

**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 RSMo, hereinafter, the Law), and the Federal Water Pollution Control Act (Public Law 92-500, 92<sup>nd</sup> Congress) as amended,

Permit No. MO-0004782

Owner: The Boeing Company  
Address: PO Box 516, Mail Code S106-7265, St. Louis, MO 63166-0516

Continuing Authority: Same as above  
Address: Same as above

Facility Name: The Boeing Company  
Facility Address: 6200 James McDonnell Blvd., St. Louis, MO 63134

Legal Description: See following page(s)  
UTM Coordinates: See following page(s)

Receiving Stream: See following page(s)  
First Classified Stream and ID: See following page(s)  
USGS Basin & Sub-watershed No.: See following page(s)

is authorized to discharge from the facility described herein, in accordance with the effluent limitations and monitoring requirements as set forth herein:

**FACILITY DESCRIPTION**

SIC # 3721, NAICS # 336411.

The Boeing Company is a military contractor for the manufacturing of combat aircraft and missile parts. Industrial activities include vehicle fueling, and outdoor storage of materials. Facility engages in seasonal de-icing of parking lots and employee walkways. This facility does not require a certified wastewater operator per 10 CSR 20-9.030 as this facility is privately owned and domestic wastewater is managed by sending to POTW. Industrial process wastewater and sludge are sent to a permitted wastewater treatment facility and are not authorized for discharge under this permit. Site discontinued use of urea agents in 2013, and all urea was removed from the site storage in 2016.

For outfall descriptions, see following pages.

Non-contact cooling water discharges were removed in the 2024 modification.

This permit authorizes only stormwater discharges under the Missouri Clean Water Law and the National Pollutant Discharge Elimination System; it does not apply to other regulated areas.

December 1, 2021  
Effective Date

January 1, 2025  
Modification Date

March 31, 2026  
Expiration Date

  
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John Hoke, Director, Water Protection Program

## **FACILITY DESCRIPTION (CONTINUED)**

Outfalls #001-#005, #008, #009, and #011 are historical outfalls which are no longer covered by this permit. All maximum and average flows below are per reported eDMRs for the last permit cycle, unless otherwise noted.

OUTFALL #006 – This outfall has been removed as of 2021, as it receives no industrial contributions. If the cooling tower overflows into Outfall #006, per Standard Conditions Part I, the facility must report it as a spill. Process waste contributions to this outfall are strictly prohibited.

OUTFALL #07A – removed at the 2024 modification

Non-contact cooling water; internal monitoring and compliance point, discharges to outfall #07B

Legal Description: Sec.4, T64N, R6E, St. Louis County

UTM Coordinates: X = 730553, Y = 4293049

OUTFALL #07B – ALSO KNOWN AS #007 – Stormwater

Legal Description: Sec.4, T64N, R6E, St. Louis County

UTM Coordinates: X = 730334, Y = 4293244

Receiving Waterbody: Tributary to Coldwater Creek

First Classified Waterbody and ID: 100K Extent-Remaining Streams (C); WBID# 3960; Metropolitan No-Discharge Stream

USGS Basin & Sub-watershed No.: Lower Missouri (10300200-0802)

Maximum Flow: 1.41 MGD

OUTFALL #010 – Stormwater, no treatment

This outfall receives industrially exposed stormwater. Cooling water discharges were removed from this outfall in the 2021 renewal as those discharges are now directed to the sanitary sewer.

Legal Description: Land Grant 2979, St. Louis County

UTM Coordinates: X = 731040, Y = 4293132

Receiving Waterbody: Tributary to Coldwater Creek

First Classified Waterbody and ID: 100K Extent-Remaining Streams (C); WBID# 3960; Metropolitan No-Discharge Stream

USGS Basin & Sub-watershed No.: Lower Missouri (10300200-0802)

Maximum Flow: 3.6 MGD

OUTFALL #012 – Stormwater; oil water separator and stormwater surge basin treatment

Legal Description: Land Grant 3096, St. Louis County

UTM Coordinates: X = 729626, Y = 4292668

Receiving Waterbody: Tributary to Coldwater Creek

First Classified Waterbody and ID: 100K Extent-Remaining Streams (C); WBID# 3960; Metropolitan No-Discharge Stream

USGS Basin & Sub-watershed No.: Lower Missouri (10300200-0802)

Maximum Flow: 3.22 MGD

OUTFALL #013 – Stormwater; no treatment.

Legal Description: Sec.4, T64N, R6E, St. Louis County

UTM Coordinates: X = 730208, Y = 4293262

Receiving Waterbody: Tributary to Coldwater Creek

First Classified Waterbody and ID: 100K Extent-Remaining Streams (C); WBID# 3960; Metropolitan No-Discharge Stream

USGS Basin & Sub-watershed No.: Lower Missouri (10300200-0802)

Maximum Flow: 1.37 MGD

## **FACILITY DESCRIPTION (CONTINUED)**

OUTFALL #014 – Stormwater; sedimentation and bio-retention treatment.

Legal Description:	Land Grant 2979, St. Louis County
UTM Coordinates:	X = 730644, Y = 4293498
Receiving Waterbody:	Tributary to Coldwater Creek
First Classified Waterbody and ID:	100K Extent-Remaining Streams (C); WBID# 3960; Metropolitan No-Discharge Stream
USGS Basin & Sub-watershed No.:	Lower Missouri (10300200-0802)
Maximum Flow:	1.66 MGD

OUTFALL #015 – Stormwater; sedimentation and hydrodynamic separator (HDS) system (vortex separator) treatment.

Legal Description:	Land Grant 2979, St. Louis County
UTM Coordinates:	X = 731086, Y = 4293046
Receiving Waterbody:	Tributary to Coldwater Creek
First Classified Waterbody and ID:	100K Extent-Remaining Streams (C); WBID# 3960; Metropolitan No-Discharge Stream
USGS Basin & Sub-watershed No.:	Lower Missouri (10300200-0802)
Maximum Flow:	1.24 MGD

OUTFALL #016 – Stormwater; sedimentation treatment.

Legal Description:	Land Grant 5, St. Louis County
UTM Coordinates:	X = 728915, Y = 4293993
Receiving Waterbody:	Tributary to Coldwater Creek
First Classified Waterbody and ID:	100K Extent-Remaining Streams (C); WBID# 3960; Metropolitan No-Discharge Stream
USGS Basin & Sub-watershed No.:	Lower Missouri (10300200-0802)
Maximum Flow:	0.26 MGD

OUTFALL #017 – Stormwater; sedimentation treatment.

Legal Description:	Land Grant 5, St. Louis County
UTM Coordinates:	X = 730280, Y = 4293630
Receiving Waterbody:	Tributary to Coldwater Creek
First Classified Waterbody and ID:	100K Extent-Remaining Streams (C); WBID# 3960; Metropolitan No-Discharge Stream
USGS Basin & Sub-watershed No.:	Lower Missouri (10300200-0802)
Maximum Flow:	0.4 MGD (estimated from drainage basin size)

## A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

Non-contact cooling water is no longer discharged to surface waters. Outfall #07A was removed at the 2024 modification.

OUTFALLS #007, #010, #012, #013, #014, #015, #016, #017 <i>Stormwater Only</i>	TABLE A-6 FINAL EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS					
The facility is authorized to discharge from outfall(s) as specified. The final effluent limitations shall become effective on <b>December 1, 2021</b> , and remain in effect until expiration of the permit. Discharges shall be controlled, limited and monitored by the facility as specified below:						
EFFLUENT PARAMETERS	UNITS	FINAL LIMITATIONS		BENCH- MARKS	MONITORING REQUIREMENTS **	
		DAILY MAXIMUM			MEASUREMENT FREQUENCY	SAMPLE TYPE
LIMIT SET: QS						
PHYSICAL						
Flow	MGD	*		-	once/quarter ◇	24 Hr Est.
CONVENTIONAL						
Chemical Oxygen Demand	mg/L	**		141	once/quarter ◇	grab
Oil & Grease	mg/L	**		10	once/quarter ◇	grab
pH †	SU	6.0-9.0		-	once/quarter ◇	grab
Settleable Solids	mL/L/hr	**		1.5	once/quarter ◇	grab
Total Suspended Solids (TSS)	mg/L	**		100	once/quarter ◇	grab
METALS						
Aluminum, Total Recoverable	µg/L	**		1,100	once/quarter ◇	grab
Copper, Total Recoverable	µg/L	**		21	once/quarter ◇	grab
Iron, Total Recoverable	µg/L	**		4,000	once/quarter ◇	grab
NUTRIENTS						
Nitrate plus Nitrite	mg/L	*		-	once/quarter ◇	grab
Total Kjeldahl Nitrogen (TKN)	mg/L	*		-	once/quarter ◇	grab
Phosphorus, Total (TP)	mg/L	*		-	once/quarter ◇	grab
OTHER						
Chloride	mg/L	**	860	once/quarter ◇	grab	
Chloride + Sulfate	mg/L	**	1,000	once/quarter ◇	grab	
Sulfate	mg/L	*	-	once/quarter ◇	grab	
MONITORING REPORTS SHALL BE SUBMITTED QUARTERLY; THE FIRST REPORT IS DUE APRIL 28, 2022. THERE SHALL BE NO DISCHARGE OF FLOATING SOLIDS OR VISIBLE FOAM IN OTHER THAN TRACE AMOUNTS.						

\* Monitoring and reporting requirement only

\*\* Monitoring and reporting requirement with benchmark. See Special Conditions for additional requirements.

‡ Chlorine, Total Residual. This permit contains a Total Residual Chlorine (TRC) limit. Note was removed at the 2024 modification, this permit no longer covers TRC.

† pH: the facility will report the minimum and maximum values; pH is not to be averaged.

\*\* Precipitation Event Monitoring Requirement: all samples shall be collected from a discharge resulting from a precipitation event greater than 0.1 inches in magnitude and occurring at least 72 hours from the previously measurable precipitation event. If a discharge does not occur within the reporting period, report as no discharge. The total amount of precipitation should be noted from the event from which the samples were collected.

◇ 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 <sup>th</sup>
Second	April, May, June	Sample at least once during any month of the quarter	July 28 <sup>th</sup>
Third	July, August, September	Sample at least once during any month of the quarter	October 28 <sup>th</sup>
Fourth	October, November, December	Sample at least once during any month of the quarter	January 28 <sup>th</sup>

## B. BEST MANAGEMENT PRACTICES PLAN REQUIREMENTS

This facility is located in a Metropolitan No-Discharge Stream's watershed (Coldwater Creek, WBID #1706) as defined in 10 CSR 20-7.031 Table F. 10 CSR 20-7.015(5) allows discharge to these watersheds as authorized in 10 CSR 20-7.031 and non-contaminated stormwater flows; all other discharges to these watersheds are prohibited. 10 CSR 20-7.031(7) states uncontaminated cooling water, permitted stormwater discharges in compliance with permit conditions, and excess wet-weather bypass discharges (for treatment works treating domestic sewage) not interfering with beneficial uses (described under 10 CSR 20-7.031(2)) are authorized for discharge. This facility has only stormwater flows.

Note to the 2024/5 modification: references to cooling water were removed from these requirements.

To ensure the facility remains in compliance with stormwater permit conditions, and thus comply with the Metropolitan No-discharge regulations of 10 CSR 20-7.031(7), the facility shall develop a Best Management Practices Plan (Plan) to improve stormwater management at the site to reduce benchmark exceedances. The Plan shall be developed and implemented as follows:

- Within one (1) year of the effective date of this permit, the facility shall submit to the Department via email ([cleanwaterpermits@dnr.mo.gov](mailto:cleanwaterpermits@dnr.mo.gov); Subject line: Boeing, MO-0004782, BMP Plan ATTN: Industrial Permitting Unit), a comprehensive plan to comply with the technology based requirements of this permit, including numeric benchmarks and pollutant management strategies. The Plan proposal shall include the following:
  - Information about the sources of aluminum, iron, settleable solids, TSS, chloride, and chlorides plus sulfates in the facility's stormwater. The Plan proposal may need to include extra stormwater samples at locations other than the designated outfalls to discern the source of the pollutants. If the source is determined to be unknown, the Plan shall detail efforts made to clarify the source of the pollutant and a proposal for future efforts to determine the source of the pollutant. The proposals for additional information finding activities will be reviewed at the time of the plan's submission, for implementation with the rest of the Plan.
  - A map showing locations on the site which contribute or are believed to contribute to the pollutants covered by the Plan. The map shall also include locations of proposed BMPs or other proposed site activities to improve technology requirement compliance. The map should also indicate any additional location(s) where samples of stormwater or wastewater were acquired during part (a).
  - A detailed proposal for removal of each pollutant from the stormwater, including an analysis of all BMPs considered for the treatment/removal of the pollutants, including those not chosen, and the reason why they were, or were not, chosen. Taking no action is not an acceptable conclusion of the proposal or BMP analysis. All discharged pollutants must be addressed by the plan.
  - Any proposed schedules for implementation of the BMPs, with an explanation for the time needed to install those BMPs which will not be implemented within 30 days of approval of the plan. All BMPs shall be implemented within three (3) years of the effective date of this permit; if this is not possible, the facility shall provide justification for the extension of the timeframe. All extensions of the time allowed for this Plan's implementation, including extensions of the BMP installation and implementation dates, shall be approved by the Water Protection Program's Industrial Permitting Unit.
- The Department shall approve or deny the plan as soon as possible after submission. If the facility does not receive an approval or denial of the plan within six months of submission, the facility may accept that as approval of the plan. Within two (2) years of the effective date of this permit, the plan shall be finalized for implementation.
- Within (3) years of the effective date of this permit, all BMPs shall be fully implemented, installed, and functioning onsite as designed and detailed in the Plan. Any extensions of this date approved by the Department will be noted in the Plan document and retained onsite until the Plan is fully implemented. A permit modification may be required to alter the date of the final compliance with the Plan if an extension is granted.
- After implementation of the plan, the facility and the Department shall assess the success of the BMPs. At the time of renewal, the facility shall submit a summary report of BMP functionality and data trends for each outfall. Improved DMR data is expected; however, should any BMPs fail to improve effluent, further action may need to be taken in subsequent renewals to address stormwater and cooling water discharges at the site, which may include the requirement to cease discharge of cooling water or stormwater not in compliance with the permit conditions and the Metropolitan No-Discharge designation of the receiving stream.

### C. STANDARD CONDITIONS

In addition to specified conditions stated herein, this permit is subject to the attached Part I standard conditions dated August 1, 2014, and hereby incorporated as though fully set forth herein.

### D. SPECIAL CONDITIONS

1. Spills, Overflows, and Other Unauthorized Discharges.

- (a) Any spill, overflow, or other discharge(s) not specifically authorized above are unauthorized discharges.
- (b) Should an unauthorized discharge cause or permit any contaminants to discharge or enter waters of the state, the unauthorized discharge must be reported to the regional office as soon as practicable but no more than 24 hours after the discovery of the discharge. If the spill or overflow needs to be reported after normal business hours or on the weekend, the facility must call the Department's 24-hour spill line at 573-634-2436.

2. Electronic Discharge Monitoring Report (eDMR) Submission System

Per 40 CFR Part 127 National Pollutant Discharge Elimination System (NPDES) Electronic Reporting Rule, reporting of effluent monitoring data and any report required by the permit (unless specifically directed otherwise by the permit), shall be submitted via an electronic system to ensure timely, complete, accurate, and nationally consistent set of data about the NPDES program.

- (a) eDMR Registration Requirements. The facility must register in the Department's eDMR system through the Missouri Gateway for Environmental Management (MoGEM) before the first report is due. Registration and other information regarding MoGEM can be found at <https://dnr.mo.gov/mogem>. Information about the eDMR system can be found at <https://dnr.mo.gov/env/wpp/edmr.htm>. The first user shall register as an Organization Official and the association to the facility must be approved by the Department. Regarding Standard Conditions Part I, §B, #7, the eDMR system is currently the only Department approved reporting method for this permit unless a waiver is granted by the Department.
- (b) Electronic Submissions. To access the eDMR system, use: <https://apps5.mo.gov/mogems/welcome.action> For assistance using the eDMR system, contact [edmr@dnr.mo.gov](mailto:edmr@dnr.mo.gov) or call 855-789-3889 or 573-526-2082.
- (c) Waivers from Electronic Reporting. The facility must electronically submit compliance monitoring data and reports unless a waiver is granted by the Department in compliance with 40 CFR Part 127. Only facilities with an approved waiver request may submit monitoring data and reports on paper to the Department for the period the approved electronic reporting waiver is effective. Facilities 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.

3. Stormwater Pollution Prevention Plan (SWPPP).

The facility's SIC code or description is found in 40 CFR 122.26(b)(14) and/or 10 CSR 20-6.200(2) and hence shall implement a Stormwater Pollution Prevention Plan (SWPPP) which must be prepared and implemented upon permit effective date. 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 annually or if site conditions affecting stormwater change. The facility 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); 2015 [https://www.epa.gov/sites/production/files/2015-11/documents/swppp\\_guide\\_industrial\\_2015.pdf](https://www.epa.gov/sites/production/files/2015-11/documents/swppp_guide_industrial_2015.pdf) The purpose of the SWPPP 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 ineffective at providing the necessary protections for which it was designed. Corrective action describes the steps the facility took to eliminate the deficiency.

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) A map with all outfalls and structural BMPs marked.
- (c) A schedule for at least 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.
  - (1) Operational deficiencies must be corrected within seven (7) calendar days.
  - (2) Minor structural deficiencies must be corrected within fourteen (14) calendar days.
  - (3) Major structural deficiencies (deficiencies projected to take longer than 14 days to correct) must be reported as an uploaded attachment through the eDMR system with the DMRs. The initial report shall consist of the deficiency noted, the proposed remedies, the interim or temporary remedies (including proposed timing of the placement of the interim measures), and an estimate of the timeframe needed to wholly complete the repairs or construction. If required by the Department, the facility shall work with the regional office to determine the best course of action. The facility should



D. SPECIAL CONDITIONS (CONTINUED)

- (4) consider temporary structures to control stormwater runoff. The facility shall correct the major structural deficiency as soon as reasonably achievable.
  - (5) All actions taken to correct the deficiencies shall be included with the written report, including photographs, and kept with the SWPPP. Additionally, corrective action of major structural deficiencies shall be reported as an uploaded attachment through the eDMR system with the DMRs.
  - (6) BMP failure causing discharge through an unregistered outfall is considered an illicit discharge and must be reported in accordance with Standard Conditions Part I.
  - (7) 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 personnel upon request. Electronic versions of the documents and photographs are acceptable.
  - (d) A provision for designating a responsible individual for environmental matters and a provision for providing training to all personnel involved in housekeeping, material handling (including but not limited to loading and unloading), storage, and staging of all operational, maintenance, storage, and cleaning areas. Proof of training shall be submitted upon request by the Department.
4. Site-wide minimum Best Management Practices (BMPs). At a minimum, the facility shall adhere to the following:
- (a) Prevent the spillage or loss of fluids, oil, grease, fuel, etc. from vehicle maintenance, equipment cleaning, warehouse activities, and other areas, 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, solid waste, and solvents. Keep storage bins for waste products covered to minimize contact with precipitation, where possible.
  - (c) Store all paint, solvents, petroleum products and petroleum waste products (except fuels), and storage containers (such as drums, cans, or cartons) so 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. Spill records should be retained on-site.
  - (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 minimize sediment loss off of the property.
  - (f) Remove sediment from stormwater sediment pond(s) no less than every ten years, or more frequently dependent on the amount of sediment received; sediment accumulated shall be no more than 20% total volume or as prescribed in the engineering design, whichever is less. Records must be retained since last cleanout.
  - (g) After snow or ice, if the facility applies sand/salt to the pavement of the parking lots, sidewalks, or stairs, the facility shall sweep the lots to remove sand/salt as soon as possible after snow or ice melt, collect excess solids, and minimize and control the discharge of solids into stormwater inlets. Salt and sand shall be stored in a manner that minimizes mobilization in stormwater (for example: under roof, in covered container, in secondary containment, under tarp, etc.).
  - (h) Minimize the accumulation of metals or aging equipment with visible rust in outdoor locations exposed to stormwater. Ensure metal equipment and scrap are stored indoors or in a covered container when possible. Ensure outdoor metal surfaces, storage containers, and equipment are maintained to prevent rust exposure to stormwater as much as possible, which may include painting surfaces as needed.
5. Stormwater Benchmarks. This permit stipulates pollutant benchmarks applicable to the facility's stormwater discharges.
- (a) Benchmarks do not constitute direct numeric effluent limitations; therefore, a benchmark exceedance alone is not a permit violation. Stormwater monitoring, numeric benchmark compliance, and visual inspections shall be used to determine the overall effectiveness of the BMPs identified in the SWPPP.
  - (b) If a sample exceeds a benchmark concentration or an inspection exceeds a narrative requirement, the facility must review the SWPPP and BMPs to determine what improvements or additional controls are needed to reduce the pollutant concentrations in the facility's future stormwater discharges.
  - (c) Every time a numeric benchmark exceedance occurs, a Corrective Action Report (CAR) must be completed. A CAR is a document recording the efforts undertaken by the facility to improve BMPs to meet benchmarks in future samples. CARs must be retained with the SWPPP and be available to the Department upon request. This permit may require CARs be submitted to the Department upon permit renewal; see Renewal Requirements section below.
  - (d) Failure to take corrective action to address any narrative or numeric benchmark exceedance, and failure to make measurable progress towards achieving the numeric benchmark(s), is a permit violation.
  - (e) Stormwater benchmarks and required minimum BMPs as described in this permit are enforceable permit conditions. Any requested change(s) to numeric benchmark values or deviation from minimum BMP requirements must be established through the permitting process. Assessment, evaluation, and implementation of specific BMPs to meet numeric benchmarks or minimum BMP requirements, must be addressed through the SWPPPs and CARs.

D. SPECIAL CONDITIONS (CONTINUED)

6. Petroleum Secondary Containment.

Before releasing water accumulated in petroleum secondary containment areas, it must be examined for hydrocarbon odor and presence of sheen to protect the general criteria found at 10 CSR 20-7.031(4).

- (a) If odor or sheen is found, the water shall not be discharged without treatment and shall be disposed of in accordance with legally approved methods, such as being sent to an accepting wastewater treatment facility.
- (b) If the facility wishes to discharge the accumulated stormwater with hydrocarbon odor or presence of sheen, the water shall be treated using an appropriate removal method. Following treatment and before release, 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 before discharge is authorized. Records of all testing and treatment of water accumulated in secondary containment shall be available on demand to the Department. Electronic records retention is acceptable.

7. Oil/Water Separators. This site operates oil water separator tanks for the treatment of stormwater. OWS use at the site is hereby authorized and shall be operated per manufacturer's specifications. The specifications and operating records must be made accessible to Department staff upon request. Oil water separator sludge is considered used oil; sludge must be disposed of in accordance with 10 CSR 25-11.279.

8. 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 for permit shield, and the CWA §402(k) for toxic substances. 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 CWA §§301(b)(2)(C) and (D), §304(b)(2), and §307(a)(2), 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 already limited in the permit. This permit may be modified, revoked and reissued, or terminated for cause, including determination new pollutants found in the discharge not identified in the application for the new or revised permit. The filing of a request by the facility for a permit modification, termination, notice of planned changes, or anticipated non-compliance does not stay any permit condition.

9. All outfalls must be clearly marked in the field.

10. Report no discharge when a discharge does not occur during the report period. It is a violation of this permit to report no-discharge when a discharge has occurred.

11. The Department may require sampling and reporting as a result of illegal discharges from the site, compliance issues related to water quality concerns or BMP effectiveness, or evidence of off-site impacts from activities or discharges at the facility.

12. This permit does not apply to fertilizer products receiving a current exemption under the Missouri Clean Water Law and regulations in 10 CSR 20-6.015(3)(B)8., and are land applied in accordance with the exemption.

13. Changes in Discharges of Toxic Pollutant.

In addition to the reporting requirements under 40 CFR 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) 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 µg/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) 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 40 CFR 122.21(g)(7).
  - (4) The level established by the Director in accordance with 40 CFR 122.44(f).



#### D. SPECIAL CONDITIONS (CONTINUED)

14. Reporting of Non-Detects.
  - (a) Compliance analysis conducted by the facility, or any contracted laboratory shall be conducted in such a way the precision and accuracy of the analyzed result can be enumerated. See sufficiently sensitive test method requirements in Standard Conditions Part I, §A, No. 4 regarding proper testing and detection limits used for sample analysis. For the purposes of this permit, the definitions in 40 CFR 136 apply; method detection limit (MDL) and laboratory established reporting limit (RL) are used interchangeably in this permit.
  - (b) The facility shall not report a sample result as “non-detect” without also reporting the MDL. Reporting “non-detect” without also including the MDL will be considered failure to report, which is a violation of this permit.
  - (c) For the daily maximum, the facility shall report the highest value; if the highest value was a non-detect, use the less than “<” symbol and the laboratory’s highest method detection limit (MDL) or the highest reporting limit (RL); whichever is higher (e.g. <6).
  - (d) When calculating monthly averages, zero shall be used in place of any value(s) not detected. Where all data used in the average are below the MDL or RL, the highest MDL or RL shall be reported as “<#” for the average as indicated in item (c).
15. Failure to pay fees associated with this permit is a violation of the Missouri Clean Water Law (644.055 RSMo).
16. This permit does not cover land disturbance activities.
17. This permit does not authorize the placement of fill materials in flood plains, placement of solid materials into any waterway, the obstruction of stream flow, or changing the channel of a defined drainage course.
18. All records required by this permit may be maintained electronically per 432.255 RSMo. These records should be maintained in a searchable format.
19. Renewal Application Requirements.
  - (a) This facility shall submit an appropriate and complete application to the Department no less than 180 days prior to the expiration date listed on page 1 of the permit.
  - (b) Application materials shall include complete Form A and Form C. If the form names have changed, then the facility should ensure they are submitting the correct forms as required by regulation.
  - (c) The facility may use the electronic submission system to submit the application to the Program, if available.
  - (d) This facility must submit all CARs completed for the last permit term if a benchmark exceedance occurred.
  - (e) The facility shall submit a summary report of BMP functionality and data trends for each outfall, as required by permit section B. BEST MANAGEMENT PRACTICES PLAN REQUIREMENTS, above.

#### E. NOTICE OF RIGHT TO APPEAL

If you were adversely affected by this decision, you may be entitled to pursue an appeal before the administrative hearing commission (AHC) pursuant to 621.250 and 644.051.6 RSMo. To appeal, you must file a petition with the AHC within thirty days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed; if it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the AHC. Any appeal should be directed to:

Administrative Hearing Commission  
U.S. Post Office Building, Third Floor  
131 West High Street, P.O. Box 1557  
Jefferson City, MO 65102-1557  
Phone: 573-751-2422  
Fax: 573-751-5018  
Website: <https://ahc.mo.gov>

**MISSOURI DEPARTMENT OF NATURAL RESOURCES**  
**MODIFICATION STATEMENT OF BASIS FOR**  
**MO-0004782; THE BOEING COMPANY**

This Statement of Basis (Statement) gives pertinent information regarding modification(s) to the above listed operating permit. A Statement is not an enforceable part of a Missouri State Operating Permit. Changes found here supersede previous fact sheet determinations. The permit was revised as appropriate to reflect changes enumerated in this modification.

**PART I. FACILITY INFORMATION**

This facility discharged wastewater to a metropolitan no-discharge stream. The wastewater discharge is no longer allowed after this modification. The facility has re-routed the wastewater to the sanitary sewer.

