STATE OF MISSOURI

DEPARTMENT OF NATURAL RESOURCES

MISSOURI CLEAN WATER COMMISSION



MISSOURI STATE OPERATING PERMIT

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

2172 County Road 354, Fulton, MO 65251

MO-0119636

KP's Suds & Such, LLC

Permit No.

Owner:

Address:

Continuing Authority: Address:	Same as above Same as above
Facility Name: Facility Address:	KP's Suds & Such, LLC 4452 State Road J, Fulton, MO 65251
Legal Description: Latitude/Longitude:	SW 1 / ₄ , NW 1 / ₄ , NE 1 / ₄ , Sec. 35, T48N, R11W, Callaway County $+3854031/-09207252$
Receiving Stream: First Classified Stream and ID: USGS Basin & Sub-watershed No.:	Unnamed tributary to Owl Creek (U) Owl Creek (C) (00741) (10300102-190002)
is authorized to discharge from the facility das set forth herein:	described herein, in accordance with the effluent limitations and monitoring requirements
FACILITY DESCRIPTION Outfall #001 – Carwash and Restaurant – SI Two-cell lagoon / sludge is retained in lagood Design population equivalent is 13.2. Design flow is 565 gallons per day. Design sludge production is 0.2 dry tons/year	
	charges under the Missouri Clean Water Law and the National Pollutant Discharge her regulated areas. This permit may be appealed in accordance with Section 644.051.6 of
October 9, 2009 Effective Date	Mark N. Templeton, Director Department of Natural Resources
October 8, 2014 Expiration Date	Irene Crawford Regional Director, Northeast Regional Office

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

PAGE NUMBER 2 of 8

PERMIT NUMBER MO-0119636

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

OUTFALL NUMBER AND	UNITS	FINAL EI	FFLUENT LIM	IITATIONS	MONITORING REQUIREMENTS		
EFFLUENT PARAMETER(S)	ONITS	DAILY MAXIMUM	WEEKLY AVERAGE	MONTHLY AVERAGE	MEASUREMENT FREQUENCY	SAMPLE TYPE	
Outfall #001							
Flow	MGD	*		*	once/quarter***	24 hr. estimate	
Biochemical Oxygen Demand ₅	mg/L		65	45	once/quarter***	grab	
Total Suspended Solids	mg/L		110	70	once/quarter***	grab	
pH – Units	SU	**		**	once/quarter***	grab	
Ammonia as N	mg/L	*		*	once/quarter***	grab	
Temperature	°C	90°		90°	once/quarter***	grab	
Oil & Grease	mg/L	15		10	once/quarter***	grab	
Fecal Coliform (Notes 1 & 2)	#/100mL	1000		400	once/quarter***	grab	
Total Residual Chlorine (Note 3)	mg/L	0.0164 (0.13ML)		0.0082 (0.13ML)	once/quarter***	grab	
Chemical Oxygen Demand	mg/L	30		20	once/quarter***	grab	
Chloride	mg/L	378		188	once/quarter***	grab	
Lead, Total Recoverable	μg/L	9.5		4.7	once/quarter***	grab	
Zinc, Total Recoverable	μg/L	180		90	once/quarter***	grab	
Copper, Total Recoverable	μg/L	19.2		9.6	once/quarter***	grab	
Surfactants	mg/L	*		*	once/quarter***	grab	

MONITORING REPORTS SHALL BE SUBMITTED <u>QUARTERLY</u>; THE FIRST REPORT IS DUE <u>JANUARY 28, 2010.</u> THERE SHALL BE NO DISCHARGE OF FLOATING SOLIDS OR VISIBLE FOAM IN OTHER THAN TRACE AMOUNTS.

Whole Effluent Toxicity (WET) test % Survival See Special Conditions #9 once/five years grab

MONITORING REPORTS SHALL BE SUBMITTED ONCE IN FIVE YEARS; THE FIRST REPORT IS DUE BY JANUARY 28, 2012.

B. STANDARD CONDITIONS

IN ADDITION TO SPECIFIED CONDITIONS STATED HEREIN, THIS PERMIT IS SUBJECT TO THE ATTACHED <u>Parts I & III</u> STANDARD CONDITIONS DATED <u>October 1, 1980 and August 15, 1994</u>, AND HEREBY INCORPORATED AS THOUGH FULLY SET FORTH HEREIN.

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS (continued)

- * Monitoring requirement only.
- ** pH is measured in pH units and is not to be averaged. The pH is to be maintained at or above 6.0 pH units.
- *** See table below for quarterly sampling.

