bottom deposits preventing full maintenance of beneficial uses because nothing disclosed by the permittee indicates solids will be present in sufficient amounts to cause or contribute to unsightly or harmful bottom deposits; this outfall has a TSS benchmark; however, it is based on technology for the processes involved and is not a water quality limitation.
- (B) Waters shall be free from oil, scum and floating debris in sufficient amounts to be unsightly or prevent full maintenance of beneficial uses.

- For outfall #001, there is RP for oil in sufficient amounts to be unsightly preventing full maintenance of beneficial uses because disclosures via DMR requirements for this outfall indicates oil will be present in sufficient amounts to impair beneficial uses.
- For outfall #002, there is no RP for oil in sufficient amounts to be unsightly preventing full maintenance of beneficial uses because nothing disclosed by the permittee at renewal or during prior sampling for DMR requirements for these outfalls indicates oil will be present in sufficient amounts to impair beneficial uses.
- For all outfalls, there is no RP for scum and floating debris in sufficient amounts to be unsightly preventing full maintenance of beneficial uses because nothing disclosed by the permittee at renewal for these outfalls indicates scum and floating debris will be present in sufficient amounts to impair beneficial uses
- (C) Waters shall be free from substances in sufficient amounts to cause unsightly color or turbidity, offensive odor or prevent full maintenance of beneficial uses.
 - For all outfalls, there is no RP for unsightly color or turbidity in sufficient amounts preventing full maintenance of beneficial uses because nothing disclosed by the permittee at renewal for these outfalls indicates unsightly color or turbidity will be present in sufficient amounts to impair beneficial uses.
 - For all outfalls, there is no RP for offensive odor in sufficient amounts preventing full maintenance of beneficial uses because nothing disclosed by the permittee at renewal for these outfalls indicates offensive odor will be present in sufficient amounts to impair beneficial uses.
- (D) Waters shall be free from substances or conditions in sufficient amounts to result in toxicity to human, animal or aquatic life.
 - The permit writer considered specific toxic pollutants when writing this permit. Numeric effluent limitations are included for those pollutants that could be discharged in toxic amounts. These effluent limitations are protective of human health, animals, and aquatic life.
- (E) There shall be no significant human health hazard from incidental contact with the water.
 - It is the permit writer's opinion that this criterion is the same as (D).
- (F) There shall be no acute toxicity to livestock or wildlife watering.
 - It is the permit writer's opinion that this criterion is the same as (D).
- (G) Waters shall be free from physical, chemical or hydrologic changes that would impair the natural biological community.
 - For all outfall #001, there is RP for physical changes that would impair the natural biological community because disclosures by the permittee at renewal for these outfalls indicates a physical changes that would impair the natural biological community. Limits were placed on temperature to protect this general criterion.
 - For all outfall #002, there is no RP for physical changes that would impair the natural biological community because nothing disclosed by the permittee at renewal for this outfall indicates physical changes that would impair the natural biological community.
 - For all outfalls, there is no RP for chemical changes that would impair the natural biological community because nothing
 disclosed by the permittee at renewal for these outfalls indicates chemical changes that would impair the natural biological
 community.
 - For all outfalls, there is no RP for hydrologic changes that would impair the natural biological community because nothing disclosed by the permittee at renewal for these outfalls indicates hydrologic changes that would impair the natural biological community.
- (H) Waters shall be free from used tires, car bodies, appliances, demolition debris, used vehicles or equipment and solid waste as defined in Missouri's Solid Waste Law, section 260.200, RSMo, except as the use of such materials is specifically permitted pursuant to section 260.200-260.247.
 - There are no solid waste disposal activities or any operation that has reasonable potential to cause or contribute to the materials listed above being discharged through any outfall.

OUTFALL #001 - MAIN FACILITY OUTFALL

EFFLUENT LIMITATIONS TABLE:

PARAMETERS	Unit	Daily Max	MONTHLY AVG	PREVIOUS PERMIT LIMITS	Minimum Sampling Frequency	Minimum Reporting Frequency	SAMPLE TYPE
PHYSICAL							
FLOW	MGD	*	*	WEEKLY	ONCE/MONTH	ONCE/MONTH	24 Hr. Tot
TEMPERATURE	°F	90	90	SAME	ONCE/MONTH	ONCE/MONTH	GRAB
CONVENTIONAL							
COD	mg/L	*	*	SAME	ONCE/MONTH	ONCE/MONTH	GRAB
CHLORINE, TOTAL RESIDUAL	μg/L	*	*	NEW	ONCE/MONTH	ONCE/MONTH	GRAB
OIL & GREASE	mg/L	15	10	SAME	ONCE/MONTH	ONCE/MONTH	GRAB
pH ‡	SU	6.5 то 9.0	6.5 to 9.0	SAME	ONCE/MONTH	ONCE/MONTH	GRAB
TSS	mg/L	45	30	SAME	ONCE/MONTH	ONCE/MONTH	GRAB
METALS							
COPPER, TR	μg/L	*	*	NEW	ONCE/QUARTER	ONCE/QUARTER	GRAB

Monitoring requirement only

** Monitoring with associated benchmark

Report the minimum and maximum pH values; pH is not to be averaged.

NEW Parameter not established in previous state operating permit.

TR Total Recoverable

DERIVATION AND DISCUSSION OF LIMITS:

PHYSICAL:

Flow

In accordance with [40 CFR Part 122.44(i)(1)(ii)] the volume of effluent discharged from each outfall is needed to assure compliance with permitted effluent limitations. If the permittee is unable to obtain effluent flow, then it is the responsibility of the permittee to inform the Department, which may require the submittal of an operating permit modification. The facility will report the total flow in millions of gallons per day (MGD). Weekly monitoring decreased to monthly.

Temperature

In accordance with 10 CSR 20-7.031(5)(D), water contaminant sources shall not cause or contribute to stream temperature in excess of ninety degrees Fahrenheit (90 °F); the permittee submitted between 44.6 and 88 °F. Limits and monthly monitoring continued from previous permit.

CONVENTIONAL:

Biochemical Oxygen Demand (BOD₅)

Monitoring not continued. The previous permit's limits were based on secondary treatment for domestic wastewater; 45 mg/L daily maximum, 30 mg/L monthly average. This is a cooling tower discharge.

Chemical Oxygen Demand (COD)

Monitoring is continued using the permit writer's best professional judgment. The permittee reported between 5 and 79 mg/L. There is no water quality standard for COD; however, increased oxygen demand may impact instream water quality. COD is also a valuable indicator parameter. COD monitoring allows the permittee to identify increases in COD that may indicate materials or chemicals coming into contact with stormwater that cause an increase in oxygen demand; or chemicals applied in the cooling system. Increases in COD may indicate a need for maintenance or improvement of BMPs.

Chlorine, Total Residual (TRC)

Monitoring required; the facility uses potable water in the cooling tower discharges. The facility must use the most sensitive analytical method.

Oil & Grease

Daily maximum 15 mg/L, monthly average 10 mg/L; continued from previous permit. The permittee reported between 5 and 23 mg/L. Conventional pollutant, in accordance with 10 CSR 20-7.031 Table A: *Criteria for Designated Uses*; 10 mg/L monthly average (chronic standard). The daily maximum was calculated using the *Technical Support Document for Water Quality-Based Toxics Control* (EPA/505/2-90-001). Section 5.4.2 indicates the waste load allocation can be set to the chronic standard. When the chronic standard is multiplied by 1.5, the daily maximum can be calculated. Hence, 10 * 1.5 = 15 mg/L for the daily maximum.

pН

6.5 to 9.0 SU. Continued from previous permit. The Water Quality Standard at 10 CSR 20-7.031(5)(E) states water contaminants shall not cause pH to be outside the range of 6.5 to 9.0 standard pH units.

Total Suspended Solids (TSS)

45 mg/L daily maximum, 30 mg/L monthly average; technology effluent limitations from the previous state operating permit have been reassessed and verified they remain applicable to the discharge. The facility can meet these limits; the facility reported between 2 and 50 mg/L for this parameter; the second highest result was 20 mg/L. There is no water quality standard for TSS; however, sediment discharges can negatively impact aquatic life habitat. TSS is also a valuable indicator parameter. TSS monitoring allows the permittee to identify increases in TSS that may indicate uncontrolled materials leaving the site. Increased suspended solids in runoff can lead to decreased available oxygen for aquatic life and an increase of surface water temperatures in a receiving stream. Suspended solids can also be carriers of toxins, which can adsorb to the suspended particles; therefore, total suspended solids are a valuable indicator parameter for other pollution.

METALS:

Copper, Total Recoverable

Monthly monitoring is required to determine if reasonable potential exists for the discharge to cause toxicity within the receiving stream; new parameter. The permittee reported this parameter present in the discharge at $9.6 \,\mu\text{g/L}$.

NUTRIENTS:

Ammonia, Total as Nitrogen

There is no statistical RP for this parameter, monitoring not continued.

OTHER:

Benzene, Ethylbenzene, Toluene, Xylene

Monitoring not continued as the permittee has shown through sampling, these parameters are not present in the wastewater discharges.

Total Toxic Organics

Monitoring not continued as the permittee has indicated these parameters are not present in the wastewater discharges.

OUTFALL #002 - STORMWATER

EFFLUENT LIMITATIONS TABLE:

DI DUMI DIMITATIONO TABLE:							
PARAMETERS	Unit	Daily Maximum Limit	BENCH- MARK	PREVIOUS PERMIT LIMITS	Minimum Sampling Frequency	MINIMUM Reporting Frequency	SAMPLE TYPE
PHYSICAL							
FLOW	MGD	*	-	NEW	ONCE/MONTH	ONCE/MONTH	24 hr. estimate
PRECIPITATION	inches	*	-	NEW	ONCE/MONTH	ONCE/MONTH	24 нг. тот
CONVENTIONAL							
BOD ₅	mg/L	**	68	45, 30	ONCE/MONTH	ONCE/MONTH	GRAB
COD	mg/L	**	147	*,*	ONCE/MONTH	ONCE/MONTH	GRAB
Oil & Grease	mg/L	**	10	15, 10	ONCE/QUARTER	ONCE/QUARTER	GRAB
PH ‡	SU	6.5 то 9.0	-	SAME	ONCE/MONTH	ONCE/MONTH	GRAB
TSS	mg/L	**	58	45, 30	ONCE/MONTH	ONCE/MONTH	GRAB
METALS							
COPPER, TR	μg/L	*	-	NEW	ONCE/QUARTER	ONCE/QUARTER	GRAB

* Monitoring requirement only

** Monitoring with associated benchmark

Report the minimum and maximum pH values; pH is not to be averaged.

NEW Parameter not established in previous state operating permit.

TR Total Recoverable

DERIVATION AND DISCUSSION OF LIMITS:

PHYSICAL:

Flow

In accordance with [40 CFR Part 122.44(i)(1)(ii)] the volume of effluent discharged from each outfall is needed to assure compliance with permitted effluent limitations. If the permittee is unable to obtain effluent flow, then it is the responsibility of the permittee to inform the Department, which may require the submittal of an operating permit modification. The facility will report the total flow in millions of gallons per day (MGD); monthly monitoring continued.

Precipitation

Monitoring only requirement; measuring the amount of precipitation [(10 CSR 20-6.200(2)(C)1.E(VI)] during an event is necessary to ensure adequate stormwater management exists at the site. Knowing the amount of potential stormwater runoff can provide the permittee a better understanding of specific control measure that should be employed to ensure protection of water quality. The facility will provide the 24 hour accumulation value of precipitation from the day of sampling the other parameters. It is not necessary to report all days of precipitation during the month because of the readily available on-line data. Daily monitoring reduced to monthly.

<u>Temperature</u>

Monitoring discontinued. Monitoring with a 90 °F limit in previous permit was required however, this is stormwater only. Stormwater discharges not affected by process wastewater is not subject to thermal limitations.

CONVENTIONAL:

Biochemical Oxygen Demand 5-Day

Monitoring with benchmark of 68 mg/L is included using the permit writer's best professional judgment. Previous permit implemented limitations of 45 mg/L daily maximum and 30 mg/L monthly average. The permittee reported between 6 and 240 mg/L. The previous permit limits were based on secondary treatment for domestic wastewater and are not applicable to this outfall. The permit writer derived the benchmark based on the 95th percentile of the data. There is no water quality standard for BOD; however, increased oxygen demand may impact instream water quality. BOD is also a valuable indicator parameter. BOD monitoring allows the permittee to identify increases in BOD that may indicate materials/chemicals coming into contact with stormwater that cause an increase in oxygen demand. Increases in BOD may indicate a need for maintenance or improvement of BMPs. The benchmark established in this permit is within the range of values implemented in other permits that have similar industrial activities and is achievable by those industries. Monthly monitoring continued.

Chemical Oxygen Demand (COD)

Monitoring with benchmark of 147 mg/L is included using the permit writer's best professional judgment. Previous permit was monitoring only; the facility reported between 5 and 330 mg/L. The benchmark was based on the 95th percentile of the data. There is no water quality standard for COD; however, increased oxygen demand may impact instream water quality. COD is also a valuable indicator parameter. COD monitoring allows the permittee to identify increases in COD that may indicate materials/chemicals coming into contact with stormwater that cause an increase in oxygen demand. Increases in COD may indicate a need for maintenance or improvement of BMPs. Monthly monitoring continued.

Oil & Grease

Monitoring with a daily maximum benchmark of 10 mg/L. Previous permit limits were 15 mg/L daily maximum and 10 mg/L monthly average. The facility reported between 5 and 5.3 mg/L (non-detections). Oil and grease is considered a conventional pollutant. Oil and grease is a comprehensive test which measures for gasoline, diesel, crude oil, creosote, kerosene, heating oils, heavy fuel oils, lubricating oils, waxes, and some asphalt and pitch. The test can also detect some volatile organics such as benzene, toluene, ethylbenzene, or toluene, but these constituents are often lost during testing due to their boiling points. It is recommended to perform separate testing for these constituents if they are a known pollutant of concern at the site, i.e. aquatic life toxicity or human health is a concern. Results do not allow for separation of specific pollutants within the test, they are reported, totaled, as "oil and grease". Per 10 CSR 20-7.031 Table A: *Criteria for Designated Uses*; 10 mg/L is the standard for protection of aquatic life. This standard will also be used to protect the general criteria found at 10 CSR 20: 7.031 (4). 10 mg/L is the level at which sheen is expected to form on receiving waters. Oils and greases of different densities will possibly form sheen or unsightly bottom deposits at levels which vary from 10 mg/L. To protect the general criteria, it is the responsibility of the permittee to visually observe the discharge and receiving waters for sheen or bottom deposits. Monthly monitoring reduced to quarterly.

рH

6.5 to 9.0 SU. The Water Quality Standard at 10 CSR 20-7.031(5)(E) states water contaminants shall not cause pH to be outside the range of 6.5 to 9.0 standard pH units. The permittee reported between 6.64 and 10 SU during the last permit cycle. Limits continued; monthly monitoring continued.

Total Suspended Solids (TSS)

Monthly monitoring with a daily maximum benchmark of 58 mg/L. Previous permit limits were based on secondary treatment for a domestic wastewater treatment facility; 45 mg/L daily maximum, 30 mg/L monthly average however this outfall is only stormwater and fire protection testing water. The facility reported between 3.2 and 69 mg/L. The benchmark was derived using the 95th percentile of the data. There is no water quality standard for TSS; however, sediment discharges can negatively impact aquatic life habitat. TSS is also a valuable indicator parameter. TSS monitoring allows the permittee to identify increases in TSS that may indicate uncontrolled materials leaving the site. Increased suspended solids in runoff can lead to decreased available oxygen for aquatic life and an increase of surface water temperatures in a receiving stream. Suspended solids can also be carriers of toxins, which can adsorb to the suspended particles; therefore, total suspended solids are a valuable indicator parameter for other pollution. A benchmark value will be implemented for this parameter. This benchmark value is shown to be achievable through proper operational controls and maintenance of BMPs.

METALS:

Copper, Total Recoverable

Quarterly monitoring is required to determine if reasonable potential exists for the discharge to cause toxicity within the receiving stream; new parameter. The permittee reported this parameter present in the discharge at $6.9 \,\mu\text{g/L}$.

OTHER:

Benzene, Ethylbenzene, Toluene, Xylene

Monitoring not continued as the permittee has shown through sampling, these parameters are not present in the stormwater discharges.

Total Toxic Organics

Monitoring not continued as the permittee has indicated these parameters are not present in the stormwater discharges.

Part V. SAMPLING AND REPORTING REQUIREMENTS:

Refer to each outfall's derivation and discussion of limits section to review individual sampling and reporting frequencies and sampling type. Additionally, see Standard Conditions Part I attached at the end of this permit and fully incorporated within.

ELECTRONIC DISCHARGE MONITORING REPORT (EDMR) SUBMISSION SYSTEM:

The U.S. Environmental Protection Agency (EPA) promulgated a final rule on October 22, 2015, to modernize Clean Water Act reporting for municipalities, industries, and other facilities by converting to an electronic data reporting system. This final rule requires regulated entities and state and federal regulators to use information technology to electronically report data required by the National Pollutant Discharge Elimination System (NPDES) permit program instead of filing paper reports. To comply with the federal rule, the Department is requiring all permittees to begin submitting discharge monitoring data and reports online.

Per 40 CFR 127.15 and 127.24, permitted facilities may request a temporary waiver for up to 5 years or a permanent waiver from electronic reporting from the Department. To obtain an electronic reporting waiver, a permittee must first submit an eDMR Waiver Request Form: http://dnr.mo.gov/forms/780-2692-f.pdf. A request must be made for each facility. If more than one facility is owned or operated by a single entity, then the entity must submit a separate request for each facility based on its specific circumstances. An approved waiver is non-transferable.

The Department must review and notify the facility within 120 calendar days of receipt if the waiver request has been approved or rejected [40 CFR 124.27(a)]. During the Department review period as well as after a waiver is granted, the facility must continue submitting a hard-copy of any reports required by their permit. The Department will enter data submitted in hard-copy from those facilities allowed to do so and electronically submit the data to the EPA on behalf of the facility.

✓ The permittee/facility is currently using the eDMR data reporting system.

SAMPLING FREQUENCY JUSTIFICATION:

Sampling and reporting frequency was generally retained from previous permit. 40 CFR 122.45(d)(1) indicates all continuous discharges shall be permitted with daily maximum and monthly average limits. Sampling frequency for stormwater-only outfalls is typically quarterly even though BMP inspection occurs monthly. The facility may sample more frequently if additional data is required to determine if best management operations and technology are performing as expected.

SAMPLING TYPE JUSTIFICATION:

Sampling type was continued from the previous permit. The sampling types are representative of the discharges, and are protective of water quality. Discharges with altering effluent should have composite sampling; discharges with uniform effluent can have grab samples. Grab samples are usually appropriate for stormwater. Parameters which must have grab sampling are: pH, ammonia, *E. coli*, total residual chlorine, free available chlorine, hexavalent chromium, dissolved oxygen, total phosphorus, and volatile organic samples.

SUFFICIENTLY SENSITIVE ANALYTICAL METHODS:

Please review Standard Conditions Part 1, section A, number 4. The analytical and sampling methods used shall conform to the reference methods listed in 10 CSR 20-7.015 and/or 40 CFR 136 unless alternates are approved by the Department. The facility shall use sufficiently sensitive analytical methods for detecting, identifying, and measuring the concentrations of pollutants. The facility shall ensure the selected methods are able to quantify the presence of pollutants in a given discharge at concentrations that are low enough to determine compliance with Water Quality Standards in 10 CSR 20-7.031 or effluent limitations unless provisions in the permit allow for other alternatives. A method is "sufficiently sensitive" when; 1) the method quantifies the pollutant below the level of the applicable water quality criterion or; 2) the method minimum level is above the applicable water quality criterion, but the amount of pollutant in a facility's discharge is high enough that the method detects and quantifies the level of pollutant in the discharge, or 3) the method has the lowest minimum level of the analytical methods approved under 10 CSR 20-7.015 and or 40 CFR 136. These methods are also required for parameters listed as monitoring only, as the data collected may be used to determine if numeric limitations need to be established. A permittee is responsible for working with their contractors to ensure the analysis performed is sufficiently sensitive. 40 CFR 136 lists the approved methods accepted by the Department. Table A at 10 CSR 20-7.031 shows water quality standards.