Outfall #07A was removed as this outfall no longer discharges wastewater.

Outfall #07B was renamed to its original name, #007.

**PART II. MODIFICATION RATIONALE**

The facility has ceased discharging non-contact cooling water; all references to wastewater were removed from the permit. Tables A-1 and A-2 were removed. These two tables identified non-contact cooling water. Outfall #07B for stormwater still exists, although no longer contains a non-contact cooling water component. Outfall #007 was removed from Table A-2 and added to Table A-6; which is the table identified for stormwater-only. However, because WET testing and lead are not found on table A-6, the modification contains slightly different monitoring requirements. WET testing was for the wastewater component of the discharge, but since it appeared on Table A-2, a public notice is required. Lead was included under outfalls #07A and #07B but was identified in the fact sheet as occurring in the wastewater, not the stormwater. Lead monitoring was not added to Table A-6 for this modification.

Outfall #07B was not required to be sampled until December 1, 2026. However, this modification requires sampling the quarter beginning after issuance.

For outfall #007, the reference to “B” was dropped as there is no “A” for #007 anymore. Table “6” appears to be a typographical error, there were no tables 3, 4, or 5 in the 2020 permit. Table A-6 is the only remaining table in this permit.

As part of the modification application process, the facility noted that groundwater was not a water which was discharged, therefore the references to groundwater discharge was removed from the facility description of outfalls #07B and #010. This appears to be an incorrect statement in the last permit. The WET testing special condition was removed; this does not apply to this permit.

Pagination, typographic errors, and formatting was updated; no other changes were made at this time.

**PART III. ADMINISTRATIVE REQUIREMENTS**

The Department shall give public notice that a draft permit has been prepared and its issuance is pending. 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.

40 CFR 122.62 says when a permit is modified, only the conditions subject to modification are reopened. Therefore, the Department will only respond to comments pertaining to changes noted in this Modification Rationale section. All sections of the fact sheet after this page are not being modified during this permit action, therefore are maintained, unless explicitly superseded above.

✓ The Public Notice period for this operating permit started November 1, 2024, and ended December 2, 2024. No comments were received.

**DATE OF FACT SHEET:** DECEMBER 6, 2024

**COMPLETED BY:**

PAM HACKLER, ENVIRONMENTAL SCIENTIST | MISSOURI DEPARTMENT OF NATURAL RESOURCES  
WATER PROTECTION PROGRAM | OPERATING PERMITS SECTION - INDUSTRIAL UNIT  
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**MISSOURI DEPARTMENT OF NATURAL RESOURCES**  
**FACT SHEET**  
**FOR THE PURPOSE OF RENEWAL**  
**OF**  
**MO-0004782**  
**THE BOEING COMPANY**

The Federal Water Pollution Control Act (Clean Water Act (CWA) §402 Public Law 92-500 as amended) established the National Pollutant 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 (§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 644 RSMo as amended). MSOPs may also cover underground injection, non-discharging facilities, and land application facilities. Permits 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 applicable regulations, rationale for the development of limitations and conditions, and the public participation process for the Missouri State Operating Permit (MSOP or permit) listed below. A factsheet is not an enforceable part of a permit.

**PART I. FACILITY INFORMATION**

Facility Type:	Industrial: Non-process wastewater < 1 MGD
SIC Code(s):	3721
NAICS Code(s):	336411
Application Date:	09/25/2020
Modification Date:	11/01/2018
Expiration Date:	01/31/2021
Last Inspection:	01/19/2018

**FACILITY DESCRIPTION:**

The Boeing Company is a military contractor for the manufacturing of combat aircraft and missile parts. Industrial activities include non-contact cooling water discharges, vehicle fueling, and outdoor storage of materials. Facility engages in seasonal de-icing of parking lots and employee walkways. Industrial wastewater sludge is not produced by this facility. This facility does not require a certified wastewater operator per 10 CSR 20-9.030 as this facility is privately owned. Domestic wastewater is managed by sending to POTW.

Saint Louis Boeing Facility BMPs (Approximate Implementation Date)

- Site discontinued the use of Urea agents (2013) and all Urea was removed from the site storage (2016);
- Site waste management, segregation of waste streams and recycling are constantly being improved (2021);
- Implemented a HDS system (vortex separator) at Outfall #015 (2018);
- Solid waste compactors were enclosed (2018);
- Bulk soils and salt storage were enclosed (2017);
- Bulk salts are removed from on-site storage during off-season (2017);
- Bioretention and rain gardens were installed at Outfall #014 (2017);
- Rip rap surge and sediment control were installed at Outfall #006 (2015); and
- Stormwater surge basins constructed at Outfall #012 (2000)

#### PERMITTED FEATURES TABLE:

OUTFALL	AVERAGE FLOW	MAXIMUM REPORTED FLOW	TREATMENT LEVEL	EFFLUENT TYPE
#006	Dependent on Precipitation	1.27 MGD	BMPs	Industrial Stormwater
#07A	0.025 MGD	0.08 MGD	BMPs, De-chlorination	Non-contact Cooling Water
#07B	0.34 MGD	1.41 MGD	BMPs	Industrial Stormwater, Non-contact Cooling Water
#010	Dependent on Precipitation	3.6 MGD	BMPs	Industrial Stormwater
#012	Dependent on Precipitation	3.22 MGD	BMPs, Oil water separator	Industrial Stormwater
#013	Dependent on Precipitation	1.37 MGD	BMPs	Industrial Stormwater
#014	Dependent on Precipitation	1.66 MGD	BMPs, Sedimentation	Industrial Stormwater
#015	Dependent on Precipitation	1.24 MGD	BMPs, Sedimentation	Industrial Stormwater
#016	Dependent on Precipitation	0.26 MGD	BMPs, Sedimentation	Industrial Stormwater
#017	Dependent on Precipitation	0.4 MGD (est)	BMPs, Sedimentation	Industrial Stormwater

#### FACILITY PERFORMANCE HISTORY & COMMENTS:

The electronic discharge monitoring reports were reviewed for the last permit term. There was an exceedance of settleable solids at outfall #007. Also identified in the DMR records were high values of aluminum and iron at many outfalls. This permit implements aluminum and iron benchmarks at all stormwater outfalls. Outfall #007 has been split in this permit into two outfalls; an internal outfall to monitor cooling water, and the outfall discharging to waters of the state which contains both stormwater and the cooling water.

This facility is located in a Metropolitan No-Discharge watershed as defined in 10 CSR 20-7.031 Table F. 10 CSR 20-7.015(5) allows discharge to these watersheds as authorized in 10 CSR 20-7.031 and non-contaminated stormwater flows; all other discharges to these watersheds are prohibited. 10 CSR 20-7.031(7) states uncontaminated cooling water, permitted stormwater discharges in compliance with permit conditions, and excess wet-weather bypass discharges (for treatment works treating domestic wastewater) not interfering with beneficial uses are authorized for discharge in these watersheds. The monitoring required in this permit will clearly differentiate between stormwater and cooling water contributions to the flow at outfall #007 by splitting the outfall into separate monitoring locations where cooling water can be monitored separately from the stormwater. This change allows the facility to determine compliance of each type of flow with the Metropolitan No-Discharge requirements.

In the previous permit cycle, the permit had benchmarks or limits required for aluminum, settleable solids, and TSS. This permit adds benchmarks for chlorides, chlorides and sulfates, and iron. Past DMR data has indicated this facility may be exceeding typical technology based benchmarks for aluminum, iron, settleable solids, TSS, chloride, and chlorides plus sulfates at the stormwater outfalls of the permit, including what was previously considered the “high flow” of outfall #007 (now designated as #07B). While a single exceedance of benchmark for a parameter does not constitute a violation of this permit, failure to take corrective action to address any narrative or numeric benchmark exceedance, and failure to make measurable progress towards achieving the numeric benchmarks, is a permit violation. To ensure the facility remains in compliance with stormwater permit conditions, and thus comply with the Metropolitan No-discharge regulations of 10 CSR 20-7.031(7), the facility shall develop a Best Management Practices Plan (Plan) to improve stormwater management at the site to reduce benchmark exceedances, as detailed in Part B of the permit.

The permit writer attempted to simplify the permit as much as possible by requiring similar monitoring parameters at all outfalls receiving similar discharges. The contributions to the effluent are similar, and therefore similar pollutants of concern are expected. It is important to determine the sources of all pollutants and determine whether the pollutants are found at other outfalls at the site. Data is patchy due to the permit not requiring monitoring for pollutants at all outfalls, and the permit writer is striving for a more complete picture of the site with the monitoring required.

The facility provided information during the pre-public notice period which clarified some data errors in the DMRs. The DMRs and RPAs were corrected to include the correct data. Additionally, the location of outfall #016 was adjusted. The facility also stated that cooling water discharges to outfall #010 were ceasing and would be directed to the sanitary sewer. All wastewater-based requirements for outfall #010 were removed and replaced with stormwater monitoring requirements. An internal monitoring point was also identified for cooling water at outfall #007, which will be monitored before combining with stormwater. Limitations were switched to this internal monitoring point, identified as #07A. Stormwater only requirements are applied to the original location of outfall #007,

identified as #07B. The permit writer has determined this to be protective of the receiving stream's designation as a Metropolitan No-Discharge stream and other use designations to be maintained. Separating the flows in this way will allow the facility and the permit writer to determine the influence of non-contact cooling water in contributing to benchmark exceedances at outfall #07B and will help the facility determine appropriate BMPs to address any exceedances, while still being protective of the receiving stream with limitations on the non-contact cooling water discharges per the Metropolitan No-Discharge Stream designation. The Plan required by Part B of the permit requires the facility to improve technology at the site to come into compliance with permit conditions and thus meet the Metropolitan No-Discharge requirements.

Outfall #017 is newly added this permit cycle as it was observed to discharge industrially exposed stormwater during a site visit by the permit writer 03/29/2021. The site visit also showed the site to be generally well maintained. The site has a large stormwater detention/bioswale around much of the facility parking lot areas. Numerous areas where BMPs could be improved were found, however, and the permit writer believes the BMP improvement plan provides adequate time to upgrade BMPs to come into compliance with the requirements of this permit.

#### CONTINUING AUTHORITY:

The Missouri Secretary of State continuing authority charter number for this facility is F00014532; this number was verified by the permit writer to be associated with the facility and precisely matches the continuing authority reported by the facility.

#### OTHER ENVIRONMENTAL PERMITS:

In accordance with 40 CFR 122.21(f)(6), the Department evaluated other environmental permits currently held by this facility. This facility has the following permits: Missouri Hazardous Waste Management Facility Part I Permit: EPA ID #MOD000818963; Metropolitan Sewer District Pretreatment/Industrial Waste Water Discharge Permit # 1036497600-2.

## **PART II. RECEIVING WATERBODY INFORMATION**

#### RECEIVING WATERBODY TABLE:

OUTFALL	WATERBODY NAME	CLASS	WBID	DESIGNATED USES	DISTANCE TO SEGMENT	12-DIGIT HUC
#007	Tributary to Coldwater Creek	n/a	n/a	GEN	0.0 mi	10300200-0802 Headwaters Coldwater Creek (Metropolitan No-Discharge Watershed)
	100K Extent-Remaining Stream	C	3960	GEN, HHP, IRR, LWW, SCR, WBC-B, WWH (ALP)	0.22 mi	
#010	Tributary to Coldwater Creek	n/a	n/a	GEN	0.0 mi	
	100K Extent-Remaining Stream	C	3960	GEN, HHP, IRR, LWW, SCR, WBC-B, WWH (ALP)	0.22 mi	
#012	Tributary to Coldwater Creek	n/a	n/a	GEN	0.0 mi	
	100K Extent-Remaining Stream	C	3960	GEN, HHP, IRR, LWW, SCR, WBC-B, WWH (ALP)	0.22 mi	
#013	Tributary to Coldwater Creek	n/a	n/a	GEN	0.0 mi	
	100K Extent-Remaining Stream	C	3960	GEN, HHP, IRR, LWW, SCR, WBC-B, WWH (ALP)	0.22 mi	
#014	Tributary to Coldwater Creek	n/a	n/a	GEN	0.0 mi	
	100K Extent-Remaining Stream	C	3960	GEN, HHP, IRR, LWW, SCR, WBC-B, WWH (ALP)	0.22 mi	
#015	Tributary to Coldwater Creek	n/a	n/a	GEN	0.0 mi	
	100K Extent-Remaining Stream	C	3960	GEN, HHP, IRR, LWW, SCR, WBC-B, WWH (ALP)	0.22 mi	
#016	Tributary to Coldwater Creek	n/a	n/a	GEN	0.0 mi	
	100K Extent-Remaining Stream	C	3960	GEN, HHP, IRR, LWW, SCR, WBC-B, WWH (ALP)	0.22 mi	

Classes are representations of hydrologic flow volume or lake basin size as defined in 10 CSR 20-7.031(1)(F). L1: Lakes with drinking water supply - wastewater discharges are not permitted to occur to L1 watersheds per 10 CSR 20-7.015(3)(C); L2: major reservoirs; L3: all other public and private lakes; P: permanent streams; C: streams which may cease flow in dry periods but maintain pools supporting aquatic life; E: streams which do not maintain surface flow; and W: wetland. Losing streams are defined in 10 CSR 20-7.031(1)(O) and are designated on the losing stream dataset or determined by the Department to lose 30% or more of flow to the subsurface.



WBID = Waterbody Identification: Missouri Use Designation Dataset per 10 CSR 20-7.031(1)(Q) and (S) as 100K Extant-Remaining Streams or newer; 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](ftp://msdis.missouri.edu/pub/Inland_Water_Resources/MO_2014_WQS_Stream_Classifications_and_Use_shp.zip); New C streams described on the dataset per 10 CSR 20-7.031(2)(A)3. as 100K Extent Remaining Streams.

HUC: Hydrologic Unit Code; TMDLs and lake nutrient criteria are the two most common watershed based limits. <https://dnr.mo.gov/env/wpp/watersheds.htm> will have additional information about the watersheds in Missouri

#### Designated Uses:

10 CSR 20-7.031(1)(C)1.: **ALP** = Aquatic Life Protection (formerly AQL); current uses are defined to ensure the protection and propagation of fish shellfish and wildlife, 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 ALP effluent limitations in 10 CSR 20-7.031 Table A1-B3 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 not included in WBC-A;

**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 and drinking of water;

**IRR** = irrigation for use on crops utilized for human or livestock consumption, includes aquifers per 10 CSR 20-7.031(6)(A);

**LWW** = Livestock and Wildlife Watering (current narrative use is defined as LWP = Livestock and Wildlife Protection), includes aquifers per 10 CSR 20-7.031(6)(A);

**DWS** = Drinking Water Supply, includes aquifers per 10 CSR 20-7.031(6)(A);

**IND** = industrial water supply

10 CSR 20-7.031(1)(C)8. to 11.: Wetlands (10 CSR 20-7.031 Tables A1-B3 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 20-7.015(7) and 10 CSR 20-7.031(6): **GRW** = Groundwater

10 CSR 20-7.031(4): **GEN** = general criteria; acute toxicity criteria applicable to all waters even those lacking designated uses

n/a = not applicable

#### WATERS OF THE STATE DESIGNATIONS:

Waters of the state are divided into seven categories per 10 CSR 20-7.015(1)(B)1 through 7. The applicable water of the state category is listed below. Missouri's technology-based effluent regulations are found in [10 CSR 20-7.015] and are implemented in 10 CSR 20-7.015(2) through (8). When implementing technology regulations, considerations are made for the facility type, discharge type, and category of waters of the state. Effluent limitations may not be applicable to certain waters of the state, facility type, or discharge type. In these cases, effluent limitations may be based on a best professional judgment evaluation. The best professional judgment evaluation will take site specific conditions into consideration; including facility type, the receiving water body classification, and type of discharge. Stormwater discharges and land application sites are not directly subject to limitations found in 10 CSR 20-7.015 but may be subject to limitations determined by the best professional judgment evaluation. Effluent limitation derivations are discussed in PART IV: EFFLUENTS LIMITS DETERMINATIONS.

✓ Metropolitan No-Discharge areas and streams; identified in Table J of 10 CSR 20-7.031 and regulated per 10 CSR 20-7.031(7).

#### EXISTING WATER QUALITY:

The first receiving waterbody has no relevant water quality data available. A Use Attainment Assessment was done on Coldwater Creek (WBID 1706) in May of 2019. It was determined the AQL, SCR, and WBC-B use designations were not supported, as the stream was impaired for bacteria and chloride.

#### UPSTREAM OR DOWNSTREAM IMPAIRMENTS:

The permit writer has reviewed upstream and downstream stream segments of this facility for impairments.

✓ No upstream impairment is present at this facility.

✓ The permit writer has noted downstream of the facility the stream is on the §303(d) list and has a TMDL; see below for specific permitting information.

#### 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; Coldwater Creek (WBID 1706) is listed on the 2006 Missouri CWA §303(d) list for chloride in the water.

✓ It is unknown at this time if the facility is a source of the above listed pollutant(s) or considered to contribute to the impairment. Once a TMDL is developed, the permit may be modified to include WLAs from the TMDL.



#### **TOTAL MAXIMUM DAILY LOAD (TMDL):**

A TMDL is a calculation of the maximum amount of a given pollutant 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 for that watershed may be developed. The TMDL shall include the WLA calculation. <http://dnr.mo.gov/env/wpp/tmdl/>

- ✓ Applicable; Coldwater Creek (WBID 1706) is associated with the 2008 EPA approved TMDL for *E. coli*.
- ✓ This facility is not considered to be a source of the above listed pollutant(s) or considered to contribute to the impairment.

#### **RECEIVING WATERBODY MONITORING REQUIREMENTS:**

- ✓ No receiving water monitoring requirements are recommended at this time.

#### **WATERBODY MIXING CONSIDERATIONS:**

For all outfalls, mixing zone and zone of initial dilution are not allowed per 10 CSR 20-7.031(5)(A)4.B.(I)(a) and (b), as the base stream flow does not provide dilution to the effluent.

### **PART III. RATIONALE AND DERIVATION OF 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)], and is an existing facility.

#### **ANTIBACKSLIDING:**

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 reissuance conform to the anti-backsliding provisions of CWA §402(o), and 40 CFR 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 were available to support removing some parameters at certain outfalls and removing limits and adding benchmarks at others.
      - Lead was removed from stormwater outfalls as it was found to not be a pollutant of concern in stormwater.
      - When no reasonable potential is found, limits may be replaced with a technology-based benchmark. Oil and grease was changed to a benchmark at the stormwater only outfalls.
    - During the pre-public notice period, Boeing provided information to the permit writer which justifies removing wastewater-based requirements for outfall #010. This outfall is now stormwater only, as the facility has directed all cooling water flows to the sanitary sewer.
    - During the pre-public notice period, Boeing provided information to the permit writer which justifies removing Outfall #006, as there are no industrial contributions to this outfall per the site visit by the permit writer. If the cooling tower overflows into Outfall #006, per Standard Conditions Part I, the facility will need to report it as a spill.
    - Outfall #007 has been split into two outfalls, an internal outfall, #07A, where water quality-based limitations are applied as necessary to protect the receiving stream's water quality, and outfall #07B, where stormwater benchmarks are applied. Limitations on the cooling water at outfall #07A are protective of the receiving stream's designation as a "Metropolitan No-Discharge" stream and other use designations to be maintained, and benchmarks on 07B ensure the facility BMPs are operating as designed to meet technology-based targets. In addition, technology-based requirements to keep and upgrade BMPs to meet benchmarks are added via a Best Management Practice plan, which must be implemented within three years.
  - ✓ The Department determined technical mistakes or mistaken interpretations of law were made in issuing the permit under CWA §402(a)(1)(b).
    - The previous permit special conditions contained a specific set of prohibitions related to general criteria (GC) 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 criteria in the previous permit. This permit assesses each general criteria as listed in the previous permit's special conditions. Federal regulations 40 CFR 122.44(d)(1)(iii) requires instances where 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, 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)(A) through (I) 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 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 while maintaining permit conditions applicable to facility disclosures and in accordance with 10 CSR 20-7.031(4) where no water contaminant by itself or in combination with other substances shall prevent the water of the state from meeting the following conditions:

- (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 facility indicates putrescent wastewater would be discharged from the facility.
  - For outfall #07A, there is RP for unsightly or harmful bottom deposits preventing full maintenance of beneficial uses. This is due to DMR data reported by the facility for settleable solids. Limits are retained on settleable solids to address this RP. There is no RP at all other outfalls for this criterion, because nothing disclosed by the facility indicates unsightly or harmful bottom deposits would be discharged from the facility. Outfall #015 reported settleable solids exceeding the benchmark once in the previous permit cycle; however, as this discharge is stormwater only, the benchmark exceedance is not considered a permit violation. This permit requires a BMP plan to address upgrades to BMPs at the site. The permit writer believes these upgrades will address the exceedance of settleable solids at this stormwater outfall.
- (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 all outfalls, there is no RP for oil in sufficient amounts to be unsightly preventing full maintenance of beneficial uses because nothing disclosed by the facility 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 facility 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 facility 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 facility 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 could be discharged in toxic amounts. These effluent limitations are protective of human health, animals, and aquatic life.
- (E) Waters shall maintain a level of water quality at their confluences to downstream waters that provides for the attainment and maintenance of the water quality standards of those downstream waters, including waters of another state.
- This criterion was not assessed for antibacksliding as this is a new requirement, approved by the EPA on July 30, 2019.
- (F) There shall be no significant human health hazard from incidental contact with the water.
- This criterion is very similar to (D) above. See Part IV, Effluent Limits Derivation below.
- (G) There shall be no acute toxicity to livestock or wildlife watering.
- This criterion is very similar to (D) above. See Part IV, Effluent Limits Derivation below.
- (H) Waters shall be free from physical, chemical or hydrologic changes that would impair the natural biological community.
- For all outfalls, there is no RP for physical changes impairing the natural biological community because nothing disclosed by the facility indicates this is occurring.
  - It has been established any chemical changes are covered by the specific numeric effluent limitations established in the permit.
  - For all outfalls, there is no RP for hydrologic changes impairing the natural biological community because nothing disclosed by the facility indicates this is occurring.
- (I) 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 260.200 RSMo, except as the use of such materials is specifically permitted pursuant to 260.200 through 260.247 RSMo.

- There are no solid waste disposal activities or any operation which has reasonable potential to cause or contribute to the materials listed above being discharged through any outfall.
- The previous permit's special conditions required sampling of total petroleum hydrocarbons (TPH) under the decision model to discharge stormwater having a sheen in secondary containment. The special condition has been revised in all permits beginning in 2015 to remove TPH as 40 CFR 136 does not contain any approved methods for the TPH parameter nor are there water quality standards for TPH. This permit requires oil and grease and BTEX (benzene, toluene, ethylbenzene, and xylene) sampling of the potentially contaminated stormwater in secondary containment. The facility need only sample for these constituents prior to release when a sheen or petroleum odor is present.
- The previous permit special condition indicated spills from hazardous waste substances must be reported to the department. However, this condition is covered under standard conditions therefore was removed from special conditions.
- The water quality standards for chronic total residual chlorine increased from 10 µg/L to 11 µg/L in 2018; see 10 CSR 20-7.031 Table A1. Permit reissuance must utilize currently applicable water quality standards when calculating water quality-based effluent limitations therefore the limitations within this permit are slightly higher than the last permit. The Department has determined, through reissuance of elevated water quality standards, the discharges of this parameter within permitted limits will not cause or contribute to exceedances of the WQS.

#### **ANTIDEGRADATION REVIEW:**

Process water discharges with new, altered, or expanding flows, 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.

This permit requires the development and implementation of a Stormwater Pollution Prevention Plan (SWPPP) which must include an alternative analysis (AA) of the BMPs. The SWPPP must be developed, implemented, updated, and maintained at the facility. Failure to implement and maintain the chosen alternative, is a permit violation. The AA is a structured evaluation of BMPs to determine which are reasonable and cost effective. Analysis should include practices designed to be 1) non-degrading, 2) less degrading, or 3) degrading water quality. The chosen BMP will be the most reasonable and cost effective while ensuring the highest statutory and regulatory requirements are achieved and the highest quality water attainable for the facility is discharged. The analysis must demonstrate why "no discharge" or "no exposure" are not feasible alternatives at the facility. Existing facilities with established SWPPPs and BMPs need not conduct an additional alternatives analysis unless new BMPs are established to address BMP failures or benchmark exceedances. This structured analysis of BMPs serves as the antidegradation review, fulfilling the requirements of 10 CSR 20-7.015(9)(A)5 and 7.031(3). For stormwater discharges with new, altered, or expanding discharges, the stormwater BMP chosen for the facility, through the AA 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.

#### **BEST MANAGEMENT PRACTICES:**

Minimum site-wide best management practices are established in this permit to ensure all facilities are managing their sites equally to protect waters of the state from certain activities which could cause negative effects in receiving water bodies. While not all sites require a SWPPP because the SIC codes are specifically exempted in 40 CFR 122.26(b)(14), these best management practices are not specifically included for stormwater purposes. These practices are minimum requirements for all industrial sites to protect waters of the state. If the minimum best management practices are not followed, the facility may violate general criteria [10 CSR 20-7.031(4)]. Statutes are applicable to all permitted facilities in the state; therefore pollutants cannot be released unless in accordance with 644.011 and 644.016 (17) RSMo.

#### **COST ANALYSIS FOR COMPLIANCE (CAFCom):**

Pursuant to 644.145 RSMo, when incorporating a new requirement for discharges from publicly owned facilities, or when enforcing provisions of this chapter or the CWA, pertaining to any portion of a publicly owned facility, the Department shall make a finding of affordability on the costs to be incurred and the impact of any rate changes on ratepayers upon which to base such permits and decisions, to the extent allowable under this chapter and the CWA. This process is completed through a CAFCom. Permits not including new requirements may be deemed affordable.

- ✓ The Department is not required to complete a cost analysis for compliance because the facility is not publicly owned.

#### **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 facility is not currently under Water Protection Program enforcement action.

#### **DOMESTIC WASTEWATER, SLUDGE, AND BIOSOLIDS:**

Domestic wastewater is defined as wastewater (i.e., human sewage) originating primarily from the sanitary conveyances of bathrooms and kitchens. Domestic wastewater excludes stormwater, animal waste, process waste, and other similar waste.

✓ Not applicable; this facility discharges domestic wastewater to an off-site permitted wastewater treatment facility (POTW).

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. Biosolids are solid materials resulting from domestic wastewater treatment meeting federal and state criteria for productive use (i.e. fertilizer) and after having pathogens removed.

Additional information: <http://extension.missouri.edu/main/DisplayCategory.aspx?C=74> (WQ422 through WQ449).

✓ Not applicable; the facility does not manage domestic wastewater on-site.

#### **EFFLUENT LIMITATIONS:**

Effluent limitations derived and established for this permit are based on current operations of the facility and applied per 10 CSR 20-7.015(9)(A) as applicable. Any flow through the outfall is considered a discharge and must be sampled and reported as provided in the permit. Future permit action due to facility modification may contain new operating permit terms and conditions which supersede the terms and conditions, including effluent limitations, of this operating permit. Daily maximums and monthly averages are required per 40 CFR 122.45(d)(1) for continuous discharges (not from a POTW).

#### **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. The 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 facilities 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 facility must first submit an eDMR Waiver Request Form: <http://dnr.mo.gov/forms/780-2692-f.pdf>. A request must be made for each operating permit. An approved waiver is not 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.