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS (continued)

Sample discharge at least once for	Report is due:	
January, February, March	(1st Quarter)	April 28
April, May, June	(2nd Quarter)	July 28
July, August, September	(3rd Quarter)	October 28
October, November, December	(4th Quarter)	January 28

- Note 1 Final limitations and monitoring requirements for Fecal Coliform are applicable only during the recreational season from April 1 through October 31.
- Note 2 The Monthly Average Limit for Fecal Coliform is a geometric mean.
- Note 3 This permit contains a Total Residual Chlorine (TRC) limit.
- (a) This effluent limit is below the minimum quantification level (ML) of the most common and practical EPA approved CLTRC methods. The department has determined the current acceptable ML for total residual chlorine to be 0.13 mg/L when using the DPD Colorimetric Method #4500 CL G. from Standard Methods for the Examination of Waters and Wastewater. The permittee will conduct analyses in accordance with this method, or equivalent, and report actual analytical values. Measured values greater than or equal to the minimum quantification level of 0.13 mg/L will be considered violations of the permit and values less than the minimum quantification level of 0.13 mg/L will be considered to be in compliance with the permit limitation. The minimum quantification level does not authorize the discharge of chlorine in excess of the effluent limits stated in the permit.
- (b) Disinfection is required year-round unless the permit specifically states that "Final limitations and monitoring requirements for Fecal Coliform are applicable only during the recreational season from April 1 through October 31." If your permit does not require disinfection during the non-recreational months, <u>do not chlorinate in those months</u>.
- (c) Do not chemically dechlorinate if it is not needed to meet the limits in your permit.
- (d) If no chlorine was used in a given sampling period, an actual analysis is not necessary. Simply report as "0 mg/L" TRC.

D. SPECIAL CONDITIONS

- 1. This permit may be reopened and modified, or alternatively revoked and reissued, to:
 - (a) Comply with any applicable effluent standard or limitation issued or approved under Sections 301(b)(2)(C) and (D), 304(b)(2), and 307(a) (2) of the Clean Water Act, if the effluent standard or limitation so issued or approved:
 - (1) contains different conditions or is otherwise more stringent than any effluent limitation in the permit; or
 - (2) controls any pollutant not limited in the permit.
 - (b) Incorporate new or modified effluent limitations or other conditions, if the result of a waste load allocation study, toxicity test or other information indicates changes are necessary to assure compliance with Missouri's Water Quality Standards.
 - (c) Incorporate new or modified effluent limitations or other conditions if, as the result of a watershed analysis, a Total Maximum Daily Load (TMDL) limitation is developed for the receiving waters which are currently included in Missouri's list of waters of the state not fully achieving the state's water quality standards, also called the 303(d) list.

The permit as modified or reissued under this paragraph shall also contain any other requirements of the Clean Water Act then applicable.

- 2. All outfalls must be clearly marked in the field.
- 3. Permittee will cease discharge by connection to area-wide wastewater treatment system within 90 days of notice of its availability.
- 4. Changes in Discharges of Toxic Substances

The permittee shall notify the Director as soon as it knows or has reason to believe:

D. SPECIAL CONDITIONS (continued)

- (a) That any activity has occurred or will occur which would result in the discharge of any toxic pollutant which is not limited in the permit, if that discharge will exceed the highest of the following "notification levels:"
 - (1) One hundred micrograms per liter (100 μ g/L);
 - (2) Two hundred micrograms per liter (200 μ g/L) for acrolein and acrylonitrile; five hundred micrograms per liter (500 μ g/L) for 2,5 dinitrophenol and for 2-methyl-4, 6-dinitrophenol; and one milligram per liter (1 mg/L) for antimony;
 - (3) Five (5) times the maximum concentration value reported for the pollutant in the permit application;
 - (4) The level established in Part A of the permit by the Director.
- (b) That they have begun or expect to begin to use or manufacture as an intermediate or final product or byproduct any toxic pollutant, which was not reported in the permit application.
- 5. Report as no-discharge when a discharge does not occur during the report period.

6. Water Quality Standards

- (a) Discharges to waters of the state shall not cause a violation of water quality standards rule under 10 CSR 20-7.031, including both specific and general criteria.
- (b) General Criteria. The following general water quality criteria shall be applicable to all waters of the state at all times including mixing zones. No water contaminant, by itself or in combination with other substances, shall prevent the waters of the state from meeting the following conditions:
 - (1) 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;
 - (2) Waters shall be free from oil, scum and floating debris in sufficient amounts to be unsightly or prevent full maintenance of beneficial uses;
 - (3) Waters shall be free from substances in sufficient amounts to cause unsightly color or turbidity, offensive odor or prevent full maintenance of beneficial uses;
 - (4) Waters shall be free from substances or conditions in sufficient amounts to result in toxicity to human, animal or aquatic life;
 - (5) There shall be no significant human health hazard from incidental contact with the water;
 - (6) There shall be no acute toxicity to livestock or wildlife watering;
 - (7) Waters shall be free from physical, chemical or hydrologic changes that would impair the natural biological community;
 - (8) Waters shall be free from used tires, car bodies, appliances, demolition debris, used vehicles or equipment and solid waste as defined in Missouri's Solid Waste Law, section 260.200, RSMo, except as the use of such materials is specifically permitted pursuant to section 260.200-260.247.
- 7. Sludge and Biosolids Use For Domestic Wastewater Treatment Facilities
 - (a) Permittee shall comply with the pollutant limitations, monitoring, reporting, and other requirements in accordance with the attached permit Standard Conditions.
 - (b) If sludge is not removed by a contract hauler, permittee is authorized to land apply biosolids. Permit Standard Conditions, Part III shall apply to the land application of biosolids. Permittee shall notify the department at least 180 days prior to the planned removal of biosolids. The department may require submittal of a biosolids management plan for department review and approval as determined appropriate on a case-by-case basis.
- 8. The permittee shall comply with any applicable requirements listed in 10 CSR 20-8 and 10 CSR 20-9, unless the facility has received written notification that the Department has approved a modification to the requirements. The monitoring frequencies contained in this permit shall not be construed by the permittee as a modification of the monitoring frequencies listed in 10 CSR 20-9. If a modification of the monitoring frequencies listed in 10 CSR 20-9 is needed, the permittee shall submit a written request to the department for review and, if deemed necessary, approval.