Part VI. ADMINISTRATIVE REQUIREMENTS

On the basis of preliminary staff review and the application of applicable standards and regulations, the Department, as administrative agent for the Missouri Clean Water Commission, proposes to issue a permit(s) subject to certain effluent limitations, schedules, and special conditions contained herein and within the operating permit. The proposed determinations are tentative pending public comment.

FEES:

The previous permit did not account for total discharges from the facility; the permit fees will be increased from \$1,800 per year to \$3,000 per year in accordance with 10 CSR 20-6.011(2)(E)2.

PERMIT SYNCHRONIZATION:

The Department of Natural Resources is currently undergoing a synchronization process for operating permits. Permits are normally issued on a five-year term, but to achieve synchronization many permits will need to be issued for less than the full five years allowed by regulation. The intent is that all permits within a watershed will move through the Watershed Based Management (WBM) cycle together will all expire in the same fiscal year. http://dnr.mo.gov/env/wpp/cpp/docs/watershed-based-management.pdf. This will allow further streamlining by placing multiple permits within a smaller geographic area on public notice simultaneously, thereby reducing repeated administrative efforts. This will also allow the Department to explore a watershed based permitting effort at some point in the future. Renewal applications must continue to be submitted within 180 days of expiration, however, in instances where effluent data from the previous renewal is less than three years old, that data may be re-submitted to meet the requirements of the renewal application. If the permit provides a schedule of compliance for meeting new water quality based effluent limits beyond the expiration date of the permit, the time remaining in the schedule of compliance will be allotted in the renewed permit.

✓ This permit will continue synchronization by expiring the end of the second quarter 2023.

PUBLIC NOTICE:

The Department shall give public notice that a draft permit has been prepared and its issuance is pending. http://dnr.mo.gov/env/wpp/permits/pn/index.html Additionally, public notice will be issued if a public hearing is to be held because of a significant degree of interest in and water quality concerns related to a draft permit. No public notice is required when a request for a permit modification or termination is denied; however, the requester and permittee must be notified of the denial in writing.

The Department must issue public notice of a pending operating permit or of a new or reissued statewide general permit. The public comment period is the length of time not less than 30 days following the date of the public notice which interested persons may submit written comments about the proposed permit.

For persons wanting to submit comments regarding this proposed operating permit, then please refer to the Public Notice page located at the front of this draft operating permit. The Public Notice page gives direction on how and where to submit appropriate comments.

The Public Notice period for this operating permit was from 5/25/2018-6/25/2018. No comments were received.

DATE OF FACT SHEET: JUNE 26, 2018

COMPLETED BY:

PAM HACKLER, ENVIRONMENTAL SCIENTIST MISSOURI DEPARTMENT OF NATURAL RESOURCES WATER PROTECTION PROGRAM OPERATING PERMITS SECTION - INDUSTRIAL UNIT (573) 526-3386 pam.hackler@dnr.mo.gov



THE MISSOURI DEPARTMENT OF NATURAL RESOURCES MISSOURI CLEAN WATER COMMISSION REVISED AUGUST 1, 2014

These Standard Conditions incorporate permit conditions as required by 40 CFR 122.41 or other applicable state statutes or regulations. These minimum conditions apply unless superseded by requirements specified in the permit.

Part I – General Conditions Section A – Sampling, Monitoring, and Recording

1. Sampling Requirements.

- Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity.
- b. All samples shall be taken at the outfall(s) or Missouri Department of Natural Resources (Department) approved sampling location(s), and unless specified, before the effluent joins or is diluted by any other body of water or substance.

2. Monitoring Requirements.

- a. Records of monitoring information shall include:
 - i. The date, exact place, and time of sampling or measurements;
 - ii. The individual(s) who performed the sampling or measurements;
 - iii. The date(s) analyses were performed;
 - iv. The individual(s) who performed the analyses;
 - v. The analytical techniques or methods used; and
 - vi. The results of such analyses.
- b. If the permittee monitors any pollutant more frequently than required by the permit at the location specified in the permit using test procedures approved under 40 CFR Part 136, or another method required for an industry-specific waste stream under 40 CFR subchapters N or O, the results of such monitoring shall be included in the calculation and reported to the Department with the discharge monitoring report data (DMR) submitted to the Department pursuant to Section B, paragraph 7.
- Sample and Monitoring Calculations. Calculations for all sample and monitoring results which require averaging of measurements shall utilize an arithmetic mean unless otherwise specified in the permit.
- Test Procedures. The analytical and sampling methods used shall conform to the reference methods listed in 10 CSR 20-7.015 unless alternates are approved by the Department. The facility shall use sufficiently sensitive analytical methods for detecting, identifying, and measuring the concentrations of pollutants. The facility shall ensure that the selected methods are able to quantify the presence of pollutants in a given discharge at concentrations that are low enough to determine compliance with Water Quality Standards in 10 CSR 20-7.031 or effluent limitations unless provisions in the permit allow for other alternatives. A method is "sufficiently sensitive" when; 1) the method minimum level is at or below the level of the applicable water quality criterion for the pollutant or, 2) the method minimum level is above the applicable water quality criterion, but the amount of pollutant in a facility's discharge is high enough that the method detects and quantifies the level of pollutant in the discharge, or 3) the method has the lowest minimum level of the analytical methods approved under 10 CSR 20-7.015. These methods are also required for parameters that are listed as monitoring only, as the data collected may be used to determine if limitations need to be established. A permittee is responsible for working with their contractors to ensure that the analysis performed is sufficiently sensitive.
- 5. Record Retention. Except for records of monitoring information required by the permit related to the permittee's sewage sludge use and disposal activities, which shall be retained for a period of at least five (5) years (or longer as required by 40 CFR part 503), the permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports required by the permit, and records of all data used to complete the application for the permit, for a period of at least three (3) years from the date of the sample, measurement, report or application. This period may be extended by request of the Department at any time.

Illegal Activities.

- a. The Federal Clean Water Act provides that any person who falsifies, tampers with, or knowingly renders inaccurate any monitoring device or method required to be maintained under the permit shall, upon conviction, be punished by a fine of not more than \$10,000, or by imprisonment for not more than two (2) years, or both. If a conviction of a person is for a violation committed after a first conviction of such person under this paragraph, punishment is a fine of not more than \$20,000 per day of violation, or by imprisonment of not more than four (4) years, or both.
- b. The Missouri Clean Water Law provides that any person or who falsifies, tampers with, or knowingly renders inaccurate any monitoring device or method required to be maintained pursuant to sections 644.006 to 644.141 shall, upon conviction, be punished by a fine of not more than \$10,000, or by imprisonment for not more than six (6) months, or by both. Second and successive convictions for violation under this paragraph by any person shall be punished by a fine of not more than \$50,000 per day of violation, or by imprisonment for not more than two (2) years, or both.

Section B – Reporting Requirements

1. Planned Changes.

- a. The permittee shall give notice to the Department as soon as possible of any planned physical alterations or additions to the permitted facility when:
 - The alteration or addition to a permitted facility may meet one of the criteria for determining whether a facility is a new source in 40 CFR 122.29(b); or
 - ii. The alteration or addition could significantly change the nature or increase the quantity of pollutants discharged. This notification applies to pollutants which are subject neither to effluent limitations in the permit, nor to notification requirements under 40 CFR 122.42;
 - iii. The alteration or addition results in a significant change in the permittee's sludge use or disposal practices, and such alteration, addition, or change may justify the application of permit conditions that are different from or absent in the existing permit, including notification of additional use or disposal sites not reported during the permit application process or not reported pursuant to an approved land application plan;
- iv. Any facility expansions, production increases, or process modifications which will result in a new or substantially different discharge or sludge characteristics must be reported to the Department 60 days before the facility or process modification begins. Notification may be accomplished by application for a new permit. If the discharge does not violate effluent limitations specified in the permit, the facility is to submit a notice to the Department of the changed discharge at least 30 days before such changes. The Department may require a construction permit and/or permit modification as a result of the proposed changes at the facility.

2. Non-compliance Reporting.

a. The permittee shall report any noncompliance which may endanger health or the environment. Relevant information shall be provided orally or via the current electronic method approved by the Department, within 24 hours from the time the permittee becomes aware of the circumstances, and shall be reported to the appropriate Regional Office during normal business hours or the Environmental Emergency Response hotline at 573-634-2436 outside of normal business hours. A written submission shall also be provided within five (5) business days of the time the permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the period of noncompliance, including exact dates and times, and if the noncompliance has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent reoccurrence of the noncompliance.



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- b. The following shall be included as information which must be reported within 24 hours under this paragraph.
 - Any unanticipated bypass which exceeds any effluent limitation in the permit.
 - ii. Any upset which exceeds any effluent limitation in the permit.
 - Violation of a maximum daily discharge limitation for any of the pollutants listed by the Department in the permit required to be reported within 24 hours.
- c. The Department may waive the written report on a case-by-case basis for reports under paragraph 2. b. of this section if the oral report has been received within 24 hours.
- Anticipated Noncompliance. The permittee shall give advance notice to the
 Department of any planned changes in the permitted facility or activity
 which may result in noncompliance with permit requirements. The notice
 shall be submitted to the Department 60 days prior to such changes or
 activity.
- 4. Compliance Schedules. Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of the permit shall be submitted no later than 14 days following each schedule date. The report shall provide an explanation for the instance of noncompliance and a proposed schedule or anticipated date, for achieving compliance with the compliance schedule requirement.
- 5. **Other Noncompliance.** The permittee shall report all instances of noncompliance not reported under paragraphs 2, 3, and 6 of this section, at the time monitoring reports are submitted. The reports shall contain the information listed in paragraph 2. a. of this section.
- 6. Other Information. Where the permittee becomes aware that it failed to submit any relevant facts in a permit application, or submitted incorrect information in a permit application or in any report to the Department, it shall promptly submit such facts or information.

7. Discharge Monitoring Reports.

- a. Monitoring results shall be reported at the intervals specified in the
- b. Monitoring results must be reported to the Department via the current method approved by the Department, unless the permittee has been granted a waiver from using the method. If the permittee has been granted a waiver, the permittee must use forms provided by the Department.
- Monitoring results shall be reported to the Department no later than the 28th day of the month following the end of the reporting period.

Section C – Bypass/Upset Requirements

1. **Definitions.**

- a. Bypass: the intentional diversion of waste streams from any portion of a treatment facility, except in the case of blending.
- b. Severe Property Damage: substantial physical damage to property, damage to the treatment facilities which causes them to become inoperable, or substantial and permanent loss of natural resources which can reasonably be expected to occur in the absence of a bypass. Severe property damage does not mean economic loss caused by delays in production.
- c. Upset: an exceptional incident in which there is unintentional and temporary noncompliance with technology based permit effluent limitations because of factors beyond the reasonable control of the permittee. An upset does not include noncompliance to the extent caused by operational error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventive maintenance, or careless or improper operation.

2. Bypass Requirements.

a. Bypass not exceeding limitations. The permittee may allow any bypass to occur which does not cause effluent limitations to be exceeded, but only if it also is for essential maintenance to assure efficient operation. These bypasses are not subject to the provisions of paragraphs 2. b. and 2. c. of this section.

b. Notice.

- Anticipated bypass. If the permittee knows in advance of the need for a bypass, it shall submit prior notice, if possible at least 10 days before the date of the bypass.
- ii. Unanticipated bypass. The permittee shall submit notice of an unanticipated bypass as required in Section B – Reporting Requirements, paragraph 5 (24-hour notice).

c. Prohibition of bypass.

- i. Bypass is prohibited, and the Department may take enforcement action against a permittee for bypass, unless:
 - Bypass was unavoidable to prevent loss of life, personal injury, or severe property damage;
- 2. There were no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment downtime. This condition is not satisfied if adequate back-up equipment should have been installed in the exercise of reasonable engineering judgment to prevent a bypass which occurred during normal periods of equipment downtime or preventive maintenance; and
- The permittee submitted notices as required under paragraph 2.
 b. of this section.
- ii. The Department may approve an anticipated bypass, after considering its adverse effects, if the Department determines that it will meet the three (3) conditions listed above in paragraph 2. c. i. of this section.

3. Upset Requirements.

- a. Effect of an upset. An upset constitutes an affirmative defense to an action brought for noncompliance with such technology based permit effluent limitations if the requirements of paragraph 3. b. of this section are met. No determination made during administrative review of claims that noncompliance was caused by upset, and before an action for noncompliance, is final administrative action subject to judicial review.
- b. Conditions necessary for a demonstration of upset. A permittee who wishes to establish the affirmative defense of upset shall demonstrate, through properly signed, contemporaneous operating logs, or other relevant evidence that:
 - An upset occurred and that the permittee can identify the cause(s) of the upset;
 - ii. The permitted facility was at the time being properly operated; and
 - iii. The permittee submitted notice of the upset as required in Section B Reporting Requirements, paragraph 2. b. ii. (24-hour notice).
 - iv. The permittee complied with any remedial measures required under Section D – Administrative Requirements, paragraph 4.
- Burden of proof. In any enforcement proceeding, the permittee seeking to establish the occurrence of an upset has the burden of proof.

Section D – Administrative Requirements

- Duty to Comply. The permittee must comply with all conditions of this
 permit. Any permit noncompliance constitutes a violation of the Missouri
 Clean Water Law and Federal Clean Water Act and is grounds for
 enforcement action; for permit termination, revocation and reissuance, or
 modification; or denial of a permit renewal application.
 - a. The permittee shall comply with effluent standards or prohibitions established under section 307(a) of the Federal Clean Water Act for toxic pollutants and with standards for sewage sludge use or disposal established under section 405(d) of the CWA within the time provided in the regulations that establish these standards or prohibitions or standards for sewage sludge use or disposal, even if the permit has not yet been modified to incorporate the requirement.
 - b. The Federal Clean Water Act provides that any person who violates section 301, 302, 306, 307, 308, 318 or 405 of the Act, or any permit condition or limitation implementing any such sections in a permit issued under section 402, or any requirement imposed in a pretreatment program approved under sections 402(a)(3) or 402(b)(8) of the Act, is subject to a civil penalty not to exceed \$25,000 per day for each violation. The Federal Clean Water Act provides that any person who negligently violates sections 301, 302, 306, 307, 308, 318, or 405 of the Act, or any condition or limitation implementing any of such sections in a permit issued under section 402 of the Act, or any requirement



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imposed in a pretreatment program approved under section 402(a)(3) or 402(b)(8) of the Act, is subject to criminal penalties of \$2,500 to \$25,000 per day of violation, or imprisonment of not more than one (1) year, or both. In the case of a second or subsequent conviction for a negligent violation, a person shall be subject to criminal penalties of not more than \$50,000 per day of violation, or by imprisonment of not more than two (2) years, or both. Any person who knowingly violates such sections, or such conditions or limitations is subject to criminal penalties of \$5,000 to \$50,000 per day of violation, or imprisonment for not more than three (3) years, or both. In the case of a second or subsequent conviction for a knowing violation, a person shall be subject to criminal penalties of not more than \$100,000 per day of violation, or imprisonment of not more than six (6) years, or both. Any person who knowingly violates section 301, 302, 303, 306, 307, 308, 318 or 405 of the Act, or any permit condition or limitation implementing any of such sections in a permit issued under section 402 of the Act, and who knows at that time that he thereby places another person in imminent danger of death or serious bodily injury, shall, upon conviction, be subject to a fine of not more than \$250,000 or imprisonment of not more than 15 years, or both. In the case of a second or subsequent conviction for a knowing endangerment violation, a person shall be subject to a fine of not more than \$500,000 or by imprisonment of not more than 30 years, or both. An organization, as defined in section 309(c)(3)(B)(iii) of the CWA, shall, upon conviction of violating the imminent danger provision, be subject to a fine of not more than \$1,000,000 and can be fined up to \$2,000,000 for second or subsequent convictions.

- c. Any person may be assessed an administrative penalty by the EPA Director for violating section 301, 302, 306, 307, 308, 318 or 405 of this Act, or any permit condition or limitation implementing any of such sections in a permit issued under section 402 of this Act. Administrative penalties for Class I violations are not to exceed \$10,000 per violation, with the maximum amount of any Class II penalty assessed not to exceed \$25,000. Penalties for Class II violations are not to exceed \$10,000 per day for each day during which the violation continues, with the maximum amount of any Class II penalty not to exceed \$125,000.
- It is unlawful for any person to cause or permit any discharge of water contaminants from any water contaminant or point source located in Missouri in violation of sections 644.006 to 644.141 of the Missouri Clean Water Law, or any standard, rule or regulation promulgated by the commission. In the event the commission or the director determines that any provision of sections 644.006 to 644.141 of the Missouri Clean Water Law or standard, rules, limitations or regulations promulgated pursuant thereto, or permits issued by, or any final abatement order, other order, or determination made by the commission or the director, or any filing requirement pursuant to sections 644.006 to 644.141 of the Missouri Clean Water Law or any other provision which this state is required to enforce pursuant to any federal water pollution control act, is being, was, or is in imminent danger of being violated, the commission or director may cause to have instituted a civil action in any court of competent jurisdiction for the injunctive relief to prevent any such violation or further violation or for the assessment of a penalty not to exceed \$10,000 per day for each day, or part thereof, the violation occurred and continues to occur, or both, as the court deems proper. Any person who willfully or negligently commits any violation in this paragraph shall, upon conviction, be punished by a fine of not less than \$2,500 nor more than \$25,000 per day of violation, or by imprisonment for not more than one year, or both. Second and successive convictions for violation of the same provision of this paragraph by any person shall be punished by a fine of not more than \$50,000 per day of violation, or by imprisonment for not more than two (2) years, or both.

2. Duty to Reapply.

- a. If the permittee wishes to continue an activity regulated by this permit after the expiration date of this permit, the permittee must apply for and obtain a new permit.
- b. A permittee with a currently effective site-specific permit shall submit an application for renewal at least 180 days before the expiration date of the existing permit, unless permission for a later date has been granted by the Department. (The Department shall not grant permission

- for applications to be submitted later than the expiration date of the existing permit.)
- c. A permittees with currently effective general permit shall submit an application for renewal at least 30 days before the existing permit expires, unless the permittee has been notified by the Department that an earlier application must be made. The Department may grant permission for a later submission date. (The Department shall not grant permission for applications to be submitted later than the expiration date of the existing permit.)
- Need to Halt or Reduce Activity Not a Defense. It shall not be a defense
 for a permittee in an enforcement action that it would have been necessary to
 halt or reduce the permitted activity in order to maintain compliance with the
 conditions of this permit.
- Duty to Mitigate. The permittee shall take all reasonable steps to minimize
 or prevent any discharge or sludge use or disposal in violation of this permit
 which has a reasonable likelihood of adversely affecting human health or the
 environment.
- 5. Proper Operation and Maintenance. The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems which are installed by a permittee only when the operation is necessary to achieve compliance with the conditions of the permit.

6. Permit Actions.

- a. Subject to compliance with statutory requirements of the Law and Regulations and applicable Court Order, this permit may be modified, suspended, or revoked in whole or in part during its term for cause including, but not limited to, the following:
 - i. Violations of any terms or conditions of this permit or the law;
 - Having obtained this permit by misrepresentation or failure to disclose fully any relevant facts;
 - A change in any circumstances or conditions that requires either a temporary or permanent reduction or elimination of the authorized discharge; or
 - iv. Any reason set forth in the Law or Regulations.
- b. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition.

7. Permit Transfer.

- a. Subject to 10 CSR 20-6.010, an operating permit may be transferred upon submission to the Department of an application to transfer signed by the existing owner and the new owner, unless prohibited by the terms of the permit. Until such time the permit is officially transferred, the original permittee remains responsible for complying with the terms and conditions of the existing permit.
- b. The Department may require modification or revocation and reissuance of the permit to change the name of the permittee and incorporate such other requirements as may be necessary under the Missouri Clean Water Law or the Federal Clean Water Act.
- c. The Department, within 30 days of receipt of the application, shall notify the new permittee of its intent to revoke or reissue or transfer the permit.
- 8. Toxic Pollutants. The permittee shall comply with effluent standards or prohibitions established under section 307(a) of the Federal Clean Water Act for toxic pollutants and with standards for sewage sludge use or disposal established under section 405(d) of the Federal Clean Water Act within the time provided in the regulations that establish these standards or prohibitions or standards for sewage sludge use or disposal, even if the permit has not yet been modified to incorporate the requirement.
- Property Rights. This permit does not convey any property rights of any sort, or any exclusive privilege.