To assist the facility in entering data into the eDMR system, the permit describes limit sets designators in each table in Part A of the permit. The data entry personnel should use these identifiers to ensure data entry is being completed appropriately. For example, M for monthly, Q for quarterly, and others.

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

#### **FEDERAL 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 has an associated ELG but does not discharge process wastewater to waters of the state; stormwater discharges are not addressed by the ELG.

#### **GENERAL CRITERIA CONSIDERATIONS:**

In accordance with 40 CFR 122.44(d)(1), effluent limitations shall be placed into permits for pollutants determined to cause, have reasonable potential to cause, or to contribute to, an excursion above any water quality standard, including narrative water quality criteria. In order to comply with this regulation, the permit writer has completed a reasonable potential determination on whether discharges have reasonable potential to cause or contribute to an excursion of the general criteria listed in 10 CSR 20-7.031(4). In instances where reasonable potential exists, the permit includes limitations within the permit to address the reasonable potential. In discharges where reasonable potential does not exist, the permit may include monitoring to later determine the discharge's potential to



impact the narrative criteria. Additionally, 644.076.1 RSMo, as well as Part I §D – Administrative Requirements of Standard Conditions included in this permit state it shall be unlawful for any person to cause or allow any discharge of water contaminants from any water contaminant or point source located in Missouri in violation of §§644.006 to 644.141 of the Missouri Clean Water Law or any standard, rule, or regulation promulgated by the commission. See Part IV for specific determinations.

#### **GROUNDWATER MONITORING:**

Groundwater is a water of the state according to 644.016(27) RSMo, 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.

#### **LAND APPLICATION:**

Land application, or surficial dispersion of wastewater and/or sludge, is performed by facilities to maintain a basin as no-discharge. Requirements for these types of operations are found in 10 CSR 20-6.015; authority to regulate these activities is from 644.026 RSMo.

- ✓ Not applicable; this permit does not authorize operation of a surficial land application system to disperse wastewater or sludge.
- ✓ This permit does not authorize land disposal or the application of hazardous waste.

#### **LAND DISTURBANCE:**

Land disturbance, sometimes called construction activities, are actions which cause disturbance of the root layer or soil; these include clearing, grading, and excavating of the land. 40 CFR 122.26(b)(14) and 10 CSR 20-6.200(3) requires permit coverage for these activities. Coverage is not required for facilities when only providing maintenance of original line and grade, hydraulic capacity, or to continue the original purpose of the facility.

- ✓ Not applicable; this permit does not provide coverage for land disturbance activities. The facility may obtain a separate land disturbance permit (MORA) online at <https://dnr.mo.gov/env/wpp/stormwater/sw-land-disturb-permits.htm>; MORA permits do not cover disturbance of contaminated soils, however, site specific permits such as this one can be modified to include appropriate controls for land disturbance of contaminated soils by adding site-specific BMP requirements and additional outfalls.

#### **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 Statutes Chapter 256.400 Geology, Water Resources and Geodetic Survey Section). <https://dnr.mo.gov/pubs/pub2236.htm>

- ✓ Not applicable; this facility cannot withdraw water from the state in excess of 70 gpm/0.1 MGD.

#### **MODIFICATION REQUESTS:**

Facilities have the option to request a permit modification from the Department at any time under RSMo 644.051.9. Requests must be submitted to the Water Protection Program with the appropriate forms and fees paid per 10 CSR 20-6.011. It is recommended facilities contact the permit writer early so the correct forms and fees are submitted, and the modification request can be completed in a timely fashion. Minor modifications, found in 40 CFR 122.63, are processed without the need for a public comment period. Major modifications, those requests not explicitly fitting under 40 CFR 122.63, do require a public notice period. Modifications to permits should be completed when: a new pollutant is found in the discharge; operational or functional changes occur which affect the technology, function, or outcome of treatment; the facility desires alternate numeric benchmarks; or other changes are needed to the permit.

Modifications are not required when utilizing or changing additives in accordance with the publication <https://dnr.mo.gov/pubs/pub2653.htm> nor are required when a temporary change or provisional discharge has been authorized by the regional office. While provisional discharges may be authorized by the regional office, they will not be granted for more than the time necessary for the facility to obtain an official modification from the Water Protection Program. Temporary provisional discharges due to weather events or other unforeseen circumstances may or may not necessitate a permit modification. The facility may ask for a Compliance Assistance Visit (CAV) from the regional office to assist in the decision-making process; CAVs are provided free of charge to the permitted entity.

#### **NUTRIENT MONITORING:**

Nutrient monitoring is required for facilities characteristically or expected to discharge nutrients (nitrogenous compounds and/or phosphorus) when the design flow is equal to or greater than 0.1 MGD per 10 CSR 20-7.015(9)(D)8. This requirement is applicable to all Missouri waterways.

- ✓ The total design flow of wastewater is below 0.1 MGD; therefore, monitoring is not required under this state regulation. However, monitoring for nitrate + nitrite, phosphorus, and TKN are required by this permit to characterize the total nitrogen discharges from the site, which were disclosed in pre-public notice comments. These requirements are made per 40 CFR 122.41(j) which requires all permits to specify monitoring to yield data which are representative of the monitored activity at the site. As TN has been reported as present in the effluent, monitoring will be required to fully characterize the effluent for permitting purposes.

Water quality standards per 10 CSR 20-7.031(5)(N) describe nutrient criteria requirements assigned to lakes (which include reservoirs) in Missouri, equal to or greater than 10 acres during normal pool conditions. The Department's Nutrient Criteria Implementation Plan (NCIP) may be reviewed at: <https://dnr.mo.gov/env/wpp/rules/documents/nutrient-implementation-plan-final-072618.pdf> Discharges of wastewater in to lakes or lake watersheds designated as L1 (drinking water use) are prohibited per 10 CSR 20-7.015(3)(C).

✓ Not applicable; this facility does not discharge in a lake watershed.

#### OIL/WATER SEPARATORS:

Oil water separator (OWS) tank systems are frequently found at industrial sites where process water and stormwater may contain oils and greases, oily wastewaters, or other immiscible liquids requiring separation. Food industry discharges typically require pretreatment prior to discharge to municipally owned treatment works. Per 10 CSR 26-2.010(2)(B), all oil water separator tanks must be operated according to manufacturer's specifications and authorized in NPDES permits per 10 CSR 26-2.010(2) or may be regulated as a petroleum tank.

✓ Applicable; the OWS, as disclosed by the facility, discharges to outfall #012, and this outfall contains appropriate parameters as determined by the permit writer. Sludge generated by OWS is subject to Special Conditions. See SLUDGE – INDUSTRIAL below.

#### OPERATOR CERTIFICATION REQUIREMENTS:

Operators or supervisors of operations at regulated domestic wastewater treatment facilities shall be certified in accordance with 10 CSR 20-9 and any other applicable state law or regulation.

✓ Not applicable; this facility is not required to have a certified operator. This permit does not cover domestic wastewater. Additionally, this facility is not owned or operated by a municipality, public sewer district, county, public water supply district, or private sewer company regulated by the Public Service Commission or operated by a state or federal agency. Private entities are exempted from the population equivalent requirement unless the Department has reason to believe a certified operator is necessary.

#### PRETREATMENT:

This permit does not regulate pretreatment requirements for facilities discharging to an accepting permitted wastewater treatment facility. If applicable, the receiving entity (the publicly owned treatment works - POTW) is to ensure compliance with any effluent limitation guidelines for pretreatment listed in 40 CFR Subchapter N per 10 CSR 20-6.100. Pretreatment regulations per 644.016 RSMo are limitations on the introduction of pollutants or water contaminants into publicly owned treatment works or facilities.

✓ Applicable, this facility discharges industrial wastewater to a POTW. They are currently discharging to Metropolitan St. Louis Sewer District under permit #1036497600-2.

#### REASONABLE POTENTIAL (RP):

Federal regulation [40 CFR Part 122.44(d)(1)(i)] requires effluent limitations for all pollutants which 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. Per 10 CSR 20-7.031(4), general criteria shall be applicable to all waters of the state at all times; however, acute toxicity criteria may be exceeded by permit in zones of initial dilution, and chronic toxicity criteria may be exceeded by permit in mixing zones. If the permit writer determines any given pollutant has the reasonable potential to cause or contribute to an in-stream excursion above the WQS, the permit must contain effluent limits for the pollutant per 40 CFR Part 122.44(d)(1)(iii) and the most stringent limits per 10 CSR 20-7.031(9)(A). Permit writers may use mathematical reasonable potential analysis (RPA) using the Technical Support Document for Water Quality Based Toxics Control (TSD) methods (EPA/505/2-90-001) as found in Section 3.3.2 or may also use reasonable potential determinations (RPD) as provided in Sections 3.1.2, 3.1.3, and 3.2 of the TSD.

✓ Applicable; an RPA was conducted on appropriate parameters and was conducted as per (TSD 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	units	CMC acute	Daily max	N#	CV	N Max	MF	RWC Acute	RWC chronic	RP
Copper, #07A (Low)	µg/L	63.7	64	19	0.381	13.5	1.76	23.78	23.78	No

Units are (µg/L) unless otherwise noted.

n/a Not Applicable

n 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).

✓ A mathematical RPA was not conducted on the stormwater outfalls and parameters 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 (<http://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 facility 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 facility; B. effluent guidelines; C. best professional judgment of the permit writer; D. water quality; and E. BMPs. Part IV provides specific decisions related to this permit.

#### **RENEWAL REQUIREMENTS:**

The renewal special condition permit requirement is designed to guide the facility to prepare and include all relevant and applicable information in accordance with 10 CSR 20-6.010(7)(A)-(C), and if applicable, federal regulations. The special condition may not include all requirements and requests for additional information may be made at the time of permit renewal under 644.051.13(5) RSMo and 40 CFR 122.21(h). Prior to submittal, the facility must review the entire submittal to confirm all required information and data is provided; it is the facility's responsibility to discern if additional information is required. Failure to fully disclosure applicable information with the application or application addendums may result in a permit revocation per 10 CSR 20-6.010(8)(A) and may result in the forfeiture of permit shield protection authorized in 644.051.16 RSMo.

#### **SAMPLING FREQUENCY JUSTIFICATION:**

Sampling and reporting frequency was generally retained from previous permit. 40 CFR 122.45(d)(1) indicates all continuous discharges, such as wastewater discharges, shall be permitted with daily maximum and monthly average limits. Minimum sampling frequency for all parameters is annually per 40 CFR 122.44(i)(2).

Sampling frequency for stormwater-only outfalls is typically quarterly even though BMP inspection occurs monthly or more often dependent on site needs. 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, volatile organic compounds, and others. For further information on sampling and testing methods see 10 CSR 20-7.015(9)(D)2.

#### **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. SOC's are allowed under 40 CFR 122.47 and 10 CSR 20-7.031(11) providing certain conditions are met. An SOC is not allowed:

- For effluent limitations based on technology-based standards established in accordance with federal requirements, if the deadline for compliance established in federal regulations has passed in accordance with 40 CFR 125.3.
- For a newly constructed facility in most cases per 644.029 RSMo. Newly constructed facilities must meet all applicable effluent limitations (technology and water quality) when discharge begins. New facilities are required to install the appropriate control technologies as specified in a permit or antidegradation review. A SOC is allowed for a new water quality-based effluent limit not included in a previously public noticed permit or antidegradation review, which may occur if a regulation changes during construction.
- To develop a TMDL, UAA, or other study associated with development of a site-specific criterion. A facility is not prohibited from conducting these activities, but a SOC may not be specifically granted for conducting these activities.

In order to provide guidance in developing SOC's, and to attain a greater level of consistency, the Department issued a policy on development of SOC's on October 25, 2012. The policy provides guidance to permit writers on standard time frames for schedules for common activities, and guidance on factors to modify the length of the schedule.

- ✓ Not applicable; no water quality-based schedule of compliance is included in this permit.

#### **SPILLS, OVERFLOWS, AND OTHER UNAUTHORIZED DISCHARGE REPORTING:**

Per 260.505 RSMo, 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>

Any other spills, overflows, or unauthorized discharges reaching waters of the state must be reported to the regional office during normal business hours, or after normal business hours, to the Department's 24-hour Environmental Emergency Response spill line at 573-634-2436.

#### **SLUDGE – INDUSTRIAL:**

Industrial sludge is solid, semi-solid, or liquid residue generated during the treatment of industrial process or non-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 any material derived from industrial sludge. Industrial sludge could also be derived from lagoon dredging or other similar maintenance activities.

- ✓ Applicable; sludge is removed by contract hauler, incinerated, stored in the lagoon, considered hazardous waste, etc. The permitted management strategy must be followed, see permit under FACILITY DESCRIPTION. If the permitted management strategy cannot be followed, the facility must obtain a permit modification. Oil sludge from oil water separators must be disposed of as "used oil" under 10 CSR 25-11.279.

#### **STANDARD CONDITIONS:**

The standard conditions Part I attached to this permit incorporate all sections of 10 CSR 20-6.010(8) and 40 CFR 122.41(a) through (n) by reference as required by law. These conditions, in addition to the conditions enumerated within the standard conditions should be reviewed by the facility to ascertain compliance with this permit, state regulations, state statutes, federal regulations, and the Clean Water Act.

#### **STORMWATER PERMITTING: LIMITATIONS AND BENCHMARKS:**

Because of the fleeting nature of stormwater discharges, the Department, under the direction of EPA guidance, has determined monthly averages are generally inappropriate for stormwater-only discharges. The *Technical Support Document for Water Quality Based Toxics Control* (EPA/505/2-90-001; 1991) §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), a benchmark, or a monitoring requirement as dictated by site specific conditions, the BMPs in place, the BMPs proposed, past performance of the facility, and the receiving water's current quality.

Sufficient rainfall to cause a discharge for one hour or more from a facility may not necessarily cause significant flow in a receiving stream. Acute Water Quality Standards (WQSs) are based on one hour of exposure and must be protected at all times. Therefore, industrial stormwater facilities with toxic contaminants present in the stormwater may have the potential to cause a violation of acute WQSs if toxic contaminants occur in sufficient amounts. In this instance, the permit writer may apply daily maximum limitations.

Conversely, it is unlikely for rainfall to cause a discharge for four continuous days from a facility; if this does occur however, the receiving stream will also likely sustain a significant amount of flow providing dilution. Most chronic WQSs are based on a four-day exposure with some exceptions. Under this scenario, most industrial stormwater facilities have limited potential to cause a violation of chronic water quality standards in the receiving stream.

A standard mass-balance equation cannot be calculated for stormwater because stormwater flow and flow in the receiving stream cannot be determined for conditions on any given day or storm event without real-time monitoring. The amount of stormwater discharged from the facility will vary based on current and 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, area of surfaces with reduced permeability (houses, parking lots, and the like) in the watershed, hydrogeology, topography, etc. Decreased permeability may increase the stream flow dramatically over a short period of time (flash).

Numeric benchmark values are based on site specific requirements taking in to account a number of factors but cannot be applied to any process water discharges. First, the technology in place at the site to control pollutant discharges in stormwater is evaluated. The permit writer also evaluates other similar permits for similar activities. A review of the guidance forming the basis of Environmental Protection Agency's (EPA's) *Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity* (MSGP) may also occur. 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 may also be used. 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. If a facility has not disclosed BMPs applicable to the pollutants for the site, the facility may not be eligible for benchmarks.

40 CFR 122.44(b)(1) requires the permit implement the most stringent limitations for each discharge, including industrially exposed stormwater; and 40 CFR 122.44(d)(1)(i) and (iii) requires the permit to include water-quality based effluent limitations where

reasonable potential has been found. However, because of the non-continuous nature of stormwater discharges, staff are unable to perform statistical Reasonable Potential Analysis (RPA) under most stormwater discharge scenarios. Reasonable potential determinations (RPDs; see REASONABLE POTENTIAL above) using best professional judgment are performed.

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 facility in knowing when additional corrective actions may be necessary to comply with the conditions of the permit.

BMP inspections typically occur more frequently than sampling. Sampling frequencies are based on the facility's ability to comply with the benchmarks and the requirements of the permit. Inspections should occur after large rain events and any other time an issue is noted; sampling after a benchmark exceedance may need to occur to show the corrective action taken was meaningful. When a permitted feature or outfall consists of only stormwater, a benchmark may be implemented at the discretion of the permit writer, if there is no RP for water quality excursions.

✓ Applicable, this facility has stormwater-only outfalls where benchmarks or limitations were deemed appropriate contaminant measures.

#### **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 §304(e) of the Clean Water Act (CWA) for the control of toxic pollutants and hazardous substances from ancillary industrial activities; 2) Authorized under §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*, (EPA 833-B-09-002) published by the EPA in 2015 [https://www.epa.gov/sites/production/files/2015-11/documents/swppp\\_guide\\_industrial\\_2015.pdf](https://www.epa.gov/sites/production/files/2015-11/documents/swppp_guide_industrial_2015.pdf), 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. Additional information can be found in *Stormwater Management for Industrial Activities: Developing Pollution Prevention Plans and Best Management Practices* (EPA 832-R-92-006; September 1992).

A SWPPP must be prepared by the facility 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 facility 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 re-evaluate 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 which are reasonable and cost effective. The AA evaluation should include practices 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), §II.B.

If parameter-specific numeric benchmark exceedances continue to occur and the facility 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 facility 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, which includes an appropriate fee; the application is found at: <https://dnr.mo.gov/forms/#WaterPollution>

✓ Applicable; a SWPPP shall be developed and implemented for this facility; see specific requirements in the SPECIAL CONDITIONS section of the permit.

#### **SUFFICIENTLY SENSITIVE ANALYTICAL METHODS:**

Please review Standard Conditions Part 1, §A, No. 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 and incorporated within this permit. 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 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 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 facility is responsible for working with their contractors to ensure the analysis performed is sufficiently sensitive.

#### **UNDERGROUND INJECTION CONTROL (UIC):**

The UIC program for all classes of wells in the State of Missouri is administered by the Missouri Department of Natural Resources and approved by EPA pursuant to §§1422 and 1425 of the Safe Drinking Water Act (SDWA) and 40 CFR 147 Subpart AA. Injection wells are classified based on the liquids which are being injected. Class I wells are hazardous waste wells which are banned by 577.155 RSMo; Class II wells are established for oil and natural gas production; Class III wells are used to inject fluids to extract minerals; Class IV wells are also banned by Missouri in 577.155 RSMo; Class V wells are shallow injection wells; some examples are heat pump wells and groundwater remediation wells. Domestic wastewater being disposed of sub-surface is also considered a Class V well. In accordance with 40 CFR 144.82, construction, operation, maintenance, conversion, plugging, or closure of injection wells shall not cause movement of fluids containing any contaminant into Underground Sources of Drinking Water (USDW) if the presence of any contaminant may cause a violation of drinking water standards or groundwater standards under 10 CSR 20-7.031, or other health-based standards, or may otherwise adversely affect human health. If the director finds the injection activity may endanger USDWs, the Department may require closure of the injection wells, or other actions listed in 40 CFR 144.12(c), (d), or (e). In accordance with 40 CFR 144.26, the facility shall submit a Class V Well Inventory Form for each active or new underground injection well drilled, or when the status of a well changes, to the Missouri Department of Natural Resources, Geological Survey Program, P.O. Box 250, Rolla, Missouri 65402. The Class V Well Inventory Form can be requested from the Geological Survey Program or can be found at the following web address: <http://dnr.mo.gov/forms/780-1774-f.pdf> Single family residential septic systems and non-residential septic systems used solely for sanitary waste and having the capacity to serve fewer than 20 persons a day are excluded from the UIC requirements (40 CFR 144.81(9)).

✓ Not applicable; the facility has not submitted materials indicating the facility will be performing UIC at this site.

#### **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 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 to 644.141. Thermal variances are regulated separately and are found under 644.

✓ 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; definitions], the WLA is the maximum 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 water, then the other must be used per 10 CSR 20-7.015(9)(A).

- ✓ Applicable; wasteload allocations for toxic parameters were calculated using water quality criteria or water quality model results and by applying the dilution equation below; WLAs are calculated using the *Technical Support Document For Water Quality-Based Toxics Control* or “TSD” EPA/505/2-90-001; 3/1991, §4.5.5.

$$C = \frac{(C_s \times Q_s) + (C_e \times Q_e)}{(Q_e + Q_s)}$$

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).
- Number of Samples “n”: effluent quality is determined by the underlying distribution of daily values, 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 assumption 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 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 uses an assumed number of samples “n = 4”.

#### WASTELOAD ALLOCATION (WLA) MODELING:

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

- ✓ Applicable; a metals translator study was submitted to the Department by Barr Engineering on behalf of the Boeing Company for determining site-specific metal translators for copper. The metals translator study, titled *Site-Specific Effluent Limitations Determination – Metals Translator/Water-Effect Ratio Study* dated October 2014 with revisions dated February 2015, was submitted in an effort to develop copper conversion factors specific to the receiving stream for outfall #007 and #010. Barr Engineering used EPA’s metals translator study guidance titled *The Metals Translator: Guidance for Calculating a Total Recoverable Permit Limit from a Dissolved Criterion*. The study consisted of sample collection of receiving water upstream of the outfalls, adjacent to the outfalls, and downstream of the outfalls. These samples were analyzed for several parameters including dissolved and total recoverable copper. Per the EPA’s guidance, the dissolved fractions were calculated by dividing the dissolved copper by the total recoverable copper for each sample. These fractions were then averaged using a geometric mean calculation to get a final conversion factor for each outfall. These site-specific conversion factors replaced the default conversion factors for calculating total recoverable criteria. The final effluent limitations were based on the site-specific total recoverable criteria developed for copper. The study has not been included in this permit but is available upon request.

#### WATER QUALITY STANDARD REVISION:

In accordance with 644.058 RSMo, the Department is required to utilize an evaluation of the environmental and economic impacts of modifications to water quality standards of twenty-five percent or more when making individual site-specific permit decisions.

- ✓ This operating permit does not contain requirements for a water quality standard changing twenty-five percent or more since the previous operating permit.

## **PART IV. EFFLUENT LIMIT DETERMINATIONS**

### **OUTFALL #07A, NON-CONTACT COOLING WATER INTERNAL MONITORING POINT**

#### **EFFLUENT LIMITATIONS TABLE:**

PARAMETERS	UNIT	DAILY MAX	MONTHLY AVG.	PREVIOUS PERMIT LIMITS	MINIMUM SAMPLING FREQUENCY	REPORTING FREQUENCY	SAMPLE TYPE
PHYSICAL							
FLOW	MGD	*	*	SAME	ONCE/QUARTER	ONCE/QUARTER	24 Hr. Tot
TEMPERATURE	°F	*	*	NEW	ONCE/QUARTER	ONCE/QUARTER	MEASURE
CONVENTIONAL							
COD	mg/L	*	*	**141	ONCE/QUARTER	ONCE/QUARTER	GRAB
CHLORINE, TOTAL RESIDUAL	µg/L	18 ML 130	9 ML 130	17/8 ML 130	ONCE/QUARTER	ONCE/QUARTER	GRAB
pH †	SU	6.5-9.0	--	SAME	ONCE/QUARTER	ONCE/QUARTER	GRAB
SETTLABLE SOLIDS	mL/L/hr	1.5	1.0	SAME	ONCE/QUARTER	ONCE/QUARTER	GRAB
TOTAL SUSPENDED SOLIDS (TSS)	mg/L	*	*	**100	ONCE/QUARTER	ONCE/QUARTER	GRAB
METALS							
ALUMINUM, TR	µg/L	*	*	NEW	ONCE/QUARTER	ONCE/QUARTER	GRAB
CHROMIUM VI, DISSOLVED	MONITORING REMOVED						
COPPER, TR	µg/L	*	*	71/27 LIMIT	ONCE/QUARTER	ONCE/QUARTER	GRAB
IRON, TR	µg/L	*	*	NEW	ONCE/QUARTER	ONCE/QUARTER	GRAB
LEAD, TR	µg/L	*	*	NEW	ONCE/QUARTER	ONCE/QUARTER	GRAB
NUTRIENTS							
NITRATE + NITRITE	mg/L	*	*	NEW	ONCE/QUARTER	ONCE/QUARTER	GRAB
PHOSPHORUS	mg/L	*	*	NEW	ONCE/QUARTER	ONCE/QUARTER	GRAB
TOTAL KJELDAHL NITROGEN (TKN)	mg/L	*	*	NEW	ONCE/QUARTER	ONCE/QUARTER	GRAB
OTHER							
CHLORIDE	mg/L	*	*	NEW	ONCE/QUARTER	ONCE/QUARTER	GRAB
CHLORIDE PLUS SULFATE	mg/L	*	*	NEW	ONCE/QUARTER	ONCE/QUARTER	GRAB
SULFATE	mg/L	*	*	NEW	ONCE/QUARTER	ONCE/QUARTER	GRAB

- \* monitoring and reporting 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 ensure compliance with permitted effluent limitations. If the facility is unable to obtain effluent flow, then it is the responsibility of the facility 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), quarterly monitoring continued from previous permit.

##### **Temperature**

Quarterly monitoring only, new to this permit. This flow consists entirely of cooling water. Monitoring is added to determine whether flows have reasonable potential to contribute to a change of temperature in stream which would be an excursion from water quality standards. 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) or change the stream temperature by more than 5 degrees Fahrenheit.



## CONVENTIONAL:

### **Chemical Oxygen Demand (COD)**

Quarterly monitoring is included using the permit writer's best professional judgment. The previous permit had a benchmark for this pollutant of 141 mg/L on outfall #007, this is moved to outfall #07B while #07A is monitoring only. As there is no RP for excursions from the narrative water quality standards, this parameter will be continued as monitoring only. There is no numeric water quality standard for COD; however, increased oxygen demand may impact instream water quality. COD is also a valuable indicator parameter.

### **Chlorine, Total Residual (TRC)**

Quarterly monitoring, with a daily maximum limit of 18 µg/L, with a monthly average limit of 9 µg/L, ML of 130 µg/L. The previous permit required 17 µg/L for a daily max and 8 µg/L for a monthly average at outfall #007; however, the standards for chlorine have changed slightly. The ML remains unchanged. There were no exceedances of the ML in the previous permit cycle at outfall #007. Chlorine is found in the source water for the cooling water at this facility, therefore monitoring shall occur for all discharges, and not just when "added" as required by the previous permit.

### **pH**

Quarterly monitoring with a limit of 6.5 to 9.0 SU – instantaneous grab sample. Water quality limits [10 CSR 20-7.031(5)(E)] are applicable to this outfall, continued from the previous permit. pH is a fundamental water quality indicator. Additionally, metals leachability and ammonia availability in wastewater is dependent on pH. Limitations in this permit will protect against aquatic organism toxicity, downstream water quality issues, human health hazard contact, and negative physical changes in accordance with the general criteria at 10 CSR 20-7.031(4) and the Clean Water Act's (CWA) goal of 100% fishable and swimmable rivers and streams.

### **Settleable Solids (SS)**

Quarterly monitoring with a daily maximum limit of 1.5 mL/L/hr and a monthly average of 1.0 mL/L/hr, continued from the previous permit (#007). There was one exceedance of this limit at outfall #007 base flow in the previous permit cycle. There is no numeric water quality standard for SS; however, sediment discharges can negatively impact aquatic life. Increased settleable solids are known to interfere with multiple stages of the life cycle in many benthic organisms. For example, they can smother eggs and young or clog the crevasses benthic organisms use for habitat. Settleable solids are also a valuable indicator parameter. Solids monitoring allows the facility to identify increases in sediment and solids indicating uncontrolled materials leaving the site.