D. SPECIAL CONDITIONS (continued)

9. Acute Whole Effluent Toxicity (WET) tests shall be conducted as follows:

SUMMARY OF WET TESTING FOR THIS PERMIT						
OUTFALL A.E.C. % FREQUENCY SAMPLE TYPE MONTH						
#001	100 %	Once/five years	grab	August, 2011		

- (a) Test Schedule and Follow-Up Requirements
 - (1) Perform a MULTIPLE-dilution acute WET test in the months and at the frequency specified above. For tests which are successfully passed, submit test results using the Department's WET test report form #MO-780-1899 along with complete copies of the test reports as received from the laboratory, including copies of chain-of-custody forms within 30 calendar days of availability to the WATER PROTECTION PROGRAM, P.O. Box 176, Jefferson City, MO 65102. If the effluent passes the test, do not repeat the test until the next test period.
 - (a) For discharges of stormwater, samples shall be collected within three hours from when discharge first occurs.
 - (b) Samples submitted for analysis of stormwater discharges shall be collected as a grab.
 - (c) For discharges of non-stormwater, samples shall be collected only when precipitation has not occurred for a period of forty-eight hours prior to sample collection. In no event shall sample collection occur simultaneously with the occurrence of precipitation excepting for stormwater samples.
 - (d) A twenty-four hour composite sample shall be submitted for analysis of non-stormwater discharges.
 - (e) Upstream receiving water samples, where required, shall be collected upstream from any influence of the effluent where downstream flow is clearly evident.
 - (f) Samples submitted for analysis of upstream receiving water may be collected as either a grab or twenty-four-hour composite as appropriate to the nature of the discharge.
 - (g) Chemical and physical analysis of the upstream control and effluent sample shall occur immediately upon being received by the laboratory, prior to any manipulation of the effluent sample beyond preservation methods consistent with federal guidelines for WET testing that are required to stabilize the sample during shipping.
 - (h) Any and all chemical or physical analysis of the effluent sample performed in conjunction with the WET test shall be performed at the 100% Effluent concentration in addition to analyses performed upon any other effluent concentration.
 - (i) All chemical analyses included in the Missouri Department of Natural Resources WET test report form #MO-780-1899 shall be performed and results shall be recorded in the appropriate field of the report form.
 - (j) Where flow-weighted composite sample is required for analysis, the samples shall be composited at the laboratory where the test is to be performed.
 - (k) Where in stream testing is required downstream from the discharge, sample collection shall occur immediately below the established Zone of Initial Dilution in conjunction with or immediately following a release or discharge.
 - (l) Samples submitted for analysis of downstream receiving water may be collected as either a grab or twenty-four-hour composite as appropriate to the nature of the discharge.
 - (m) All instream samples, including downstream samples, shall be tested for toxicity at the 100% concentration in addition to any other assigned AEC for in-stream samples.
 - (2) All failing test results along with complete copies of the test reports as received from the laboratory, INCLUDING THOSE TESTS CONDUCTED UNDER CONDITION (3) BELOW, shall be reported to the WATER PROTECTION PROGRAM, P.O. Box 176, Jefferson City, MO 65102 within 14 calendar days of the availability of the results.
 - (3) If the effluent fails the test, a multiple dilution test shall be performed for BOTH test species within 30 calendar days and biweekly thereafter (for storm water, tests shall be performed on the next and subsequent storm water discharges as they occur, but not less than 7 days apart) until one of the following conditions are met:
 - (a) THREE CONSECUTIVE MULTIPLE-DILUTION TESTS PASS. No further tests need to be performed until next regularly scheduled test period.
 - (b) A TOTAL OF THREE MULTIPLE-DILUTION TESTS FAIL.
 - (4) Failure of at least two multiple-dilution tests during any period of accelerated monitoring violates the permit narrative requirement for aquatic life protection.