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- 10. Duty to Provide Information. The permittee shall furnish to the Department, within a reasonable time, any information which the Department may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit or to determine compliance with this permit. The permittee shall also furnish to the Department upon request, copies of records required to be kept by this permit.
- 11. Inspection and Entry. The permittee shall allow the Department, or an authorized representative (including an authorized contractor acting as a representative of the Department), upon presentation of credentials and other documents as may be required by law, to:
 - Enter upon the permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of the permit;
 - Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and
 - d. Sample or monitor at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by the Federal Clean Water Act or Missouri Clean Water Law, any substances or parameters at any location.

12. Closure of Treatment Facilities.

- a. Persons who cease operation or plan to cease operation of waste, wastewater, and sludge handling and treatment facilities shall close the facilities in accordance with a closure plan approved by the Department.
- b. Operating Permits under 10 CSR 20-6.010 or under 10 CSR 20-6.015 are required until all waste, wastewater, and sludges have been disposed of in accordance with the closure plan approved by the Department and any disturbed areas have been properly stabilized. Disturbed areas will be considered stabilized when perennial vegetation, pavement, or structures using permanent materials cover all areas that have been disturbed. Vegetative cover, if used, shall be at least 70% plant density over 100% of the disturbed area.

13. Signatory Requirement.

- All permit applications, reports required by the permit, or information requested by the Department shall be signed and certified. (See 40 CFR 122.22 and 10 CSR 20-6.010)
- b. The Federal Clean Water Act provides that any person who knowingly makes any false statement, representation, or certification in any record or other document submitted or required to be maintained under this permit, including monitoring reports or reports of compliance or non-compliance shall, upon conviction, be punished by a fine of not more than \$10,000 per violation, or by imprisonment for not more than six (6) months per violation, or by both.
- c. The Missouri Clean Water Law provides that any person who knowingly makes any false statement, representation or certification in any application, record, report, plan, or other document filed or required to be maintained pursuant to sections 644.006 to 644.141 shall, upon conviction, be punished by a fine of not more than ten thousand dollars, or by imprisonment for not more than six months, or by both.
- 14. Severability. The provisions of the permit are severable, and if any provision of the permit, or the application of any provision of the permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of the permit, shall not be affected thereby.

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PART III – SLUDGE AND BIOSOLIDS FROM DOMESTIC AND INDUSTRIAL WASTEWATER TREATMENT FACILITIES

SECTION A - GENERAL REQUIREMENTS

- 1. This permit pertains to sludge requirements under the Missouri Clean Water Law and regulation for domestic wastewater and industrial process wastewater. This permit also incorporates applicable federal sludge disposal requirements under 40 CFR 503 for domestic wastewater. The Environmental Protection Agency (EPA) has principal authority for permitting and enforcement of the federal sludge regulations under 40 CFR 503 for domestic wastewater. EPA has reviewed and accepted these standard sludge conditions. EPA may choose to issue a separate sludge addendum to this permit or a separate federal sludge permit at their discretion to further address the federal requirements.
- These PART III Standard Conditions apply only to sludge and biosolids generated at domestic wastewater treatment
 facilities, including public owned treatment works (POTW), privately owned facilities and sludge or biosolids
 generated at industrial facilities.
- 3. Sludge and Biosolids Use and Disposal Practices:
 - a. The permittee is authorized to operate the sludge and biosolids treatment, storage, use, and disposal facilities listed in the facility description of this permit.
 - b. The permittee shall not exceed the design sludge volume listed in the facility description and shall not use sludge disposal methods that are not listed in the facility description, without prior approval of the permitting authority.
 - The permittee is authorized to operate the storage, treatment or generating sites listed in the Facility
 Description section of this permit.
- 4. Sludge Received from other Facilities:
 - a. Permittees may accept domestic wastewater sludge from other facilities including septic tank pumpings from residential sources as long as the design sludge volume is not exceeded and the treatment facility performance is not impaired.
 - b. The permittee shall obtain a signed statement from the sludge generator or hauler that certifies the type and source of the sludge
- These permit requirements do not supersede nor remove liability for compliance with county and other local ordinances.
- 6. These permit requirements do not supersede nor remove liability for compliance with other environmental regulations such as odor emissions under the Missouri Air Pollution Control Law and regulations.
- 7. This permit may (after due process) be modified, or alternatively revoked and reissued, to comply with any applicable sludge disposal standard or limitation issued or approved under Section 405(d) of the Clean Water Actor under Chapter 644 RSMo.
- 8. In addition to STANDARD CONDITIONS, the Department may include sludge limitations in the special conditions portion or other sections of a site specific permit.
- 9. Alternate Limits in the Site Specific Permit.
 - Where deemed appropriate, the Department may require an individual site specific permit in order to authorize alternate limitations:
 - a. A site specific permit must be obtained for each operating location, including application sites.
 - b. To request a site specific permit, an individual permit application, permit fee, and supporting documents shall be submitted for each operating location. This shall include a detailed sludge/biosolids management plan or engineering report.
- 10. Exceptions to these Standard Conditions may be authorized on a case-by-case basis by the Department, as follows:
 - a. The Department will prepare a permit modification and follow permit notice provisions as applicable under 10 CSR 20-6.020, 40 CFR 124.10, and 40 CFR 501.15(a)(2)(ix)(E). This includes notification of the owner of the property located adjacent to each land application site, where appropriate.
 - b. Exceptions cannot be granted where prohibited by the federal sludge regulations under 40 CFR 503.

SECTION B - DEFINITIONS

- 1. Best Management Practices include agronomic loading rates, soil conservation practices and other site restrictions.
- 2. Biosolids means organic fertilizer or soil amendment produced by the treatment of domestic wastewater sludge.
- 3. Biosolids land application facility is a facility where biosolids are spread onto the land at agronomic rates for production of food or fiber. The facility includes any structures necessary to store the biosolids until soil, weather, and crop conditions are favorable for land application.
- 4. Class A biosolids means a material that has met the Class A pathogen reduction requirements or equivalent treatment by a Process to Further Reduce Pathogens (PFRP) in accordance with 40 CFR 503.
- 5. Class B biosolids means a material that has met the Class B pathogen reduction requirements or equivalent treatment by a Process to Significantly Reduce Pathogens (PFRP) in accordance with 40 CFR 503.
- Domestic wastewater means wastewater originating from the sanitary conveniences of residences, commercial buildings, factories and institutions; or co-mingled sanitary and industrial wastewater processed by a (POTW) or a privately owned facility.
- 7. Industrial wastewater means any wastewater, also known as process water, not defined as domestic wastewater. Per 40 CFR Part 122, process water means any water which, during manufacturing or processing, comes into direct contact with or results from the production or use of any raw material, intermediate product, finished product, byproduct, or waste product.
- 8. Mechanical treatment plants are wastewater treatment facilities that use mechanical devices to treat wastewater, including septic tanks, sand filters, extended aeration, activated sludge, contact stabilization, trickling filters, rotating biological discs, and other similar facilities. It does not include wastewater treatment lagoons and constructed wetlands for wastewater treatment.
- 9. Operating location as defined in 10 CSR 20-2.010 is all contiguous lands owned, operated or controlled by one (1) person or by two (2) or more persons jointly or as tenants in common.
- 10. Plant Available Nitrogen (PAN) is the nitrogen that will be available to plants during the growing seasons after biosolids application.
- 11. Public contact site is land with a high potential for contact by the public. This includes, but is not limited to, public parks, ball fields, cemeteries, plant nurseries, turf farms, and golf courses.
- 12. Sludge is the solid, semisolid, or liquid residue removed during the treatment of wastewater. Sludge includes septage removed from septic tanks or equivalent facilities. Sludge does not include carbon coal byproducts (CCBs)
- 13. Sludge lagoon is part of a mechanical wastewater treatment facility. A sludge lagoon is an earthen basin that receives sludge that has been removed from a wastewater treatment facility. It does not include a wastewater treatment lagoon or sludge treatment units that are not a part of a mechanical wastewater treatment facility.
- 14. Septage is the material pumped from residential septic tanks and similar treatment works (with a design population of less than 150 people). The standard for biosolids from septage is different from other sludges.

SECTION C - MECHANICAL WASTEWATER TREATMENT FACILITIES

- 1. Sludge shall be routinely removed from wastewater treatment facilities and handled according to the permit facility description and sludge conditions of this permit.
- 2. The permittee shall operate the facility so that there is no sludge discharged to waters of the state.
- 3. Mechanical treatment plants shall have separate sludge storage compartments in accordance with 10 CSR 20, Chapter 8. Failure to remove sludge from these storage compartments on the required design schedule is a violation of this permit.

SECTION D - SLUDGE DISPOSED AT OTHER TREATMENT FACILITY OR CONTRACT HAULER

- This section applies to permittees that haul sludge to another treatment facility for disposal or use contract haulers to remove and dispose of sludge.
- 2. Permittees that use contract haulers are responsible for compliance with all the terms of this permit including final disposal, unless the hauler has a separate permit for sludge or biosolids disposal issued by the Department; or the hauler transports the sludge to another permitted treatment facility.
- 3. Haulers who land apply septage must obtain a state permit.
- 4. Testing of sludge, other than total solids content, is not required if sludge is hauled to a municipal wastewater treatment facility or other permitted wastewater treatment facility, unless it is required by the accepting facility.

SECTION E - INCINERATION OF SLUDGE

- 1. Sludge incineration facilities shall comply with the requirements of 40 CFR 503 Subpart E; air pollution control regulations under 10 CSR 10; and solid waste management regulations under 10 CSR 80.
- 2. Permittee may be authorized under the facility description of this permit to store incineration ash in lagoons or ash ponds. This permit does not authorize the disposal of incineration ash. Incineration ash shall be disposed in accordance with 10 CSR 80; or if the ash is determined to be hazardous with 10 CSR 25.
- 3. In addition to normal sludge monitoring, incineration facilities shall report the following as part of the annual report, quantity of sludge incinerated, quantity of ash generated, quantity of ash stored, and ash used or disposal method, quantity, and location. Permittee shall also provide the name of the disposal facility and the applicable permit number.

SECTION F - SURFACE DISPOSAL SITES AND SLUDGE LAGOONS

- 1. Surface disposal sites of domestic facilities shall comply with the requirements in 40 CFR 503 Subpart C; air pollution control regulations under 10 CSR 10; and solid waste management regulations under 10 CSR 80.
- 2. Sludge storage lagoons are temporary facilities and are not required to obtain a permit as a solid waste management facility under 10 CSR 80. In order to maintain sludge storage lagoons as storage facilities, accumulated sludge must be removed routinely, but not less than once every two years unless an alternate schedule is approved in the permit. The amount of sludge removed will be dependent on sludge generation and accumulation in the facility. Enough sludge must be removed to maintain adequate storage capacity in the facility.
 - a. In order to avoid damage to the lagoon seal during cleaning, the permittee may leave a layer of sludge on the bottom of the lagoon, upon prior approval of the Department; or
 - b. Permittee shall close the lagoon in accordance with Section H.

SECTION G - LAND APPLICATION

- 1. The permittee shall not land apply sludge or biosolids unless land application is authorized in the facility description or the special conditions of the issued NPDES permit.
- 2. Land application sites within a 20 miles radius of the wastewater treatment facility are authorized under this permit when biosolids are applied for beneficial use in accordance with these standard conditions unless otherwise specified in a site specific permit. If the permittee's land application site is greater than a 20 mile radius of the wastewater treatment facility, approval must be granted from the Department.
- 3. Land application shall not adversely affect a threatened or endangered species or its designated critical habitat.
- 4. Biosolids shall not be applied unless authorized in this permit or exempted under 10 CSR 20, Chapter 6.
 - a. This permit does not authorize the land application of domestic sludge except for when sludge meets the definition of biosolids.
 - b. This permit authorizes "Class A or B" biosolids derived from domestic wastewater and/or process water sludge to be land applied onto grass land, crop land, timber or other similar agricultural or silviculture lands at rates suitable for beneficial use as organic fertilizer and soil conditioner.

5. Public Contact Sites:

Permittees who wish to apply Class A biosolids to public contact sites must obtain approval from the Department after two years of proper operation with acceptable testing documentation that shows the biosolids meet Class A criteria. A shorter length of testing will be allowed with prior approval from the Department. Authorization for land applications must be provided in the special conditions section of this permit or in a separate site specific permit.

- a. After Class B biosolids have been land applied, public access must be restricted for 12 months.
- b. Class B biosolids are only land applied to root crops, home gardens or vegetable crops whose edible parts will not be for human consumption.
- 6. Agricultural and Silvicultural Sites:

Septage – Based on Water Quality guide 422 (WQ422) published by the University of Missouri

- a. Haulers that land apply septage must obtain a state permit
- b. Do not apply more than 30,000 gallons of septage per acre per year.
- c. Septage tanks are designed to retain sludge for one to three years which will allow for a larger reduction in pathogens and vectors, as compared to other mechanical type treatment facilities.
- d. To meet Class B sludge requirements, maintain septage at 12 pH for at least thirty (30) minutes before land application. 50 pounds of hydrated lime shall be added to each 1,000 gallons of septage in order to meet pathogen and vector stabilization for septage biosolids applied to crops, pastures or timberland.
- e. Lime is to be added to the pump truck and not directly to the septic tanks, as lime would harm the beneficial bacteria of the septic tank.

Biosolids - Based on Water Quality guide 423, 424, and 425 (WQ423, WQ424, WQ425) published by the University of Missouri:

- a. Biosolids shall be monitored to determine the quality for regulated pollutants
- b. The number of samples taken is directly related to the amount of sludge produced by the facility (See Section I of these Standard Conditions). Report as dry weight unless otherwise specified in the site specific permit. Samples should be taken only during land application periods. When necessary, it is permissible to mix biosolids with lower concentrations of biosolids as well as other suitable Department approved material to reach the maximum concentration of pollutants allowed.
- c. Table 1 gives the maximum concentration allowable to protect water quality standards

TABLE 1

Biosolids ceiling concentration ¹					
Pollutant	Milligrams per kilogram dry weight				
Arsenic	75				
Cadmium	85				
Copper	4,300				
Lead	840				
Mercury	57				
Molybdenum	75				
Nickel	420				
Selenium	100				
Zinc	7,500				

Land application is not allowed if the sludge concentration exceeds the maximum limits for any of these pollutants

d. The low metal concentration biosolids has reduced requirements because of its higher quality and can safely be applied for 100 years or longer at typical agronomic loading rates. (See Table 2)

TABLE 2

Pionolida Lo	yy Motal Concentration 1					
Biosolids Low Metal Concentration ¹						
Pollutant	Milligrams per kilogram dry weight					
Arsenic	41					
Cadmium	39					
Copper	1,500					
Lead	300					
Mercury	17					
Nickel	420					
Selenium	36					
Zinc	2,800					

You may apply low metal biosolids without tracking cumulative metal limits, provided the cumulative application of biosolids does not exceed 500 dry tons per acre.

e. Each pollutant in Table 3 has an annual and a total cumulative loading limit, based on the allowable pounds per acre for various soil categories.

TABLE 3

Pollutant	CEC 15+		CEC 5	5 to 15	CEC 0 to 5	
	Annual	Total ¹	Annual	Total ¹	Annual	Total ¹
Arsenic	1.8	36.0	1.8	36.0	1.8	36.0
Cadmium	1.7	35.0	0.9	9.0	0.4	4.5
Copper	66.0	1,335.0	25.0	250.0	12.0	125.0
Lead	13.0	267.0	13.0	267.0	13.0	133.0
Mercury	0.7	15.0	0.7	15.0	0.7	15.0
Nickel	19.0	347.0	19.0	250.0	12.0	125.0
Selenium	4.5	89.0	4.5	44.0	1.6	16.0
Zinc	124.0	2,492.0	50.0	500.0	25.0	250.0

¹ Total cumulative loading limits for soils with equal or greater than 6.0 pH (salt based test) or 6.5 pH (water based test)

TABLE 4 - Guidelines for land application of other trace substances ¹

Cumu	lative Loading
Pollutant	Pounds per acre
Aluminum	$4,000^2$
Beryllium	100
Cobalt	50
Fluoride	800
Manganese	500
Silver	200
Tin	1,000
Dioxin	$(10 \text{ ppt in soil})^3$
Other	4

- Design of land treatment systems for Industrial Waste, 1979. Michael Ray Overcash, North Carolina State University and Land Treatment of Municipal Wastewater, EPA 1981.)
- ² This applies for a soil with a pH between 6.0 and 7.0 (salt based test) or a pH between 6.5 to 7.5 (water based test). Case-by-case review is required for higher pH soils.
- Total Dioxin Toxicity Equivalents (TEQ) in soils, based on a risk assessment under 40 CFR 744, May 1998.
- Case by case review. Concentrations in sludge should not exceed the 95th percentile of the National Sewage Sludge Survey, EPA, January 2009.

Best Management Practices - Based on Water Quality guide 426 (WQ426) published by the University of Missouri

- a. Use best management practices when applying biosolids.
- b. Biosolids cannot discharge from the land application site
- c. Biosolid application is subject to the Missouri Department of Agriculture State Milk Board concerning grazing restrictions of lactating dairy cattle.
- d. Biosolid application must be in accordance with section 4 of the Endangered Species Act.
- e. Do not apply more than the agronomic rate of nitrogen needed.
- f. The applicator must document the Plant Available Nitrogen (PAN) loadings, available nitrogen in the soil, and crop removal when either of the following occurs: 1) When biosolids are greater than 50,000 mg/kg TN; or 2) When biosolids are land applied at an application rate greater than two dry tons per acre per year.
 - PAN can be determined as follows and is in accordance with WQ426
 (Nitrate + nitrite nitrogen) + (organic nitrogen x 0.2) + (ammonia nitrogen x volatilization factor¹).

 Volatilization factor is 0.7 for surface application and 1 for subsurface application.
- g. Buffer zones are as follows:
 - i. 300 feet of a water supply well, sinkhole, lake, pond, water supply reservoir or water supply intake in a stream;
 - 300 feet of a losing stream, no discharge stream, stream stretches designated for whole body contact recreation, wild and scenic rivers, Ozark National Scenic Riverways or outstanding state resource waters as listed in the Water Quality Standards, 10 CSR 20-7.031;
 - iii. 150 feet if dwellings;
 - iv. 100 feet of wetlands or permanent flowing streams;
 - v. 50 feet of a property line or other waters of the state, including intermittent flowing streams.
- h. Slope limitation for application sites are as follows;
 - i. A slope 0 to 6 percent has no rate limitation
 - ii. Applied to a slope 7 to 12 percent, the applicator may apply biosolids when soil conservation practices are used to meet the minimum erosion levels
 - iii. Slopes > 12 percent, apply biosolids only when grass is vegetated and maintained with at least 80 percent ground cover at a rate of two dry tons per acre per year or less.
- No biosolids may be land applied in an area that it is reasonably certain that pollutants will be transported into waters of the state.
- j. Do not apply biosolids to sites with soil that is snow covered, frozen or saturated with liquid without prior approval by the Department.
- k. Biosolids / sludge applicators must keep detailed records up to five years.