### **Total Suspended Solids (TSS)**

Quarterly monitoring. The previous permit required a benchmark of 100 mg/L on outfall #007. Benchmarks are not appropriate for cooling water discharges and are therefore not applied to #07A. The DMR data reported by this site does not indicate an issue in the low flow discharges from these outfalls, therefore limitations are not necessary to protect water quality. Monitoring is continued as suspended solids are a pollutant of concern in the discharge. TSS is also a valuable indicator parameter and may be used to help evaluate general water quality.

## METALS:

### **Aluminum, Total Recoverable; Iron, Total Recoverable; Lead, Total Recoverable**

Quarterly monitoring, new to this permit. These pollutants are added as they are known pollutants of concern at this site which may be found in the cooling water. They were not included in the previous permit in the base flow monitoring for unclear reasons. Monitoring will help determine compliance with water quality for all discharges at this site.

### **Chromium VI, Dissolved**

Monitoring for this parameter is removed as all results were non-detects, indicating it is not a pollutant of concern at the site.

### **Copper, Total Recoverable**

Quarterly monitoring. The previous permit required limits for this parameter; however, an RPA found no reasonable potential to exceed water quality standards in the base flow which consists of cooling water only, therefore limitations were removed for #07A. Monitoring is continued as copper is a known pollutant of concern at the site.

## **NUTRIENTS:**

### **Nitrate + Nitrite; Total Kjeldahl Nitrogen**

Quarterly monitoring. In the previous permit cycle, the facility reported very high levels of ammonia on the DMRs. During the pre-public notice period, the facility supplied a comment stating the ammonia reported had, in fact, been total nitrogen. Total nitrogen consists of nitrate + nitrite and TKN (TKN includes both ammonia and organic nitrogen) therefore these parameters are required in this permit cycle to fully characterize the discharges from this site per 40 CFR 122.41(j). Nitrogen is a pollutant of concern in streams and lakes in Missouri and can have a deleterious effect on water quality for a number of reasons. Monitoring the fractions of TN can help determine the source of TN at the site and determine reasonable potential for each fraction to cause or contribute to exceedances of the water quality standards.

## **OTHER:**

### **Chloride**

Quarterly monitoring, new to this permit cycle. Chloride is a known pollutant of concern at the site; however, it was not monitored for in the low flows of the previous permit cycle. Monitoring is included to characterize cooling water effluent.

### **Sulfate**

Quarterly monitoring required to determine chloride plus sulfate below. The facility shall sample and independently report the analytical value of sulfate.

### **Chloride Plus Sulfate**

Quarterly monitoring, new to this permit cycle. Chloride is a known pollutant of concern at the site; however, it was not monitored for in the low flows of the previous permit cycle. Monitoring is included to characterize cooling water effluent. As the state water quality standards include a requirement of 1000 mg/L of chloride + sulfate, both parameters' totals are to be added together to determine compliance with this water quality standard.

## **OUTFALL #07B – STORMWATER, NON-CONTACT COOLING WATER**

Outfall #07B monitors the combination of stormwater and cooling water at this site; however, because the cooling water is measured and limited separately, this combined outfall is treated as stormwater only. Benchmarks applied to this outfall are considered typical and achievable by similar industries or this site in particular according to their DMR data. This outfall was previously referred to as “#007-High Flow.” Due to the Metropolitan No-Discharge watershed, a requirement for a plan to be submitted to the Department, reviewed, and implemented within four years is included in this permit (see Permit, Part B. BEST MANAGEMENT PRACTICES PLAN REQUIREMENTS). The plan requirements state the facility must upgrade their technology to show compliance with the narrative and numeric technology requirements of the permit, including the benchmarks for this outfall. Technology upgrades to both cooling water and stormwater BMPs may be required to comply with the plan.

**EFFLUENT LIMITATIONS TABLE:**

PARAMETERS	UNIT	DAILY MAX	BENCHMARK	PREVIOUS PERMIT LIMITS	MINIMUM SAMPLING FREQUENCY	REPORTING FREQUENCY	SAMPLE TYPE
PHYSICAL							
FLOW	MGD	*	-	SAME	ONCE/QUARTER	ONCE/QUARTER	24 HR. EST
PRECIPITATION	MONITORING REMOVED						
CONVENTIONAL							
COD	mg/L	**	141	SAME	ONCE/QUARTER	ONCE/QUARTER	GRAB
CHLORINE, TOTAL RESIDUAL	µg/L	*	-	17 LIMIT	ONCE/QUARTER	ONCE/QUARTER	GRAB
OIL & GREASE	mg/L	**	10	15	ONCE/QUARTER	ONCE/QUARTER	GRAB
pH <sup>†</sup>	SU	6.5-9.0	-	SAME	ONCE/QUARTER	ONCE/QUARTER	GRAB
SETTLABLE SOLIDS	mL/L/hr	**	1.5	1.5 LIMIT	ONCE/QUARTER	ONCE/QUARTER	GRAB
TOTAL SUSPENDED SOLIDS (TSS)	mg/L	**	100	SAME	ONCE/QUARTER	ONCE/QUARTER	GRAB
METALS							
ALUMINUM, TR; FINAL	µg/L	**	1,100	*	ONCE/QUARTER	ONCE/QUARTER	GRAB
CHROMIUM (VI), DISSOLVED	MONITORING REMOVED						
COPPER, TR	µg/L	**	21	71 LIMIT	ONCE/QUARTER	ONCE/QUARTER	GRAB
IRON, TR	µg/L	**	4,000	*	ONCE/QUARTER	ONCE/QUARTER	GRAB
LEAD, TR	µg/L	*	-	SAME	ONCE/QUARTER	ONCE/QUARTER	GRAB
NUTRIENTS							
NITRATE PLUS NITRITE AS N	mg/L	*	*	NEW	ONCE/QUARTER	ONCE/QUARTER	GRAB
PHOSPHORUS, TOTAL P (TP)	mg/L	*	*	SAME	ONCE/QUARTER	ONCE/QUARTER	GRAB
TOTAL KJELDAHL NITROGEN (TKN)	mg/L	*	*	NEW	ONCE/QUARTER	ONCE/QUARTER	GRAB
NITROGEN, TOTAL AS N	REMOVED FROM REPORTING						
OTHER							
CHLORIDE, FINAL	mg/L	**	860	*	ONCE/QUARTER	ONCE/QUARTER	GRAB
SULFATE	mg/L	*	-	NEW	ONCE/QUARTER	ONCE/QUARTER	GRAB
CHLORIDE PLUS SULFATE, FINAL	mg/L	**	1,000	NEW	ONCE/QUARTER	ONCE/QUARTER	GRAB
WET TEST - ACUTE	TUa	*	-	SAME	ONCE/YEAR	ONCE/YEAR	GRAB

- \* monitoring and reporting 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:**

The cooling water flow for outfall #07A requires a daily max and a monthly average, therefore it is not necessary to protect for the consistent base flow at #07B, as it is already limited via the #07A requirements.

**PHYSICAL:**
**Flow**

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

**Precipitation**

Monitoring is removed from all outfalls. Precipitation data is readily available online.

## CONVENTIONAL:

### **Chemical Oxygen Demand (COD)**

Quarterly monitoring with a benchmark of 141 mg/L, continued from the previous permit. The data shows no RP for excursions from the narrative water quality standards, therefore limitations for this parameter are unnecessary at #07B. There is no numeric 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 facility to identify increases in COD, which may indicate materials/chemicals coming into contact with stormwater causing an increase in oxygen demand. Increases in COD may indicate a need for maintenance or improvement of BMPs.

### **Chlorine, Total Residual (TRC)**

Quarterly monitoring. The previous permit required 17 µg/L for a daily max and 8 µg/L for a monthly average at this outfall; however, this outfall is now treated as stormwater, and chlorine is limited at #07A. There were no exceedances of the ML in the previous permit cycle at this outfall. Chlorine is found in the source water for the cooling water at this facility, therefore monitoring for this pollutant is required for all quarters where there is a discharge, not just when the pollutant is “added” by the facility as was required in the previous permit.

### **Oil & Grease**

Quarterly monitoring with a benchmark of 10 mg/L. The previous permit required a daily maximum limit of 15 mg/L; however, the permit writer did not determine RP from the available data and information from the site. As there is no RP, limitations for this parameter are not required and are removed and replaced with a technology-based benchmark. The facility reported from 5 mg/L to 6 mg/L at this outfall. 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 xylene, but these constituents are often lost during testing due to their boiling points. 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 facility to visually observe the discharge and receiving waters for sheen or bottom deposits. 10 mg/L is achieved consistently by other industrial sites with typical BMPs in place.

### **pH**

Quarterly monitoring with a limit of 6.5 to 9.0 SU – instantaneous grab sample. Water quality limits [10 CSR 20-7.031(5)(E)] are applicable to this outfall, continued from the previous permit. pH is a fundamental water quality indicator. Additionally, metals leachability and ammonia availability in wastewater is dependent on pH. Limitations in this permit will protect against aquatic organism toxicity, downstream water quality issues, human health hazard contact, and negative physical changes in accordance with the general criteria at 10 CSR 20-7.031(4) and the Clean Water Act’s (CWA) goal of 100% fishable and swimmable rivers and streams.

### **Settleable Solids (SS)**

Quarterly monitoring with a benchmark of 1.5 mL/L/hr. The previous permit required a daily maximum limit of 1.5 mL/L/hr; however, the permit writer did not determine this parameter has RP for excursions from the water quality standards during high flow, and therefore the limits have been removed and replaced with a technology-based benchmark. There is no numeric water quality standard for SS; however, sediment discharges can negatively impact aquatic life habitat. Settleable solids are also a valuable indicator parameter. Solids monitoring allows the facility to identify increases in sediment and solids may indicate uncontrolled materials leaving the site. 1.5 mL/L/hr is achieved consistently at other industrial sites with typical BMPs in place.

### **Total Suspended Solids (TSS)**

Quarterly monitoring with a benchmark of 100 mg/L continued from the previous permit. There is no numeric 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 facility to identify increases in TSS indicating 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. The data at this site showed some numbers above 100 mg/L; however, the data was not consistently elevated. The facility should consider possible causes for elevated TSS in the effluent, and ways to prevent elevated TSS in the high flow discharges. The BMP Plan in this permit requires the facility to consider BMPs to address elevated TSS.

## **METALS:**

### **Aluminum, Total Recoverable**

Quarterly monitoring with a benchmark of 1,100 µg/L. The previous permit required monitoring only for this parameter. Aluminum is a component of many metals used in this industry and may also be found naturally occurring in soil. DMR data indicates several monitoring results above this benchmark. 1,100 µg/L is the benchmark for aluminum found in the EPA's MSGP for other industrial sites, and data from this site indicates it has been achieved in certain events. The BMP Plan in this permit requires the facility to consider BMPs to address elevated aluminum.

### **Chromium VI, Dissolved**

Monitoring for this parameter is removed. The DMR data submitted by the facility indicates this is not a pollutant of concern at the site.

### **Copper, Total Recoverable**

Quarterly monitoring with a benchmark of 21 µg/L. The previous permit required a daily maximum of 71 µg/L. The DMR data reported for this outfall exceeded the 21 µg/L benchmark two times in the previous permit cycle, values of 23.2 µg/L and 54.7 µg/L reported. Copper is a known pollutant of concern at this site and can be found in the metals used by the industry. The benchmark is placed at the 97<sup>th</sup> percentile of the available DMR data at this site for stormwater outfalls, which does not include data from #007 and #010 base flow in the previous permit. BMPs may require improvement (as determined by the BMP Plan) to consistently meet the benchmarks of the permit.

### **Iron, Total Recoverable**

Quarterly monitoring with a benchmark of 4,000 µg/L. The previous permit required monitoring only. Data ranged from 74.7 µg/L up to 5,490 µg/L. 4,000 µg/L is known to be an achievable benchmark at industrial sites utilizing typical BMPs. The BMP plan in this permit requires the facility to address BMPs to improve compliance with the benchmarks of this permit. It is anticipated the facility's data will improve for this parameter after implementation of the BMP measures decided on in the Plan.

### **Lead, Total Recoverable**

Quarterly monitoring, continued from the previous permit. Lead is a known pollutant of concern at this site and in the industry, therefore monitoring is continued. Other outfalls at this site showed non-detections; however, outfall #007 (high flow) reported 31.8 µg/L. As it is a pollutant found in the effluent, monitoring is continued at this outfall.

## **NUTRIENTS:**

### **Ammonia, Total as Nitrogen**

Application materials reported high levels of ammonia at outfalls #007 and #010; however, during the pre-public notice period, the facility stated the values for total nitrogen were reported in place of ammonia values. Total nitrogen is found by adding the fractions of nitrate + nitrite, and total kjeldahl nitrogen. Monitoring for each of these fractions is required in this permit cycle to determine the type of nitrogen at the site. This can help the facility determine the source of the discharge and work to eliminate it. As ammonia is a required component of TKN, it is not included as a separate parameter for monitoring in this permit.

### **Nitrate plus Nitrite; Total Kjeldahl Nitrogen (TKN)**

Quarterly monitoring. Nitrogen is expected to be present in this discharge (per application materials). Application materials reported high levels of ammonia at outfalls #007 and #010; however, during the pre-public notice period, the facility stated the values for total nitrogen were reported in place of ammonia values. Total nitrogen is found by adding the fractions of nitrate + nitrite, and total Kjeldahl nitrogen. Monitoring for each of these fractions is required in this permit cycle to determine the type of nitrogen at the site. This can help the facility determine the source of the discharge and work to eliminate it.

### **Phosphorus, Total P (TP)**

Phosphorus is expected to be present in this discharge, as reported in previous DMRs, therefore monitoring is required.

### **Nitrogen, Total as N**

Reporting of total nitrogen is removed, as the permit now requires the reporting of the fractions used to calculate total nitrogen.

## **OTHER:**

### **Chloride**

Quarterly monitoring with a benchmark of 860 µg/L. The previous permit required monitoring only for this parameter; however, the facility reports de-icing activities, and the data shows elevated values mostly in the winter.

### **Sulfate**

Quarterly monitoring required to determine chloride plus sulfate below. The facility shall sample and independently report the analytical value of sulfate.

### **Chloride Plus Sulfate**

Quarterly monitoring with a benchmark 1000 mg/L. This is a new requirement in this permit cycle. A review of the data finds elevated levels of chloride, as high as 912 mg/L, which indicate added sulfate values may exceed the benchmark placed on this parameter. The facility should seek BMPs to help ensure lower levels of chlorides in the discharges from the site, possibly including management of de-icing materials.

## **Outfall #010, #012, #013, #014, #015, #016, #017– Stormwater Only**

### **EFFLUENT LIMITATIONS TABLE:**

PARAMETERS	UNIT	DAILY MAXIMUM LIMIT	BENCH- MARK	PREVIOUS PERMIT LIMITS	MINIMUM SAMPLING FREQUENCY	REPORTING FREQUENCY	SAMPLE TYPE
PHYSICAL							
FLOW	MGD	*	-	SAME	ONCE/QUARTER	ONCE/QUARTER	24 HR. ESTIMATE
PRECIPITATION	MONITORING REMOVED						
CONVENTIONAL							
COD	mg/L	**	141	SAME	ONCE/QUARTER	ONCE/QUARTER	GRAB
OIL & GREASE	mg/L	**	10	***	ONCE/QUARTER	ONCE/QUARTER	GRAB
pH †	SU	6.0-9.0	-	***	ONCE/QUARTER	ONCE/QUARTER	GRAB
SETTLEABLE SOLIDS	mL/L/hr	**	1.5	***	ONCE/QUARTER	ONCE/QUARTER	GRAB
TSS	mg/L	**	100	SAME	ONCE/QUARTER	ONCE/QUARTER	GRAB
METALS							
ALUMINUM, TR	µg/L	**	750	***	ONCE/QUARTER	ONCE/QUARTER	GRAB
CADMIUM, TR	MONITORING REMOVED						
CHROMIUM VI, DISSOLVED	MONITORING REMOVED						
COPPER, TR	µg/L	**	21	***	ONCE/QUARTER	ONCE/QUARTER	GRAB
IRON, TR	µg/L	**	4,000	***	ONCE/QUARTER	ONCE/QUARTER	GRAB
LEAD, TR	MONITORING REMOVED						
NUTRIENTS							
NITRATE PLUS NITRITE	mg/L	*	-	NEW	ONCE/QUARTER	ONCE/QUARTER	GRAB
TOTAL KJELDAHL NITROGEN (TKN)	mg/L	*	-	NEW	ONCE/QUARTER	ONCE/QUARTER	GRAB
PHOSPHORUS, TOTAL (TP)	mg/L	*	-	***	ONCE/QUARTER	ONCE/QUARTER	GRAB
NITROGEN, TOTAL (TN)	REPORTING REMOVED						
OTHER							
CHLORIDE	mg/L	**	860	***	ONCE/QUARTER	ONCE/QUARTER	GRAB
CHLORIDE + SULFATE	mg/L	**	1,000	NEW	ONCE/QUARTER	ONCE/QUARTER	GRAB
SULFATE	mg/L	*	-	NEW	ONCE/QUARTER	ONCE/QUARTER	GRAB

- \* Monitoring and reporting requirement only
- \*\* Monitoring with associated benchmark
- \*\*\* Requirements varied by outfall. See parameter descriptions below for more specific information.
- † Report the minimum and maximum pH values; pH is not to be averaged
- 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 ensure compliance with permitted effluent limitations. If the facility is unable to obtain estimated effluent flow, then it is the responsibility of the facility to inform the Department, which may require the submittal of an operating permit modification. The facility will report the estimated total flow in millions of gallons per day (MGD), quarterly monitoring continued from previous permit.

#### **Precipitation**

Monitoring for precipitation is removed from the permit. Precipitation data is readily available online.

### **CONVENTIONAL:**

#### **Chemical Oxygen Demand (COD)**

Quarterly monitoring with 141 mg/L daily maximum benchmark is continued from the previous permit. The benchmark was exceeded once in the previous permit cycle at outfall #012. There is no numeric 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 facility to identify increases in COD may indicate materials/chemicals coming into contact with stormwater causing an increase in oxygen demand. Increases in COD may indicate a need for maintenance or improvement of BMPs. The benchmark value falls within the range of values implemented in other permits having similar industrial activities and is achievable through proper BMP controls.

#### **Oil & Grease**

Quarterly monitoring with a daily maximum benchmark of 10 mg/L. The previous permit required a limit of 15 mg/L at outfalls #010, #012 and #014, and a benchmark of 15 mg/L at outfalls #013, #015, and #016. Limits were removed and replaced with a benchmark at outfalls #010, #012 and #014 as no reasonable potential for exceedances of the water quality standards, narrative or numeric, are found in the DMR reports. 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 xylene, 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 A1: *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). Ten 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 facility to visually observe the discharge and receiving waters for sheen or bottom deposits. The benchmark is achievable through proper operational and maintenance of BMPs and falls within the range of values implemented in other permits having similar industrial activities.

#### **pH**

Quarterly monitoring with a limit of 6.0 to 9.0 SU. Technology based limits are applicable to this outfall. The permit writer has determined there is no reasonable potential to affect water quality at these outfalls, therefore technology-based limitations are continued from the previous permit.

#### **Settleable Solids (SS)**

Quarterly monitoring with a daily maximum benchmark of 1.5 mL/L/hour, continued from the previous permit. Outfall #010 had a limit in the previous permit cycle; however, the facility has ceased cooling water discharges to this outfall, therefore benchmarks are appropriate. DMR data ranged from 0.1 mL/L/hr up to 1.0 mL/L/hr in the previous permit cycle at these outfalls. There is no numeric water quality standard for SS; however, sediment discharges can negatively impact aquatic life habitat. Settleable solids are also a valuable indicator parameter in stormwater. Solids monitoring allows the facility to identify increases in sediment and solids may indicate uncontrolled materials leaving the site. The benchmark value falls within the range of values implemented in other permits having similar industrial activities.

#### **Total Suspended Solids (TSS)**

Quarterly monitoring with a daily maximum benchmark of 100 mg/L, continued from the previous permit. The DMR data at these outfalls ranged from 6 mg/L up to 409 mg/L. There is no numeric 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 facility to

identify increases in TSS indicating uncontrolled materials leaving the site. Increased TSS numbers can indicate a need for increased BMPs or maintenance on BMPs, which will be addressed through the required BMP plan at this 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. The benchmark is achievable through proper operational and maintenance of BMPs and falls within the range of values implemented in other permits having similar industrial activities.

## **METALS:**

### **Aluminum, Total Recoverable**

Quarterly monitoring with a daily maximum benchmark of 750 µg/L, continued from the previous permit. Outfall #010 required monitoring only for this parameter. Data was varied, ranging from 71.4 µg/L up to 9,290 µg/L. These values indicate a need to improve BMPs at the site, which will be addressed through the required BMP plan for this permit. Consistently exceeding benchmarks at the site without improvement of BMPs may be considered a violation of the permit. The facility is located in a Metropolitan No-discharge watershed, and non-compliance with the permit would require the facility to stop discharging stormwater to the watershed. Through the BMP plan, the facility will consider measures to improve compliance with the benchmarks on this parameter at all outfalls.

### **Chromium VI, Dissolved**

Monitoring for this parameter is removed as DMR data does not indicate it is a pollutant of concern at the site.

### **Copper, Total Recoverable**

Quarterly monitoring with a benchmark of 21 µg/L. The previous permit had variable requirements at stormwater outfalls in the previous permit cycle. Monitoring was required with a benchmark only at outfall #006 and a limit of 70 µg/L at outfall #010. This parameter is added to all outfalls in this permit as it is a known pollutant of concern at the site, and consistent data is needed from all outfalls to be able to assess the discharges at this site comprehensively. The benchmark was determined using the 97<sup>th</sup> percentile of all stormwater data from the site, excluding outfall #007 and #010 base flow data from the previous permit requirements.

### **Iron, Total Recoverable**

Quarterly monitoring, with a benchmark of 4,000 µg/L. The previous permit had variable monitoring requirements at the outfalls. Outfalls #013 and #015 did not require monitoring in the previous permit; however, as the pollutants of concern are expected to be similar at all outfalls, monitoring is added to these outfalls. Data in the previous permit cycle ranged from 67 µg/L up to 11,600 µg/L. A benchmark is added at all the outfalls, 4,000 µg/L. This value will require improvements to the BMPs at the site to consistently meet the benchmark, which will be addressed by the BMP plan. This benchmark is placed in the typical range of iron benchmarks at similar facilities and is believed to be achievable at industrial sites with well-maintained BMPs.

### **Cadmium, Total Recoverable; Lead, Total Recoverable**

Monitoring for these pollutants is removed, as DMR data does not indicate they are pollutants of concern at these outfalls.

## **NUTRIENTS:**

### **Ammonia, Total as Nitrogen**

Elevated values of ammonia were reported at these outfalls in the application materials. Comments in the pre-public notice period indicated the values reported for ammonia were, in fact, total nitrogen; therefore, this permit requires monitoring for the species of nitrogen which are used to obtain total nitrogen. Ammonia is included in the TKN fraction, therefore reporting for ammonia separately is not required.

### **Nitrate plus Nitrite; Total Kjeldahl Nitrogen (TKN)**

Quarterly monitoring. This is a new requirement in this permit. Elevated ammonia values were reported at these outfalls in the application materials. Comments in the pre-public notice period indicated the values reported for ammonia were, in fact, total nitrogen; therefore, this permit requires monitoring for the species of nitrogen which are used to obtain total nitrogen. Monitoring is required to fully characterize the effluent.

### **Phosphorus, Total**

Quarterly monitoring. The monitoring requirements for this pollutant were variable in the previous permit. Outfall #016 did not require monitoring. Data indicates this is a pollutant of concern at the site; therefore, monitoring is continued and extended to outfall #016 for a complete characterization of nutrient discharges at this site.

### **Nitrogen, Total**

Monitoring for total nitrogen is removed as it has been split into its component parts for monitoring in this permit cycle. It will help clarify nutrient discharges at this site to have an idea of which fraction of nitrogen is being measured in the discharges.

### **OTHER:**

#### **Chloride**

Quarterly monitoring with a benchmark of 860 µg/L. The previous permit had variable monitoring requirements for this parameter, with outfall #016 not requiring monitoring for this pollutant. This is a known pollutant of concern at the site, and is known to be elevated at other outfalls, therefore a benchmark is added to all stormwater outfalls so for the facility to assess their BMP measures for effectiveness for chloride discharges. Increased numbers for this pollutant should be addressed by the BMP Plan required in this permit.

#### **Sulfate**

Monitoring required to determine chloride plus sulfate below. The facility shall sample and independently report the analytical value of sulfate.

#### **Chloride Plus Sulfate**

Quarterly monitoring with a 1,000 mg/L benchmark. This is new to this permit cycle. The site reports chloride as a pollutant of concern. Monitoring is added to fully characterize chloride and sulfate discharges at the site. The benchmark is set at 1,000 mg/L, for the facility to assess their BMP's effectiveness at removing chloride plus sulfate from the discharges.

## **PART V. 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.

### **PERMIT SYNCHRONIZATION:**

Permits are normally issued on a five-year term, but to achieve watershed synchronization some permits will need to be issued for less than the full five years as allowed by regulation. The intent is 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 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 two years old, such 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.

- ✓ If the Department issues the permit at this time, the effective period of the permit would be less than one year in length. To ensure efficient use of Department staff time, reduce the Department's permitting back log, and to provide better service to the facility by avoiding another renewal application to be submitted in such a short time period, this operating permit will be issued for the maximum timeframe of five years and synced with other permits in the watershed at a later date.

### **PUBLIC NOTICE:**

The Department shall give public notice a draft permit has been prepared and its issuance is pending. Additionally, public notice will be issued if a public hearing is to be held because of a significant degree of interest in or with 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 facility must be notified of the denial in writing. <http://dnr.mo.gov/env/wpp/permits/pn/index.html> The Department must issue public notice of a pending operating 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 wishing to submit comments regarding this proposed operating permit, 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. All comments must be in written form.

- ✓ The Public Notice period for this operating permit began September 24, 2021, and ended October 25, 2021. Comments were received from the facility, but the permit was not changed to address these comments.

**DATE OF FACT SHEET:** 04/16/2021

**COMPLETED BY:**

JESSICA VITALE, ENVIRONMENTAL ANALYST

MISSOURI DEPARTMENT OF NATURAL RESOURCES

WATER PROTECTION PROGRAM

OPERATING PERMITS SECTION – STORMWATER AND CERTIFICATION UNIT

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STANDARD CONDITIONS FOR NPDES PERMITS  
ISSUED BY  
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.**
  - a. 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.
3. **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.
4. **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.

6. **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:
    - i. 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.





STANDARD CONDITIONS FOR NPDES PERMITS  
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- b. The following shall be included as information which must be reported within 24 hours under this paragraph.
    - i. Any unanticipated bypass which exceeds any effluent limitation in the permit.
    - ii. Any upset which exceeds any effluent limitation in the permit.
    - iii. 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.
3. **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 permit.
    - 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.
    - c. Monitoring results shall be reported to the Department no later than the 28<sup>th</sup> day of the month following the end of the reporting period.
- b. Notice.
    - i. 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:
      1. 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
      3. 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. 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:
      - i. 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.
    - b. Burden of proof. In any enforcement proceeding, the permittee seeking to establish the occurrence of an upset has the burden of proof.