D. SPECIAL CONDITIONS (continued)

- (5) The permittee shall submit a summary of all test results for the test series along with complete copies of the test reports as received from the laboratory to the WATER PROTECTION PROGRAM, P.O. Box 176, Jefferson City, MO 65102 within 14 calendar days of the third failed test.
- (6) Additionally, the following shall apply upon failure of the third MULTIPLE DILUTION test: A toxicity identification evaluation (TIE) or toxicity reduction evaluation (TRE) is automatically triggered. The permittee shall contact THE WATER PROTECTION PROGRAM within 14 calendar days from availability of the test results to ascertain as to whether a TIE or TRE is appropriate. The permittee shall submit a plan for conducting a TIE or TRE to the WATER PROTECTION PROGRAM within 60 calendar days of the date of DNR's direction to perform either a TIE or TRE. This plan must be approved by DNR before the TIE or TRE is begun. A schedule for completing the TIE or TRE shall be established in the plan approval.
- (7) Upon DNR's approval, the TIE/TRE schedule may be modified if toxicity is intermittent during the TIE/TRE investigations. A revised WET test schedule may be established by DNR for this period.
- (8) If a previously completed TIE has clearly identified the cause of toxicity, additional TIEs will not be required as long as effluent characteristics remain essentially unchanged and the permittee is proceeding according to a DNR approved schedule to complete a TRE and reduce toxicity. Regularly scheduled WET testing as required in the permit, without the follow-up requirements, will be required during this period.
- (9) When WET test sampling is required to run over one DMR period, each DMR report shall contain a copy of the Department's WET test report form that was generated during the reporting period.
- (10) Submit a concise summary in tabular format of all WET test results with the annual report.
- (b) PASS/FAIL procedure and effluent limitations:
 - (1) To pass a multiple-dilution test:
 - (a) For facilities with a computed percent effluent at the edge of the zone of initial dilution, Allowable Effluent Concentration (AEC) OF 30% OR LESS, the AEC must be less than three-tenths (0.3) of the LC₅₀ concentration for the most sensitive of the test organisms; **OR**,
 - (b) For facilities with an AEC greater than 30%, the LC50 concentration must be greater than 100%; AND,
 - (c) all effluent concentrations equal to or less than the AEC must be nontoxic. Mortality observed in all effluent concentrations equal to or less than the AEC shall not be significantly different (at the 95% confidence level; p = 0.05) than that observed in the upstream receiving-water control sample. Where upstream receiving water is not available mortality observed in the AEC test concentration shall not be significantly different (at the 95% confidence level; p = 0.05) than that observed in the laboratory control. The appropriate statistical tests of significance shall be consistent with the most current edition of METHODS FOR MEASURING THE ACUTE TOXICITY OF EFFLUENTS AND RECEIVING WATERS TO FRESHWATER AND MARINE ORGANISMS or other federal guidelines as appropriate or required. Failure of one multiple-dilution test may be considered an effluent limit violation.

(c) Test Conditions

- (1) Test Type: Acute Static non-renewal
- (2) All tests, including repeat tests for previous failures, shall include both test species listed below.
- (3) Test species: Ceriodaphnia dubia and Pimephales promelas (fathead minnow). Organisms used in WET testing shall come from cultures reared for the purpose of conducting toxicity tests and cultured in a manner consistent with the most current USEPA guidelines. All test animals shall be cultured as described in the most current edition of Methods for Measuring the Acute Toxicity of Effluents and Receiving Waters to Freshwater and Marine Organisms.
- (4) Test period: 48 hours at the "Acceptable Effluent Concentration" (AEC) specified above.
- (5) Upstream receiving stream water shall be used as dilution water. If upstream water is unavailable or if mortality in the upstream water exceeds 10%, "reconstituted" water will be used as dilution water. Procedures for generating reconstituted water will be supplied by the MDNR upon request.
- (6) Multiple-dilution tests will be run with:
 - (a) 100%, 50%, 25%, 12.5%, and 6.25% effluent, unless the AEC is less than 25% effluent, in which case dilutions will be 4 times the AEC, two times the AEC, AEC, 1/2 AEC and 1/4 AEC;
 - (b) 100% receiving-stream water (if available), collected upstream of the outfall at a point beyond any influence of the effluent; and
 - (c) reconstituted water.
- (7) If reconstituted-water control mortality for a test species exceeds 10%, the entire test will be rerun.
- (8) If upstream control mortality exceeds 10%, the entire test will be rerun using reconstituted water as the dilutant.

SUMMARY OF TEST METHODOLOGY FOR ACUTE WHOLE-EFFLUENT TOXICITY TESTS

Whole-effluent-toxicity test required in NPDES permits shall use the following test conditions when performing single or multiple dilution methods. Any future changes in methodology will be supplied to the permittee by the Missouri Department of Natural Resources (MDNR). Unless more stringent methods are specified by the DNR, the procedures shall be consistent with the most current edition of Methods for Measuring the Acute Toxicity of Effluents and Receiving Waters to Freshwater and Marine Organisms,

Test conditions for Ceriodaphnia dubia:

Test duration: 48 h

Temperature: $25 \pm 1^{\circ}$ C Temperatures shall not deviate by more than 3°C during the test.

Light Quality: Ambient laboratory illumination

Photoperiod: 16 h light, 8 h dark
Size of test vessel: 30 mL (minimum)
Volume of test solution: 15 mL (minimum)

Age of test organisms: <24 h old

No. of animals/test vessel: 5
No. of replicates/concentration: 4

No. of organisms/concentration: 20 (minimum)

Feeding regime: None (feed prior to test)

Aeration: None

Dilution water: Upstream receiving water; if no upstream flow, synthetic water modified to

reflect effluent hardness.