SECTION H - CLOSURE REQUIREMENTS

- 1. This section applies to all wastewater facilities (mechanical, industrial, and lagoons) and sludge or biosolids storage and treatment facilities and incineration ash ponds. It does not apply to land application sites.
- 2. Permittees of a domestic wastewater facility who plan to cease operation must obtain Department approval of a closure plan which addresses proper removal and disposal of all residues, including sludge, biosolids. Mechanical plants, sludge lagoons, ash ponds and other storage structures must obtain approval of a closure plan from the Department. Permittee must maintain this permit until the facility is closed in accordance with the approved closure plan per 10 CSR 20 6.010 and 10 CSR 20 6.015.
- Residuals that are left in place during closure of a lagoon or earthen structure or ash pond shall not exceed the agricultural loading rates as follows:
 - a. Residuals shall meet the monitoring and land application limits for agricultural rates as referenced in Section H of these standard conditions.
 - b. If a wastewater treatment lagoon has been in operation for 15 years or more without sludge removal, the sludge in the lagoon qualifies as a Class B biosolids with respect to pathogens due to anaerobic digestion, and testing for fecal coliform is not required. For other lagoons, testing for fecal coliform is required to show compliance with Class B biosolids limitations. In order to reach Class B biosolids requirements, fecal coliform must be less than 2,000,000 colony forming units or 2,000,000 most probable number. All fecal samples must be presented as geometric mean per gram.
 - c. The allowable nitrogen loading that may be left in the lagoon shall be based on the plant available nitrogen (PAN) loading. For a grass cover crop, the allowable PAN is 300 pounds/acre.
 - i. PAN can be determined as follows:
 (Nitrate + nitrite nitrogen) + (organic nitrogen x 0.2) + (ammonia nitrogen x volatilization factor¹).
 ¹ Volatilization factor is 0.7 for surface application and 1 for subsurface application.
- 4. When closing a domestic wastewater treatment lagoon with a design treatment capacity equal or less than 150 persons, the residuals are considered "septage" under the similar treatment works definition. See Section B of these standard conditions. Under the septage category, residuals may be left in place as follows:
 - a. Testing for metals or fecal coliform is not required
 - b. If the wastewater treatment lagoon has been in use for less than 15 years, mix lime with the sludge at a rate of 50 pounds of hydrated lime per 1000 gallons (134 cubic feet) of sludge.
 - c. The amount of sludge that may be left in the lagoon shall be based on the plant available nitrogen (PAN) loading. 100 dry tons/acre of sludge may be left in the basin without testing for nitrogen. If 100 dry tons/acre or more will be left in the lagoon, test for nitrogen and determine the PAN using the calculation above. Allowable PAN loading is 300 pounds/acre.
- 5. Residuals left within the domestic lagoon shall be mixed with soil on at least a 1 to 1 ratio, the lagoon berm shall be demolished, and the site shall be graded and contain ≥70% vegetative density over 100% of the site so as to avoid ponding of storm water and provide adequate surface water drainage without creating erosion.
- 6. Lagoons and/or earthen structure and/or ash pond closure activities shall obtain a storm water permit for land disturbance activities that equal or exceed one acre in accordance with 10 CSR 20-6.200
- 7. When closing a mechanical wastewater and/or industrial process wastewater plant; all sludge must be cleaned out and disposed of in accordance with the Department approved closure plan before the permit for the facility can be terminated.
 - a. Land must be stabilized which includes any grading, alternate use or fate upon approval by the Department, remediation, or other work that exposes sediment to stormwater per 10 CSR 20-6.200. The site shall be graded and contain ≥70% vegetative density over 100% of the site, so as to avoid ponding of storm water and provide adequate surface water drainage without creating erosion.
 - b. Per 10 CSR 20-6.015(4)(B)6, Hazardous Waste shall not be land applied or disposed during industrial and mechanical plant closures unless in accordance with Missouri Hazardous Waste Management Law and Regulations under 10 CSR 25.
 - c. After demolition of the mechanical plant / industrial plant, the site must only contain clean fill defined in RSMo 260.200 (5) as uncontaminated soil, rock, sand, gravel, concrete, asphaltic concrete, cinderblocks, brick, minimal amounts of wood and metal, and inert solids as approved by rule or policy of the Department for fill or other beneficial use. Other solid wastes must be removed.
- 8. If sludge from the domestic lagoon or mechanical treatment plant exceeds agricultural rates under Section G and/or H, a landfill permit or solid waste disposal permit must be obtained if the permittee chooses to seek authorization for onsite sludge disposal under the Missouri Solid Waste Management Law and regulations per 10 CSR 80, and the permittee must comply with the surface disposal requirements under 40 CFR 503, Subpart C.

SECTION I - MONITORING FREQUENCY

1. At a minimum, sludge or biosolids shall be tested for volume and percent total solids on a frequency that will accurately represent sludge quantities produced and disposed. Please see the table below.

TABLE 5

Design Sludge	Monitoring Frequency (See Notes 1, 2, and 3)						
Production (dry tons per year)	Metals, Pathogens and Vectors Nitrogen TKN ¹		Nitrogen PAN ²	Priority Pollutants and TCLP ³			
0 to 100	1 per year	1 per year	1 per month	1 per year			
101 to 200	biannual	biannual	1 per month	1 per year			
201 to 1,000	quarterly	quarterly	1 per month	1 per year			
1,001 to 10,000	1 per month	1 per month	1 per week	4			
10,001 +	1 per week	1 per week	1 per day	⁴			

- ¹ Test total Kjeldahl nitrogen, if biosolids application is 2 dry tons per acre per year or less.
- ² Calculate plant available nitrogen (PAN) when either of the following occurs: 1) when biosolids are greater than 50,000 mg/kg TN; or 2) when biosolids are land applied at an application rate greater than two dry tons per acre per year.
- Priority pollutants (40 CFR 122.21, Appendix D, Tables II and III) and toxicity characteristic leaching procedure (40 CFR 261.24) is required only for permit holders that must have a pre-treatment program.
- One sample for each 1,000 dry tons of sludge.

Note 1: Total solids: A grab sample of sludge shall be tested one per day during land application periods for percent total solids. This data shall be used to calculate the dry tons of sludge applied per acre.

Note 2: Total Phosphorus: Total phosphorus and total potassium shall be tested at the same monitoring frequency as metals.

Note 3: Table 5 is not applicable for incineration and permit holders that landfill their sludge.

- 2. If you own a wastewater treatment lagoon or sludge lagoon that is cleaned out once a year or less, you may choose to sample only when the sludge is removed or the lagoon is closed. Test one composite sample for each 100 dry tons of sludge or biosolids removed from the lagoon during the year within the lagoon at closing. Composite sample must represent various areas at one-foot depth.
- 3. Additional testing may be required in the special conditions or other sections of the permit. Permittees receiving industrial wastewater may be required to conduct additional testing upon request from the Department.
- 4. At this time, the Department recommends monitoring requirements shall be performed in accordance with, "POTW Sludge Sampling and Analysis Guidance Document," United States Environmental Protection Agency, August 1989, and the subsequent revisions.

SECTION J - RECORD KEEPING AND REPORTING REQUIREMENTS

- 1. The permittee shall maintain records on file at the facility for at least five years for the items listed in these standard conditions and any additional items in the Special Conditions section of this permit. This shall include dates when the sludge facility is checked for proper operation, records of maintenance and repairs and other relevant information.
- 2. Reporting period
 - a. By January 28th of each year, an annual report shall be submitted for the previous calendar year period for all mechanical wastewater treatment facilities, sludge lagoons, and sludge or biosolids disposal facilities.
 - b. Permittees with wastewater treatment lagoons shall submit the above annual report only when sludge or biosolids are removed from the lagoon during the report period or when the lagoon is closed.
- 3. Report Forms. The annual report shall be submitted on report forms provided by the Department or equivalent forms approved by the Department.
- 4. Reports shall be submitted as follows:

Major facilities (those serving 10,000 persons or 1 million gallons per day) shall report to both the Department and EPA. Other facilities need to report only to the Department. Reports shall be submitted to the addresses listed as follows:

DNR regional office listed in your permit (see cover letter of permit) ATTN: Sludge Coordinator

EPA Region VII Water Compliance Branch (WACM) Sludge Coordinator 11201 Renner Blvd. Lenexa, KS 66219

- 5. Annual report contents. The annual report shall include the following:
 - a. Sludge and biosolids testing performed. Include a copy or summary of all test results, even if not required by the permit.
 - b. Sludge or biosolids quantity shall be reported as dry tons for quantity generated by the wastewater treatment facility, the quantity stored on site at the end of the year, and the quantity used or disposed.
 - c. Gallons and % solids data used to calculate the dry ton amounts.
 - d. Description of any unusual operating conditions.
 - e. Final disposal method, dates, and location, and person responsible for hauling and disposal.
 - This must include the name, address for the hauler and sludge facility. If hauled to a municipal
 wastewater treatment facility, sanitary landfill, or other approved treatment facility, give the name
 of that facility.
 - Include a description of the type of hauling equipment used and the capacity in tons, gallons, or cubic feet.

f. Contract Hauler Activities:

If contract hauler, provide a copy of a signed contract from the contractor. Permittee shall require the contractor to supply information required under this permit for which the contractor is responsible. The permittee shall submit a signed statement from the contractor that he has complied with the standards contained in this permit, unless the contract hauler has a separate sludge or biosolids use permit.

g. Land Application Sites:

- i. Report the location of each application site, the annual and cumulative dry tons/acre for each site, and the landowners name and address. The location for each spreading site shall be given as a legal description for nearest ¼, ¼, Section, Township, Range, and county, or UTM coordinates. The facility shall report PAN when either of the following occurs: 1) When biosolids are greater than 50,000 mg/kg TN; or 2) when biosolids are land applied at an application rate greater than two dry tons per acre per year.
- ii. If the "Low Metals" criteria are exceeded, report the annual and cumulative pollutant loading rates in pounds per acre for each applicable pollutant, and report the percent of cumulative pollutant loading which has been reached at each site.
- iii. Report the method used for compliance with pathogen and vector attraction requirements.
- iv. Report soil test results for pH, CEC, and phosphorus. If none was tested during the year, report the last date when tested and results.

AP29092

RECEIVED

MISSOURI DEPARTMENT OF NATURAL RESOURCES
WATER PROTECTION PROGRAM
FORM A – APPLICATION FOR NONDOMESTIC PERMITTUNDER WISSOURCES
CLEAN WATER LAW

FOR AGENCY USE ONLY

CHECK NUMBER

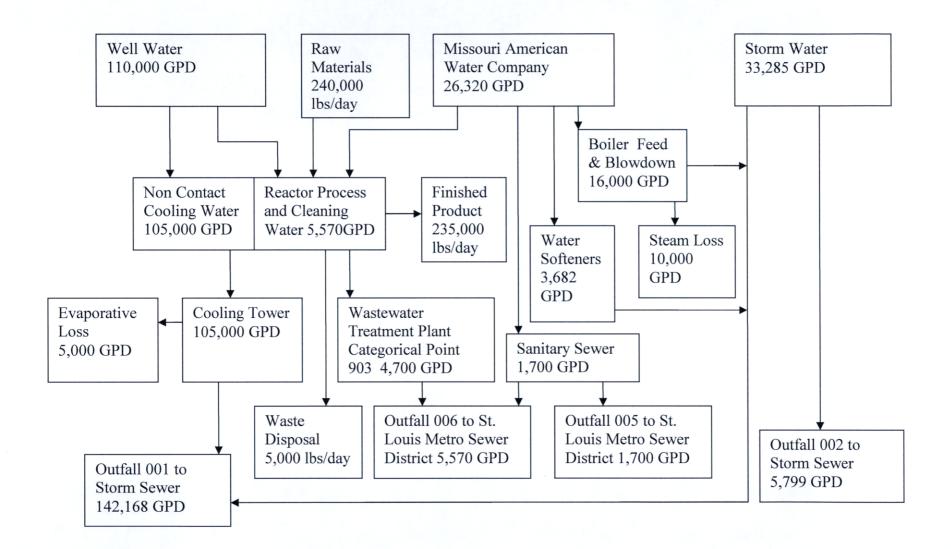
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FEE SUBMITTED

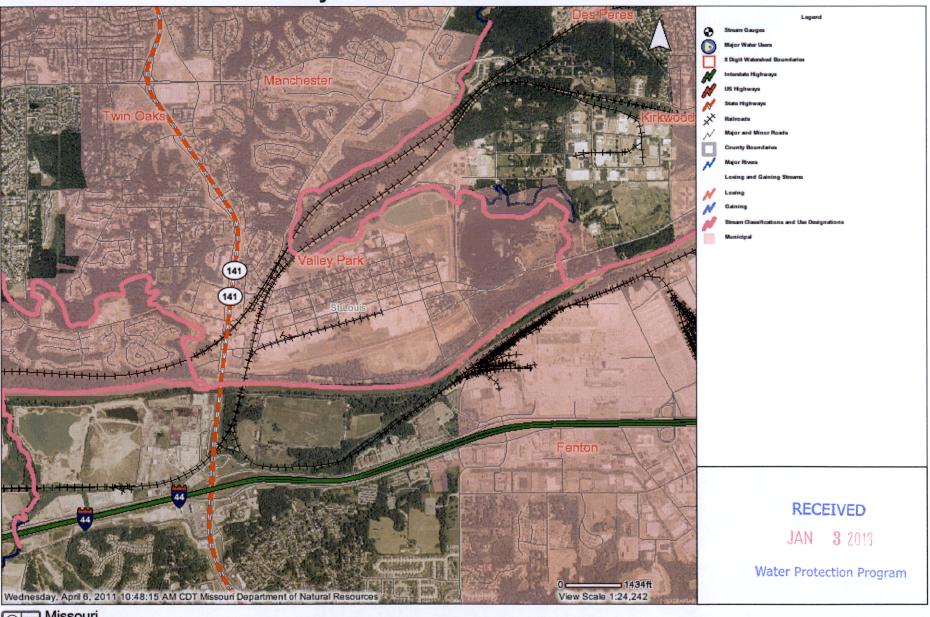
Note	>	PLEASE READ THE ACCOMPANYING INSTRU	UCTIONS BEFORE COMPLETING T	HIS FORM.	
1.	This	application is for:			
		An operating permit for a new or unpermitted	facility:		
		Please indicate the original Construction Per	mit #		
	\checkmark	An operating permit renewal:			
		Please indicate the permit # MO- 0001341	Expiration Date _06-30-20)18	
		An operating permit modification:			
		Please indicate the permit # MO	Modification Reason:		
1.1	Is the	appropriate fee included with the application? (Se	ee instructions for appropriate fee)	YES	☑ NO
2. FACI					
NAME					NUMBER WITH AREA CODE
Reichho	ld, LLC	2		(636) 225- FAX	5226
				(636) 225-	2954
ADDRESS			CITY	STATE	ZIP CODE
249 St. I		Avenue	Valley Park	MO	63088
NAME	EK		EMAIL ADDRESS	TELEPHONE	NUMBER WITH AREA CODE
Reichho	14 11 (2.2	kevin.massey@reichhold.com	(636) 225-	5226
Reichilo	iu, LL	52	Revininassey@reionnoid.com	FAX	2054
ADDRESS	MAILING	3)	CITY	(636) 225- STATE	ZIP CODE
1035 Sw		귀하면 그 나는 사람이 되었다. 이 사람들은 사람들은 사람들이 되었다.	Durham	NC	27703
3.1	Req	uest review of draft permit prior to public notic	e? YES NO		
4. CON	TINUII	NG AUTHORITY			
NAME			EMAIL ADDRESS		NUMBER WITH AREA CODE
Reichho	ld, LLC	2	kevin.massey@reichhold.com	(636) 225- FAX	-0220
				(636) 225-	
ADDRESS			CITY	STATE	ZIP CODE
1035 Sw	-		Durham	NC	27703
5. OPEI	KATO	Χ	CERTIFICATE NUMBER	TELEPHONE	NUMBER WITH AREA CODE
SAME			N/A		
OAML			11/2	FAX	
ADDRESS	MAILING	3)	CITY	STATE	ZIP CODE
6. FACI	LITY (CONTACT			
NAME			TITLE	A STATE OF THE STA	NUMBER WITH AREA CODE
Kevin M	assey		Plant Manager E-MAIL ADDRESS	(636) 225- FAX	-5226 x121
			kevin.massey@reichhold.com	(636) 225-	2954
7. ADD	TION	AL FACILITY INFORMATION			
7.1	Lens	al Description of Outfalls. (Attach additional sh	neets if necessary)		
7.1					0
	001	NW 1/4 SW 1/4 Sec 17	T 44N R 5E	STL_	County
	UTM	Coordinates Easting (X): 3833008 North For Universal Transverse Mercator (UTM), Zone 15	ning (Y): -09029154	m 1983 (NAI	083)
	002	NW 1/4 SW 1/4 Sec 17			County
			ning (Y): -0902918	333	
	003	1/4 1/4 Sec			County
			ning (Y):		
	004		R	486	County
	UTM	Coordinates Easting (X): North	ning (Y):		
7.2	Prima	ry Standard Industrial Classification (SIC) and Fac	cility North American Industrial Classif	ication Syst	em (NAICS) Codes.
		- SIC 2821 and NAICS 325211	002 - SIC ar	nd NAICS_	
		- SIC and NAICS			
MO 780-14	79 (09-16)			

8.	ADDITIONAL FORMS AND MAPS NECESSARY TO CO (Complete all forms that are applicable.)	MPLETE THIS	APPLICATION	ı		
A.	Is your facility a manufacturing, commercial, mining or silv	viculture waste	treatment facility	y ?	YES 🗸	NO □
	If yes, complete Form C or 2F. (2F is the U.S. EPA's Application for Storm Water Discha	rges Associate	with Industrial A	ctivity.)		
В.	Is application for storm water discharges only? If yes, complete Form C or 2F.				YES [NO ☑
C.	Is your facility considered a "Primary Industry" under EPA If yes, complete Forms C or 2F and D.	guidelines:			YES 🔽] NO □
D.	Is wastewater land applied? If yes, complete Form I.				YES [NO ☑
E.	Is sludge, biosolids, ash or residuals generated, treated, slf yes, complete Form R.	stored or land a	pplied?		YES [NO ☑
F.	If you are a Class IA CAFO, please disregard part D and Nutrient Management Plan.	E of this section	n. However, ple	ase attach	any revi	ision to your
F.	Attach a map showing all outfalls and the receiving stream	n at 1" = 2,000'	scale.			
9.	ELECTRONIC DISCHARGE MONITORING REPORT (e	DMR) SUBMIS	SION SYSTEM			
and more consister visit http	CFR Part 127 National Pollutant Discharge Elimination Sysnitoring shall be submitted by the permittee via an electronient set of data. One of the following must be checked in b://dnr.mo.gov/env/wpp/edmr.htm to access the Facility Paru have completed and submitted with this permit application	c system to en order for this ticipation Pack	sure timely, com application to age.	plete, acc be consid	curate, an	nd nationally mplete. Please
- You eDMR s	u have previously submitted the required documentation to system.	participate in th	ne eDMR system	n and/or y	ou are cu	urrently using the
	have submitted a written request for a waiver from electron	onic reporting.	See instructions	for furthe	r informa	tion regarding
waivers	DOWNSTREAM LANDOWNER(S) Attach additional shee (PLEASE SHOW LOCATION ON MAP. SEE 8.D ABOVE		ry. See Instruct	ions.		
NAME City of V	alley Park					
ADDRESS		CITY			STATE	ZIP CODE
320 Ben	ton Avenue	Valley Park			МО	63088
11.	I certify that I am familiar with the information contained in information is true, complete and accurate, and if granted all rules, regulations, orders and decisions, subject to any Water Law to the Missouri Clean Water Commission.	this permit, I a	gree to abide by	the Misso	ouri Clear	n Water Law and
NAME AND	OFFICIAL TITLE (TYPE OR PRINT)			TELEPHONE	NUMBER WI	TH AREA CODE
Kevin Ma				(636) 225		121
SIGNATUR	Ken- M Was			12/	28/2	0/}
MO 780-14	79 (09-16)					
	BEFORE MAILING, PLEASE ENSURE ALL SECTION IF APPLICABLE			ND ADD	ITIONA	L FORMS,
	Submittal of an incomplete application n			being ret	urned.	
	HAVE YOU	J INCLUDED:				
	 Appropriate Fees? ✓ Map at 1" = 2000' scale? ✓ Signature? ✓ Form C or 2F, if applicable? ✓ Form D, if applicable? 		Form I (Irriga Form R (Sluc Revised Nutr applicable?	lge), if ap	plicable	?

Reichhold, LLC 2. Valley Park, Missouri Water and Product Flow Diagram



Reichhold LLC 2 Valley Park Missouri

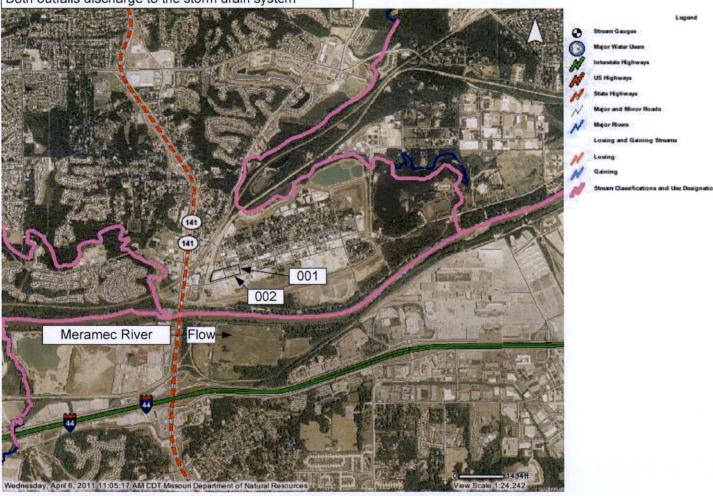




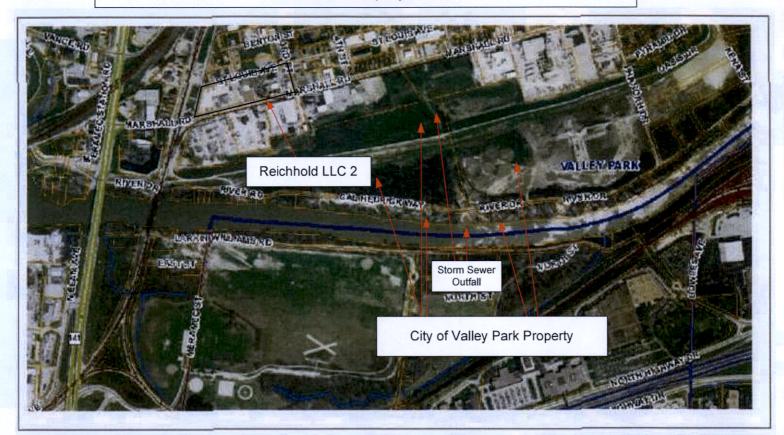
Disclaimer: Although this map has been compiled by the Missouri Department of Natural Resources, no warranty, expressed or implied, is made by the department as to the accuracy of the data and related materials. The act of distribution shall not constitute any such warranty, and no responsibility is assumed by the department in the use of these data or related materials.