## 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.

## Section D – Administrative Requirements

1. **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



STANDARD CONDITIONS FOR NPDES PERMITS  
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MISSOURI CLEAN WATER COMMISSION  
REVISED  
AUGUST 1, 2014

- 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 I 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.
- d. 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 permittee 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.)
3. **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.
4. **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;
- ii. Having obtained this permit by misrepresentation or failure to disclose fully any relevant facts;
- iii. 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.
9. **Property Rights.** This permit does not convey any property rights of any sort, or any exclusive privilege.



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MISSOURI CLEAN WATER COMMISSION  
REVISED  
AUGUST 1, 2014

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:
  - a. 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;
  - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
  - c. 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.**
  - a. 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.

28 June, 2024

Missouri Department of Natural Resources  
Water Protection Program  
Industrial Operating Permits Section  
P.O. Box 176  
Jefferson City, MO 65102-0176

**Subject: The Boeing Company Missouri State Operating Permit (MO-0004782)  
Modification Application**

Dear Permitting Staff,

On behalf of The Boeing Company (Boeing), please find enclosed completed Missouri State Operating Permit (MSOP; MO-0004782) modification application materials for the Boeing St. Louis, Missouri facility (facility). In 2021, Outfall 07A was added to facility's MSOP to isolate intermittent, non-contact cooling water discharges that historically discharged to Outfall 07. As a result, Outfall 07 was re-named Outfall 07B. Therefore, Outfall 07B flow consists mainly of stormwater, however, Outfall 07A flows directly to Outfall 07B, so the intermittent, non-contact cooling water ultimately leaves the facility at Outfall 07B.

Since its addition to the MSOP, Outfall 07A discharges have exceeded pH effluent limitations on multiple occasions. pH exceedances are due to the use of municipal water as the source for cooling water, which has a high background pH (typically above 9.0 S.U.). In 2023, Boeing entered an Abatement Order of Consent (AOC; Order No. 2023-WPCB-1827) with the Missouri Department of Natural Resources (MDNR) to eliminate Outfall 07A discharges. To comply with the AOC, Boeing installed a non-contact cooling water recirculating system that eliminates discharges from Outfall 07A. Discharges to Outfall 07A ceased on June 17, 2024. Boeing submits the attached MSOP modification application to the MDNR to comply with item 11 in the AOC, which requires an application for a modified MSOP within 30 days of construction completion eliminating Outfall 07A. The AOC will be terminated within 60 days of completion of construction or on July 1, 2024, per item 13 in the AOC. Form A and Form C are included in this application in accordance with MDNR guidelines.

If you have any questions or concerns, please contact Mike Hogan at [mhogan@geosyntec.com](mailto:mhogan@geosyntec.com) at your earliest convenience.

28 June 2024  
Page 2

Sincerely,

Mike Hogan

A handwritten signature in black ink, appearing to read 'Mike Hogan', with a stylized flourish at the end.

Project Scientist  
Geosyntec Consultants, Inc

Enclosures:

Attachment 1: Form A - Application for Nondomestic Permit Under Missouri Clean Water Law

Attachment 2: Form C - Application for Discharge Permit – Manufacturing Commercial, Mining, Silviculture, Operations and Stormwater

Copies to:

Christina Reich, The Boeing Company, Environmental Engineer  
Brendan McGhee, The Boeing Company, Senior Manager, Environmental Engineering



# Attachment 1 – Form A



MISSOURI DEPARTMENT OF NATURAL RESOURCES  
WATER PROTECTION PROGRAM  
**FORM A – APPLICATION FOR NONDOMESTIC PERMIT UNDER MISSOURI  
CLEAN WATER LAW**

**FOR AGENCY USE ONLY**

CHECK NUMBER

DATE RECEIVED

FEE SUBMITTED

JET PAY CONFIRMATION NUMBER

**PLEASE READ ALL THE ACCOMPANYING INSTRUCTIONS BEFORE COMPLETING THIS FORM.  
SUBMITTAL OF AN INCOMPLETE APPLICATION MAY RESULT IN THE APPLICATION BEING RETURNED.**

**IF YOUR FACILITY IS ELIGIBLE FOR A NO EXPOSURE EXEMPTION:**

Fill out the No Exposure Certification Form (Mo 780-2828): <https://dnr.mo.gov/forms/780-2828-f.pdf>

**1. REASON FOR APPLICATION:**

- ☐ a. This facility is now in operation under Missouri State Operating Permit (permit) MO – \_\_\_\_\_, is submitting an application for renewal, and there is no proposed increase in design wastewater flow. Annual fees will be paid when invoiced and there is no additional permit fee required for renewal.
- ☐ b. This facility is now in operation under permit MO – \_\_\_\_\_, is submitting an application for renewal, and there is a proposed increase in design wastewater flow. Antidegradation Review may be required. Annual fees will be paid when invoiced and there is no additional permit fee required for renewal.
- ☐ c. This is a facility submitting an application for a new permit (for a new facility). Antidegradation Review may be required. New permit fee is required.
- ☒ d. This facility is now in operation under Missouri State Operating Permit (permit) MO – 0004782 and is requesting a modification to the permit. Antidegradation Review may be required. Modification fee is required.

**2. FACILITY**

NAME The Boeing Company		TELEPHONE NUMBER WITH AREA CODE (314) 232-2817	
ADDRESS (PHYSICAL) 6200 James McDonnell Blvd.	CITY St. Louis	STATE MO	ZIP CODE 63134

**3. OWNER**

NAME The Boeing Company		TELEPHONE NUMBER WITH AREA CODE (314) 232-2817	
EMAIL ADDRESS christina.j.reich@boeing.com			
ADDRESS (MAILING) P.O. Box 516, Mail Code S106-7265	CITY St. Louis	STATE MO	ZIP CODE 63166-0516

**4. CONTINUING AUTHORITY**

NAME The Boeing Company		TELEPHONE NUMBER WITH AREA CODE (314) 232-2817	
EMAIL ADDRESS christina.j.reich@boeing.com			
ADDRESS (MAILING) P.O. Box 516, Mail Code S106-7265	CITY St. Louis	STATE MO	ZIP CODE 63166-0516

**5. OPERATOR CERTIFICATION**

NAME N/A	CERTIFICATE NUMBER	TELEPHONE NUMBER WITH AREA CODE	
ADDRESS (MAILING)	CITY	STATE	ZIP CODE

**6. FACILITY CONTACT**

NAME Christina Reich	TITLE Environmental Engineer	TELEPHONE NUMBER WITH AREA CODE (314) 232-2817
E-MAIL ADDRESS christina.j.reich@boeing.com		

**7. DOWNSTREAM LANDOWNER(S)** Attach additional sheets as necessary.

NAME Norfolk Southern Railroad			
ADDRESS 6403 Graham Road	CITY St. Louis	STATE MO	ZIP CODE 63134

MO 780-1479 (04-21)

**8. ADDITIONAL FACILITY INFORMATION****8.1 Legal Description of Outfalls. (Attach additional sheets if necessary.)**

*For Universal Transverse Mercator (UTM), use Zone 15 North referenced to North American Datum 1983 (NAD83)*

001             <sup>1</sup>/<sub>4</sub>             <sup>1</sup>/<sub>4</sub>      Sec             T             R                    County  
UTM Coordinates Easting (X):                           Northing (Y):                     

002             <sup>1</sup>/<sub>4</sub>             <sup>1</sup>/<sub>4</sub>      Sec             T             R                    County  
UTM Coordinates Easting (X):                           Northing (Y):                     

003             <sup>1</sup>/<sub>4</sub>             <sup>1</sup>/<sub>4</sub>      Sec             T             R                    County  
UTM Coordinates Easting (X):                           Northing (Y):                     

004             <sup>1</sup>/<sub>4</sub>             <sup>1</sup>/<sub>4</sub>      Sec             T             R                    County  
UTM Coordinates Easting (X):                           Northing (Y):                     

**See Attachment 1-A for legal descriptions of outfalls**

Include all subsurface discharges and underground injection systems for permit consideration.

**8.2 Primary Standard Industrial Classification (SIC) and Facility North American Industrial Classification System (NAICS) Codes.**

Primary SIC 3721      and NAICS 336411      SIC             and NAICS         
SIC             and NAICS             SIC             and NAICS       

**9. ADDITIONAL FORMS AND MAPS NECESSARY TO COMPLETE THIS APPLICATION**

- A. Is this permit for a manufacturing, commercial, mining, solid/hazardous waste, or silviculture facility? YES ☒ NO ☐  
If yes, complete Form C.
- B. Is the facility considered a "Primary Industry" under EPA guidelines (40 CFR Part 122, Appendix A) : YES ☐ NO ☒  
If yes, complete Forms C and D.
- C. Is wastewater land applied? YES ☐ NO ☒  
If yes, complete Form I.
- D. Are sludge, biosolids, ash, or residuals generated, treated, stored, or land applied? YES ☐ NO ☒  
If yes, complete Form R.
- E. Have you received or applied for any permit or construction approval under the CWA or any other environmental regulatory authority? YES ☒ NO ☐  
If yes, please include a list of all permits or approvals for this facility:  
Environmental Permits for this facility: See Attachment 1-A
- F. Do you use cooling water in your operations at this facility? YES ☒ NO ☐  
If yes, please indicate the source of the water: Missouri American Water
- G. Attach a map showing all outfalls and the receiving stream at 1" = 2,000' scale. **See Attachment 1-B for Map**

**10. ELECTRONIC DISCHARGE MONITORING REPORT (eDMR) SUBMISSION SYSTEM**

Per 40 CFR Part 127 National Pollutant Discharge Elimination System (NPDES) Electronic Reporting Rule, reporting of effluent limits and monitoring shall be submitted by the permittee via an electronic system to ensure timely, complete, accurate, and nationally consistent set of data. **One of the following must be checked in order for this application to be considered complete.** Please visit <https://dnr.mo.gov/env/wpp/edmr.htm> for information on the Department's eDMR system and how to register.

☐ - I will register an account online to participate in the Department's eDMR system through the Missouri Gateway for Environmental Management (MoGEM) before any reporting is due, in compliance with the Electronic Reporting Rule.

☒ - I have already registered an account online to participate in the Department's eDMR system through MoGEM.

☐ - I have submitted a written request for a waiver from electronic reporting. See instructions for further information regarding waivers.

☐ - The permit I am applying for does not require the submission of discharge monitoring reports.

## 11. FEES

Permit fees may be paid by attaching a check, or online by credit card or eCheck through the JetPay system. Use the URL provided to access JetPay and make an online payment:

For new permits: <https://magic.collectorsolutions.com/magic-ui/payments/mo-natural-resources/591>

For modifications: <https://magic.collectorsolutions.com/magic-ui/payments/mo-natural-resources/596>

## 12. CERTIFICATION

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.

NAME AND OFFICIAL TITLE (TYPE OR PRINT)

Brendan McGhee - Senior Manager, Environmental Engineering

TELEPHONE NUMBER WITH AREA CODE

(253) 329-0895

SIGNATURE

*Brendan McGhee*

DATE SIGNED

6/27/24

MO 780-1479 (04-21)

**BEFORE SUBMITTING, PLEASE ENSURE ALL SECTIONS ARE COMPLETED AND ADDITIONAL FORMS, IF APPLICABLE, ARE INCLUDED.**

**INSTRUCTIONS FOR COMPLETING FORM A - APPLICATION FOR NONDOMESTIC PERMIT**

1. Check which option is applicable. **Do not check more than one item.** Nondomestic permit refers to permits issued by the Department of Natural Resources' Water Protection Program for all **nondomestic** wastewater treatment facilities, including all industry, stormwater, and Class IA Concentrated Animal Feeding Operations (CAFO). **This includes all nondomestic wastewater treatment facilities that incorporate domestic wastewater into the operating permit.**

For some new or modified permits, a construction permit is required prior to beginning construction at the facility. For other permits, an exemption is provided from construction permit requirements. Please review the requirements at <http://dnr.mo.gov/env/wpp/permits/ww-construction-permitting.htm>. If the facility is for wastewater treatment and is designed for greater than 22,500 gallons per day, the engineering report must be submitted and approved prior to submittal of the application, fee, plans, and specifications. A summary of design data must be submitted with the engineering plans and specifications.

For new wastewater facilities, some wastewater permit modifications, and some permit renewals with proposed increase in design wastewater flow, an antidegradation review may be required. Please visit <https://dnr.mo.gov/env/wpp/permits/antideg-implementation.htm> for more information

2. Facility - Provide the name by which this facility is known locally. Example: Southwest Sewage Treatment Plant, Country Club Mobile Home Park, etc. Also include the street address or location of the facility. If the facility lacks a street name or route number, give the names of the closest intersection, highway, county road, etc.
3. Owner - Provide the legal name and address of owner or company.
4. Continuing Authority – A continuing authority is a company, business, entity, or person(s) operating the facility and/or ensuring compliance with the permit requirements. A continuing authority is not, however, an entity or individual that is contractually hired by the permittee to sample or operate and maintain the system for a defined time period, such as a certified operator or analytical laboratory. To access the regulatory requirement regarding continuing authority, 10 CSR 20-6.010(2), please visit <https://s1.sos.mo.gov/cmsimages/adrules/csr/current/10csr/10c20-6.pdf>. A continuing authority's name must be listed **exactly** as it appears on the Missouri Secretary of State's (SoS's) webpage: <https://bsd.sos.mo.gov/BusinessEntity/BESearch.aspx?SearchType=0>, unless the continuing authority is an individual(s), government, or otherwise not required to register with the SoS.
5. Operator - Provide the name, certificate number, mailing address and telephone number of the person operating the facility, if required by regulation (10 CSR 20-9.020(2)). Most industrial facilities will not be required to have a certified wastewater operator.
6. Provide the name, title, and work telephone number of a person who is thoroughly familiar with the operation of the facility, with the facts reported in this application, and who can be contacted by the department, if necessary. This person will need to be available to respond to emails which will include pre-public notice drafts of permits.
7. Please provide the name and address of the first downstream landowner, different from that of the permitted facility, through whose property the discharge will flow. Also, please indicate the location on the map. For discharges that leave the permitted facility and flow under a road or highway, or along the right-of-way, the downstream property owner is the landowner that the discharge flows to after leaving the right-of-way. For no discharge facilities, provide this information for the location where discharge would flow if there was one. For land application sites, include the owners of the land application sites and all adjacent landowners.
- 8.1 An outfall is the point at which wastewater or stormwater is discharged. Outfalls should be given in terms of the legal description of the facility. Global Positioning System, or GPS, is a satellite-based navigation system. The department prefers a GPS receiver is used at the outfall pipe and the displayed coordinates submitted. If access to a GPS receiver is not available, please use a mapping system to approximate the coordinates. This section also needs to include any subsurface discharges, discharges to groundwater, sinkholes or subsurface seepage from storage basins. This section also needs to include underground injection into wells, conduits to groundwater and shallow subsurface dispersal fields (leach fields).
- 8.2 List only your primary Standard Industrial Classification (SIC), and North American Industry Classification System (NAICS) code for each outfall. The SIC system was devised by the U.S. Office of Management and Budget to cover all economic activities. To find the correct SIC code, an applicant may check his or her unemployment insurance forms or contact the Missouri Division of Employment Security, 573-751-3215. The primary SIC code is that of the operation that generates the most revenue. If this information is not available, the number of employees or, secondly, production rate may be used to determine your SIC code. Additional information for Standard Industrial Codes can be found at [www.osha.gov/pls/imis/sicsearch.html](http://www.osha.gov/pls/imis/sicsearch.html) and for the North American Industry Classification System at [www.census.gov/naics](http://www.census.gov/naics) or contact the appropriate Department of Natural Resources regional office.



**INSTRUCTIONS FOR COMPLETING FORM A - APPLICATION FOR NONDOMESTIC PERMIT  
(CONTINUED)**

9. If you answer yes to A, B, C, D, or E, then you must complete and file the supplementary form(s) indicated. 40 CFR 122.21(f) and (g) requires the facility to submit the information requested herein. For 9.E., please include all permits or approvals, including construction, issued under the Hazardous Waste Management Program (RCRA), the Safe Drinking Water Act, Clean Air Act, or any other permits issued under the Clean Water Act.

A U.S. Geological Survey 1" = 2,000' scale map must be submitted with the permit application showing all outfalls, the receiving stream and the location of the downstream property owners. This type of map can be obtained from the Missouri Department of Natural Resources' Geological Survey in Rolla at 573-368-2100 or various online mapping applications.

10. Electronic Discharge Monitoring Report (eDMR) Submission System – Visit the eDMR site at <http://dnr.mo.gov/env/wpp/edmr.htm> and click on the "Facility Participation Package" link. The eDMR Permit Holder and Certifier Registration Form and information about the eDMR system can be found in the Facility Participation Package.

Waivers from electronic reporting may be granted by the Department per 40 CFR 127.15 under certain, special circumstances. A written request must be submitted to the Department for approval. Waivers may be granted to facilities owned or operated by:

- A. Members of religious communities that choose not to use certain technologies.
- B. Permittees located in areas with limited broadband access. The National Telecommunications and Information Administration (NTIA) in collaboration with the Federal Communications Commission (FCC) have created a broadband internet availability map: <http://www.broadbandmap.gov/>. Please contact the department if you need assistance.

11. Please visit <https://dnr.mo.gov/pubs/pub2564.htm> for permit fees. This form must be submitted with the application fee if requesting a new permit, permit modification or permit transfer.

Fee schedules are listed in regulation at 10 CSR 20-6.011, <https://s1.sos.mo.gov/cmsimages/adrules/csr/current/10csr/10c20-6.pdf>.

Incomplete permit applications and/or related engineering documents will be returned by the department if they are not completed in the time frame established in a comment letter from the department to the owner. Permit fees for returned applications shall be forfeited. Permit fees for applications being processed by the department that are withdrawn by the applicant shall be forfeited.

12. Certification/Signature - All applications must be signed as follows and the signature must be **original**:
- A. For a corporation, by an officer having responsibility for the overall operation of the regulated facility or activity or for environmental matters.
  - B. For a partnership or sole proprietorship, by a general partner or the proprietor.
  - C. For a municipal, state, federal or other public facility, by either a principal executive officer or by an individual having overall responsibility for environmental matters at the facility.

<b>Send completed form and fees (if not submitted electronically) to :</b>
<a href="mailto:cleanwaterpermits@dnr.mo.gov">cleanwaterpermits@dnr.mo.gov</a> or Missouri Department Of Natural Resources Water Protection Program Water Pollution Control Branch ATTN: Operating Permits Section P.O. BOX 176 JEFFERSON CITY, MO 65102-0176

If there are any questions concerning this form, contact the Department of Natural Resources' Water Protection Program, Operating Permits Section at 800-361-4827 or 573-522-4502.

## **The Boeing Company Operating Permit MO-0004782 Modification Application**

### **Attachment 1-A**

#### **Form A, Section 8.1 – Legal Descriptions of Outfalls**

Outfall 006 – NW ¼, Sec. 4, T46N, R6E, St. Louis County

UTM Coordinates Easting (X): 730393, Northing (Y): 4293048

Outfall 006 was removed in 2021 and receives no industrial contributions

Outfall 07B – NW ¼, Sec. 4, T46N, R6E, St. Louis County

UTM Coordinates Easting (X): 730334, Northing (Y): 4293244

Outfall 010 – NW ¼, Sec. 4, T46N, R6E, Land Grant 2979, St. Louis County

UTM Coordinates Easting (X): 731040, Northing (Y): 4293132

Outfall 012 – NW ¼, Sec. 4, T46N, R6E, Land Grant 3069, St. Louis County

UTM Coordinates Easting (X): 729626, Northing (Y): 4292668

Outfall 013 – NW ¼, Sec. 4, T46N, R6E, St. Louis County

UTM Coordinates Easting (X): 730208, Northing (Y): 4293262

Outfall 014 – NW ¼, Sec. 4, T46N, R6E, Land Grant 2979, St. Louis County

UTM Coordinates Easting (X): 730644, Northing (Y): 4293498

Outfall 015 – NW ¼, Sec. 4, T46N, R6E, Land Grant 2979, St. Louis County

UTM Coordinates Easting (X): 731086, Northing (Y): 4293046

Outfall 016 – NW ¼, Sec. 4, T46N, R6E, Land Grant 5, St. Louis County

UTM Coordinates Easting (X): 728915, Northing (Y): 4293993

Outfall 017 - NW ¼, Sec. 4, T46N, R6E, Land Grant 5, St. Louis County

UTM Coordinates Easting (X): 730280, Northing (Y): 4293630

#### **Form A, Section 9.E. – Additional Environmental Permits**

RCRA Generator Info:

Tract I – EPA ID MOD000818963, State ID 001001

Tract II North – EPA ID MOD980968457, State ID 004217

Tract II East & West – EPA ID MOD000818906, State ID 001248

Part 70 Permit to Operate (air) OP2021-014

Land Disturbance Permits MORA24672 and MORA25445



<b>Legend</b> ● Permitted Outfall	<b>Outfalls and Receiving Stream</b>	
	Boeing STL Facility Berkeley, Missouri	
	<b>Geosyntec</b> consultants	<b>Attachment</b>  <b>1-B</b>
CSWR 3016		June 2024

## Attachment 2 – Form C



MISSOURI DEPARTMENT OF NATURAL RESOURCES  
WATER PROTECTION PROGRAM, WATER POLLUTION CONTROL BRANCH  
**FORM C – APPLICATION FOR DISCHARGE PERMIT – MANUFACTURING, COMMERCIAL,  
MINING, SILVICULTURE OPERATIONS, AND STORMWATER**

**GENERAL INFORMATION (PLEASE SEE INSTRUCTIONS)**

1.0 NAME OF FACILITY

The Boeing Company

1.1 THIS FACILITY IS OPERATING UNDER MISSOURI STATE OPERATING PERMIT (MSOP) NUMBER:

MO-0004782

1.2 IS THIS A NEW FACILITY? PROVIDE CONSTRUCTION PERMIT (CP) NUMBER IF APPLICABLE.

N/A

1.3 Describe the nature of the business, in detail. Identify the goods and services provided by the business. Include descriptions of all raw, intermediate, final products, byproducts, or waste products used in the production or manufacturing process, stored outdoors, loaded or transferred and any other pertinent information for potential sources of wastewater or stormwater discharges.

The Boeing Company manufactures military and commercial aircraft such as the F15 and F18 Fighter Jets. Outfalls 07B, 010, 012, 013, 014, 015, 016, and 017 are used exclusively for stormwater discharges. Outfall 006 was removed in 2021 and does not discharge, while Outfalls 07A will no longer discharge as a result of the installation of a non-contact cooling water recirculating system. To support manufacturing efforts, outdoor activities include vehicle fueling, pedestrian walkway deicing, bulk loading of waste and recycled products, bulk loading and unloading of acids and caustics to support chemical processing, and the unloading of fuel products. All waste and recycled products that are stored outdoors are contained, covered, and are not typically exposed to stormwater. These products include aviation fuel, petroleum fuel, various oil-based substances, and liquid nitrogen, as well as non-bulk items such as solvents, paints, and building support chemicals.

**FLOWS, TYPE, AND FREQUENCY**

2.0 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 and maximum flows between intakes, operations, treatment units, evaporation, public sewers, and outfalls. If a water balance cannot be 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.

See Attachment 2-A

2.1 For each outfall (1) below, provide: (2) a description of all operations contributing wastewater to the effluent, including process wastewater, sanitary wastewater, cooling water, stormwater runoff, and any other process or non-process wastewater, (3) the average flow and maximum flow (put max in parentheses) contributed by each operation and the sum of those operations, (4) the treatment received by the wastewater, and (5) the treatment type code. Continue on additional sheets if necessary.

1. OUTFALL NO.	2. OPERATION(S) CONTRIBUTING FLOW; INCLUDE ALL PROCESSES AND SUB PROCESSES AT EACH OUTFALL	3. AVERAGE FLOW AND (MAXIMUM FLOW), INCLUDE UNITS.	4. TREATMENT DESCRIPTION	5. TREATMENT CODES FROM TABLE A
	See Attachment 2-A			

Attach additional pages if necessary.



## 2.2 INTERMITTENT DISCHARGES

Except for stormwater runoff, leaks, or spills, are any of the discharges described in items 2.0 or 2.1 intermittent or seasonal?

☐ Yes (complete the following table)

☒ No (go to section 2.3)

1. OUTFALL NUMBER	2. OPERATION(S) CONTRIBUTING FLOW	3. FREQUENCY		4. FLOW				C. DURATION (in days)
				A. FLOW RATE (in mgd)		B. TOTAL VOLUME (specify with units)		
		A. DAYS PER WEEK (specify average)	B. MONTHS PER YEAR (specify average)	1. MAXIMUM DAILY	2. LONG TERM AVERAGE	4. LONG TERM DAILY	3. MAXIMUM AVERAGE	

## 2.3 PRODUCTION

A. Does an effluent limitation guideline (ELG) promulgated by EPA under section 304 of the Clean Water Act apply to your facility? Indicate the part and subparts applicable.

☐ Yes 40 CFR \_\_\_\_\_ Subpart(s) \_\_\_\_\_ ☒ No (go to section 2.5)

B. Are the limitations in the effluent guideline(s) expressed in terms of production (or other measure of operation)? Describe in C below.

☐ Yes (complete C.) ☐ No (go to section 2.5)

C. If you answered "yes" to B, list the quantity representing an actual measurement of your maximum level of production, expressed in the terms and units used in the applicable effluent guideline and indicate the affected outfalls.

A. OUTFALL(S)	B. QUANTITY PER DAY	C. UNITS OF MEASURE	D. OPERATION, PRODUCT, MATERIAL, ETC. (specify)

## 2.4 IMPROVEMENTS

A. Are you required by any federal, state, or local authority to meet any implementation schedule for the construction, upgrading, or operation of wastewater treatment equipment or practices or any other environmental programs which may affect the discharges described in this application? This includes, but is not limited to, permit conditions, administrative or enforcement orders, enforcement compliance schedule letters, stipulations, court orders, and grant or loan conditions.

☐ Yes (complete the following table) ☒ No (go to 2.6)

1. IDENTIFICATION OF CONDITION, AGREEMENT, ETC.	2. AFFECTED OUTFALLS	3. BRIEF DESCRIPTION OF PROJECT	4. FINAL COMPLIANCE DATE	
			A. REQUIRED	B. PROJECTED

B. Optional: provide below or attach additional sheets describing water pollution control programs or other environmental projects which may affect discharges. Indicate whether each program is underway or planned, and indicate actual or planned schedules for construction. This may include proposed bmp projects for stormwater.

## 2.5 SLUDGE MANAGEMENT

Describe the removal of any industrial or domestic biosolids or sludges generated at your facility. Include names and contact information for any haulers used. Note the frequency, volume, and methods (incineration, landfilling, composting, etc) used. See Form A for additional forms which may need to be completed.

Industrial wastewater sludge is not produced by this facility. Oil/water separator solids are removed intermittently, as needed, by a contract hauler, incinerated, and stored in a lagoon as hazardous waste. Solids from oil/water separators is disposed of as used oil, and is removed/hailed by Hepaco/EMA/Clean Harbors.

## DATA COLLECTION AND REPORTING REQUIREMENTS FOR APPLICANTS

### 3.0 EFFLUENT (AND INTAKE) CHARACTERISTICS (SEE INSTRUCTIONS)

A. & B. See instructions before continuing – complete one Table 1 for **each outfall** (and intake) – annotate the outfall (intake) number or designation in the space provided. The facility is not required to complete intake data unless required by the department or rule. See Attachment 2-B

C. Use the space below to list any pollutants listed in the instructions section 3.0 C. Table B which you know or have reason to believe is discharged or may be discharged from any outfall not listed in parts 3.0 A or B on Table 1. For every pollutant listed, briefly describe the reasons you believe it to be present and report any analytical data in your possession.