Endpoint: Pass/Fail (Statistically significant Mortality when compared to upstream

receiving water control or synthetic control if upstream water was not

available at $p \le 0.05$)

Test acceptability criterion: 90% or greater survival in controls

Test conditions for Pimephales promelas:

No. of organisms/concentration:

Test duration: 48 h

Temperature: 25 ± 1 °C Temperatures shall not deviate by more than 3°C during the test.

Light Quality: Ambient laboratory illumination

Photoperiod: 16 h light/ 8 h dark
Size of test vessel: 250 mL (minimum)
Volume of test solution: 200 mL (minimum)
Age of test organisms: 1-14 days (all same age)

No. of animals/test vessel:

No. of replicates/concentration: 4 (minimum) single dilution method

2 (minimum) multiple dilution method 40 (minimum) single dilution method 20 (minimum) multiple dilution method

Feeding regime: None (feed prior to test)

Aeration: None, unless DO concentration falls below 4.0 mg/L; rate should not

exceed 100 bubbles/min.

Dilution water: Upstream receiving water; if no upstream flow, synthetic water modified to

reflect effluent hardness.

Endpoint: Pass/Fail (Statistically significant Mortality when compared to upstream

receiving water control or synthetic control if upstream water was not

available at $p \le 0.05$)

Test Acceptability criterion: 90% or greater survival in controls

PERMIT TRANSFER

This permit may be transferred to a new owner by submitting an "Application for Transfer of Operating Permit" signed by the seller and buyer of the facility, along with the appropriate modification fee.

PERMIT RENEWAL REQUIREMENTS

Unless this permit is terminated, the permittee shall submit an application for the renewal of this permit no later than six (6) months prior to the permit's expiration date. Failure to apply for renewal may result in termination of this permit and enforcement action to compel compliance with this condition and the Missouri Clean Water Law.

TERMINATION

In order to terminate this permit, the permittee shall notify the department by submitting Form J, included with the State Operating Permit. The permittee shall complete Form J and mail it to the department at the address noted in the cover letter of this permit. Proper closure of any storage structure is required prior to permit termination. A closure plan shall be submitted to the department and approved prior to initiating closure activities.

DUTY OF COMPLIANCE

The permittee shall comply with all conditions of this permit. Any noncompliance with this permit constitutes a violation of Chapter 644, Missouri Clean Water Law, and 10 CSR 20-6. Noncompliance may result in enforcement action, termination of this authorization, or denial of the permittee's request for renewal.

This permit authorizes only the activities described in this permit. Compliance with this permit may not be considered a shield from compliance with any local ordinance, State Regulation or State Law.

Missouri Department of Natural Resources Statement of Basis KP's Suds & Such, LLC MO-0119636

A Statement of Basis (Statement) gives pertinent information regarding the applicable regulations and rational for the development of the NPDES Missouri State Operating Permit (operating permit). This Statement includes Wasteload Allocations, Water Quality Based Effluent Limitations, and Reasonable Potential Analysis calculations as well as any other calculations that effect the effluent limitations of this operating permit. This Statement does not pertain to operating permits that include sewage sludge land application plans and variance procedures, and does not include the public comment process for this operating permit.

A Statement is not an enforceable part of an operating permit.

Part I - Facility Information

Facility Type: Carwash and Restaurant

Facility SIC Code(s): 4952

Facility Description:

Two-cell lagoon / sludge is retained in lagoon.

Design population equivalent is 13.2.

Design flow is 565 gallons per day.

Design sludge production is 0.2 dry tons/year.

OUTFALL(S) TABLE:

OUTFALL	DESIGN FLOW (GPD)	TREATMENT LEVEL	EFFLUENT TYPE	DISTANCE TO CLASSIFIED SEGMENT (MI)
#001	565	Equivalent to Secondary	Domestic	~ 2.1

Receiving Water Body's Water Quality & Facility Performance History:

No stream surveys or low flow studies have been conducted on this site. The facility has not submitted the last two years' Discharge Monitoring Reports. Due to this fact, a WET test has been added to this permit to determine the toxicity of the site's effluent.

Comments:

Parameters that were included in the previous permit have been removed from the reissuance due to the fact that there is no WQS available for the receiving water for the site. These parameters include: Total Phosphorous, Sodium, and Boron. Also, Actual Flow for this facility was unable to be determined due to a lack of data. The facility uses a private well for its water source that is not equipped with a meter to gauge the amount of water used. Future Discharge Monitoring Reports should be reviewed for observed flows.