Reichhold LLC 2 249 St. Louis Ave. Valley Park, Missouri 63088 NPDES Outfalls

001 - Located Along 3rd Street on East Side of Site 002 - Located Along Marshal Road on South Side of Site Both outfalls discharge to the storm drain system



Reichhold LLC 2 Valley Park, Missouri Downstream Property Owners





St. Louis County Property Viewer



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MISSOURI DEPARTMENT OF NATURAL RESOURCES

JAN 3 2018 WATER PROTECTION PROGRAM, WATER POLLUTION BRANCH FORM C - APPLICATION FOR DISCHARGE PERMIT - Program MANUFACTURING, COMMERCIAL, MINING, SILVICULTURE OPERATIONS, PROCESS AND STORMWATER

FOR AGENCY USE ONLY

CHECK NO.

DATE RECEIVED

FEE SUBMITTED

NOTE: DO NOT ATTEMPT TO COMPLETE THIS FOR	RM BEFORE READING THE ACCOMPANYING INSTR	RUCTIONS
1.00 NAME OF FACILITY		
Reichhold, LLC 2		
1.10 THIS FACILITY IS NOW IN OPERATION UNDER MISSOURI OPERATING P	ERMIT NUMBER	
MO-0001341		
1.20 THIS IS A NEW FACILITY AND WAS CONSTRUCTED UNDER MISSOURI C PERMIT).	CONSTRUCTION PERMIT NUMBER (COMPLETE ONLY IF THIS FACILITY DOES	NOT HAVE AN OPERATING
2.00 LIST THE STANDARD INDUSTRIAL CLASSIFICATION (SIC) CODES APPLI	CABLE TO YOUR FACILITY (FOUR DIGIT CODE)	
A. FIRST	B. SECOND	
C. THIRD	D. FOURTH	
2.10 FOR EACH OUTFALL GIVE THE LEGAL DESCRIPTION.		
OUTFALL NUMBER (LIST) SW 1/4 NW 1/4	SEC T R St. Louis	COUNTY
Latitude: 38 degrees; 32 minutes; 47 seconds Longitude: 90 degrees; 22 minutes; 10 secon		
2.20 FOR EACH OUTFALL LIST THE NAME OF THE RECEIVING WATER		
OUTFALL NUMBER (LIST)	RECEIVING WATER	
001	Meramec River	
002	Meramec River	
2.30 BRIEFLY DESCRIBE THE NATURE OF YOUR BUSINESS		
Manufacturing resins used by our customers for coating	gs and paints.	

- A. Attach a line drawing showing the water flow through the facility. Indicate sources of intake water, operations contributing wastewater to the effluent and treatment units labeled to correspond to the more detailed descriptions in item B. Construct a water balance on the line drawing by showing average flows between intakes, operations, treatment units, public sewers and outfalls. If a water balance cannot by determined (e.g., for certain mining activities), provide a pictorial description of the nature and amount of any sources of water and any collection or treatment measures.
- B. For each outfall, provide a description of 1. All operations contributing wastewater to the effluent, including process wastewater, sanitary wastewater, cooling water and storm water runoff. 2. The average flow contributed by each operation. 3. The treatment received by the wastewater. Continue on additional sheets if necessary.

1. OUTFALL NO.	2. OPERATION(S)	3. TREATMENT				
(LIST)	A. OPERATION (LIST)	B. AVERAGE FLOW (INCLUDE UNITS) (MAXIMUM FLOW)	A. DESCRIPTION	B. LIST CODES FROM TABLE A		
001	Non-contact cooling	7,500 GPD	Cooling Tower	l-F		
001	Boiler blow-down	6,000 GPD	None			
001	Water softener demineralizer	3,628 GPD	None			
001	Storm water	75,028 GPD	None	_		
002	Storm water	5,799 GPD	Sedimentation	I-U		
005	Sanitary	1,700 GPD	None			
006	Industrial process waste water	5,570 GPD	Neutralization	2-K		
	plus sanitary		Sedimentation	I-U		
			Floccutation	I-G		
			Filtration	I-Q		
			Carbon Absorption	2-A		
•						
-						
		-				
	-					
· · · · · · · · · · · · · · · · · · ·						
<u> </u>				·		
	<u> </u>					

2.40 CONT	INUED	1										
C. EXCEPT FOR	STORM	RUNOFF, LEAKS OR SPILI	S, ARE A	NY OF THE DISC	HARGES DESC	RIBED IN ITEMS	A OR B INTERMIT	TENT OR SEASO	ONAL?			
\square	YES (C	OMPLETE THE FOLLO	WING T	ABLE)	NO (GO	TO SECTION :	2.50)			· · · · · · · · · · · · · · · · · · ·		
					3. FRE	QUENCY			B. TOTAL VOL	B. TOTAL VOLUME (specify with		
1. OUTFALL NUMBER	,	. OPERATION(S) CONTRI	RUTING F	i OW (list)	ļ		A. FLOW R	ATE (in mgd)		its)	C. DURATION	
(list)				1017 (1103)	A. DAYS PER WEEK (specify average)	B. MONTHS PER YEAR (specify average)	1. LONG TERM AVERAGE	2. MAXIMUM DAILY	4. LONG TERM DAILY	3. MAXIMUM AVERAGE	(in days)	
002	Daily	pumped discharge	of sto	rm water	5	12	0.005	0.053*	0.005	0.053*	1	
	* Data from Sept 1, 2016 to Sept 30, 20 used to determine the Daily Max Flow											
	N EFFLU	ENT GUIDELINE LIMITATIO		JLGATED BY EPA TO SECTION 2.60		ION 304 OF THE	CLEAN WATER A	CT APPLY TO YO	UR FACILITY?			
		TIONS IN THE APPLICABLE PLETE c.)		NT GUIDELINES O SECTION 2.60,		TERMS OF PRO	DUCTION (OF OT	HER MEASURE (OF OPERATION)?			
C. IF YOU AND UNITS	ANSWER USED IN	ED 'YES' TO B. LIST THE C THE APPLICABLE EFFLUI	DUANTITY ENT GUID	THAT REPRESE ELINE AND INDI	ENTS AN ACTUA CATE THE AFFE	AL MEASUREME ECTED OUTFALL	NT OF YOUR MAX S.	IMUM LEVEL OF	PRODUCTION, EX	PRESSED IN TH	E TERMS	
·				1, MAXI	TITUAUD MUM	Υ					FECTED FALLS	
A. QUANTITY P	ER DAY	B. UNITS OF MEASUR	E		C. O		DUCT, MATERIAL pecify)	, ETC.			all numbers)	
2.60 IMPROVEM	ENTS						•	•				
OPERATION APPLICATION STIPULATION	N OF WA DN? THE DNS, CO	EQUIRED BY ANY FEDERA STEWATER TREATMENT E S INCLUDES, BUT IS NOT L JIRT ORDERS AND GRANT TE THE FOLLOWING TABLE	QUIPMEI IMITED T OR LOAI	NT OR PRACTICE O, PERMIT CON OCONDITIONS.	ES OR ANY OTH	ier environme	NTAL PROGRAMS	S THAT MAY AFF	ECT THE DISCHA	RGES DESCRIBE	ED IN THIS E LETTERS,	
		ON OF CONDITION	2.	AFFECTED OU	TFALLS	3	. BRIEF DESCRIP	TION OF PROJEC	2T	4. FINAL COM	PLIANCE DATE	
	AGREEM	ENT, ETC.			<u>.</u> .	.	. BREF DESCRIF		,, 	A. REQUIRED	B. PROJECTE	
R ODTION	Al- VOU	MAY ATTACH ADDITIONA	SHEET	S DESCRIBING A	NY ADDITIONA	WATER BOILL	TION CONTROL P	ROGRAMS (OP (OTHER ENVIRONM	IFNTAL PROJEC	TS WHICH	
MAY AFFE	T YOUR	DISCHARGES) YOU NOW PLANNED SCHEDULES FOR	HAVE UN	DER WAY OR W	HICH YOU PLAN	N. INDICATE WH	DE ADDITIONAL O	OGRAM IS NOW I	UNDER WAY OR F	'LANNED, AND II	NDICATE	

200	INITABLE	AMID	CCCI	I IEMT	α	ACTEDICTION	

A. & B. SEE INSTRUCTIONS BEFORE PROCEEDING - COMPLETE ONE TABLE FOR EACH OUTFALL - ANNOTATE THE OUTFALL NUMBER IN THE SPACE PROVIDED. NOTE: TABLE 1 IS INCLUDED ON SEPARATE SHEETS NUMBERED FROM PAGE 6 TO PAGE 7.

C. USE THE SPACE BELOW TO LIST ANY OF THE POLLUTANTS LISTED IN PART B OF THE INSTRUCTIONS, WHICH YOU KNOW OR HAVE REASON TO BELIEVE IS DISCHARGED OR MAY BE DISCHARGED FROM ANY OUTFALL. FOR EVERY POLLUTANT YOU LIST, BRIEFLY DESCRIBE THE REASONS YOU BELIEVE IT TO BE PRESENT AND REPORT ANY ANALYTICAL DATA IN YOUR POSSESSION.

1. POLLUTANT	2. SOURCE	1. POLLUTANT	2. SOURCE
Xylene	Raw Material		
Styrene	Raw Material		
· · ·			
			,
;			
	<u> </u>		<u> </u>
	<u> </u>		
	-		
ı			

3.10 BIOLOGICAL TOXICITY TESTING DATA DO YOU HAVE ANY KNOWLEDGE OR DISCHARGES OR ON RECEIVING WAT		AL TEST FOR ACUTE OR CHRONIC TOXICITY HAS	BEEN MADE ON ANY OF YOUR
_	DESCRIBE THEIR PURPOSES BELOW.)	☑ NO (GO TO 3.20)	
3.20 CONTRACT ANALYSIS INFORMATION	RTED PERFORMED BY A CONTRACT LABOR	PATODY OD CONCI II TING EIDMO	
		ANTS ANALYZED BY EACH SUCH LABORATORY O	R FIRM BELOW.)NO (GO TO 3.30)
A. NAME	B. ADDRESS	C. TELEPHONE (area code and number	
PDC Laboratories, Inc.	3278 N. Highway 67	314-432-0550	BOD
7 DO Laboratorios, mo.	Florissant, MO 63033	0.1 102 0000	COD
			TSS pH
			Oil and Grease
			Ammonia Nitrogen
			· ·
			1
3,30 CERTIFICATION		<u> </u>	
I CERTIFY UNDER PENALTY OF THIS APPLICATION AND ALL AT FOR OBTAINING THE INFORMAT	FACHMENTS AND THAT, BASED (FION, I BELIEVE THAT THE INFOR	EXAMINED AND AM FAMILIAR WITH TOON MY INQUIRY OF THOSE INDIVIDUATION IS TRUE, ACCURATE AND CONTINUITY (ACCURATE AND CONTINUITY)	ALS IMMEDIATELY RESPONSIBLE DMPLETE. I AM AWARE THAT THERE
		· · · · · · · · · · · · · · · · · · ·	
NAME AND OFFICIAL TITLE (TYPE OR PRIN	(1)		ONE NUMBER WITH AREA CODE
Kevin Massey, Plant Manager			225-5226
SIGNATURE (SEE INSTRUCTIONS)		DATE \$1	GNED / _ /
K~.74			12/28/2017
MO 780-1514 (06-13)			PAGE 5

FORM C TABLE 1 FOR 3.00 ITEM A AND B

INTAKE AND EFFLUENT CHARACTERISTICS

OUTFALL NO.

PART A - You must provide the results of at least one analysis for every pollutant in this table. Complete one table for each outfall. See instructions for additional details.

				2. EFFLUEN	Т			3. UNITS (S	pecify if blank)	4. INTAKE (optional)		
1. POLLUTANT	A. MAXIMUM DA	ILY VALUE	B. MAXIMUM 30 DAY VALUE (if available)		C. LONG TERM AVRG. VALUE (if available)		D. NO. OF	A. CONCEN-		A. LONG TERM AV	/RG. VALUE	B. NO. OF
	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	ANALYSES	TRATION	B. MASS	(1) CONCENTRATION	(2) MASS	ANALYSES
A. Biochemical Oxygen Demand (BOD)			<6	<1	<6	<1	12	mg/L	lbs./Day			
B. Chemical Oxygen Demand (COD)			79	10.3	28.8	3.74	12	mg/L	lbs/Day			
C. Total organic Carbon (TOC)	4.4	0.57					1	mg/L	lbs./Day			
D. Total Suspended Solids (TSS)			50	6.5	8.7	1.13	12	mg/L	lbs./Day			
E. Ammonia (as N)			0.37	<0.04	0.21	<0.03	4	mg/L	lbs./Day			
F. Flow	VALUE		VALUE 475,000 gal/da	ay*	VALUE 75,027	VALUE * on 8/4/16				VALUE		
G. Temperature (winter)	VALUE		VALUE 20.5		VALUE 15.5	VALUE 9		°C		VALUE		
H. Temperature (summer)	VALUE		VALUE 28.9		VALUE 26.3		9		°C	VALUE		
I. pH	MINIMUM	MUMIXAN	MINIMUM 6.67	MAXIMUM 8.58			12	STANDA	ARD UNITS			

PART B – Mark "X" in column 2A for each pollutant, you know or have reason to believe is present. Mark "X" in column 2B for each pollutant you believe to be absent. If you mark column 2A for any pollutant, you must provide the results for at least one analysis for that pollutant. Complete one table for each outfall. See the instructions for additional details and requirements.

	2. MAI	RK "X"			3.	EFFLUENT	4. UNITS		5. INTAKE (optional)		1			
1. POLLUTANT AND CAS NUMBER (if available)	Α	B. BELIEVED	A. MAXIMUM DAIL	Y VALUE	B. MAXIMUM 30 [(if availab		C. LONG TERM AV (if availab		D. NO. OF	A. CONCEN-	B. MASS	A. LONG TERM AVRG. VALUE		B. NO. O
(if available)	BELIEVED PRESENT	ABSENT	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	ANALYSES	TRATION	B. WASS	(1) CONCENTRATION	(2) MASS	ANALYSE
CONVENTIONAL AND NONC	ONVENTIO	DNAL POL	LUTANTS											
A. Bromide (24959-67-9)		х						1 1 1 1 1						
B. Chlorine, Total Residual		Х												
C. Color		Х												
D. Fecal Coliform		Х												
E. Fluoride (16984-48-8)		Х												
F. Nitrate - Nitrate (as N)		X									121 121			

MO 780-1514 (06-13)

	2. MA	RK "X"			3.	EFFLUENT	4. UN	IITS	5. INTAKE (optional)					
1. POLLUTANT AND CAS NUMBER (if available)	A. BELIEVED	B. BELIEVED	A. MAXIMUM DAI	B. MAXIMUM 3 (if avai			C. LONG TERM AV		D. NO. OF	A. CONCEN-	B. MASS	A. LONG TERM AV	/RG. VALUE	B. NO. O
(ii available)	PRESENT	ABSENT	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	ANALYSES	TRATION	b. MASS	CONCENTRATION	(2) MASS	ANALYSE
G. Nitrogen, Total Organic (as N)	X		1.7	0.22					1	mg/L	lbs/day			
H. Oil and Grease	X				<5.1	<1	<5.1	<1	12	mg/l	lbs/day			
I. Phosphorus <i>(as P),</i> Total (7723-14-0)		Х												
J. Sulfate <i>(as SO</i> ⁴) (14808-79-8)		Х									9			
K. Sulfide (as S)		Х												
L. Sulfite (as SO ³) (14265-45-3)		Х												
M. Surfactants		Х												
N. Aluminum, Total (7429-90-5)		Х												
O. Barium, Total (7440-39-3)		X												
P. Boron, Total (7440-42-8)		Х												
Q. Cobalt, Total (7440-48-4)		Х												
R. Iron, Total (7439-89-6)		Х												
S. Magnesium, Total (7439-95-4)		X												
T. Molybdenum, Total (7439-98-7)	Х		<0.012	<0.001					1	mg/l	lbs/day			
U. Manganese, Total (7439-96-5)		Х						7						
V. Tin, Total (7440-31-5)	,	Х												
W. Titanium, Total (7440-32-6)		Х												PAGE 7

MO 780-1514 (06-13)

	2. MAI	RK "X"			3.	EFFLUENT				4. UN	NITS	5. INT/	AKE (optional)	
1. POLLUTANT AND CAS NUMBER	A.	В.	A. MAXIMUM DAII	LYVALUE	B. MAXIMUM 30 I		C. LONG TERM AV		D. NO. OF	A. CONCEN-		A. LONG TERM AV	RG. VALUE	B. NO. O
(if available)	BELIEVED PRESENT	BELIEVED ABSENT	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	ANALYSES		B. MASS	(1) CONCENTRATION	(2) MASS	ANALYSE
METALS, AND TOTAL PHEN	OLS													
1M. Antimony, Total (7440-36-9)		X												
2M. Arsenic, Total (7440-38-2)		x												
3M. Beryllium, Total (7440-41-7)		X												
4M. Cadmium, Total (7440-43-9)		X												
5M. Chromium III (16065-83-1)		X				17								
6M. Chromium VI (18540-29-9)		X												
7M. Copper, Total (7440-50-8)	Х		<0.0096	<0.001					1	mg/l	lbs/day			
8M. Lead, Total (7439-92-1)		Х												
9M. Mercury, Total (7439-97-6)		X												
10M. Nickel, Total (7440-02-0)		X												
11M. Selenium, Total (7782-49-2)		Х												
12M. Silver, Total (7440-22-4)		Х												
13M. Thallium, Total (7440-28-0)		Х												
14M. Zinc, Total (7440-66-6)	Х		<0.024	<0.003					1	mg/l	lbs/day			
15M. Cyanide, Amenable to Chlorination		Х												
16M. Phenols, Total		Х												
RADIOACTIVITY													Ŷ	
(1) Alpha Total		Х												
(2) Beta Total		X												
(3) Radium Total		X												
(4) Radium 226 Total		X												

VALUE

MINIMUM

VALUE 25

MINIMUM

6.64

MAXIMUM

(winter)

I. pH

H. Temperature (summer)

FORM C

VALUE

°C

STANDARD UNITS

9

12

(Use the same format) instea SEE INSTRUCTIONS	d of completing these	pages.						TABL	E 1 FOR 3.00	ITEM A AND B		
INTAKE AND EFFLUE	ENT CHARACTE	RISTICS									OUTFALL NO.	
PART A - You must provide	the results of at least	one analysis	for every pollutant i	in this table. Co	omplete one table for	each outfall. See	instructions for a	additional details	•			
			-	2. EFFLUEN	т	<u> </u>		3. UNITS (s	specify if blank)	4. IN	TAKE (optional)
1. POLLUTANT	A. MAXIMUM DA	ILY VALUE	B. MAXIMUM 30 (if availa		C. LONG TERM A		D. NO. OF	A. CONCEN-		A. LONG TERM A	/RG. VALUE	B. NO. OF
	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	ANALYSES	TRATION	B. MASS	(1) CONCENTRATION	(2) MASS	ANALYSES
A Biochemical Oxygen			_									

49 3.18 8.1 <1 12 mg/L lbs./Day Demand (BOD) B. Chemical Oxygen Demand 3.07 12 110 7.14 47.25 mg/L lbs./Day (COD) C. Total organic Carbon 77 4.99 1 mg/L lbs./Day (TOC) D. Total Suspended Solids 12 30 1.95 10,75 <1 mg/L lbs./Day (TSS) E. Ammonia < 0.09 0.46 < 0.06 4 lbs./Day 0.75 mg/L (as N) VALUE 5,799 VALUE 53,070* VALUE VALUE *on 4/29/17 F. Flow gpd gpd VALUE 12.6 VALUE 9.3 VALUE VALUE G. Temperature 9 °C

PART B - Mark "X" in column 2A for each pollutant you know or have reason to believe is present. Mark "X" in column 2B for each pollutant you believe to be absent. If you mark column 2A for any pollutant, you must provide the results for at least one analysis for that pollutant. Complete one table for each outfall. See the instructions for additional details and requirements.