1. POLLUTANT	2. SOURCE	3. OUTFALL(S)	4. ANALYTICAL RESULTS (INCLUDE UNITS)

#### 3.1 Whole Effluent Toxicity Testing

A. To your knowledge, have any Whole Effluent Toxicity (WET) tests been performed on the facility discharges (or on receiving waters in relation to your discharge) within the last three years?

☐ Yes (go to 3.1 B)

☒ No (go to 3.2)

#### 3.1 B

Disclose wet testing conditions, including test duration (chronic or acute), the organisms tested, and the testing results. Provide any results of toxicity identification evaluations (TIE) or toxicity reduction evaluations (TRE) if applicable. Please indicate the conclusions of the test(s) including any pollutants identified as causing toxicity and steps the facility is taking to remedy the toxicity.

### 3.2 CONTRACT ANALYSIS INFORMATION

Were any of the analyses reported herein, above, or on Table 1 performed by a contract laboratory or consulting firm?

☒ Yes (list the name, address, telephone number, and pollutants analyzed by each laboratory or firm.) ☐ No (go to 4.0)

A. LAB NAME	B. ADDRESS	C. TELEPHONE (area code and number)	D. POLLUTANTS ANALYZED (list or group)
Teklab, Inc.	5445 Horseshoe Lake Rd., Collinsville, IL 62234	(618) 344-1004	All pollutants analyzed

<b>4.0 STORMWATER</b>			
<b>4.1</b> Do you have industrial stormwater discharges from the site? If so, attach a site map outlining drainage areas served by each outfall. Indicate the following attributes within each drainage area: pavement or other impervious surfaces; buildings; outdoor storage areas; material loading and unloading areas; outdoor industrial activities; structural stormwater control measures; hazardous waste treatment, storage, and disposal units; and wells or springs in the area.    See Attachment 2-B			
OUTFALL NUMBER	TOTAL AREA DRAINED (PROVIDE UNITS)	TYPES OF SURFACES (VEGETATED, STONE , PAVED, ETC)	BEST MANAGEMENT PRACTICES EMPLOYED; INCLUDE STRUCTURAL BMPS AND TREATMENT DESIGN FLOW FOR BMPS DESCRIBE HOW FLOW IS MEASURED

**4.2 STORMWATER FLOWS**  
 Provide the date of sampling with the flows, and how the flows were estimated.  
 See Attachment 2-B

**SIGNATORY REQUIREMENTS**

**5.0 CERTIFICATION**  
  
 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.

NAME AND OFFICIAL TITLE (TYPE OR PRINT)  Brendan McGhee - Senior Manager, Environmental Engineering	TELEPHONE NUMBER WITH AREA CODE  (314) 232-2817
SIGNATURE (SEE INSTRUCTIONS)  	DATE SIGNED  6/27/24

See Attachment 2B for other Outfalls

SEE INSTRUCTIONS; PLEASE PRINT OR TYPE.

You may report some or all of this information on separate sheet (use similar format) instead of completing these pages.

FORM C    TABLE 1    FOR 3.0 - ITEMS A AND B

EFFLUENT (AND INTAKE) CHARACTERISTICS										THIS OUTFALL IS: Stormwater		OUTFALL NO. 010	
3.0 PART A – You must provide the results of at least one analysis for every pollutant in Part A. Complete one table for each outfall or proposed outfall. See instructions.													
1. POLLUTANT	2. VALUES								3. UNITS (specify if blank)				
	A. MAXIMUM DAILY VALUE		B. MAXIMUM 30 DAY VALUES		C. LONG TERM AVERAGE VALUES		D. NO. OF ANALYSES	A. CONCENTRATION	B. MASS				
	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS							
A. Biochemical Oxygen Demand, 5-day (BOD <sub>5</sub> )	N/A												
B. Chemical Oxygen Demand (COD)	74	182			28	214	9	mg/L	lbs				
C. Total Organic Carbon (TOC)	N/A												
D. Total Suspended Solids (TSS)	145	357			30	261	9	mg/L	lbs				
E. Ammonia as N	N/A												
F. Flow	VALUE 3.16		VALUE		VALUE 1.04		9	MILLIONS OF GALLONS PER DAY (MGD)					
G. Temperature (winter)	VALUE		VALUE		VALUE			°F					
H. Temperature (summer)	VALUE		VALUE		VALUE			°F					
I. pH	MINIMUM 7.0		MAXIMUM 8.1		AVERAGE 7.6 (median)		9	STANDARD UNITS (SU)					
3.0 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 the pollutant. Complete one table for each outfall (intake). Provide results for additional parameters not listed here in Part 3.0 C.													
1. POLLUTANT AND CAS NUMBER (if available)	2. MARK "X"		3. VALUES								4. UNITS		
	A. BELIEVED PRESENT	B. BELIEVED ABSENT	A. MAXIMUM DAILY VALUE		B. MAXIMUM 30 DAY VALUES		C. LONG TERM AVERAGE VALUES		D. NO. OF ANALYSES	A. CONCENTRATION	B. MASS		
			CONCENTRATION	MASS	CONCENTRATION	MASS	CONCENTRATION	MASS					
Subpart 1 – Conventional and Non-Conventional Pollutants													
A. Alkalinity (CaCO <sub>3</sub> )		X	MINIMUM		MINIMUM		MINIMUM						
B. Bromide (24959-67-9)		X											
C. Chloride (16887-00-6)	X		337	345			73	635	9	mg/L	lbs		
D. Chlorine, Total Residual		X											
E. Color		X											
F. Conductivity		X											
F. Cyanide, Amenable to Chlorination		X											

1. POLLUTANT AND CAS NUMBER (if available)	2. MARK "X"		3. VALUES							4. UNITS	
	A. BELIEVED PRESENT	B. BELIEVED ABSENT	A. MAXIMUM DAILY VALUE		B. MAXIMUM 30 DAY VALUE		C. LONG TERM AVERAGE VALUE		D. NO. OF ANALYSES	A. CONCEN- TRATION	B. MASS
			CONCENTRATION	MASS	CONCENTRATION	MASS	CONCENTRATION	MASS			
Subpart 1 – Conventional and Non-Conventional Pollutants (Continued)											
G. <i>E. coli</i>		X									
H. Fluoride (16984-48-8)		X									
I. Nitrate plus Nitrate (as N)	X		2.0	2.0			0.65	5.7	9	mg/L	lbs
J. Kjeldahl, Total (as N)	X		1.5	9.0			0.90	5.6	9	mg/L	lbs
K. Nitrogen, Total Organic (as N)		X									
L. Oil and Grease		X	<6.0	0.00			<6.0	0.00	9	mg/L	lbs
M. Phenols, Total		X									
N. Phosphorus (as P), Total (7723-14-0)	X		0.18	0.44			0.02	0.17	9	mg/L	lbs
O. Sulfate (as SO <sup>4</sup> ) (14808-79-8)	X		57	58			12	106	9	mg/L	lbs
P. Sulfide (as S)		X									
Q. Sulfite (as SO <sup>3</sup> ) (14265-45-3)		X									
R. Surfactants		X									
S. Trihalomethanes, Total		X									
Subpart 2 – Metals											
1M. Aluminum, Total Recoverable (7429-90-5)	X		1,910	4.7			407	3.5	9	ug/L	lbs
2M. Antimony, Total Recoverable (7440-36-9)		X									
3M. Arsenic, Total Recoverable (7440-38-2)		X									
4M. Barium, Total Recoverable (7440-39-3)		X									
5M. Beryllium, Total Recoverable (7440-41-7)		X									
6M. Boron, Total Recoverable (7440-42-8)		X									
7M. Cadmium, Total Recoverable (7440-43-9)		X									
8M. Chromium III Total Recoverable (16065-83-1)		X									
9M. Chromium VI, Dissolved (18540-29-9)		X									
10M. Cobalt, Total Recoverable (7440-48-4)		X									



1. POLLUTANT AND CAS NUMBER <i>(if available)</i>	2. MARK "X"		3. VALUES							4. UNITS	
	A. BELIEVED PRESENT	B. BELIEVED ABSENT	A. MAXIMUM DAILY VALUE		B. MAXIMUM 30 DAY VALUE		C. LONG TERM AVERAGE VALUE		D. NO. OF ANALYSES	A. CONCEN- TRATION	B. MASS
			CONCENTRATION	MASS	CONCENTRATION	MASS	CONCENTRATION	MASS			
Subpart 2 – Metals (Continued)											
11M. Copper, Total Recoverable (7440-50-8)	X		22	0.05			5.9	0.05	9	ug/L	lbs
12M. Iron, Total Recoverable (7439-89-6)	X		3,230	7.9			545	4.7	9	ug/L	lbs
13M. Lead, Total Recoverable (7439-92-1)		X									
14M. Magnesium, Total Recoverable (7439-95-4)		X									
15M. Manganese, Total Recoverable (7439-96-5)		X									
16M. Mercury, Total Recoverable (7439-97-6)		X									
17M. Methylmercury (22967926)		X									
18M. Molybdenum, Total Recoverable (7439-98-7)		X									
19M. Nickel, Total Recoverable (7440-02-0)		X									
20M. Selenium, Total Recoverable (7782-49-2)		X									
21M. Silver, Total Recoverable (7440-22-4)		X									
22M. Thallium, Total Recoverable (7440-28-0)		X									
23M. Tin, Total Recoverable (7440-31-5)		X									
24M. Titanium, Total Recoverable (7440-32-6)		X									
25M. Zinc, Total Recoverable (7440-66-6)		X									
Subpart 3 – Radioactivity											
1R. Alpha Total		X									
2R. Beta Total		X									
3R. Radium Total		X									
4R. Radium 226 plus 228 Total		X									

INSTRUCTIONS FOR FILLING OUT APPLICATION FOR NPDES DISCHARGE PERMIT – FORM C –  
MANUFACTURING, COMMERCIAL, MINING, SILVICULTURE OPERATIONS, PROCESS WASTEWATER, NON-  
PROCESS WASTEWATER, AND INDUSTRIAL STORMWATER DISCHARGES.

All applicable sections must be filled in when the application is submitted. The form must be signed as indicated. This application is to be completed only for facilities with a discharge. Non-discharging (land application facilities) should fill out the appropriate forms for the activity. Include any area with potential discharge, even if there is normally no discharge. If this form is not adequate for you to describe your existing operations, then sufficient information should be attached so an evaluation of the discharges can be made. Attach additional sheets as necessary for any additional information. If an applicant believes previous outfalls are no longer applicable to the facility, please indicate so. Certain parts of the application may be submitted electronically, such as extensive analytical data, or project plans relating to improvements. This may be included using a thumb drive or CD. If extensive data is submitted without an electronic copy, the department may request the submission at a later time so the permit writer can mathematically evaluate the data. If you have any questions regarding this form please contact the Water Protection Program Operating Permits Administrative Assistant at 800-361-4827 or 573-571-6825 and you will be directed to a permit writer.

## GENERAL INFORMATION

1.0 Name of Facility – By what title or name is this facility known? Has the official name changed? Please indicate both the previous and current name you wish to be listed on the permit.

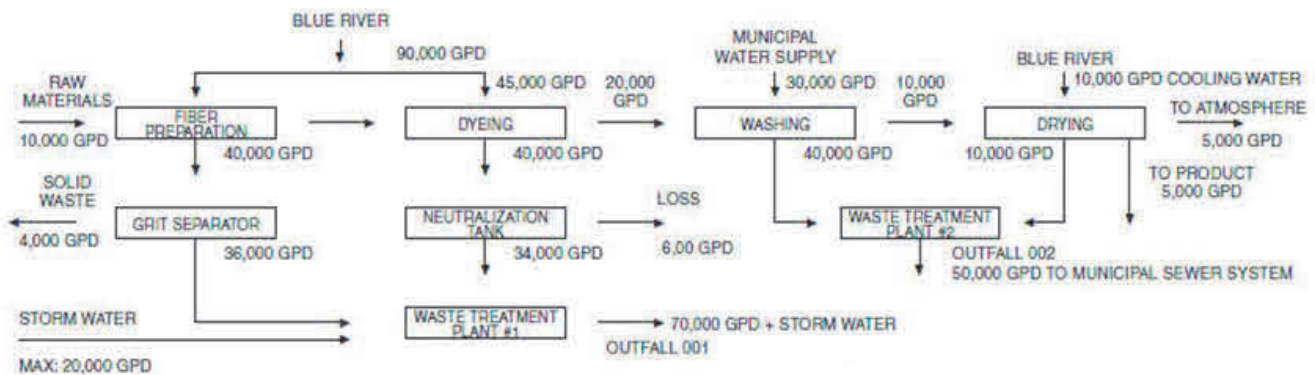
1.1 Operating permit number as assigned (MO-#####)

1.2 Indicate if this is a new facility or if there are any new discharges. Has the facility completed an antidegradation review? Is this facility being moved from a general permit to a site specific permit? If so, indicate general permit number.

1.3 Self-explanatory.

## FLOWS, TYPE, AND FREQUENCY

2.0 The line drawing should show the route taken by water in your facility from intake to discharge. Show all operations contributing wastewater, including process and production areas, sanitary flows, cooling water, and stormwater runoff. Indicate any alternate treatment trains available. You may group similar operations into a single unit labeled to correspond to the more detailed listing. More than one drawing may be required depending on the complexity of the system. The water balance should show average and maximum flows. Show all significant losses of water to: products, atmosphere, public sewer systems; both storm sewer and sewer. You should use actual measurements whenever available; otherwise, use your best estimate. An example of an acceptable line drawing appears below.



2.1 List all sources of wastewater to each outfall. Operations may be described in general terms (for example, “dye-making reactor” or a “distillation tower”). You may estimate the flow contributed by each source if no data is available, and for stormwater, you may use any reasonable measure of duration, volume, or frequency. For each treatment unit, indicate its size, flow rate, and retention time, and describe the ultimate disposal of any solid or liquid wastes not discharged. Treatment units should be listed in order and you should select the proper code from Table A to fill in column 3B for each treatment unit. Insert “XX” into column 3B if no code corresponds to a treatment unit you list.

TABLE A – CODES FOR TREATMENT UNITS			
PHYSICAL TREATMENT PROCESSES			
1-A	Ammonia Stripping	1-M	Grit Removal
1-B	Dialysis	1-N	Microstraining
1-C	Diatomaceous Earth Filtration	1-O	Mixing
1-D	Distillation	1-P	Moving Bed Filters
1-E	Electrodialysis	1-Q	Multimedia Filtration
1-F	Evaporation	1-R	Rapid Sand Filtration
1-G	Flocculation	1-S	Reverse Osmosis (Hyper Filtration)
1-H	Flotation	1-T	Screening
1-I	Foam Fractionation	1-U	Sedimentation (Settling)
1-J	Freezing	1-V	Slow Sand Filtration
1-K	Gas-Phase Separation	1-W	Solvent Extraction
1-L	Grinding (Comminutors)	1-X	Sorption
CHEMICAL TREATMENT PROCESSES			
2-A	Carbon Absorption	2-G	Disinfection (Ozone)
2-B	Chemical Oxidation	2-H	Disinfection (Other)
2-C	Chemical Precipitation	2-I	Electrochemical Treatment
2-D	Coagulation	2-J	Ion Exchange
2-E	Dechlorination	2-K	Neutralization
2-F	Disinfection (Chlorine)	2-L	Reduction
BIOLOGICAL TREATMENT PROCESSES			
3-A	Activated Sludge	3-E	Pre-Aeration
3-B	Aerated Lagoons	3-F	Spray Irrigation/Land Application
3-C	Anaerobic Treatment	3-G	Stabilization Ponds
3-D	Nitrification-Denitrification	3-H	Trickling Filtration
OTHER PROCESSES			
4-A	Discharge to Surface Water	4-C	Reuse/Recycle of Treated Effluent
4-B	Ocean Discharge Through Outfall	4-D	Underground Injection
SLUDGE TREATMENT AND DISPOSAL PROCESSES			
5-A	Aerobic Digestion	5-M	Heat Drying
5-B	Anaerobic Digestion	5-N	Heat Treatment
5-C	Belt Filtration	5-O	Incineration
5-D	Centrifugation	5-P	Land Application
5-E	Chemical Conditioning	5-Q	Landfill
5-F	Chlorine Treatment	5-R	Pressure Filtration
5-G	Composting	5-S	Pyrolysis
5-H	Drying Beds	5-T	Sludge Lagoons
5-I	Elutriation	5-U	Vacuum Filtration
5-J	Flotation Thickening	5-V	Vibration
5-K	Freezing	5-W	Web Oxidation
5-L	Gravity Thickening		

2.2 A discharge is intermittent unless it occurs without interruption during the operating hours of the facility, except for infrequent shutdowns for maintenance, process changes, or other similar activities. A discharge is seasonal if it occurs only during certain parts of the year. Fill in every applicable column in this item for each source of intermittent or seasonal discharges. Base your answers on actual data whenever available; otherwise, provide your best estimate. Report the highest daily value for flow rate and total volume in the “Maximum Daily” columns. Report the average of all daily values measures during days when discharge occurred within the last year in the “Long Term Average” columns.

## PRODUCTION

2.3 A. All effluent limitation guidelines (ELGs) promulgated by EPA appear in the Federal Register and are published annually in 40 CFR Subchapter N (400-499). A guideline applies to you based on the applicability sections within each subpart. If you are unsure you are covered by an ELG, check with your Missouri Department of Natural Resources' Regional Office. You must check yes if an applicable effluent guideline has been promulgated, even if the guideline limitations are being contested in court. If you believe a promulgated effluent guideline has been remanded for reconsideration by a court and does not apply to your operations, you may check no. The ELG number and subpart(s) must be included.

2.3 B. An ELG is expressed in terms of production (or other measure of operation) if the limitations are expressed as mass of pollutant per operational parameter; for example, "pounds of BOD per cubic foot of logs from which bark is removed," or "pounds of TSS per megawatt hour of electrical energy consumed by smelting furnace." An example of a guideline not expressed in terms of a measure of operation is one which limits the concentration of pollutants, or requires no discharge of the wastewater.

2.3 C. This item must be completed if you checked "yes" to item B. The production information requested here is necessary to apply effluent guidelines to your facility and you may not claim it as confidential. However, you do not have to indicate how the reported information was calculated. Report quantities and the units of measurement used in the applicable effluent guideline. The data provided must be a measure of actual operation over a one month period, such as the production for the highest month during the last twelve months, or the monthly average production for the highest year of the last five years, or other reasonable measure of actual operation, but may not be based on design capacity or on predictions of future increases in operation. This data must be concurrent of facility operations.

2.4 IMPROVEMENTS If you check yes to this question, complete all parts of the table, or attach a copy of any previous submission you have made containing the same information. You are not required to submit a description of future pollution control projects if you do not wish to, or if none are planned.

2.5 SLUDGE MANAGEMENT If the facility generates any sludge or biosolids, please indicate where the sludge accumulates (lagoon, tank, etc.) and the methods of disposal. Please include the volume and frequency of sludge removal/disposal and any haulers used. Please indicate if the facility composts, incinerates, landfills, stores, sells, or other methods of eliminating the sludge from lagoons or holding tanks. Consider submitting a sludge or biosolids management plan electronically if additional description is needed.

## DATA COLLECTION AND REPORTING REQUIREMENTS FOR APPLICANTS

3.0 This section requires collection and reporting of data on pollutants discharged from each outfall, including stormwater outfalls, non-process wastewater, and any intake data you wish to provide. Parts A, B, and C address different sets of pollutants and must be completed in accordance with the specific instructions for the part. All data must be reported as a concentration **and** as total mass. You may report some or all of the required data by attaching separate sheets of paper.

3.0 A. and B. These sections are found on Table 1. Complete a separate table for each outfall and intake.

3.0 A. Requires reporting at least one analysis for each pollutant. Part A must be completed by all applicants for all outfalls, including outfalls containing only noncontact cooling water, stormwater runoff, or other discharges; intake values are not required in this Part. Upon written request, (email is suitable) prior to submitting the application, the department may waive the requirements to test for one or more of these pollutants upon determining testing for the pollutant(s) is not applicable for your effluent.

3.0 B. Mark "X" in either "Believed Present", Column 2A, or "Believed Absent", Column 2B, for each pollutant, based on your best estimate, and test those you believe present. Base your determination a pollutant is present in, or absent from, your discharge on your knowledge of your raw materials, source water, maintenance chemicals, intermediate, byproduct, and final products, and any previous analyses known to you of the facility's effluent, or of any similar effluent. If either chloride or sulfate is believed present, the department asks you to test for both chloride and sulfate. If you expect a pollutant is present as a result your intake water, you should mark "Believed Present" and analyze for the pollutant. Provide analysis of the intake or source water as well; this includes water withdrawn from wells or obtained from a potable water source. Presence of a pollutant in the discharge from sourced water does not eliminate disclosure requirements. If a

pollutant is reported as not present, the pollutant will be considered “believed absent” for the purposes of application shield.

### 3.0 A and B Continued

Use the following abbreviations (or other as applicable) in Column 4, “Units”. Mass must be specified as per day, month, or year.

CONCENTRATION		MASS	
ppm	parts per million	lbs	pounds
mg/L	milligrams per liter	ton	tons (English tons)
ppb	parts per billion	mg	Milligrams
ug/L	micrograms per liter	g	grams
pCi/L	picocuries per liter	kg	kilograms
		T	tonnes (metric tons)

**MAXIMUM DAILY VALUE.** If you measure a pollutant only once, complete only the “Maximum Daily Value” columns and insert “1” into the “number of analyses” in Column D. The Missouri Department of Natural Resources may require you to conduct additional analyses to further characterize your discharge. If the pollutant is sampled but not detected, a less than “<” symbol should be used next to the detection limit (or laboratory reporting limit). Simply stating “below detection limits” without quantifying the limit of detection may not be appropriate and additional information may be required.

**MAXIMUM 30 DAY VALUES.** “Maximum 30 Day Values” are not compulsory but should be filled out if data is available. The department suggests at least 4 samples (one per week) be collected over a one month period for averaging purposes, but is not required. Determine the average of all daily values taken during one calendar month, and report the highest average of all daily values taken during all calendar months, and report the highest average in Column B. Column D must show the number of samples used in the calculation.

**LONG TERM AVERAGES.** “Long Term Average Values” are not compulsory but should be filled out if data is available. Determine the long term average of all the data and report in Column C. Column D must show the number of samples used in the calculations. The facility should include a statement describing the timeframe of the data used in the calculations. Consider including an electronic copy of the data with the application.

**SAMPLING.** The collection of samples for analyses should be supervised by a person experienced in performing sampling of industrial wastewater and/or stormwater. You may contact your Missouri Department of Natural Resources’ Regional Office for detailed guidance on sampling techniques and for answers to specific questions. Any specific requirements contained in the applicable analytical methods should be followed for sample containers, sample preservation, holding times, the collection of duplicate or blank samples, etc. The time when you sample should be representative of your normal operation, with all processes contributing wastewater in normal operation, and with your treatment system operating properly with no system upsets. Samples should be collected from the center of the flow channel, at a site specified in your present permit, or for new discharges, at any site adequate for the collection of a representative sample.

**GRAB SAMPLE.** An individual sample of sufficient volume for analysis, collected at a randomly selected time, over a period not exceeding 15 minutes, which is representative of the discharge. Grab samples must be used for temperature, pH, total residual chlorine, oil and grease, *E. coli*, and any pollutant considered to be volatile. Grab samples are typically appropriate for stormwater.

**COMPOSITE SAMPLE.** Use composite sampling (if available) for all pollutants (except above). A combination of at least eight sample aliquots of at least 100 milliliters, collected at periodic intervals during the operating hours of a facility over a 24 hour period. For volatile pollutants, aliquots must be combined in the laboratory immediately before analysis. The composite must be proportional; either time interval proportional, or flow proportional. Aliquots may be collected manually or automatically.

**ANALYSIS.** You must use test methods promulgated in 40 CFR Part 136 for all analyses. The facility must use a sufficiently sensitive method to determine compliance with Missouri Water Quality Standards in accordance with Standard Conditions Part I. If no method has been promulgated for a particular pollutant, you may use any suitable method for measuring the level of the pollutant in your discharge. If there is no promulgated method, your attached description should include the preservation techniques, sample holding times, the quality control measures which you used, and any other



pertinent information, such as filtering or what fraction the method detects. For obscure methods or new contaminants, consider including an electronic copy of the method with the application and the laboratory analysis sheets.

**IDENTICAL OUTFALL CONSIDERATION.** If you have two or more substantially identical outfalls, you may submit the results of the analysis for one substantially identical outfall in its place. Identify which outfall you did test and describe why the outfalls which you did not test are substantially identical to the outfall you did test.

**REPORTING OF INTAKE DATA.** You are not required to report intake data unless you wish apply for “net” effluent limitations for one or more pollutants. Net limitations are technology limits adjusted by subtracting the level of the pollutant present in the intake water from the discharge. National Pollutant Discharge Elimination System (NPDES) regulations allow net limitations only in certain circumstances. To demonstrate eligibility, report the maximum and average of the results of analyses on the intake water, attach a statement the intake water is drawn from the same body of water into which the discharge is made, and a statement how the pollutant level is reduced by the wastewater treatment. When applicable, a demonstration to the extent the pollutants in the intake vary physically, chemically, or biologically from the pollutants contained in the discharge; for example, when the pollutant represents a class of compounds.

3.0. C. requires listing any pollutants from “TABLE B – TOXIC POLLUTANTS AND HAZARDOUS SUBSTANCES REQUIRED TO BE IDENTIFIED BY APPLICANTS IF EXPECTED TO BE PRESENT” you believe to be present and explain why you believe them to be present. If you have analytical data, you must report it. You may include other pollutants not listed below but present in your discharge in 3.0 C. Please provide Chemical Abstract Service (CAS) numbers for any additional pollutants described. If the facility is required to complete Form D, duplication of the parameters here is not required.

TABLE B – TOXIC POLLUTANTS AND HAZARDOUS SUBSTANCES REQUIRED TO BE IDENTIFIED BY APPLICANTS IF EXPECTED TO BE PRESENT		
TOXIC POLLUTANT	HAZARDOUS SUBSTANCES	HAZARDOUS SUBSTANCES
Asbestos	Dimethylamine	Napthenic acid
HAZARDOUS SUBSTANCES	Dintrobenzene	Nitrotoluene
Acetaldehyde	Diquat	Parathion
Allyl alcohol	Disulfoton	Phenolsulfonate
Allyl chloride	Diuron	Phosgene
Amyl acetate	Epichlorohydrin	Propargite
Aniline	Ethion	Propylene oxide
Benzonitrile	Ethylene diamine	Pyrethrins
Benzyl chloride	Ethylene dibromide	Quinoline
Butyl acetate	Formaldehyde	Resorcinol
Butylamine	Furfural	Strontium
Captan	Guthion	Strychnine
Carbaryl	Isoprene	Sytrene
Carbofuran	Isopropanolamine	2,4,5-T (2,4,5-Trichloro-phenoxyacetic acid)
Carbon disulfide	Kelthane	TDE (Tetrachlorodiphenyl ethane)
Chlorpyrifos	Kepone	2, 4, 5-TP (2-(2,4,5-Trichloro-phenoxy) propanoic acid)
Coumaphos	Malathion	Trichlorofon
Cresol	Mercaptodimethur	Triethanolamine
Crotonaldehyde	Methoxychlor	Triethaylamine
2,4-D (2,4-Dichloro-Phenoxyacetic acid)	Methyl mercaptan	Uranium
Diazinon	Methyl parathion	Vanadium
Dicamba	Mevinphos	Vinyl acetate
Dichlobenil	Mexacarbate	Xylene
2,2-Dichloropropionic acid	Monethyl amine	Xylenol
Dichlorvos	Monomethyl amine	Zirconium
Diethylamine	Nalad	

3.1 Self-explanatory.

3.2 Self-explanatory.

#### 4.0 STORMWATER [10 CSR 20-6.200(2)(C)1.]

In accordance with 10 CSR 20-6.200(2)(C)1.E(I) and (II), the facility must sample the stormwater for any pollutant listed in the permit for process wastewater discharges and/or the applicable Effluent Limitation Guideline. All industrial stormwater must be sampled for parameters listed in 10 CSR 20-6.200(2)(C)1.E.(III); these are: oil and grease, pH, biochemical oxygen demands (BOD<sub>5</sub>), chemical oxygen demands (COD), total suspended solids (TSS), conductivity, total phosphorus, total Kjeldahl nitrogen, and nitrate plus nitrite nitrogen.