<u>Part IIA – Operator Certification Requirements</u>

As per [10 CSR 20-6.010(8) Terms and Conditions of a Permit], permittees shall operate and maintain facilities to comply with the Missouri Clean Water Law and applicable permit conditions and regulations. Operators or supervisors of operations at regulated wastewater treatment facilities shall be certified in accordance with [10 CSR 20-9.020(2)] and any other applicable state law or regulation. As per [10 CSR 20-9.010(2)(A)], requirements for operation by certified personnel shall apply to all wastewater treatment systems, if applicable, as listed below:

Check boxes below that are applicable to the facility;

•	Ov	wned or operated by or for:	
	•	Municipalities	
	•	Public Sewer District:	
	•	County	
	•	Public Water Supply Districts:	
	•	Private sewer company regulated by the Public Service Commission:	
	•	State or Federal agencies:	Γ

more service connections.	olicable if the	ney nave a	Population Equivalent greater	than two nunc	ired (200) and/	or 111ty (50) or
Department required: The Department requires operator due to:	this facilit	y to retain t	the services of a certified			
- This facility does not currently treatment facility. Missouri Clean Wadevelop a schedule of activities includestablished in this operating permit as	nter Law an	d its impler e by which	menting regulation 10 CSR 20 compliance shall be obtained.	-9.020(2)(F) a	llows the depar	rtment to
Not Applicable ⊠; This facility is no	t required t	to have a ce	rtified operator.			
Part IIB – Operational Monitor As per [10 CSR 20-9.010(4))], the fac		required to	conduct operational monitoring	ng.		
Part III – Receiving Stream In	<u>ıformati</u>	<u>on</u>				
APPLICABLE DESIGNATIONS OF WAT As per Missouri's Effluent Regulation categories. Each category lists effluer Table and further discussed in the Der	s [10 CSR nt limitation	20-7.015], ins for specif	fic parameters, which are pres			
Missouri or Mississippi Rive Lake or Reservoir [10 CSR 2 Losing [10 CSR 20-7.015(4)] Metropolitan No-Discharge [Special Stream [10 CSR 20-7 Subsurface Water [10 CSR 2 All Other Waters [10 CSR 20	(0-7.015(3))]: (10 CSR 20 (7.015(6)]: (0-7.015(7)]]: -7.015(5)]: :]:			
10 CSR 20-7.031 Missouri Water Quaterms of "water uses to be maintained stream's beneficial water uses to be m 20-7.031(3)].	and the cri	iteria to pro	tect those uses." The receiving	g stream and/o	or 1st classified	receiving
RECEIVING STREAM(S) TABLE:						1
WATERBODY NAME	CLASS	WBID	DESIGNATED USES*	8-Digit HUC	EDU**	
Unnamed tributary to Owl Creek	U	NA	General Criteria	10300102	Ozarks / Moreau /	
Owl Creek	С	00741	LWW, AQL, & WBC***		Loutre	
* - Irrigation (IRR), Livestock & Wildlife Wate Fishery(CLF), Cold Water Fishery (CDF), Who (IND), Groundwater (GRW). ** - Ecological Drainage Unit *** - UAA conducted on July 10, 2005 and WE	ole Body Cont	act Recreation				
Part IV – Rationale and Deriv	ation of	Effluent	Limitations & Permit (Conditions		
ANTI-BACKSLIDING: A provision in the Federal Regulation as stringent as the previous permit with			WA §402(c); 40 CFR Part 12	2.44(I)] that re	equires a reissu	ed permit to be

_ - All limits in this statement are at least as protective as those previously established; therefore, backsliding does not apply.

□ Limitations proposed in this statement for the reissuance of this permit conform to the anti-backsliding provisions of Section 402(o) of the Clean Water Act, and 40 CFR Part 122.44.
AREA-WIDE WASTE TREATMENT MANAGEMENT & CONTINUING AUTHORITY: As per [10 CSR 20-6.010(8)(A)10.], when a Continuing Authority under paragraph 10 CSR 20-6.010(3)(B)1. or 2. is expected to be available for connection within the next five (5) years, any operating permit issued to a permittee under this paragraph, located within the service area of the paragraph (3)(B)1. or 2. facility, shall contain the following special condition This language is contained in Special Condition #3 of this operating permit.
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.
Applicable □;
Not Applicable ⊠; The permittee/facility is not currently under Water Protection Program enforcement action.
Removal efficiency is a method by which the Federal Regulations define Secondary Treatment and Equivalent to Secondary Treatment, which applies to Biochemical Oxygen Demand 5-day (BOD ₅) and Total Suspended Solids (TSS) for Publicly Owned Treatment Works (POTWs)/municipals. Please see the United States Environmental Protection Agency's (EPA) website for interpretation of percent removal requirements for National Pollutant Discharge Elimination System Permit Application Requirements for Publicly Owned Treatment Works and Other Treatment Works Treating Domestic Sewage @ www.epa.gov/fedrgstr/EPA-WATER/1999/August/Day-04/w18866.htm
Applicable :; Secondary Treatment is 85% removal [40 CFR Part 133.102(a)(3) & (b)(3)].
Applicable \square ; Equivalent to Secondary Treatment is 65% removal [40 CFR Part 105(a)(3) & (b)(3)].
Applicable \square ; This wastewater treatment facility is not a POTW; however, influent monitoring is being required to determine percent removal.
Not Applicable ⊠; This wastewater treatment facility is not a POTW. Influent monitoring is not being required to determine percent removal.
SANITARY SEWER OVERFLOWS (SSOS), BYPASSES, INFLOW & INFILTRATION (I&I) – PREVENTION/REDUCTION: Sanitary Sewer Systems (SSSs) are municipal wastewater collection system that convey domestic, commercial, and industrial wastewater, and limited amounts of infiltrated groundwater and storm water (i.e. I&I), to a POTW. SSSs are not designed to collect large amounts of storm water runoff from precipitation events.
Untreated or partially treated discharges from SSSs are commonly referred to as SSOs. SSOs have a variety of causes including blockages, line breaks, sewer defects that allow excess storm water and ground water to overload the system, lapses in sewer system operation and maintenance, inadequate sewer design and construction, power failures, and vandalism. A SSOs is defined as an untreated or partially treated sewage release from a SSS. SSOs can occur at any point in an SSS, during dry weather or wet weather. SSOs include overflows that reach waters of the state. SSOs also include overflows out of manholes and onto city streets, sidewalks, and other terrestrial locations. SSSs can back up into buildings, including private residences. When sewage backups are caused by problems in the publicly-owned portion of an SSS, they are considered SSOs.
Applicable \Box ; The permittee is required to develop or implement a program for maintenance and repair of the collection system and shall be required in this operating permit by either means of a Special Condition or Schedule of Compliance. In addition, the department considers the development of this program as an implementation of this condition.
At this time, the department recommends the US EPA's Guide for Evaluating Capacity, Management, Operation and Maintenance (CMOM) Programs At Sanitary Sewer Collection Systems (Document # EPA 305-B-05-002). The CMOM identifies some of the