VALUE

20.1

MAXIMUM

7.91

·	2. MA	RK "X"			3.	EFFLUENT				4. U!	NITS	5. INTA	KE (optional))
1. POLLUTANT AND CAS NUMBER	A.	В,	A. MAXIMUM DAIL	Y VALUE	B. MAXIMUM 30 I		C. LONG TERM AV (if availab		D. NO. OF	A. CONCEN-	D 11400	A. LONG TERM AV	RG. VALUE	B. NO. OF
(if eveilable)	BELIEVED PRESENT	BELIEVED ABSENT	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	ANALYSES	TRATION	B, MASS	(1) CONCENTRATION	(2) MASS	ANALYSES
CONVENTIONAL AND NON	ONVENTION	ONAL POI	LLUTANTS		 -									
A. Bromide (24959-67-9)		х												
B. Chlorine, Total Residual		Х				-					:			
C. Color		Х							_					
D. Fecal Coliform		Х												
E. Fluoride (16984-48-8)		х	_	ii										
F. Nitrate - Nitrate (as N)		Х						•		•"				
MO 780-1514 (06-13)									•		•			PAGE 6

	2. MA	RK "X"			3.	EFFLUENT				4. UN	ITS	5. INT	AKE (optional))
1. POLLUTANT AND CAS NUMBER (if evailable)	A. BELIEVED	B. BELIEVED	A. MAXIMUM DAI	LY VALUE	B. MAXIMUM 30 t		C. LONG TERM AV		D. NO. OF	A. CONCEN-	B. MASS	A. LONG TERM AN	/RG. VALUE	B. NO. O
(in eventually	PRESENT	ABSENT	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	ANALYSES	TRATION	B. IWA33	(1) CONCENTRATION	(2) MASS	ANALYSE
G. Nitrogen, Total Organic (as N)	Х		4.2	0.27					1	mg/L	lbs/day			
H. Oil and Grease		x			<5.2	<1	<5.2	<1	12	mg/L	lbs/day			
l. Phosphorus (as P), Total (7723-14-0)		Х												
J. Sulfate (as SO ⁴) (14808-79-8)		х							_					
K. Sulfide (as S)		Х												
L. Sulfite (as SO ³) (14265-45-3)		х						-		-				
M. Surfactants	ľ	Х												
N. Aluminum, Total (7429-90-5)		х												
O. Barium, Total (7440-39-3)		Х										_		
P. Boron, Total (7440-42-8)		х						-					-	
Q. Cobalt, Total (7440-48-4)		х											_	
R. Iron, Total (7439-89-6)		Х												
S. Magnesium, Total (7439-95-4)		×												
T. Molybdenum, Total (7439-98-7)	Х		<0.012	<1					1	mg/l	lbs/day			
U. Manganese, Total (7439-96-5)		х	-1-										_	
V. Tin, Total (7440-31-5)		х												
W. Titanium, Total (7440-32-8)		Х												

	2. MA	RK "X"			3.	EFFLUENT				4. UN	ITS	5. INTA	AKE (optional)	
1. POLLUTANT AND CAS NUMBER (if available)	A. BELIEVED	B. BELIEVED	A. MAXIMUM DAI	LY VALUE	B. MAXIMUM 30 ((if availab		C. LONG TERM AV		D. NO. OF	A. CONCEN-	D 44400	A. LONG TERM AV	RG. VALUE	B. NO. OF
(ii dvaliable)	PRESENT	ABSENT	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	ANALYSES	TRATION	B. MASS	(1) CONCENTRATION	(2) MASS	ANALYSES
METALS, AND TOTAL PHEN	OLS													
1M. Antimony, Total (7440-36-9)		Х												
2M. Arsenic, Total (7440-38-2)		Х												
3M. Beryllium, Total (7440-41-7)		Х						_						
4M. Cadmium, Total (7440-43-9)		Х												
5M. Chromium III (16065-83-1)		Х	-	-										
6M. Chromium VI (18540-29-9)		X						•						
7M. Copper, Total (7440-50-8)	Х		0.0069	<0.001					1	mg/i	lbs/day			
8M. Lead, Total (7439-92-1)		X					_	_						
9M. Mercury, Total (7439-97-6)		Х				- "		_						
10M. Nickel, Total (7440-02-0)		Х				•			_					
11M. Selenium, Total (7782-49-2)		Х	_								,			
12M. Silver, Total (7440-22-4)		Х												
13M. Thallium, Total (7440-28-0)		x _											-	
14M. Zinc, Total (7440-66-6)	Х		0.067	<0.001					1	mg/l	lbs/day			
15M. Cyanide, Amenable to Chlorination		X												
16M. Phenois, Total		X												<u> </u>
RADIOACTIVITY					·-		,		 					
(1) Alpha Total		X											·	
(2) Beta Total	<u> </u>	X			_			. <u>.</u>	<u> </u>					<u> </u>
(3) Radium Total		Х							<u> </u>					
(4) Radium 226 Total		X												
MO 780-1514 (06-13)	_1		 		1	l	<u> </u>		1		<u> </u>	1		PAGE 8

APPLICATION FOR DISCHARGE PERMIT FORM D - PRIMARY INDUSTRIES

TA	BLE II
NPDES # (IF ASSIGNED)	OUTFALL NUMBER
MO-0001341	001

1.30 If you are a primary industry and this outfall contains process wastewater, refer to Table A in the instructions to determine which of the GC/MS fractions you must test for. Mark "X" in column 2-A for all such GC/MS fractions that apply to your industry and for ALL toxic metals, cyanides, and total phenols. Mark "X" in column 2-B for each pollutant you know or have reason to believe is present. Mark "X" in column 2-C for each pollutant you believe to be absent. If you mark either columns 2-A or 2-B for any pollutant, you must provide the results of at least one analysis for that pollutant. Note that there are seven pages to this part, please review each carefully. Complete one table (all seven pages) for each outfall. See instructions for additional details and requirements.

	2	MARK "X"		1			. EFFLUENT				}				
1. POLLUTANT		В.	C.	A. MAXIMUM DAII	LY VALUE	B. MAXIMUM 30 D (if availab	AY VALUE ie)	C. LONG TERM AV	VRG. VALUE ble)	D.	4. U	NITS		KE (option	al)
AND CAS NUMBER (if available)	A. TEST-ING REQUIRED	BELIEVE D PRESENT	C. BELIEVE D ABSENT	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(z) MASS	NO. OF ANALYSES	A. CONCEN- TRATION	B. MASS	A. LONG TERM AV VALUE	_	B. NO OF ANALYSES
				CONCENTION		CONCENTRATION		CONCENTRATION		ANALISES			(1) CONCENTRATION	(2) MASS	
METALS, AND TOTAL						-									
1M. Antimony, Total (7440- 36-9)			<u>.</u>												
2M. Arsenic, Total (7440-38-2)	-	-	<u> </u>						•						abe
3M. Beryllium, Total (7440- 41-7)	·		<u> 1</u>						1						
4M. Cadmium, Total (7440-43-9)															
5M. Chromium III (16065-83-1)		_	<u></u>												
6M. Chromium VI (18540-29-9)		_				<u> </u>							-		
7M. Copper, Total (7440-50-8)		<u> </u>	_	0.0096	0.001			· -	ļ	1	mg/l	lbs/day		-	
8M. Lead, Total (7439-92-1)		_	<u>./</u>			-									
9M. Magnesium Total (7439-95-4)		_	<u>./</u>												
10M. Mercury, Total (7439-97-6)			V								:				
11M. Molybdenum Total (7439-98-7)		7		<0.012	<0.002					1	mg/l	lbs/day			
12M. Nickel, Total (7440-02-0)			<u></u>												
13M. Selenium, Total (7782-49-2)	_		<u>/</u>			•									
14M. Silver, Total (7440-22-4)			✓			-							-		
15M. Thallium, Total (7440 28-0)			7			-							-		
16M, Tin Total (7440-31-5)			<u>Z</u>					_							
17M, Titanium Total (7440-32-6)	_		<u>/</u>	;											
18M. Zinc, Total (7440-66-6)		<u></u>		0.024	0.003	_				1	mg/l	lbs/day			

CONTINUED FROM PAGE 3 19M. Cyanide, Amenable to 7 Chlorination 20M. Phenols, Total J \Box DIOXIN 2,3,7,8 - Tetra -DESCRIBE RESULTS chlorodibenzo-P-Dioxin 1 (1764-01-6) 2. MARK "X" 3. EFFLUENT 5. INTAKE (optional) B. MAXIMUM 30 DAY VALUE C. LONG TERM AVRG. VALUE 4. UNITS A. MAXIMUM DAILY VALUE (if available) (if available) 1. POLLUTANT A. TES-ING RE-B, BELIEVED B. MASS A. LONG TERM AVRG. VALUE AND CAS NUMBER C. BELIEVED B. NO OF A. CONCEN-TRATION D. NO. OF (If available) ANALYSES (1) CONCENTRATION ANALYSES (1) CONCENTRATION (1) CONCENTRATION (2) MASS (2) MASS (2) MASS (1) CONCENTRATION GC/MS FRACTION - VOLATILE COMPOUNDS 1V. Acrolein 1 (107-02-8)2V. Acrylonitrile 1 (107-13-1) 3V. Benzene 1 < 0.005 < 0.001 < 0.005 4 mq/l lbs/day (71-43-2)4V. Bis (Chloromethyl) / Ether (542-88-1) 5V. Bromoform 1 (75-25-2)6V. Carbon Tetrachloride \neg 7 (56-23-5)7V. Chlorobenzene 1 (108-90-7)8V. Chlorodibromomethane 1 (124-48-1) 9V. Chloroethane 7 (75-00-3)10V. 2-Chloroethylvinyl 7 Ether (110-75-8) 11V. Chloroform 7 (67-66-3) 12V. Dichlorobromomethane 1 (75-27-4)13V. Dichloro-7 difluoromethane (75-71-8) 14V. 1.1 - Dichloroethane 7 (75-34-3)15V. 1,2 - Dichloroethane 7 (107-06-2) 16V. 1.1 - Dichloroethylene 4 (75-35-4)17V, 1,3 - Dichloropropane 7 (78-87-5)18V. 1,2 -Dichloropropylene 7 (542-75-6) 19V. Ethylbenzene 7 0.0094 0.001 0.0052 mg/l bs/day (100-41-4) 20V. Methyl Bromide 7 (74-83-9)21V. Methyl Chloride 7 (74-87-3)

NPDES # (IF ASSIGNED) OUTFALL NUMBER

MO-0001341 001 CONTINUED FROM THE FRONT 2. MARK "X" 3. EFFLUENT C. LONG TERM AVRG. B. MAXIMUM 30 DAY VALUE 5. INTAKE (optional) 4. UNITS A. MAXIMUM DAILY VALUE VALUE 1. POLLUTANT (If available) (if available) B. BELIEVED C. BELIEVED AND CAS NUMBER A. TESTING D. NO. OF B. MASS A. LONG TERM AVRG. B. NO OF A. CONCEN-(if avallable) RE-QUIRED ANALYSES PRESENT ABSENT VALUE ANALYSES (1) CONCENTRATION (1) CONCENTRATION (1) CONCENTRATION (2) MASS (2) MASS (2) MASS (1) CONCENTRATION GC.MS FRACTION - VOLATILE COMPOUNDS (continued) 22V. Methylene Chloride (75-09-2)23V. 1.1.2.2 - Tetra-1 chloroethane (79-34-5) 24V. Tetrachloroethylene 7 (127-18-4) 25V. Toluene < 0.005 < 0.001 < 0.005 < 0.001 4 lbs/dav mg/l (108-88-3) 26V. 1.2 - Trans Dichloroethylene **V** (156-60-5) 27V. 1,1,1 - Tri - \Box Z chloroethane (71-55-6) 28V. 1,1,2 - Tri-Z chloroethane (79-00-5) 29V. Trichloro -V ethylene (79-01-6) 30V. Trichloro -7 fluoromethane (75-69-4) 31V. Vinvl Chloride (75-01-4) GC/MS FRACTION - ACID COMPOUNDS 1A. 2 - Chlorophenol ⊿ (95-57-8) 2A. 2.4 - Dichloro -◢ phenol (120-83-2) 3A. 2,4 - Dimethyl -1 phenol (105-67-9) 4A. 4.6 - Dinitro - O-✓ Cresol (534-52-1) 5A. 2.4 - Dinitro -✓ phenol (51-28-5) 6A, 2-Nitrophenol ≰ (88-75-5)7A. 4-Nitrophenol ⊿ (100-02-7) 8A. P - Chloro - M ✓ Cresol (59-50-7) 9A. Pentachloro --✓ phenol (87-86-5) 10A. Phenol ◢ (108-952)11A. 2.4.6 - Trichloro-✓ phenol (88-06-2) 12A, 2 - methyl - 4,6 7 dinitrophenol (534-52-1)

CONTINUED FROM THE FRONT

CONTINUED FROM T		2. MARK "X"		_		3.	EFFLUENT						_		
1. POLLUTANT		В.	С.	A. MAXIMUM DAIL	Y VALUE	B. MAXIMUM 30 D. (if availabl	AY VALUE	C. LONG TERM VALUE (if availab)			4. U	NITS	5. INTA	KE (option	al)
AND CAS NUMBER (if available)	A, TESTING REQUIRED	BELIEVED PRESENT	BELIEVED ABSENT	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	D, NO. OF ANALYSES	A. CONCEN- TRATION	B. MASS	A. LONG TERM AV VALUE	RG.	B. NO OF ANALYSES
				CONCENTRATION	.,,	CONCENTRATION	, -,	CONCENTRATION					(1) CONCENTRATION	(2) MASS	
GC/MS FRACTION - BAS	E/NEUTRAL	COMPOUN	DS												
1B. Acenaphthene (83-32-9)			_												
2B. Acenaphtylene (208-96-8)			Z							_					
3B. Anthracene (120-12-7)															
4B. Benzidine (92-87-5)			5								•				
5B, Benzo (a) Anthracene (56-55-3)			S												
6B. Benzo (a) Pyrene (50-32-8)			 						1						
7B. 3,4 – Benzofluoranthene (205-99-2)			N						-						
8B. Benzo (ghi) Perylene (191-24-2)		Г	N	-											
9B. Benzo (k) Fluoranthene (207-08-9)		L	Z	-											
10B. Bis (2-Chloroethoxy) Methane (111-91-1)		Г	7		-								-		
11B. Bis (2-Chloroethyl) Ether (111-44-4)															
12B. Bis (2- Chloroisopropyl) Ether (39638-32-9)		Ē.	<u> Z</u>	-											
13B. Bis (2-Ethylhexyl) Phthalate (117-81-7)			<u>\</u>	-					-	-					
14B. 4-Bromophenyl Phenyl Ether (101-55-3)			Z												
15B. Butyl Benzyl Phthalate (85-68-7)			 ✓												
16B. 2- Chloronaphthalene (91-58-7)			Z												
17B. 4-Chlorophenyl Phenyl Ether (7005-72-3)			\												
18B. Chrysene (218-01-9)		L.	<u> </u>												
19B. Dibenzo (a.h) Anthracene (53-70-3)			V												
20B. 1,2 – Dichlorobenzene (95-50-1)															
21B. 1,3 – Dichlorobenzene (541-73-1) MO 780-(516 (02-12)						PAGE									ON PAGE 6

CONTINUED FROM PAGE 5

| NPDES # (IF ASSIGNED) | OUTFALL NUMBER | MO-0001341 | 001

2. MARK "X"			MO-0001	341		001									
1. POLLUTANT				A. MAXIMUM DAI	LY VALUE	B, MAXIMUM 30 D (if availabl		C, LONG TERM VALUE (if availab			4. U	NITS	5. INT	AKE (option	al)
AND CAS NUMBER (if available)	A. TESTING REQUIRED	8. BELIEVED PRESENT	C. BELIEVED ABSENT	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	D, NO. OF ANALYSES	A. CONCEN- TRATION	B. MASS	A. LONG TERM AV		B. NO OF ANALYSES
-· -· -	<u> </u>							CONCENTRATION					CONCENTRATION	(2) MASS	
GC/MS FRACTION - BAS	E/NEUTRAL	COMPOUN	IDS (continu	ed)	<u> </u>							_	<u> </u>		
22B. 1, 4- Dichlorobenzene (106-46-7)			Z												
23B. 3, 3'- Dichlorobenzidine (91-94-1)		L	\											-	
24B. Diethyl Phthalate (84-66-2)			Z												
25B. Dimethyl Phthalate (131-11-3)			∠												
26B. Di-N-butyl Phthalate (84-74-2)															
27B. 2,4-Dinitrotoluene (121-14-2)			✓				_			-	i				
28B. 2,6-Dinitrotoluene (606-20-2)			<u>7</u>	-											
29B. Di-N-Octyphthalate (117-84-0)		Г	7	_						-					
30B. 1,2- Diphenylhydrazine (as Azobenzene) (122-66- 7)			<u> 7</u>												
31B. Fluoranthene (208-44-0)	П	Г											-		
32B. Fluorene (86-73-7)		С	V												
33B. Hexachlorobenzene (87-68-3)			Z	-											
34B. Hexachlorobutadiene (87-68-3)	П	Г												-	
35B. Hexachloro- cyclopentadiene (77-47-4)	П		7												
36B. Hexachloroethane (67-72-1)			<u> </u>												
37B. Indeno (1,2,3-c-d) Pyrene (193-39-5)	L	L,	V												
38В. Isophoroпе (78-59-1)			<u> </u>	_		-									
39B. Naphthalene (91-20-3)	П		7												
40B. Nitrobenzene (98-95-3)			Z												
41B. N-Nitro- sodimethylamine (62-75- 9)			Z												
MO 780-1516 (06-13)		•					PAGE	6				·	,	ONTINUE O	N PAGE 7

CONTINUED FROM THE FRONT 2. MARK "X" 3. EFFLUENT C. LONG TERM AVRG. B. MAXIMUM 30 DAY VALUE 4. UNITS 5. INTAKE (optional) A. MAXIMUM DAILY VALUE VALUE 1. POLLUTANT (if available) (if available) B. BELIEVED PRESENT C, BELIEVED ABSENT AND CAS NUMBER A TES-ING D. NO. OF A. LONG TERM AVRG. VALUE A. CONCEN-TRATION B. MASS B. NO OF (if avallable) REQUIRED **ANALYSES** ANALYSES (1) CONCENTRATION (1) CONCENTRATION (1) CONCENTRATION (2) MASS (2) MASS (2) MASS (1) CONCENTRATION GC/MS FRACTION - BASE/NEUTRAL COMPOUNDS (continued) 42B, N-Nitroso N-Propylamine (621-64-7) 43B, N-Nitrosodiphenylamine (86-30-✓ 44B. Phenanthrene ⊿ (85-01-8) 45B. Pyrene ⊿ (129-00-0) 46B. 1,2,4-Tri 7 chlorobenzene (120-82-1) **GC/MS FRACTION - PESTICIDES** 1P. Aldrin ⊿ (309-00-2)2P. a-BHC ✓ (319-84-6)3Р. В-ВНС ✓ (319-84-6) 4P. y-BHC <u>/</u>] (58-89-9)5P. δ-BHC 1 (319-86-8)6P. Chlordane ✓ (57-74-9)7P. 4,4'-DDT 1 (50-29-3)8P. 4,4'-DDE ✓ (72-55-9)9P. 4.4'-DDD ≰ (72-54-8)10P. Dieldrin ⊿ (60-57-1)11P. α-Endosulfan ✓ (115-29-7)12P. β-Endosultan ≰ (115-29-7) 13P. Endosulfan Sulfate ✓ (1031-07-8) 14P, Endrin ✓ (72-20-8)15P. Endrin Aldehyde (7421-93-4) 16P. Heptachlor

(76-44-8)