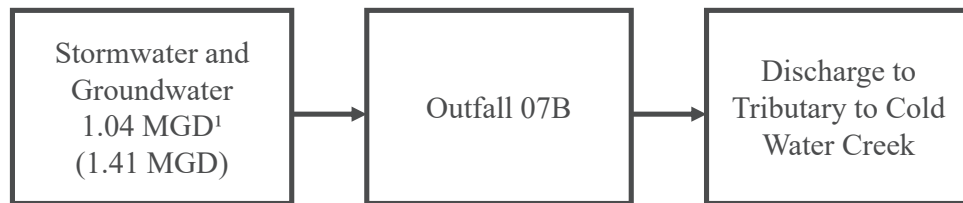
4.1 Indicate the outfall numbers for industrial stormwater discharges. Provide the area drained by each outfall. Indicate the type and percentages of surface(s), for example: 60% grass or vegetated areas, 10% non-vegetated soils, 30% pavement, etc., the outfall drains. The facility must indicate any structural best management practices, such as settling/retention, rain garden/infiltration, filter socks, etc, employed at each outfall.

4.2 Describe the method used to determine the flow rate in accordance with 10 CSR 20-6.200(2)(C)1., and the flow rate; submit the date and duration of the storm event from which the samples were taken.

**5.0 SIGNATORY REQUIREMENTS** The Clean Water Act provides for severe penalties for submitting false information on this application form. Section 309(c)(2) of the Clean Water Act provides “Any person who knowingly makes any false statement, representation, or certification in any application . . . shall upon conviction, be punished by a fine of no more \$10,000 or by imprisonment for not more than six months, or both.

All applications must be signed as follows and the signature must be original. For a corporation: by an officer having responsibility for the overall operation of the regulated facility or activity or for environmental matters. For a partnership or sole proprietorship: by a general partner or the proprietor. For a municipal, state, federal or other public facility: by either a principal executive officer or by an individual having overall responsibility for environmental matters at the facility.

**Attachment 2-A – Form C Section 2.0**  
**Outfall 07B Flow Diagram**

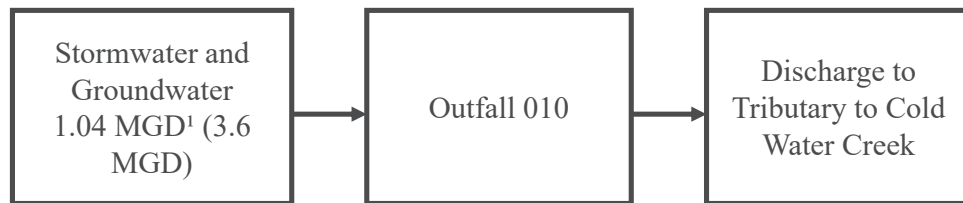


Notes:

<sup>1</sup>: Average flow per quarterly discharge monitoring calculated between March 2022 and March 2024.

MGD: million gallons per day

**Attachment 2-A – Form C Section 2.0**  
**Outfall 010 Flow Diagram**

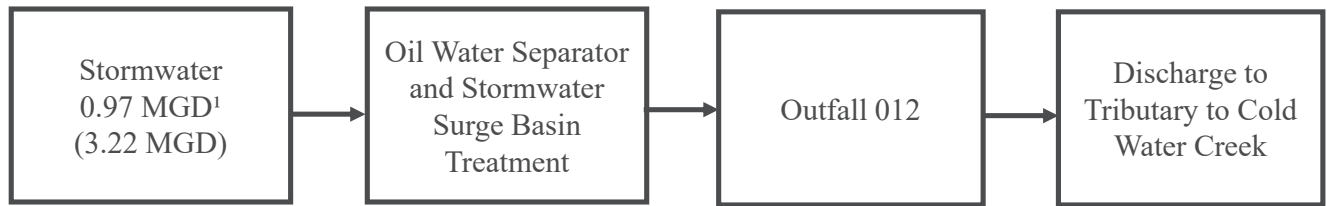


Notes:

<sup>1</sup>: Average flow per quarterly discharge monitoring calculated between March 2022 and March 2024.

MGD: million gallons per day

**Attachment 2-A – Form C Section 2.0**  
**Outfall 012 Flow Diagram**



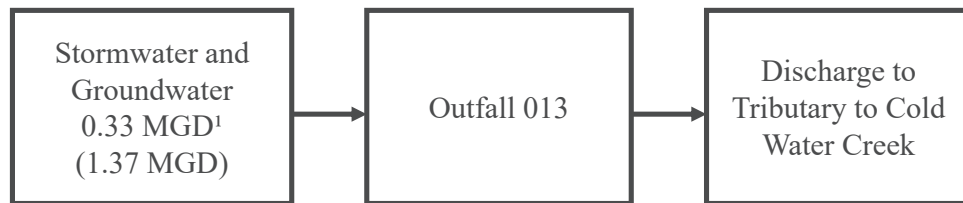
Notes:

<sup>1</sup>: Average flow per quarterly discharge monitoring calculated between March 2022 and March 2024.

MGD: million gallons per day



**Attachment 2-A – Form C Section 2.0**  
**Outfall 013 Flow Diagram**

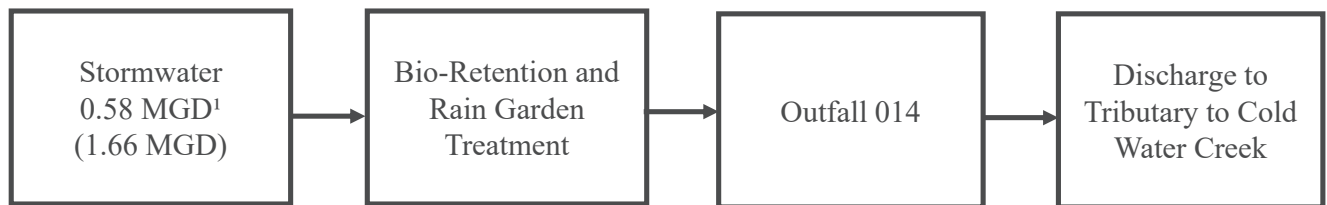


Notes:

<sup>1</sup>: Average flow per quarterly discharge monitoring calculated between March 2022 and March 2024.

MGD: million gallons per day

**Attachment 2-A – Form C Section 2.0**  
**Outfall 014 Flow Diagram**

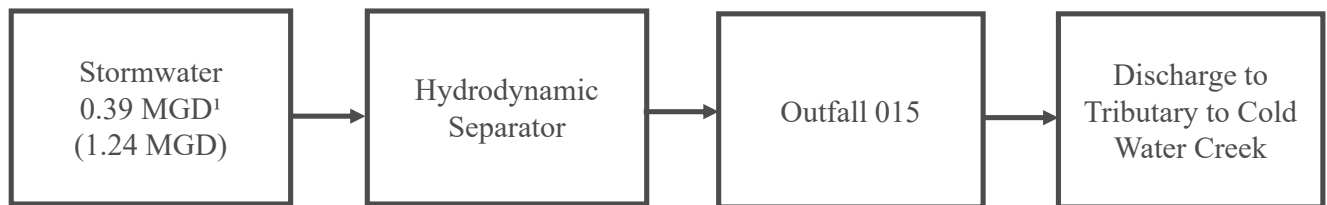


Notes:

<sup>1</sup>: Average flow per quarterly discharge monitoring calculated between March 2022 and March 2024.

MGD: million gallons per day

**Attachment 2-A – Form C Section 2.0**  
**Outfall 015 Flow Diagram**

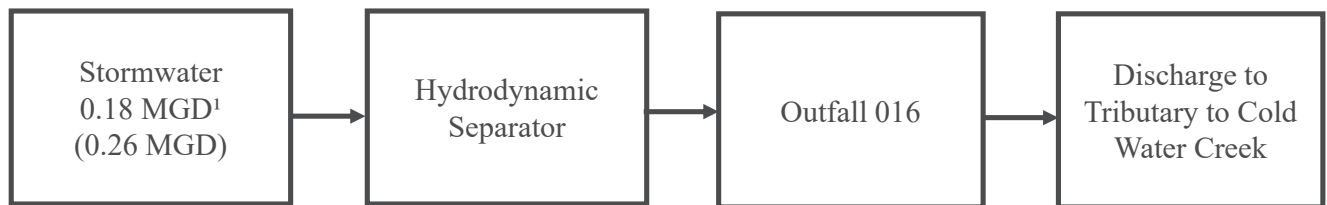


Notes:

<sup>1</sup>: Average flow per quarterly discharge monitoring calculated between March 2022 and March 2024.

MGD: million gallons per day

**Attachment 2-A – Form C Section 2.0**  
**Outfall 016 Flow Diagram**

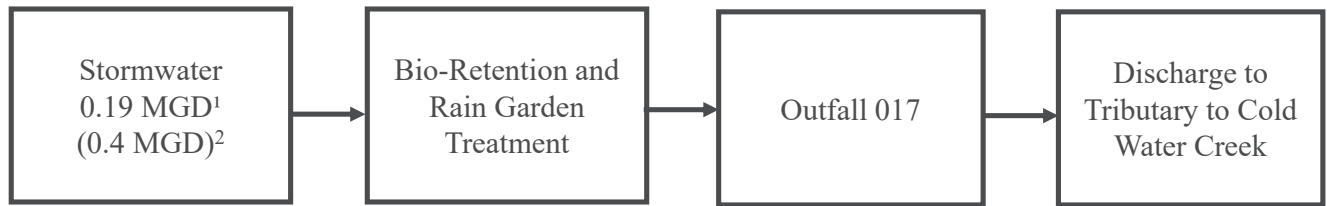


Notes:

<sup>1</sup>: Average flow per quarterly discharge monitoring calculated between March 2022 and March 2024.

MGD: million gallons per day

**Attachment 2-A – Form C Section 2.0**  
**Outfall 017 Flow Diagram**



Notes:

<sup>1</sup>: Average flow per quarterly discharge monitoring calculated between March 2022 and March 2024.

MGD: million gallons per day

<sup>2</sup>: Estimated based on drainage basin area

## The Boeing Company Operating Permit MO-0004782 Modification Application

### Attachment 2-B

#### Form C, Section 3.0 – Effluent Characteristics

All data reported in Section 3.0 was collected during the current permit cycle between 1 January 2022 and 4 March, 2024.

Outfall #006 was eliminated in 2021 and is therefore not included in this section.

Outfall #07A is being eliminated in accordance with the Abatement Order of Consent (AOC; Order No. 2023-WPCB-1827). Water that was previously discharged through Outfall #07A is used in a non-contact cooling water recirculation system and is no longer discharged. Therefore, Outfall #07A is not included in this section. The MSOP requires sampling of Outfall 07B starting during the next permit cycle in 2026, and as such, recent analytical and flow data for Outfall 07B are not included in this attachment.

In accordance with Special Condition 15(d) of MO-0004782, average data values reported in this section were calculated using a concentration of zero in place of any values not detected. Where all data for a parameter was not detected, a “<” qualifier was listed with the laboratory reporting limit.

See tables on subsequent pages. Outfall 010 data is presented directly on Form C.

#### Form C, Section 4.1 – Stormwater

Outfall	Total Area Drained (acres)	Types of Surfaces	Best Management Practices Employed
07B	33.3	Vegetation, pavement, and roofs	riprap sediment protection, flows not measured
10	76.1	Pavement and roofs	None
12	52.8	Pavement and roofs	2 detention/retention basins, 3 oil/water separators, flow not measured
13	25.5	Vegetation, pavement, and roofs	Riprap outfall protection, flow not measured
14	55.3	Vegetation, pavement, and roofs	2 detention basins, 4 bio retention basins, flow not measured
15	35.9	Vegetation, pavement, and roofs	Hydrodynamic separator unit, flow not measured
16	10.0	Pavement and roofs	Hydrodynamic separator unit, flow not measured
17	13.1	Vegetation, pavement, and roofs	7 bioretention basins, flow not measured

#### Form C, Section 4.2 – Stormwater Flows



The following table displays the calculations used to estimate stormwater flow during quarter one of 2024.

<b>Outfall</b>	<b>Area (ft<sup>2</sup>)</b>	<b>Precipitation (ft)</b>	<b>Convert ft<sup>3</sup> to Gallons</b>	<b>Gallon/ft<sup>3</sup></b>	<b>Runoff Coefficient</b>	<b>Runoff (gallons)</b>	<b>Runoff (MGD)</b>
10	3316179	0.008333	7.48	206,709	0.66	136,428	0.136
12	2300404	0.061667	7.48	1,061,100	0.85	901,935	0.901
13	1112571	0.008333	7.48	69,350	0.75	52,013	0.052
14	2408839	0.021667	7.48	390,393	0.42	163,965	0.163
15	1565678	0.008333	7.48	97,594	0.48	46,845	0.046
16	435600	0.021667	7.48	70,596	0.85	60,007	0.060
17	568894	0.021667	7.48	92,199	0.79	72,837	0.072

SEE INSTRUCTIONS; PLEASE PRINT OR TYPE.

You may report some or all of this information on separate sheet (*use similar format*) instead of completing these pages.

FORM C    TABLE 1    FOR 3.0 - ITEMS A AND B

EFFLUENT (AND INTAKE) CHARACTERISTICS	THIS OUTFALL IS: Stormwater	OUTFALL NO. 012
---------------------------------------	-----------------------------	-----------------

3.0 PART A – You must provide the results of at least one analysis for every pollutant in Part A. Complete one table for each outfall or proposed outfall. See instructions.

1. POLLUTANT	2. VALUES							3. UNITS ( <i>specify if blank</i> )	
	A. MAXIMUM DAILY VALUE		B. MAXIMUM 30 DAY VALUES		C. LONG TERM AVERAGE VALUES		D. NO. OF ANALYSES	A. CONCENTRATION	B. MASS
	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS			
A. Biochemical Oxygen Demand, 5-day (BOD <sub>5</sub> )	N/A								
B. Chemical Oxygen Demand (COD)	33	30			17	135	9	mg/L	lbs
C. Total Organic Carbon (TOC)	N/A								
D. Total Suspended Solids (TSS)	38	545			5.0	43	9	mg/L	lbs
E. Ammonia as N	N/A								
F. Flow	VALUE 2.8		VALUE		VALUE 1.0		9	MILLIONS OF GALLONS PER DAY (MGD)	
G. Temperature ( <i>winter</i> )	VALUE N/A		VALUE		VALUE			°F	
H. Temperature ( <i>summer</i> )	VALUE N/A		VALUE		VALUE			°F	
I. pH	MINIMUM 7.7		MAXIMUM 7.9		AVERAGE 7.7 (median)		9	STANDARD UNITS (SU)	

3.0 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 the pollutant. Complete one table for each outfall (intake). Provide results for additional parameters not listed here in Part 3.0 C.

1. POLLUTANT AND CAS NUMBER (if available)	2. MARK “X”		3. VALUES							4. UNITS	
	A. BELIEVED PRESENT	B. BELIEVED ABSENT	A. MAXIMUM DAILY VALUE		B. MAXIMUM 30 DAY VALUES		C. LONG TERM AVERAGE VALUES		D. NO. OF ANALYSES	A. CONCENTRATION	B. MASS
			CONCENTRATION	MASS	CONCENTRATION	MASS	CONCENTRATION	MASS			

Subpart 1 – Conventional and Non-Conventional Pollutants

A. Alkalinity (CaCO <sub>3</sub> )		X	MINIMUM		MINIMUM		MINIMUM				
B. Bromide (24959-67-9)		X									
C. Chloride (16887-00-6)	X		420	3075			182	1463	9	mg/L	lbs
D. Chlorine, Total Residual		X									
E. Color		X									
F. Conductivity		X									
F. Cyanide, Amenable to Chlorination		X									

1. POLLUTANT AND CAS NUMBER (if available)	2. MARK "X"		3. VALUES							4. UNITS	
	A. BELIEVED PRESENT	B. BELIEVED ABSENT	A. MAXIMUM DAILY VALUE		B. MAXIMUM 30 DAY VALUE		C. LONG TERM AVERAGE VALUE		D. NO. OF ANALYSES	A. CONCEN- TRATION	B. MASS
			CONCENTRATION	MASS	CONCENTRATION	MASS	CONCENTRATION	MASS			
Subpart 1 – Conventional and Non-Conventional Pollutants (Continued)											
G. <i>E. coli</i>		X									
H. Fluoride (16984-48-8)		X									
I. Nitrate plus Nitrate (as N)	X		1.5	11			0.91	7.3	9	mg/L	lbs
J. Kjeldahl, Total (as N)	X		1.4	7.5			0.30	2.5	9	mg/L	lbs
K. Nitrogen, Total Organic (as N)		X									
L. Oil and Grease	X		10	75			3.0	2.5	9	mg/L	lbs
M. Phenols, Total		X									
N. Phosphorus (as P), Total (7723-14-0)	X		0.19	2.7			0.03	0.27	9	mg/L	lbs
O. Sulfate (as SO <sup>4</sup> ) (14808-79-8)	X		165	1208			61	492	9	mg/L	lbs
P. Sulfide (as S)		X									
Q. Sulfite (as SO <sup>3</sup> ) (14265-45-3)		X									
R. Surfactants		X									
S. Trihalomethanes, Total		X									
Subpart 2 – Metals											
1M. Aluminum, Total Recoverable (7429-90-5)	X		1100	16			227	1.8	9	ug/L	lbs
2M. Antimony, Total Recoverable (7440-36-9)		X									
3M. Arsenic, Total Recoverable (7440-38-2)		X									
4M. Barium, Total Recoverable (7440-39-3)		X									
5M. Beryllium, Total Recoverable (7440-41-7)		X									
6M. Boron, Total Recoverable (7440-42-8)		X									
7M. Cadmium, Total Recoverable (7440-43-9)		X									
8M. Chromium III Total Recoverable (16065-83-1)		X									
9M. Chromium VI, Dissolved (18540-29-9)		X									
10M. Cobalt, Total Recoverable (7440-48-4)		X									

1. POLLUTANT AND CAS NUMBER (if available)	2. MARK "X"		3. VALUES							4. UNITS	
	A. BELIEVED PRESENT	B. BELIEVED ABSENT	A. MAXIMUM DAILY VALUE		B. MAXIMUM 30 DAY VALUE		C. LONG TERM AVERAGE VALUE		D. NO. OF ANALYSES	A. CONCEN- TRATION	B. MASS
			CONCENTRATION	MASS	CONCENTRATION	MASS	CONCENTRATION	MASS			
Subpart 2 – Metals (Continued)											
11M. Copper, Total Recoverable (7440-50-8)	X		16	0.01			3.7	0.03	9	ug/L	lbs
12M. Iron, Total Recoverable (7439-89-6)	X		1050	15			251	2.0	9	ug/L	lbs
13M. Lead, Total Recoverable (7439-92-1)		X									
14M. Magnesium, Total Recoverable (7439-95-4)		X									
15M. Manganese, Total Recoverable (7439-96-5)		X									
16M. Mercury, Total Recoverable (7439-97-6)		X									
17M. Methylmercury (22967926)		X									
18M. Molybdenum, Total Recoverable (7439-98-7)		X									
19M. Nickel, Total Recoverable (7440-02-0)		X									
20M. Selenium, Total Recoverable (7782-49-2)		X									
21M. Silver, Total Recoverable (7440-22-4)		X									
22M. Thallium, Total Recoverable (7440-28-0)		X									
23M. Tin, Total Recoverable (7440-31-5)		X									
24M. Titanium, Total Recoverable (7440-32-6)		X									
25M. Zinc, Total Recoverable (7440-66-6)		X									
Subpart 3 – Radioactivity											
1R. Alpha Total		X									
2R. Beta Total		X									
3R. Radium Total		X									
4R. Radium 226 plus 228 Total		X									

SEE INSTRUCTIONS; PLEASE PRINT OR TYPE.

You may report some or all of this information on separate sheet (*use similar format*) instead of completing these pages.

FORM C    TABLE 1    FOR 3.0 - ITEMS A AND B

EFFLUENT (AND INTAKE) CHARACTERISTICS	THIS OUTFALL IS: <b>Stormwater</b>	OUTFALL NO. <b>013</b>
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3.0 PART A – You must provide the results of at least one analysis for every pollutant in Part A. Complete one table for each outfall or proposed outfall. See instructions.

1. POLLUTANT	2. VALUES							3. UNITS ( <i>specify if blank</i> )	
	A. MAXIMUM DAILY VALUE		B. MAXIMUM 30 DAY VALUES		C. LONG TERM AVERAGE VALUES		D. NO. OF ANALYSES	A. CONCENTRATION	B. MASS
	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS			
A. Biochemical Oxygen Demand, 5-day (BOD <sub>5</sub> )	N/A								
B. Chemical Oxygen Demand (COD)	53	50			29	75	9	mg/L	lbs
C. Total Organic Carbon (TOC)	N/A								
D. Total Suspended Solids (TSS)	60	56			18	45	9	mg/L	lbs
E. Ammonia as N	N/A								
F. Flow	VALUE 1.2		VALUE		VALUE 0.33		9	MILLIONS OF GALLONS PER DAY (MGD)	
G. Temperature ( <i>winter</i> )	VALUE N/A		VALUE		VALUE			°F	
H. Temperature ( <i>summer</i> )	VALUE N/A		VALUE		VALUE			°F	
I. pH	MINIMUM 7.3		MAXIMUM 8.3		AVERAGE 7.8 (median)		9	STANDARD UNITS (SU)	

3.0 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 the pollutant. Complete one table for each outfall (intake). Provide results for additional parameters not listed here in Part 3.0 C.

1. POLLUTANT AND CAS NUMBER ( <i>if available</i> )	2. MARK “X”		3. VALUES							4. UNITS	
	A. BELIEVED PRESENT	B. BELIEVED ABSENT	A. MAXIMUM DAILY VALUE		B. MAXIMUM 30 DAY VALUES		C. LONG TERM AVERAGE VALUES		D. NO. OF ANALYSES	A. CONCENTRATION	B. MASS
			CONCENTRATION	MASS	CONCENTRATION	MASS	CONCENTRATION	MASS			

Subpart 1 – Conventional and Non-Conventional Pollutants

A. Alkalinity (CaCO <sub>3</sub> )		X	MINIMUM		MINIMUM		MINIMUM				
B. Bromide (24959-67-9)		X									
C. Chloride (16887-00-6)	X		700	654			280	768	9	mg/L	lbs
D. Chlorine, Total Residual		X									
E. Color		X									
F. Conductivity		X									
F. Cyanide, Amenable to Chlorination		X									

1. POLLUTANT AND CAS NUMBER <i>(if available)</i>	2. MARK "X"		3. VALUES							4. UNITS	
	A. BELIEVED PRESENT	B. BELIEVED ABSENT	A. MAXIMUM DAILY VALUE		B. MAXIMUM 30 DAY VALUE		C. LONG TERM AVERAGE VALUE		D. NO. OF ANALYSES	A. CONCEN- TRATION	B. MASS
			CONCENTRATION	MASS	CONCENTRATION	MASS	CONCENTRATION	MASS			
Subpart 1 – Conventional and Non-Conventional Pollutants (Continued)											
G. <i>E. coli</i>		X									
H. Fluoride (16984-48-8)		X									
I. Nitrate plus Nitrate (as N)	X		1.4	0.72			0.73	2.0	g	mg/L	lbs
J. Kjeldahl, Total (as N)	X		1.9	4.4			0.50	1.3	g	mg/L	lbs
K. Nitrogen, Total Organic (as N)		X									
L. Oil and Grease	X		8.0	7.5			0.90	2.4	g	mg/L	lbs
M. Phenols, Total		X									
N. Phosphorus (as P), Total (7723-14-0)	X		0.57	0.25			0.14	0.37	g	mg/L	lbs
O. Sulfate (as SO <sup>4</sup> ) (14808-79-8)	X		40	26			17	46	g	mg/L	lbs
P. Sulfide (as S)		X									
Q. Sulfite (as SO <sup>3</sup> ) (14265-45-3)		X									
R. Surfactants		X									
S. Trihalomethanes, Total		X									
Subpart 2 – Metals											
1M. Aluminum, Total Recoverable (7429-90-5)	X		1040	1.0			456	1.3	g	ug/L	lbs
2M. Antimony, Total Recoverable (7440-36-9)		X									
3M. Arsenic, Total Recoverable (7440-38-2)		X									
4M. Barium, Total Recoverable (7440-39-3)		X									
5M. Beryllium, Total Recoverable (7440-41-7)		X									
6M. Boron, Total Recoverable (7440-42-8)		X									
7M. Cadmium, Total Recoverable (7440-43-9)		X									
8M. Chromium III Total Recoverable (16065-83-1)		X									
9M. Chromium VI, Dissolved (18540-29-9)		X									
10M. Cobalt, Total Recoverable (7440-48-4)		X									



1. POLLUTANT AND CAS NUMBER (if available)	2. MARK "X"		3. VALUES							4. UNITS	
	A. BELIEVED PRESENT	B. BELIEVED ABSENT	A. MAXIMUM DAILY VALUE		B. MAXIMUM 30 DAY VALUE		C. LONG TERM AVERAGE VALUE		D. NO. OF ANALYSES	A. CONCEN- TRATION	B. MASS
			CONCENTRATION	MASS	CONCENTRATION	MASS	CONCENTRATION	MASS			
Subpart 2 – Metals (Continued)											
11M. Copper, Total Recoverable (7440-50-8)	X		19	0.02			7.3	0.02	9	ug/L	lbs
12M. Iron, Total Recoverable (7439-89-6)	X		1680	1.6			566	1.6	9	ug/L	lbs
13M. Lead, Total Recoverable (7439-92-1)		X									
14M. Magnesium, Total Recoverable (7439-95-4)		X									
15M. Manganese, Total Recoverable (7439-96-5)		X									
16M. Mercury, Total Recoverable (7439-97-6)		X									
17M. Methylmercury (22967926)		X									
18M. Molybdenum, Total Recoverable (7439-98-7)		X									
19M. Nickel, Total Recoverable (7440-02-0)		X									
20M. Selenium, Total Recoverable (7782-49-2)		X									
21M. Silver, Total Recoverable (7440-22-4)		X									
22M. Thallium, Total Recoverable (7440-28-0)		X									
23M. Tin, Total Recoverable (7440-31-5)		X									
24M. Titanium, Total Recoverable (7440-32-6)		X									
25M. Zinc, Total Recoverable (7440-66-6)		X									
Subpart 3 – Radioactivity											
1R. Alpha Total		X									
2R. Beta Total		X									
3R. Radium Total		X									
4R. Radium 226 plus 228 Total		X									

SEE INSTRUCTIONS; PLEASE PRINT OR TYPE.