criteria used by the EPA to evaluate a collection system's management, operation, and maintenance and was intended for use by the

EPA, state, regulated community, and/or third party entities. The CMOM is applicable to small, medium, and large systems; both public and privately owned; and both regional and satellite collection systems. The CMOM does not substitute for the Clean Water Act, the Missouri Clean Water Law, and both federal and state regulations, as it is not a regulation.
Not Applicable \boxtimes ; This facility is not required to develop or implement a program for maintenance and repair of the collection system; however, it is a violation of Missouri State Environmental Laws and Regulations to allow untreated wastewater to discharge to waters of the state.
SCHEDULE OF COMPLIANCE (SOC): A schedule of remedial measures included in a permit, including an enforceable sequence of interim requirements (actions, 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.
Applicable : ; The time given for effluent limitations of this permit listed under Interim Effluent Limitation and Final Effluent Limitations where established in accordance with [10 CSR 20-7.031(10)].
Not Applicable ⊠; This permit does not contain a SOC.
STORM WATER POLLUTION PREVENTION PLAN (SWPPP): In accordance with 40 CFR 122.44(k) <i>Best Management Practices (BMPs)</i> to control or abate the discharge of pollutants when: (1) Authorized under section 304(e) of the Clean Water Act (CWA) for the control of toxic pollutants and hazardous substances from ancillary industrial activities: (2) Authorized under section 402(p) of the CWA for the control of storm water 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 <i>Storm Water Management for Industrial Activities: Developing Pollution Prevention Plans and Best Management Practices</i> [EPA 832-R-92-006] (Storm Water Management), BMPs are measures or practices used to reduce the amount of pollution entering (regarding this operating permit) waters of the state. BMPs may take the form of a process, activity, or physical structure.
Additionally in accordance with the Storm Water 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.
Applicable []; A SWPPP shall be developed and implemented for each site and shall incorporate required practices identified by the department with jurisdiction, incorporate erosion control practices specific to site conditions, and provide for maintenance and adherence to the plan.
Not Applicable ⊠; At this time, the permittee is not required to develop and implement a SWPPP.
WATER QUALITY STANDARDS: Per [10 CSR 20-7.031(3)], General Criteria shall be applicable to all waters of the state at all times including mixing zones. Additionally, [40 CFR 122.44(d)(1)] directs the department to establish in each NPDES permit to include conditions to achieve water quality established under Section 303 of the Clean Water Act, including State narrative criteria for water quality.

WHOLE EFFLUENT TOXICITY (WET) TEST:

A WET test is a quantifiable method of determining if a discharge from a facility may be causing toxicity to aquatic life by itself, in combination with or through synergistic responses when mixed with receiving stream water.

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In accordance with the Clean Water Act (CWA) §101(a)(3), requiring WET testing is reasonably appropriate for site-specific Missouri State Operating Permits for discharges to waters of the state issued under the National Pollutant Discharge Elimination System. Furthermore, WET testing is a means by which the department determines that [10 CSR 20-7.031(3)(D, F, & G)] are being met by the permitted facility. In addition to justification for the WET testing, WET tests are required under [10 CSR 20-6.010(8)(A)4] to be performed by specialist who are properly trained in conducting the test according to the methods prescribed by the Federal Government as referenced in [40 CFR Part 136]. A WET test may be applied to facilities that meet the following criteria:

[Facility is a designated Major.