CONTINUED FROM PAGE 7

 NPDES # (iF ASSIGNED)
 OUTFALL NUMBER

 MO-0001341
 001

	,			INIO-000	1341		1001								
	-	2. MARK "X"		A. MAXIMUM DAII	I Y VALUE	B. MAXIMUM 30 D	EFFLUENT AY VALUE	C. LONG TERM	AVRG.		} 4. U	NITS	5. INTA	KE (option	al)
1. POLLUTANT AND CAS NUMBER (if evallable)	A. TESTING REQUIRED	B. BELIEVED	C. BELIEVED		1	(if availab	fe)	(if availat	ole)	D. NO. OF ANALYSES	A. CONCEN- TRATION	B. MASS	A. LONG TERM AV	RG.	B. NO OF
(in available)		PRESENT	ABSENT	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	ANALTSES	TRATION		VALUE (1) CONCENTRATION	(2) MASS	ANALYSES
GC/MS FRACTION - PES	STICISES (cor	ntinued)	l	<u> </u>									CONCENTION	IMPROG	
17P. Heptachlor Epoxide (1024-57-3)	1 1	Ī	V		-								_	-	
18P. PCB-1242 (53469-21-9)	1		1												
19P. PBC-1254 (11097-69-1)	1		/												
20P. PCB-1221 (11104-28-2)	ı	1	1/												
21P. PCB-1232 (11141-16-5)	1	1.1	V												
22P, PCB-1248 (12672-29-6)	l l		V												
23P. PCB-1260 (11096-82-5)		L	V												
24P. PCB-1016 (12674-11-2)	1	11	V										-		
25P. Toxaphene (8001-35-2)	1		 	-											
J. RADIOACTIVITY															
(1) Alpha Total	1	[]	V												
(2) Beta Total	-		V										1		
(3) Radium Total	1		/								-				
(4) Radium 226 Total	1		V												
							:								
	<u> </u>														

2.00	2.00 POTENTIAL DISCHARGES NOT COVERED BY ANALYSIS										
A.	A. IS ANY POLLUTANT LISTED IN ITEM 1.30 A SUBSTANCE OR A COMPONENT OF A SUBSTANCE WHICH YOU DO OR EXPECT THAT YOU WILL OVER THE NEXT FIVE YEARS USE OR MANUFACTURE AS AN INTERMEDIATE OR FINAL PRODUCT OR BYPRODUCT?										
	YES (LIST ALL SUCH PO		NO (GO TO B)								
Ethy	ylbenzene - Used as solvent ir	n products; Toluene - Used as so	lvent in products; Benzene - Used a	as solvent in products							
			1								
B.			SES OR PRODUCTS CAN REASONABLE BE CEED TWO TIMES THE MAXIMUM VALUES								
	YES (COMPLETE C BELC	OW) BO (GO TO SECTION	v 3.00)								
C.	C. IF YOU ANSWERED "YES" TO ITEM B, EXPLAIN BELOW AND DESCRIBE IN DETAIL THE SOURCES AND EXPECTED LEVELS OF SUCH POLLUTANTS THAT YOU ANTICIPATE WILL BE DISCHARGED FROM EACH OUTFALL OVER THE NEXT FIVE YEARS, TO THE BEST OF YOUR ABILITY AT THIS TIME. CONTINUE ON ADDITIONAL SHEETS IF YOU NEED MORE SPACE.										
	CONTINUE ON ADDITIONAL SHEE	13 IF TOO NEED MORE SPACE.	· · · · · · · · · · · · · · · · · · ·	<u> </u>							
3.00	CONTRACT ANALYSIS INFOR	RMATION	· · · · · · · · · · · · · · · · · · ·	 							
			A CONTRACT LEGGISTORY OF CONCU	TIMO EIDMO							
	WERE ANY OF THE ANALYSI	ES REPORTED IN 1.30 PERFORMED BY	A CONTRACT LABORATORY OR CONSUL	TING FIRM!							
	YES (LIST THE NAME, AL	DDRESS, AND TELEPHONE NUMBER O	F, AND ANALYZED BY, EACH SUCH LABOI								
	YES (LIST THE NAME, ALL NO (GO TO SECTION 4.0	DDRESS, AND TELEPHONE NUMBER OF 0)	F, AND ANALYZED BY, EACH SUCH LABOI	RATORY OR FIRM BELOW)							
-	YES (LIST THE NAME, AL	DDRESS, AND TELEPHONE NUMBER OF (0) B. ADDRESS									
	YES (LIST THE NAME, ALL NO (GO TO SECTION 4.0	DDRESS, AND TELEPHONE NUMBER OF 0)	F, AND ANALYZED BY, EACH SUCH LABOI	RATORY OR FIRM BELOW)							
- 11	NO (GO TO SECTION 4.0 A. NAME	DDRESS, AND TELEPHONE NUMBER OF (0) B. ADDRESS	F, AND ANALYZED BY, EACH SUCH LABOR C. TELEPHONE (area code and number)	D. POLLUTANTS ANALYZED (list)							
	YES (LIST THE NAME, ALL NO (GO TO SECTION 4.0	DDRESS, AND TELEPHONE NUMBER OF 0) B. ADDRESS 3278 N. Highway 67	F, AND ANALYZED BY, EACH SUCH LABOR C. TELEPHONE (area code and number)	D. POLLUTANTS ANALYZED (list) Benzene, Toluene, Ethyl							
	YES (LIST THE NAME, ALL NO (GO TO SECTION 4.0	DDRESS, AND TELEPHONE NUMBER OF 0) B. ADDRESS 3278 N. Highway 67	F, AND ANALYZED BY, EACH SUCH LABOR C. TELEPHONE (area code and number)	D. POLLUTANTS ANALYZED (list) Benzene, Toluene, Ethyl Benzene,							
	YES (LIST THE NAME, ALL NO (GO TO SECTION 4.0	DDRESS, AND TELEPHONE NUMBER OF 0) B. ADDRESS 3278 N. Highway 67	F, AND ANALYZED BY, EACH SUCH LABOR C. TELEPHONE (area code and number)	D. POLLUTANTS ANALYZED (list) Benzene, Toluene, Ethyl Benzene, Zinc, Copper							
	YES (LIST THE NAME, ALL NO (GO TO SECTION 4.0	DDRESS, AND TELEPHONE NUMBER OF 0) B. ADDRESS 3278 N. Highway 67	F, AND ANALYZED BY, EACH SUCH LABOR C. TELEPHONE (area code and number)	D. POLLUTANTS ANALYZED (list) Benzene, Toluene, Ethyl Benzene, Zinc, Copper							
	YES (LIST THE NAME, ALL NO (GO TO SECTION 4.0	DDRESS, AND TELEPHONE NUMBER OF 0) B. ADDRESS 3278 N. Highway 67	F, AND ANALYZED BY, EACH SUCH LABOR C. TELEPHONE (area code and number)	D. POLLUTANTS ANALYZED (list) Benzene, Toluene, Ethyl Benzene, Zinc, Copper							
	YES (LIST THE NAME, ALL NO (GO TO SECTION 4.0	DDRESS, AND TELEPHONE NUMBER OF 0) B. ADDRESS 3278 N. Highway 67	F, AND ANALYZED BY, EACH SUCH LABOR C. TELEPHONE (area code and number)	D. POLLUTANTS ANALYZED (list) Benzene, Toluene, Ethyl Benzene, Zinc, Copper							
	YES (LIST THE NAME, ALL NO (GO TO SECTION 4.0	DDRESS, AND TELEPHONE NUMBER OF 0) B. ADDRESS 3278 N. Highway 67	F, AND ANALYZED BY, EACH SUCH LABOR C. TELEPHONE (area code and number)	D. POLLUTANTS ANALYZED (list) Benzene, Toluene, Ethyl Benzene, Zinc, Copper							
400	PDC Laboratories	DDRESS, AND TELEPHONE NUMBER OF 0) B. ADDRESS 3278 N. Highway 67	F, AND ANALYZED BY, EACH SUCH LABOR C. TELEPHONE (area code and number)	D. POLLUTANTS ANALYZED (list) Benzene, Toluene, Ethyl Benzene, Zinc, Copper							
4.00 I Ce	YES (LIST THE NAME, AL NO (GO TO SECTION 4.0 A. NAME PDC Laboratories CERTIFICATION	DDRESS, AND TELEPHONE NUMBER OF OF OF THE PROPERTY OF THE PROP	C. TELEPHONE (area code and number) (314) 432-0550	Benzene, Toluene, Ethyl Benzene, Zinc, Copper Molybdenum							
I ce	PDC Laboratories CERTIFICATION CER	B. ADDRESS B. ADDRESS 3278 N. Highway 67 Florissant, MO 63033	C. TELEPHONE (area code and number) (314) 432-0550 d and am familiar with the information of those individuals immediated.	Benzene, Toluene, Ethyl Benzene, Zinc, Copper Molybdenum nation submitted in this ely responsible for obtaining							
I ce app the	PDC Laboratories CERTIFICATION ertify under penalty of law the olication and all attachment information, I believe that	DDRESS, AND TELEPHONE NUMBER OF OF OF OTHER PROPERTY OF THE PR	C. TELEPHONE (area code and number) (314) 432-0550 d and am familiar with the information of those individuals immediate and complete. I am aware the	Benzene, Toluene, Ethyl Benzene, Zinc, Copper Molybdenum nation submitted in this ely responsible for obtaining							
I ce app the per	PDC Laboratories CERTIFICATION ertify under penalty of law the blication and all attachment information, I believe that inalties for submitting false in	B. ADDRESS 3278 N. Highway 67 Florissant, MO 63033 nat I have personally examine s and that, based on my inquithe information is true, accurantormation, including the poss	C. TELEPHONE (area code and number) (314) 432-0550 d and am familiar with the information of those individuals immediate and complete. I am aware the airline and imprisonment.	Benzene, Toluene, Ethyl Benzene, Zinc, Copper Molybdenum nation submitted in this ely responsible for obtaining at there are significant							
I ce app the per	PDC Laboratories CERTIFICATION ertify under penalty of law the blication and all attachment information, I believe that the balties for submitting false in EAND OFFICIAL TITLE (TYPE OR P.	B. ADDRESS 3278 N. Highway 67 Florissant, MO 63033 nat I have personally examine s and that, based on my inquithe information is true, accurantormation, including the poss	C. TELEPHONE (area code and number) (314) 432-0550 d and am familiar with the information of those individuals immediate and complete. I am aware the sibility of fine and imprisonment.	Benzene, Toluene, Ethyl Benzene, Zinc, Copper Molybdenum nation submitted in this ely responsible for obtaining at there are significant ER (AREA CODE AND NUMBER)							
I ce app the per NAM	PDC Laboratories CERTIFICATION ertify under penalty of law the blication and all attachment information, I believe that the balties for submitting false in EAND OFFICIAL TITLE (TYPE OR Pain Massey	B. ADDRESS 3278 N. Highway 67 Florissant, MO 63033 nat I have personally examine s and that, based on my inquithe information is true, accurantormation, including the poss	C. TELEPHONE (area code and number) (314) 432-0550 d and am familiar with the information of those individuals immediate and complete. I am aware the sibility of fine and imprisonment. PHONE NUMBER (636) 225-52	Benzene, Toluene, Ethyl Benzene, Zinc, Copper Molybdenum nation submitted in this ely responsible for obtaining at there are significant ER (AREA CODE AND NUMBER)							
I ce app the per NAM	PDC Laboratories CERTIFICATION ertify under penalty of law the blication and all attachment information, I believe that the balties for submitting false in EAND OFFICIAL TITLE (TYPE OR P.	B. ADDRESS 3278 N. Highway 67 Florissant, MO 63033 nat I have personally examine s and that, based on my inquithe information is true, accurantormation, including the poss	C. TELEPHONE (area code and number) (314) 432-0550 d and am familiar with the information of those individuals immediate and complete. I am aware the sibility of fine and imprisonment.	Benzene, Toluene, Ethyl Benzene, Zinc, Copper Molybdenum nation submitted in this ely responsible for obtaining at there are significant ER (AREA CODE AND NUMBER)							
I ce app the per NAM	PDC Laboratories CERTIFICATION ertify under penalty of law the blication and all attachment information, I believe that the balties for submitting false in EAND OFFICIAL TITLE (TYPE OR Pain Massey	B. ADDRESS 3278 N. Highway 67 Florissant, MO 63033 nat I have personally examine s and that, based on my inquithe information is true, accurantormation, including the poss	C. TELEPHONE (area code and number) (314) 432-0550 d and am familiar with the information of those individuals immediate and complete. I am aware the sibility of fine and imprisonment. PHONE NUMBER (636) 225-52	Benzene, Toluene, Ethyl Benzene, Zinc, Copper Molybdenum nation submitted in this ely responsible for obtaining at there are significant ER (AREA CODE AND NUMBER)							

APPLICATION FOR DISCHARGE PERMIT FORM D – PRIMARY INDUSTRIES

į	TAI	BLE II
ļ	NPDES# (IF ASSIGNED)	OUTFALL NUMBER
	MO-0001341	002

1.30 If you are a primary industry and this outfall contains process wastewater, refer to Table A in the instructions to determine which of the GC/MS fractions you must test for. Mark "X" in column 2-A for all such GC/MS fractions that apply to your industry and for ALL toxic metals, cyanides, and total phenols. Mark "X" in column 2-B for each pollutant you know or have reason to believe is present. Mark "X" in column 2-C for each pollutant you believe to be absent. If you mark either columns 2-A or 2-B for any pollutant, you must provide the results of at least one analysis for that pollutant. Note that there are seven pages to this part, please review each carefully. Complete one table (all seven pages) for each outfall. See instructions for additional details and requirements.

	2.	MARK "X"			3. EFFLUENT						ı				
1. POLLUTANT	_	В.		A. MAXIMUM DAII	LY VALUE	B. MAXIMUM 30 D. (if availab		C. LONG TERM AV			4. UNITS		5. INTAKE (optional		al)
AND CAS NUMBER (If available)	a. Test-ing Required	BELIEVE D PRESENT	C. BELIEVE D ABSENT	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	D. NO. OF ANALYSES	A. CONCEN- TRATION	B. MASS	A. LÖNG TERM AV VALUE		B, NO OF ANALYSES
													(1) CONCENTRATION	(2) MASS	
METALS, AND TOTAL				,								_			
1M. Antimony, Total (7440- 36-9)	-	! —	<u> </u>							1			-		
2M. Arsenic, Total (7440-38-2)		_	<u></u>			_							<u> </u>		
3M. Beryllium, Total (7440- 41-7)		_	₹											 	
4M. Cadmium, Total (7440-43-9)			<u>√</u>					, <u> </u>							-
5M. Chromium III (16065-83-1)		_	₹						,	-					
6M. Chromium VI (18540-29-9)		_	<u>/</u>										<u> </u>		
7M. Copper, Total (7440-50-8)		7	_	0.0069	0.001		-			1	mg/i	lbs/day			
8M. Lead, Total (7439-92-1)		_	✓				_								
9M. Magnesium Total (7439-95-4)		_	<u></u>			_		· 			-				
10M. Mercury, Total (7439-97-6)			V			_									-
11M. Molybdenum Total (7439-98-7)]_=	コ	<u></u>			-									
12M. Nickel, Total (7440-02-0)			V									_			
13M. Selenium, Total (7782-49-2)	_		<u> </u>												
14M. Silver, Total (7440-22-4)		7	V					-					-		
15M. Thallium, Total (7440- 28-0)	_						_				-				
16M, Tin Total (7440-31-5)			Z												
17M. Titanium Total (7440-32-6)	_		<u>/</u>								-				
18M. Zinc, Total (7440-66-6)			<u> </u>												
MO 780-1516 (06-13)							PAGE 2			_					

CONTINUED FROM PAGE 3 19M. Cyanide, Amenable to Chlorination 20M. Phenols, Total 7 DIOXIN 2.3.7.8 - Tetra -DESCRIBE RESULTS 1 chlorodibenzo-P-Dioxin (1764-01-6) 2. MARK "X" 3. EFFLUENT B. MAXIMUM 30 DAY VALUE C. LONG TERM AVRG. VALUE 4. UNITS 5. INTAKE (optional) A. MAXIMUM DAILY VALUE (if available) (if available) 1. POLLUTANT A. TES-ING RE-AND CAS NUMBER B. BELIEVED C. BELIEVED B. MASS A. LONG TERM AVRG. B. NO OF A. CONCEN-TRATION D. NO. OF VALUE ANALYSES (if available) ANALYSES (1) CONCENTRATION (1) CONCENTRATION (1) CONCENTRATION (2) MASS (2) MASS (2) MASS (1) CONCENTRATION (2) MASS GC/MS FRACTION - VOLATILE COMPOUNDS 1V. Acrolein 1 (107-02-8)2V. Acrylonitrile ✓ (107-13-1)3V. Benzene 1 < 0.005 < 0.001 < 0.005 4 lbs/dav ma/l (71-43-2)4V. Bis (Chloromethyl) Ether (542-88-1) 5V. Bromoform 1 (75-25-2)6V. Carbon Tetrachloride 7 (56-23-5)7V. Chlorobenzene (108-90-7) 8V, Chlorodibromomethane 1 (124-48-1)9V. Chloroethane 7 (75-00-3) 10V. 2-Chloroethylvinyl 7 Ether (110-75-8) 11V. Chloroform 7 (67-66-3)12V. Dichlorobromomethane (75-27-4)13V. Dichloro-7 difluoromethane (75-71-8) 14V. 1,1 - Dichloroethane 7 (75-34-3)15V. 1,2 - Dichloroethane 7 (107-06-2)16V. 1,1 - Dichloroethylene (75-35-4)17V. 1,3 - Dichloropropane (78-87-5)18V. 1,2 -Dichloropropylene 7 (542-75-6)19V. Ethylbenzene 7 < 0.005 < 0.001 < 0.005 mg/l bs/day (100-41-4) 20V. Methyl Bromide 7 (74-83-9)21V. Methyl Chloride 7 (74-87-3)

NPDES # (IF ASSIGNED) OUTFALL NUMBER
MO-0001341 002

CONTINUED FROM THE FRONT 2. MARK "X" 3. EFFLUENT C. LONG TERM AVRG. B. MAXIMUM 30 DAY VALUE 4. UNITS 5. INTAKE (optional) A. MAXIMUM DAILY VALUE VALUE 1. POLLUTANT (if available) (if available) Р. C. BELIEVED AND CAS NUMBER A. TESTING RE-QUIRED D. NO. OF A. LONG TERM AVRG. VALUE B. MASS BELIEVED B. NO OF A. CONCEN-(if available) ANALYSES PRESENT ABSENT ANALYSES (1) CONCENTRATION (1) CONCENTRATION (1) CONCENTRATION (2) MASS (2) MASS (2) MASS (1) CONCENTRATION GC.MS FRACTION - VOLATILE COMPOUNDS (continued) 22V. Methylene Chloride (75-09-2)23V. 1,1,2,2 - Tetrachloroethane (79-34-5) 24V. Tetrachloroethylene 1 (127-18-4) 25V. Toluene <0.005 < 0.001 < 0.005 < 0.001 4 lbs/day mg/l (108-88-3)26V. 1,2 - Trans Dichloroethylene (156-60-5) 27V. 1,1,1 - Tri -7 chloroethane (71-55-6) 28V. 1,1,2 - Tri-Z chloroethane (79-00-5) 29V. Trichloro -ethylene (79-01-6) 30V. Trichloro - \Box J \Box fluoromethane (75-69-4) 31V. Vinvl Chloride (75-01-4) GC/MS FRACTION - ACID COMPOUNDS 1A. 2 - Chlorophenol 1 (95-57-8) 2A. 2.4 - Dichloro -1 phenol (120-83-2) 3A. 2.4 - Dimethyl -1 phenol (105-67-9) 4A, 4.6 - Dinitro - O-1 Cresol (534-52-1) 5A, 2,4 - Dinitro -/ phenol (51-28-5) 6A. 2-Nitrophenol ✓ (88-75-5)7A. 4-Nitrophenol **√** (100 - 02 - 7)8A. P - Chloro - M _ / Cresol (59-50-7) 9A. Pentachioro --1 phenol (87-86-5) 10A. Phenol 1 (108-952)11A. 2,4,6 - Trichloro-1 phenol (88-06-2) 12A. 2 - methyl - 4,6 dinitrophenol (534-52-1)