You may report some or all of this information on separate sheet (*use similar format*) instead of completing these pages.

FORM C    TABLE 1    FOR 3.0 - ITEMS A AND B

EFFLUENT (AND INTAKE) CHARACTERISTICS	THIS OUTFALL IS: <b>Stormwater</b>	OUTFALL NO. <b>014</b>
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3.0 PART A – You must provide the results of at least one analysis for every pollutant in Part A. Complete one table for each outfall or proposed outfall. See instructions.

1. POLLUTANT	2. VALUES							3. UNITS ( <i>specify if blank</i> )	
	A. MAXIMUM DAILY VALUE		B. MAXIMUM 30 DAY VALUES		C. LONG TERM AVERAGE VALUES		D. NO. OF ANALYSES	A. CONCENTRATION	B. MASS
	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS			
A. Biochemical Oxygen Demand, 5-day (BOD <sub>5</sub> )	N/A								
B. Chemical Oxygen Demand (COD)	27	235			12	44	9	mg/L	lbs
C. Total Organic Carbon (TOC)	N/A								
D. Total Suspended Solids (TSS)	71	618			13	54	9	mg/L	lbs
E. Ammonia as N									
F. Flow	VALUE 1.5		VALUE		VALUE 0.58		9	MILLIONS OF GALLONS PER DAY (MGD)	
G. Temperature ( <i>winter</i> )	VALUE N/A		VALUE		VALUE			°F	
H. Temperature ( <i>summer</i> )	VALUE N/A		VALUE		VALUE			°F	
I. pH	MINIMUM 7.2		MAXIMUM 7.8		AVERAGE 7.4		9	STANDARD UNITS (SU)	

3.0 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 the pollutant. Complete one table for each outfall (intake). Provide results for additional parameters not listed here in Part 3.0 C.

1. POLLUTANT AND CAS NUMBER ( <i>if available</i> )	2. MARK “X”		3. VALUES							4. UNITS	
	A. BELIEVED PRESENT	B. BELIEVED ABSENT	A. MAXIMUM DAILY VALUE		B. MAXIMUM 30 DAY VALUES		C. LONG TERM AVERAGE VALUES		D. NO. OF ANALYSES	A. CONCENTRATION	B. MASS
			CONCENTRATION	MASS	CONCENTRATION	MASS	CONCENTRATION	MASS			

Subpart 1 – Conventional and Non-Conventional Pollutants

A. Alkalinity (CaCO <sub>3</sub> )		X	MINIMUM		MINIMUM		MINIMUM				
B. Bromide (24959-67-9)		X									
C. Chloride (16887-00-6)	X		1020	8884			206	1001	9	mg/L	lbs
D. Chlorine, Total Residual		X									
E. Color		X									
F. Conductivity		X									
F. Cyanide, Amenable to Chlorination		X									

1. POLLUTANT AND CAS NUMBER (if available)	2. MARK "X"		3. VALUES							4. UNITS	
	A. BELIEVED PRESENT	B. BELIEVED ABSENT	A. MAXIMUM DAILY VALUE		B. MAXIMUM 30 DAY VALUE		C. LONG TERM AVERAGE VALUE		D. NO. OF ANALYSES	A. CONCEN- TRATION	B. MASS
			CONCENTRATION	MASS	CONCENTRATION	MASS	CONCENTRATION	MASS			
Subpart 1 – Conventional and Non-Conventional Pollutants (Continued)											
G. <i>E. coli</i>		X									
H. Fluoride (16984-48-8)		X									
I. Nitrate plus Nitrate (as N)	X		2.1	5.8			0.73	3.6	g	mg/L	lbs
J. Kjeldahl, Total (as N)		X	<1.0	0.00			<1.0	0.00	g	mg/L	lbs
K. Nitrogen, Total Organic (as N)		X									
L. Oil and Grease		X	<6.0	0.00			<6.0	0.00	g	mg/L	lbs
M. Phenols, Total		X									
N. Phosphorus (as P), Total (7723-14-0)	X		0.31	2.5			0.05	0.25	g	mg/L	lbs
O. Sulfate (as SO <sup>4</sup> ) (14808-79-8)	X		45	355			14	69	g	mg/L	lbs
P. Sulfide (as S)		X									
Q. Sulfite (as SO <sup>3</sup> ) (14265-45-3)		X									
R. Surfactants		X									
S. Trihalomethanes, Total		X									
Subpart 2 – Metals											
1M. Aluminum, Total Recoverable (7429-90-5)	X		2750	22			592	2.9	g	ug/L	lbs
2M. Antimony, Total Recoverable (7440-36-9)		X									
3M. Arsenic, Total Recoverable (7440-38-2)		X									
4M. Barium, Total Recoverable (7440-39-3)		X									
5M. Beryllium, Total Recoverable (7440-41-7)		X									
6M. Boron, Total Recoverable (7440-42-8)		X									
7M. Cadmium, Total Recoverable (7440-43-9)		X									
8M. Chromium III Total Recoverable (16065-83-1)		X									
9M. Chromium VI, Dissolved (18540-29-9)		X									
10M. Cobalt, Total Recoverable (7440-48-4)		X									

1. POLLUTANT AND CAS NUMBER (if available)	2. MARK "X"		3. VALUES							4. UNITS	
	A. BELIEVED PRESENT	B. BELIEVED ABSENT	A. MAXIMUM DAILY VALUE		B. MAXIMUM 30 DAY VALUE		C. LONG TERM AVERAGE VALUE		D. NO. OF ANALYSES	A. CONCEN- TRATION	B. MASS
			CONCENTRATION	MASS	CONCENTRATION	MASS	CONCENTRATION	MASS			
Subpart 2 – Metals (Continued)											
11M. Copper, Total Recoverable (7440-50-8)	X		9.0	0.01			4.1	0.01	g	ug/L	lbs
12M. Iron, Total Recoverable (7439-89-6)	X		1830	14			499	2.4	g	ug/L	lbs
13M. Lead, Total Recoverable (7439-92-1)		X									
14M. Magnesium, Total Recoverable (7439-95-4)		X									
15M. Manganese, Total Recoverable (7439-96-5)		X									
16M. Mercury, Total Recoverable (7439-97-6)		X									
17M. Methylmercury (22967926)		X									
18M. Molybdenum, Total Recoverable (7439-98-7)		X									
19M. Nickel, Total Recoverable (7440-02-0)		X									
20M. Selenium, Total Recoverable (7782-49-2)		X									
21M. Silver, Total Recoverable (7440-22-4)		X									
22M. Thallium, Total Recoverable (7440-28-0)		X									
23M. Tin, Total Recoverable (7440-31-5)		X									
24M. Titanium, Total Recoverable (7440-32-6)		X									
25M. Zinc, Total Recoverable (7440-66-6)		X									
Subpart 3 – Radioactivity											
1R. Alpha Total		X									
2R. Beta Total		X									
3R. Radium Total		X									
4R. Radium 226 plus 228 Total		X									

SEE INSTRUCTIONS; PLEASE PRINT OR TYPE.

You may report some or all of this information on separate sheet (*use similar format*) instead of completing these pages.

FORM C    TABLE 1    FOR 3.0 - ITEMS A AND B

EFFLUENT (AND INTAKE) CHARACTERISTICS	THIS OUTFALL IS: <b>Stormwater</b>	OUTFALL NO. <b>015</b>
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3.0 PART A – You must provide the results of at least one analysis for every pollutant in Part A. Complete one table for each outfall or proposed outfall. See instructions.

1. POLLUTANT	2. VALUES							3. UNITS ( <i>specify if blank</i> )	
	A. MAXIMUM DAILY VALUE		B. MAXIMUM 30 DAY VALUES		C. LONG TERM AVERAGE VALUES		D. NO. OF ANALYSES	A. CONCENTRATION	B. MASS
	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS			
A. Biochemical Oxygen Demand, 5-day (BOD <sub>5</sub> )	N/A								
B. Chemical Oxygen Demand (COD)	66	26			24	73	9	mg/L	lbs
C. Total Organic Carbon (TOC)	N/A								
D. Total Suspended Solids (TSS)	38	19			20	60	9	mg/L	lbs
E. Ammonia as N	N/A								
F. Flow	VALUE 1.1		VALUE		VALUE 0.39		9	MILLIONS OF GALLONS PER DAY (MGD)	
G. Temperature ( <i>winter</i> )	VALUE N/A		VALUE		VALUE			°F	
H. Temperature ( <i>summer</i> )	VALUE N/A		VALUE		VALUE			°F	
I. pH	MINIMUM 7.6		MAXIMUM 8.2		AVERAGE 7.7 (median)		9	STANDARD UNITS (SU)	

3.0 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 the pollutant. Complete one table for each outfall (intake). Provide results for additional parameters not listed here in Part 3.0 C.

1. POLLUTANT AND CAS NUMBER ( <i>if available</i> )	2. MARK “X”		3. VALUES							4. UNITS	
	A. BELIEVED PRESENT	B. BELIEVED ABSENT	A. MAXIMUM DAILY VALUE		B. MAXIMUM 30 DAY VALUES		C. LONG TERM AVERAGE VALUES		D. NO. OF ANALYSES	A. CONCENTRATION	B. MASS
			CONCENTRATION	MASS	CONCENTRATION	MASS	CONCENTRATION	MASS			

Subpart 1 – Conventional and Non-Conventional Pollutants

A. Alkalinity (CaCO <sub>3</sub> )		X	MINIMUM		MINIMUM		MINIMUM				
B. Bromide (24959-67-9)		X									
C. Chloride (16887-00-6)	X		747	1811			212	682	9	mg/L	lbs
D. Chlorine, Total Residual		X									
E. Color		X									
F. Conductivity		X									
F. Cyanide, Amenable to Chlorination		X									

1. POLLUTANT AND CAS NUMBER (if available)	2. MARK "X"		3. VALUES							4. UNITS	
	A. BELIEVED PRESENT	B. BELIEVED ABSENT	A. MAXIMUM DAILY VALUE		B. MAXIMUM 30 DAY VALUE		C. LONG TERM AVERAGE VALUE		D. NO. OF ANALYSES	A. CONCEN- TRATION	B. MASS
			CONCENTRATION	MASS	CONCENTRATION	MASS	CONCENTRATION	MASS			
Subpart 1 – Conventional and Non-Conventional Pollutants (Continued)											
G. <i>E. coli</i>		X									
H. Fluoride (16984-48-8)		X									
I. Nitrate plus Nitrate (as N)	X		1.9	4.6			0.52	1.7	g	mg/L	lbs
J. Kjeldahl, Total (as N)	X		2.1	4.3			0.50	1.7	g	mg/L	lbs
K. Nitrogen, Total Organic (as N)		X									
L. Oil and Grease	X		9.0	7.6			1.8	5.7	g	mg/L	lbs
M. Phenols, Total		X									
N. Phosphorus (as P), Total (7723-14-0)	X		0.20	0.10			0.09	0.29	g	mg/L	lbs
O. Sulfate (as SO <sup>4</sup> ) (14808-79-8)	X		147	356			28	90	g	mg/L	lbs
P. Sulfide (as S)		X									
Q. Sulfite (as SO <sup>3</sup> ) (14265-45-3)		X									
R. Surfactants		X									
S. Trihalomethanes, Total		X									
Subpart 2 – Metals											
1M. Aluminum, Total Recoverable (7429-90-5)	X		1740	9.6			646	2.1	g	ug/L	lbs
2M. Antimony, Total Recoverable (7440-36-9)		X									
3M. Arsenic, Total Recoverable (7440-38-2)		X									
4M. Barium, Total Recoverable (7440-39-3)		X									
5M. Beryllium, Total Recoverable (7440-41-7)		X									
6M. Boron, Total Recoverable (7440-42-8)		X									
7M. Cadmium, Total Recoverable (7440-43-9)		X									
8M. Chromium III Total Recoverable (16065-83-1)		X									
9M. Chromium VI, Dissolved (18540-29-9)		X									
10M. Cobalt, Total Recoverable (7440-48-4)		X									



1. POLLUTANT AND CAS NUMBER (if available)	2. MARK "X"		3. VALUES							4. UNITS	
	A. BELIEVED PRESENT	B. BELIEVED ABSENT	A. MAXIMUM DAILY VALUE		B. MAXIMUM 30 DAY VALUE		C. LONG TERM AVERAGE VALUE		D. NO. OF ANALYSES	A. CONCEN- TRATION	B. MASS
			CONCENTRATION	MASS	CONCENTRATION	MASS	CONCENTRATION	MASS			
Subpart 2 – Metals (Continued)											
11M. Copper, Total Recoverable (7440-50-8)	X		10	0.00			3.1	0.01	g	ug/L	lbs
12M. Iron, Total Recoverable (7439-89-6)	X		1610	8.9			698	2.2	g	ug/L	lbs
13M. Lead, Total Recoverable (7439-92-1)		X									
14M. Magnesium, Total Recoverable (7439-95-4)		X									
15M. Manganese, Total Recoverable (7439-96-5)		X									
16M. Mercury, Total Recoverable (7439-97-6)		X									
17M. Methylmercury (22967926)		X									
18M. Molybdenum, Total Recoverable (7439-98-7)		X									
19M. Nickel, Total Recoverable (7440-02-0)		X									
20M. Selenium, Total Recoverable (7782-49-2)		X									
21M. Silver, Total Recoverable (7440-22-4)		X									
22M. Thallium, Total Recoverable (7440-28-0)		X									
23M. Tin, Total Recoverable (7440-31-5)		X									
24M. Titanium, Total Recoverable (7440-32-6)		X									
25M. Zinc, Total Recoverable (7440-66-6)		X									
Subpart 3 – Radioactivity											
1R. Alpha Total		X									
2R. Beta Total		X									
3R. Radium Total		X									
4R. Radium 226 plus 228 Total		X									

SEE INSTRUCTIONS; PLEASE PRINT OR TYPE.

You may report some or all of this information on separate sheet (*use similar format*) instead of completing these pages.

FORM C TABLE 1 FOR 3.0 - ITEMS A AND B

EFFLUENT (AND INTAKE) CHARACTERISTICS	THIS OUTFALL IS: <b>Stormwater</b>	OUTFALL NO. <b>016</b>
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3.0 PART A – You must provide the results of at least one analysis for every pollutant in Part A. Complete one table for each outfall or proposed outfall. See instructions.

1. POLLUTANT	2. VALUES							3. UNITS ( <i>specify if blank</i> )	
	A. MAXIMUM DAILY VALUE		B. MAXIMUM 30 DAY VALUES		C. LONG TERM AVERAGE VALUES		D. NO. OF ANALYSES	A. CONCENTRATION	B. MASS
	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS			
A. Biochemical Oxygen Demand, 5-day (BOD <sub>5</sub> )	N/A								
B. Chemical Oxygen Demand (COD)	59	10			27	42	9	mg/L	lbs
C. Total Organic Carbon (TOC)	N/A								
D. Total Suspended Solids (TSS)	32	87			11	15	9	mg/L	lbs
E. Ammonia as N	N/A								
F. Flow	VALUE 0.50		VALUE		VALUE 0.18		9	MILLIONS OF GALLONS PER DAY (MGD)	
G. Temperature ( <i>winter</i> )	VALUE N/A		VALUE		VALUE			°F	
H. Temperature ( <i>summer</i> )	VALUE N/A		VALUE		VALUE			°F	
I. pH	MINIMUM 6.8		MAXIMUM 8.6		AVERAGE 7.4 (median)		9	STANDARD UNITS (SU)	

3.0 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 the pollutant. Complete one table for each outfall (intake). Provide results for additional parameters not listed here in Part 3.0 C.

1. POLLUTANT AND CAS NUMBER <i>(if available)</i>	2. MARK "X"		3. VALUES							4. UNITS	
	A. BELIEVED PRESENT	B. BELIEVED ABSENT	A. MAXIMUM DAILY VALUE		B. MAXIMUM 30 DAY VALUES		C. LONG TERM AVERAGE VALUES		D. NO. OF ANALYSES	A. CONCENTRATION	B. MASS
			CONCENTRATION	MASS	CONCENTRATION	MASS	CONCENTRATION	MASS			
Subpart 1 – Conventional and Non-Conventional Pollutants											
A. Alkalinity (CaCO <sub>3</sub> )		X	MINIMUM		MINIMUM		MINIMUM				
B. Bromide (24959-67-9)		X									
C. Chloride (16887-00-6)	X		584	292			91	140	9	mg/L	lbs
D. Chlorine, Total Residual		X									
E. Color		X									
F. Conductivity		X									
F. Cyanide, Amenable to Chlorination		X									

1. POLLUTANT AND CAS NUMBER (if available)	2. MARK "X"		3. VALUES							4. UNITS	
	A. BELIEVED PRESENT	B. BELIEVED ABSENT	A. MAXIMUM DAILY VALUE		B. MAXIMUM 30 DAY VALUE		C. LONG TERM AVERAGE VALUE		D. NO. OF ANALYSES	A. CONCEN- TRATION	B. MASS
			CONCENTRATION	MASS	CONCENTRATION	MASS	CONCENTRATION	MASS			
Subpart 1 – Conventional and Non-Conventional Pollutants (Continued)											
G. <i>E. coli</i>		X									
H. Fluoride (16984-48-8)		X									
I. Nitrate plus Nitrate (as N)	X		4.3	0.70			0.82	1.3	g	mg/L	lbs
J. Kjeldahl, Total (as N)	X		1.8	0.30			0.50	0.77	g	mg/L	lbs
K. Nitrogen, Total Organic (as N)		X									
L. Oil and Grease	X		8.0	17			2.3	3.6	g	mg/L	lbs
M. Phenols, Total		X									
N. Phosphorus (as P), Total (7723-14-0)		X	<0.1	<0.1			<0.1	<0.1	g	mg/L	lbs
O. Sulfate (as SO <sup>4</sup> ) (14808-79-8)	X		24	12			7.0	10	g	mg/L	lbs
P. Sulfide (as S)		X									
Q. Sulfite (as SO <sup>3</sup> ) (14265-45-3)		X									
R. Surfactants		X									
S. Trihalomethanes, Total		X									
Subpart 2 – Metals											
1M. Aluminum, Total Recoverable (7429-90-5)	X		1220	3.3			322	0.49	g	ug/L	lbs
2M. Antimony, Total Recoverable (7440-36-9)		X									
3M. Arsenic, Total Recoverable (7440-38-2)		X									
4M. Barium, Total Recoverable (7440-39-3)		X									
5M. Beryllium, Total Recoverable (7440-41-7)		X									
6M. Boron, Total Recoverable (7440-42-8)		X									
7M. Cadmium, Total Recoverable (7440-43-9)		X									
8M. Chromium III Total Recoverable (16065-83-1)		X									
9M. Chromium VI, Dissolved (18540-29-9)		X									
10M. Cobalt, Total Recoverable (7440-48-4)		X									

1. POLLUTANT AND CAS NUMBER (if available)	2. MARK "X"		3. VALUES							4. UNITS	
	A. BELIEVED PRESENT	B. BELIEVED ABSENT	A. MAXIMUM DAILY VALUE		B. MAXIMUM 30 DAY VALUE		C. LONG TERM AVERAGE VALUE		D. NO. OF ANALYSES	A. CONCEN- TRATION	B. MASS
			CONCENTRATION	MASS	CONCENTRATION	MASS	CONCENTRATION	MASS			
Subpart 2 – Metals (Continued)											
11M. Copper, Total Recoverable (7440-50-8)	X		14	0.01			4.5	0.01	9	ug/L	lbs
12M. Iron, Total Recoverable (7439-89-6)	X		1330	3.6			348	0.53	9	ug/L	lbs
13M. Lead, Total Recoverable (7439-92-1)		X									
14M. Magnesium, Total Recoverable (7439-95-4)		X									
15M. Manganese, Total Recoverable (7439-96-5)		X									
16M. Mercury, Total Recoverable (7439-97-6)		X									
17M. Methylmercury (22967926)		X									
18M. Molybdenum, Total Recoverable (7439-98-7)		X									
19M. Nickel, Total Recoverable (7440-02-0)		X									
20M. Selenium, Total Recoverable (7782-49-2)		X									
21M. Silver, Total Recoverable (7440-22-4)		X									
22M. Thallium, Total Recoverable (7440-28-0)		X									
23M. Tin, Total Recoverable (7440-31-5)		X									
24M. Titanium, Total Recoverable (7440-32-6)		X									
25M. Zinc, Total Recoverable (7440-66-6)		X									
Subpart 3 – Radioactivity											
1R. Alpha Total		X									
2R. Beta Total		X									
3R. Radium Total		X									
4R. Radium 226 plus 228 Total		X									

SEE INSTRUCTIONS; PLEASE PRINT OR TYPE.

You may report some or all of this information on separate sheet (*use similar format*) instead of completing these pages.

FORM C    TABLE 1    FOR 3.0 - ITEMS A AND B

EFFLUENT (AND INTAKE) CHARACTERISTICS	THIS OUTFALL IS: <b>Stormwater</b>	OUTFALL NO. <b>017</b>
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3.0 PART A – You must provide the results of at least one analysis for every pollutant in Part A. Complete one table for each outfall or proposed outfall. See instructions.

1. POLLUTANT	2. VALUES							3. UNITS ( <i>specify if blank</i> )	
	A. MAXIMUM DAILY VALUE		B. MAXIMUM 30 DAY VALUES		C. LONG TERM AVERAGE VALUES		D. NO. OF ANALYSES	A. CONCENTRATION	B. MASS
	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS			
A. Biochemical Oxygen Demand, 5-day (BOD <sub>5</sub> )	N/A								
B. Chemical Oxygen Demand (COD)	71	275			32	48	9	mg/L	lbs
C. Total Organic Carbon (TOC)	N/A								
D. Total Suspended Solids (TSS)	18	9			6.0	6.5	9	mg/L	lbs
E. Ammonia as N	N/A								
F. Flow	VALUE 0.60		VALUE		VALUE 0.19		9	MILLIONS OF GALLONS PER DAY (MGD)	
G. Temperature ( <i>winter</i> )	VALUE N/A		VALUE		VALUE			°F	
H. Temperature ( <i>summer</i> )	VALUE N/A		VALUE		VALUE			°F	
I. pH	MINIMUM 7.1		MAXIMUM 7.5		AVERAGE 7.3 (median)		9	STANDARD UNITS (SU)	

3.0 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 the pollutant. Complete one table for each outfall (intake). Provide results for additional parameters not listed here in Part 3.0 C.

1. POLLUTANT AND CAS NUMBER ( <i>if available</i> )	2. MARK "X"		3. VALUES							4. UNITS	
	A. BELIEVED PRESENT	B. BELIEVED ABSENT	A. MAXIMUM DAILY VALUE		B. MAXIMUM 30 DAY VALUES		C. LONG TERM AVERAGE VALUES		D. NO. OF ANALYSES	A. CONCENTRATION	B. MASS
			CONCENTRATION	MASS	CONCENTRATION	MASS	CONCENTRATION	MASS			

Subpart 1 – Conventional and Non-Conventional Pollutants

A. Alkalinity (CaCO <sub>3</sub> )		X	MINIMUM		MINIMUM		MINIMUM				
B. Bromide (24959-67-9)		X									
C. Chloride (16887-00-6)	X		1710	6616			643		9	mg/L	lbs
D. Chlorine, Total Residual		X									
E. Color		X									
F. Conductivity		X									
F. Cyanide, Amenable to Chlorination		X									

1. POLLUTANT AND CAS NUMBER (if available)	2. MARK "X"		3. VALUES							4. UNITS	
	A. BELIEVED PRESENT	B. BELIEVED ABSENT	A. MAXIMUM DAILY VALUE		B. MAXIMUM 30 DAY VALUE		C. LONG TERM AVERAGE VALUE		D. NO. OF ANALYSES	A. CONCEN- TRATION	B. MASS
			CONCENTRATION	MASS	CONCENTRATION	MASS	CONCENTRATION	MASS			
Subpart 1 – Conventional and Non-Conventional Pollutants (Continued)											
G. <i>E. coli</i>		X									
H. Fluoride (16984-48-8)		X									
I. Nitrate plus Nitrate (as N)	X		2.4	3.0			1.4	2.2	9	mg/L	lbs
J. Kjeldahl, Total (as N)	X		1.6	2.0			0.50	0.76	9	mg/L	lbs
K. Nitrogen, Total Organic (as N)		X									
L. Oil and Grease	X		9.0	2.3			1.0	1.6	9	mg/L	lbs
M. Phenols, Total		X									
N. Phosphorus (as P), Total (7723-14-0)	X		0.36	0.22			0.12	0.19	9	mg/L	lbs
O. Sulfate (as SO <sup>4</sup> ) (14808-79-8)	X		110	426			59	94	9	mg/L	lbs
P. Sulfide (as S)		X									
Q. Sulfite (as SO <sup>3</sup> ) (14265-45-3)		X									
R. Surfactants		X									
S. Trihalomethanes, Total		X									
Subpart 2 – Metals											
1M. Aluminum, Total Recoverable (7429-90-5)	X		1780	2.2			848	1.3	9	ug/L	lbs
2M. Antimony, Total Recoverable (7440-36-9)		X									
3M. Arsenic, Total Recoverable (7440-38-2)		X									
4M. Barium, Total Recoverable (7440-39-3)		X									
5M. Beryllium, Total Recoverable (7440-41-7)		X									
6M. Boron, Total Recoverable (7440-42-8)		X									
7M. Cadmium, Total Recoverable (7440-43-9)		X									
8M. Chromium III Total Recoverable (16065-83-1)		X									
9M. Chromium VI, Dissolved (18540-29-9)		X									
10M. Cobalt, Total Recoverable (7440-48-4)		X									



1. POLLUTANT AND CAS NUMBER (if available)	2. MARK "X"		3. VALUES							4. UNITS	
	A. BELIEVED PRESENT	B. BELIEVED ABSENT	A. MAXIMUM DAILY VALUE		B. MAXIMUM 30 DAY VALUE		C. LONG TERM AVERAGE VALUE		D. NO. OF ANALYSES	A. CONCEN- TRATION	B. MASS
			CONCENTRATION	MASS	CONCENTRATION	MASS	CONCENTRATION	MASS			
Subpart 2 – Metals (Continued)											
11M. Copper, Total Recoverable (7440-50-8)	X		12	0.01			5.0	0.01	9	ug/L	lbs
12M. Iron, Total Recoverable (7439-89-6)	X		1890	2.3			721	1.1	9	ug/L	lbs
13M. Lead, Total Recoverable (7439-92-1)		X									
14M. Magnesium, Total Recoverable (7439-95-4)		X									
15M. Manganese, Total Recoverable (7439-96-5)		X									
16M. Mercury, Total Recoverable (7439-97-6)		X									
17M. Methylmercury (22967926)		X									
18M. Molybdenum, Total Recoverable (7439-98-7)		X									
19M. Nickel, Total Recoverable (7440-02-0)		X									
20M. Selenium, Total Recoverable (7782-49-2)		X									
21M. Silver, Total Recoverable (7440-22-4)		X									
22M. Thallium, Total Recoverable (7440-28-0)		X									
23M. Tin, Total Recoverable (7440-31-5)		X									
24M. Titanium, Total Recoverable (7440-32-6)		X									
25M. Zinc, Total Recoverable (7440-66-6)		X									
Subpart 3 – Radioactivity											
1R. Alpha Total		X									
2R. Beta Total		X									
3R. Radium Total		X									
4R. Radium 226 plus 228 Total		X									