CONTINUED FROM THE FRONT 2. MARK "X" 3. EFFLUENT C. LONG TERM AVRG. B. MAXIMUM 30 DAY VALUE 4. UNITS 5. INTAKE (optional) A. MAXIMUM DAILY VALUE VALUE 1. POLLUTANT (if available) (if available) B. BELIEVED PRESENT C, BELIEVED ABSENT AND CAS NUMBER A. TESTING D. NO. OF B. MASS A. LONG TERM AVRG. B. NO OF A. CONCEN-TRATION (if available) REQUIRED **ANALYSES** VALUE ANALYSES (1) CONCENTRATION (1) CONCENTRATION (1) CONCENTRATION (2) MASS (2) MASS (2) MASS (1) CONCENTRATION GC/MS FRACTION - BASE/NEUTRAL COMPOUNDS 1B. Acenaphthene 1 (83-32-9) 2B. Acenaphtylene (208-96-8)3B. Anthracene / (120-12-7)4B. Benzidine \mathbf{Z} (92-87-5) 5B. Benzo (a) 7 Anthracene (56-55-3) 6B. Benzo (a) 7 Pyrene (50-32-8) 7B. 3,4 -Benzofluoranthene 1 (205-99-2)8B. Benzo (ghi) 1 Perviene (191-24-2) 9B. Benzo (k) 1 Ш Fluoranthene (207-08-9) 10B. Bis (2-Chloroethoxy) 1 Methane (111-91-1) 11B, Bis (2-Chloroethyl) 7 Ether (111-44-4) 12B. Bis (2-Chloroisopropyi) Z Ether (39638-32-9) 13B. Bis (2-Ethylhexyl) 1 Phthalate (117-81-7) 14B. 4-Bromophenyl 1 Phenyl Ether (101-55-3) 15B. Butyl Benzyl Z Phthalate (85-68-7) 16B. 2-7 Chloronaphthalene (91-58-7) 17B. 4-Chlorophenyl Z Phenyl Ether (7005-72-3) 18B. Chrysene 4 (218-01-9)19B. Dibenzo (a.h) 7 Anthracene (53-70-3) 20B, 1,2 -Dichlorobenzene (95-50-1) 21B. 1,3 -Dichlorobenzene Z (541-73-1)

CONTINUED FROM PAGE 5

NPDES # (IF ASSIGNED) MO-0001341 OUTFALL NUMBER 002

2. MARK "X" 3. EFFLUENT																	
1. POELUTANT	_	Τ _	B	В	c	A. MAXIMUM DAII	Y VALUE	B. MAXIMUM 30 D. (if available	AY VALUE	C, LONG TERN VALUE (if availab			4. UNITS		5. INTAKE (optional)		
AND CAS NUMBER (if available)	A. TESTING REQUIRED		C, BELIEVED ABSENT	BELIEVED ABSENT	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	D. NO. OF ANALYSES	A. CONCEN- TRATION	B. MASS	A. LONG TERM AV VALUE		B. NO OF ANALYSES	
_				CONCENTRATION	• , , , , ,	CONCENTRATION		CONCENTRATION	,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,,				(1) CONCENTRATION	(2) MASS			
GC/MS FRACTION - BAS	E/NEUTRAL	COMPOUN	IDS (continu	red)						-							
22B. 1, 4- Dichlorobenzene (106-46-7)			Z		_									,			
23B. 3, 3'- Dichlorobenzidine (91-94-1)			\	, 													
24B. Diethyl Phthalate (84-66-2)			>														
25B. Dimethyl Phthalate (131-11-3)			✓														
26B. Di-N-butyl Phthalate (84-74-2)			<u></u>												•		
27B. 2,4-Dinitrotoluene (121-14-2)			 							-							
28B, 2,6-Dinitrotoluene (606-20-2)			Z	_													
29B. Di-N-Octyphthalate (117-84-0)		Г	7														
30B. 1,2- Diphenylhydrazine (as Azobenzene) (122-66- 7)			 ✓														
31B. Fluoranthene (206-44-0)			7		-			-									
32B. Fluorene (86-73-7)			V	<u> </u>			-										
33B. Hexachlorobenzene (87-68-3)		<u> </u>	Z			·	_			,							
34B. Hexachiorobutadiene (87-68-3)	П		7		-												
35B. Hexachloro- cyclopentadiene (77-47-4)			5	-											_		
36B. Hexachloroethane (67-72-1)			V														
37B. Indeno (1,2,3-c-d) Pyrene (193-39-5)	L	L	>														
38B. isophorone (78-59-1)			\														
39B. Naphthalene (91-20-3)	П		\														
40B. Nitrobenzene (98-95-3)			Z				_										
41B. N-Nitro- sodimethylamine (62-75- 9)			Z														
MO 780-1516 (06-13)					-		PAGE	6					C	ONTINUE (ON PAGE 7		

CONTINUED FROM THE FRONT 2. MARK "X" 3. EFFLUENT C. LONG TERM AVRG. B. MAXIMUM 30 DAY VALUE 4. UNITS 5. INTAKE (optional) A. MAXIMUM DAILY VALUE 1. POLLUTANT (if avallable) (if available) В. C. BELIEVED AND CAS NUMBER A. TES-ING REQUIRED D. NO. OF B. MASS A. LONG TERM AVRG. VALUE B. NO OF ANALYSES BELIEVED A. CONCEN-(if available) ABSENT ANALYSES (1) CONCENTRATION (1) CONCENTRATION (2) MASS (1) CONCENTRATION (2) MASS (2) MASS TRATION (1) CONCENTRATION GC/MS FRACTION - BASE/NEUTRAL COMPOUNDS (continued) 42B. N-Nitroso N-Propylamine (621-64-7) 43B. N-Nitrosodiphenylamine (86-30-1 44B. Phenanthrene ≰ (85-01-8) 45B. Pyrene ⊿ (129-00-0) 46B. 1,2,4-Tri 7 chlorobenzene (120-82-1) **GC/MS FRACTION - PESTICIDES** 1P. Aldrin ⊿ (309-00-2)2P. α-BHC ⊿ (319-84-6) зр. в-внс ✓ (319-84-6) 4Р. ү-ВНС ⊿ (58-89-9)5P, δ-BHC ✓ (319-86-8)6P. Chlordane 4 (57-74-9)7P. 4,4'-DDT 1 (50-29-3)8P. 4,4'-DDE 1 (72-55-9)9P. 4.4'-DDD / (72-54-8)10P. Dieldrin ✓ (60-57-1)11P, α-Endosulfan ⊿ (115-29-7)12P. β-Endosultan ✓ (115-29-7) 13P. Endosulfan Sulfate ⊿ (1031-07-8) 14P. Endrin ✓ (72-20-8)

MO 780-1516 (06-13) PAGE 7 CONTINUED ON PAGE 8

15P. Endrin Aldehyde

(7421-93-4) 16P, Heptachlor

(76-44-8)

∡

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CONTINUED FROM PAGE 7

			MO-0001341 002					<u> </u>								
1. POLLUTANT			2. MARK "X"		A. MAXIMUM DAII	LY VALUE	B. MAXIMUM 30 D (If availab	EFFLUENT AY VALUE (e)	C. LONG TERM VALUE (if availat	M AVRG.		4. U	INITS		KE (option	al)
AND CAS NUMBER (if available)	A. TESTING REQUIRED	B. BELIEVED PRESENT	C. BELIEVED ABSENT	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	D. NO. OF ANALYSES	A. CONCEN- TRATION	B. MASS	VALUE		B. NO OF ANALYSES	
				<u>.</u> .		<u> </u>							(1) CONCENTRATION	(2) MASS		
GC/MS FRACTION - PE	STICISES (CO)	ntinuea)		-								<u> </u>		1		
17P. Heptachlor Epoxide (1024-57-3)		1	1													
18P. PCB-1242 (53469-21-9)	1	ĪĪ	1/1										_			
19P. PBC-1254 (11097-69-1)	1	11	1/1													
20P. PCB-1221 (11104-28-2)		11	V										-			
21P. PCB-1232 (11141-16-5)	1	11	/													
22P. PCB-1248 (12672-29-6)	1	11	1/				-									
23P. PCB-1260 (11096-82-5)		Ш	<u>/</u>													
24P. PCB-1016 (12674-11-2)	I	11	 							_						
25P. Toxaphene (8001-35-2)	1	11	1							-						
J. RADIOACTIVITY																
(1) Alpha Total		11	/													
(2) Beta Total		11	/													
(3) Radium Total	1															
(4) Radium 226 Total	1	1	1/1													
140 300 4540 (00 40)													<u> </u>		L	

2.00	POTENTIAL DISCHARGES N	OT COVERED BY ANALYSIS	-		·						
Α.	A. IS ANY POLLUTANT LISTED IN ITEM 1.30 A SUBSTANCE OR A COMPONENT OF A SUBSTANCE WHICH YOU DO OR EXPECT THAT YOU WILL OVER THE NEXT FIVE YEARS USE OR MANUFACTURE AS AN INTERMEDIATE OR FINAL PRODUCT OR BYPRODUCT?										
	YES (LIST ALL SUCH PO] NO (GO TO B)	555555							
Eth	/lbenzene - Used as solvent i	n products; Toluene - Used as so	sivent in products: Ber	zene - Used a	s solvent in products						
	AND THE STORY OF T	i productoj roldono Good do oc	Area in producto, Der	2010 00000	is solvent in products						
	ADE VOUR OPERATIONS CHOUT	ZIAT VOLID DALVALATEDIA O DECORO	050 05 5500H070 044		TARREST TO MANY OF THE TARREST						
Б.	B. ARE YOUR OPERATIONS SUCH THAT YOUR RAW MATERIALS, PROCESSES OR PRODUCTS CAN REASONABLE BE EXPECTED TO VARY SO THAT YOUR DISCHARGES OF POLLUTANTS MAY DURING THE NEXT FIVE YEARS EXCEED TWO TIMES THE MAXIMUM VALUES REPORTED IN ITEM 1.30?										
	YES (COMPLETE C BELOW) INO (GO TO SECTION 3.00)										
C.		M B, EXPLAIN BELOW AND DESCRIBE I									
	CONTINUE ON ADDITIONAL SHEE		HE NEXT FIVE YEARS, TO	THE BEST OF YO	JUR ABILITY AT THIS TIME.						
			-								
!											
	<u> </u>			_							
3.00	CONTRACT ANALYSIS INFOR										
		ES REPORTED IN 1.30 PERFORMED BY									
	_	DDRESS, AND TELEPHONE NUMBER O	F, AND ANALYZED BY, EA	CH SUCH LABOR	RATORY OR FIRM BELOW)						
	NO (GO TO SECTION 4.0	·0)	·								
	A. NAME	B. ADDRESS	C. TELEPHONE (area c	ode and number)	D. POLLUTANTS ANALYZED (list)						
ļ <u>-</u>	PDC Laboratories	3278 N. Highway 67	(314) 432-0	0550	Benzene, Toluene, Ethyl						
		Florissant, MO 63033			Benzene, Copper						
											
											
			 		· .						
	,		<u> </u>								
					· · ·						
				·							
4.00	CERTIFICATION										
		hat I have personally examine	ed and am familiar w	ith the inform	pation submitted in this						
app	lication and all attachment	s and that, based on my inqui	iry of those individua	als immediate	ely responsible for obtaining						
the	information, I believe that t	the information is true, accura	ite and complete. I	am aware tha	at there are significant						
per	alties for submitting false i	nformation, including the poss	sibility of fine and im	prisonment.	•						
NAM	E AND OFFICIAL TITLE (TYPE OR P	RINT)		PHONE NUMBI	ER (AREA CODE AND NUMBER)						
Kevi	n Massey			(636) 225-52	26						
SIGN	ATURE			DATE SIGNED	· · · · · · · · · · · · · · · · · · ·						
	V. n.	11 1		1 1	28/2017						
NA	780-1546 (06-13)	PAGE 9		1-/	10/017						
WIU	100-1040 (00-10)	I. PAGES			•						

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JAN 3 2013



MISSOURI DEPARTMENT OF NATURAL RESOURCES WATER PROTECTION PROGRAM

eDMR PERMIT HOLDER AND CERTIFIER REGISTRATION

Water Protection Program

Complete this form to register a permit holder for electronic authorized representatives assigned an electronic signature.			ed to identify or c	hange				
PART A. PERMIT HOLDER INFORMATION								
PERMIT NUMBER	FACILITY NAME							
MO- 0001341	Reichhold, LLC 2							
ADDRESS	CITY		STATE	ZIP CODE				
249 ST. Louis Avenue	Valley Park		МО	63088				
PERMIT HOLDER ACCOUNT ACTION								
✓ New Application ☐ Revised Permit Holder or Acco	unt Information	Request for Re	eactivation					
PART B. USER ACCOUNT INFORMATION	(Albayea							
USER ACCOUNT ACTION	ACCOUNT TYPE							
☑ Add ☐ Update ☐ Delete	☐ Viewer ☑ P	reparer	Certifier					
LAST NAME	FIRST NAME			MIDDLE INITIAL				
Ogrodnick	Stan							
JOB TITLE	EMPLOYER'S NAME							
Regional EHS Manage-Americas	Reichhold, LLC 2							
EMAIL		TELEPHONE NUMBER	WITH AREA CODE					
Stan.Ogrodnick@reichhold.com		(919) 990-7556	-7556					
ADDRESS	CITY		STATE	ZIP CODE				
1035 Swabia Court	Durham		NC	27703				
LIGHT ACCOUNT ACTION	ACCOUNT TYPE	9 102 - 505 - 501						
USER ACCOUNT ACTION Add Update Delete		reparer \square	Certifier					
LAST NAME	FIRST NAME			MIDDLE INITIAL				
Massey	Kevin							
JOB TITLE	EMPLOYER'S NAME							
Plant Manager	Reichhold, LLC 2							
EMAIL		TELEPHONE NUMBER	WITH AREA CODE					
Kevin.Massey@reichhold.com		(636) 225-5226						
ADDRESS	CITY		STATE	ZIP CODE				
249 St Louis Avenue	Valley Park		MO	63088				
USER ACCOUNT ACTION	ACCOUNT TYPE Viewer P	renerer [7]	Certifier					
☑ Add ☐ Update ☐ Delete		reparer 🔽	Certifier					
LAST NAME	FIRST NAME			MIDDLE INITIAL				
Leighton	Robert							
JOB TITLE	EMPLOYER'S NAME							
Regional EHS Manager	Polynt Composites U							
EMAIL		TELEPHONE NUMBER	WITH AREA CODE					
bob.leighton@polynt.com		(847) 836-3682						
ADDRESS	CITY		STATE IL	ZIP CODE				
99 East Cottage Avenue	Carpentersville	60110						
MO 780-2204 (01-17)								



MISSOURI DEPARTMENT OF NATURAL RESOURCES WATER PROTECTION PROGRAM

eDMR PERMIT HOLDER AND CERTIFIER REGISTRATION

Complete this form to register a permit holder for electron authorized representatives assigned an electronic signatu			ed to identify or c	hange			
PART A. PERMIT HOLDER INFORMATION							
PERMIT NUMBER	FACILITY NAME						
MO- 0001341	Reichhold, LLC 2						
ADDRESS	CITY		STATE	ZIP CODE			
249 ST. Louis Avenue	Valley Park		MO	63088			
PERMIT HOLDER ACCOUNT ACTION							
✓ New Application ☐ Revised Permit Holder or Acco	ount Information [Request for Re	eactivation				
PART B. USER ACCOUNT INFORMATION							
USER ACCOUNT ACTION	ACCOUNT TYPE						
☑ Add ☐ Update ☐ Delete	☐ Viewer ☐ P	reparer 🗸	Certifier				
LAST NAME	FIRST NAME			MIDDLE INITIAL			
Usab	Robert						
JOB TITLE	EMPLOYER'S NAME						
Director, HSEQ	Polynt Composites	USA Inc.					
EMAIL		TELEPHONE NUMBER	WITH AREA CODE				
robert.usab@polynt.com)					
ADDRESS	CITY	•	STATE	ZIP CODE			
99 East Cottage Avenue	Carpentersville		IL	60110			
USER ACCOUNT ACTION	ACCOUNT TYPE						
✓ Add Update Delete		reparer 🗸	Certifier				
LAST NAME	FIRST NAME			MIDDLE INITIAL			
END I WANTE	THO TO THE			IIII DOLL III III II			
JOB TITLE	EMPLOYER'S NAME						
EMAIL		TELEPHONE NUMBER	WITH AREA CODE				
ADDRESS	CITY		STATE	ZIP CODE			
	Trocount Type						
USER ACCOUNT ACTION	ACCOUNT TYPE Viewer P	reparer 🗸	Certifier				
☐ Add ☐ Update ☐ Delete				MIDDLE INITIAL			
LAST NAME	FIRST NAME			MIDDLE INITIAL			
JOB TITLE	EMPLOYER'S NAME						
EMAIL		TELEPHONE NUMBER	WITH AREA CODE				
ADDRESS	CITY	-	STATE	ZIP CODE			
MO 700 0004 (04 47)			-				

PART C. PERMIT HOLDER REGISTRATION

I request the above identified permit holder be registered for electronic reporting and request any department initiated minor permit revisions (where no fee is required) that may be necessary to allow use of the department's eDMR system. As the permit holder, I agree the authorized representatives will follow permit requirements and the procedures for the electronic submission of DMR forms, as described in the permit holder participation package.

Please establish or revise the above user accounts in accordance with the information provided for each identified account. The person(s) identified as certifier(s) are hereby designated as the authorized representatives for all reporting purposes. I understand each person to receive a certifier account on the eDMR system must complete Part D and must sign in the presence of a Notary Public.

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

PERMIT HO	LDER N	AME (T	YPE OR	PRINT)

Robert Usab

OFFICIAL TITLE (TYPE OR PRINT)

Director, HSEQ

PART D. CERTIFIER REGISTRATION

The permit holder and certifier intend to have the submission of eDMRs be the functional equivalent of the paper submissions required by a permit issued in accordance with the Missouri Clean Water Law, Chapter 644, RSMo and/or the Clean Water Act, 33 U.S.C. § 1251, et seq. The certifier will use a validly issued PIN as a signature when submitting eDMRs. The permit holder and certifier agree not to contest the validity of eDMRs submitted under an authorized PIN based on the fact such submissions were completed electronically. The permit holder and certifier further agree the provisions of the Uniform Electronic Transactions Act, Sections 432.200 through 432.295, RSMo, shall apply, except as otherwise stated herein or within the permit holder participation package.

The permit holder and certifier agree:

- 1. Any eDMR submitted under the PIN specific to the certifier shall be considered a "writing" or "in writing;" and any such records shall be deemed for all purposes:
 - a. To have been "signed" by the certifier.
 - b. To constitute an "original" when printed from electronic files or records.
- 2. Electronic DMRs constitute admissible evidence in any judicial or administrative proceeding.

An electronically submitted DMR will not satisfy a reporting requirement until it has been received and accepted by the department. If an electronically submitted DMR is rejected, the permit holder shall take the necessary steps to properly resubmit such DMR within 24 hours of the notice of rejection.

MO 780-2204 (01-17)

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* Notary public 1 is for use if both the permit holder and the certifier both sign in the presence of the same notary; however, if the notary so desires they may sign and stamp both locations.

If the certifier and the permit holder do not sign at the same time, then notary 1 is specific to the certifier and notary 2 is specific to the permit holder.

In cases when the certifier and the permit holder are not in the same location, the certifier must complete the application to the best of their ability (including signature and notary public 1) and send the document to the permit holder to be completed (including signature and notary public 2).

By signing below, the permit holder and certifier agree with the terms	and conditions of Part D.
Certifier (must sign in the presence of Notary)	12/27/2017 Date
OFFICIAL SEAL TARA B BURKE NOTARY PUBLIC - STATE OF ILLINON MY COMMISSION EXPIRES:05/08/19	
Notary Public 1*	Date
Permit Holder (must sign in presence of Notary)	12/27/2017 Date
OFFICIAL SEAL TARA B BURKE NOTARY PUBLIC - STATE OF ILLINOIS MY COMMISSION EXPIRES:05/08/19	12.27.17
Notany Public 2*	Date
Notary Public 2*	Date

* Notary public 1 is for use if both the permit holder and the certifier both sign in the presence of the same notary; however, if the notary so desires they may sign and stamp both locations.

If the certifier and the permit holder do not sign at the same time, then notary 1 is specific to the certifier and notary 2 is specific to the permit holder.

In cases when the certifier and the permit holder are not in the same location, the certifier must complete the application to the best of their ability (including signature and notary public 1) and send the document to the permit holder to be completed (including signature and notary public 2).