 Facility continuously or routinely exceeds its design flow. Facility (industrial) that alters its production process throughout the year. Facility handles large quantities of toxic substances, or substances that are toxic in large amounts. Facility has Water Quality-based Effluent Limitations for toxic substances (other than NH₃) Facility is a municipality or domestic discharger with a Design Flow ≥ 22,500 gpd. Other – The facility has not submitted Discharge Monitoring Reports for the last two years. A WET test is being required to determine the toxicity of the site's effluent.
Not Applicable :; At this time, the permittee is not required to conduct WET test for this facility.
303(d) LIST & TOTAL MAXIMUM DAILY LOAD (TMDL): Section 303(d) of the federal Clean Water Act requires that each state identify waters that are 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 waters that are impaired but not addressed by normal water pollution control programs.
A TMDL is a calculation of the maximum amount of a given pollutant that a body of water can absorb before its water quality is affected. If a water body is determined to be impaired as listed on the 303(d) list, then a watershed management plan will be developed that shall include the TMDL calculation
Applicable : (Receiving water body's name) or (1st classified water body's name) is listed on the (YEAR) Missouri 303(d) List for (pollutant). — This facility is not considered to be a source of the above listed pollutant(s) or considered to contributed to the impairment of
(stream name). — This facility is considered to be a source of or has the potential to contribute to the above listed pollutant(s).
Not Applicable ∑; This facility does not discharge to a 303(d) listed stream.

Part V - EFFLUENT LIMITS DETERMINATION

Outfall #001 – Main Facility Outfall **EFFLUENT LIMITATIONS TABLE:**

PARAMETER	Unit	Basis for Limits	DAILY MAXIMUM	WEEKLY AVERAGE	MONTHLY AVERAGE	Modified	PREVIOUS PERMIT LIMITATIONS
Flow	MGD	1	*		*	NO	S
Biochemical Oxygen Demand ₅	mg/L	1/4		65	45	NO	S
Total Suspended Solids	mg/L	1/4		110	70	NO	S
pH	SU	1/4	≥6		≥6	NO	S
Temperature	°C	1/5/9	90°		90°	YES	95°
Ammonia as N	mg/L	2/3/5	*		*	YES	***
Oil & Grease	mg/L	1/9	15		10	NO	S
Fecal Coliform	**	1/2	1000		400	NO	S
Escherichia coli	**	1/2	Please see Escherichia Coli (E. coli) in the Derivation and Discussion Section below.				
Chlorine, Total Residual	mg/L	1/2	.0164		.0082	YES	***
Chemical Oxygen Demand	mg/L	1	30		20	NO	S
Chloride	mg/L	2/3	378		188	YES	250/250
Copper, Total Recoverable	μg/L	2/3	19.2		9.6	YES	20/20
Lead, Total Recoverable	μg/L	2/3	9.5		4.7	YES	12/12
Zinc, Total Recoverable	μg/L	2/3	180		90	YES	175/175
Surfactants	mg/L	9	*		*	NO	S
Whole Effluent Toxicity (WET) Test	11 Please see WET Test in the Derivation and Discussion Section below.						
Monitoring Frequency	Please see Minimum Sampling and Reporting Frequency Requirements in the Derivation and Discussion Section below.						

^{* -} Monitoring requirement only

N/A – Not applicable

S – Same as previous operating permit

Basis for Limitations Codes:

- 1. State or Federal Regulation/Law
- 2. Water Quality Standard (includes RPA)
- 3. Water Quality Based Effluent Limits
- 4. Lagoon Policy
- 5. Ammonia Policy
- 6. Dissolved Oxygen Policy

- 7. Antidegradation Policy
- 8. Water Quality Model
- 9. Best Professional Judgment
- 10. TMDL or Permit in lieu of TMDL
- 11. WET test Policy
- <u>Flow</u>. In accordance with [40 CFR Part 122.44(i)(1)(ii)] the volume of effluent discharged from each outfall is needed to assure compliance with permitted effluent limitations. If the permittee is unable to obtain effluent flow, then it is the responsibility of the permittee to inform the department, which may require the submittal of an operating permit modification.
- <u>Biochemical Oxygen Demand (BOD_5)</u>. Effluent limitations from the previous state operating permit have been reassessed and verified that they are still protective of the receiving stream's Water Quality. Therefore, effluent limitations have been retained from previous state operating permit, please see the <u>APPLICABLE DESIGNATION OF WATERS OF THE STATE</u> sub-section of the <u>Receiving Stream Information</u>.

^{** - #} of colonies/100mL; the Monthly Average for Fecal Coliform is a geometric mean.

^{*** -} Parameter not previously established in previous state operating permit.

- <u>Total Suspended Solids (TSS)</u>. Effluent limitations from the previous state operating permit have been reassessed and verified that they are still protective of the receiving stream's Water Quality. Therefore, effluent limitations have been retained from previous state operating permit, please see the <u>APPLICABLE DESIGNATION OF WATERS OF THE STATE</u> sub-section of the <u>Receiving Stream Information</u>.
- <u>pH</u>. Effluent limitations have been retained from previous state operating permit, please see the **APPLICABLE DESIGNATION OF WATERS OF THE STATE** sub-section of the **Receiving Stream Information**.
- **Temperature.** 10 CSR 20-7.031 Table A. This parameter was changed to be more accurate with similar car wash permits.
- <u>Total Ammonia Nitrogen.</u> Monitoring requirement only. Monitoring for temperature and ammonia are included to determine whether "reasonable potential" to exceed water quality standards exists after the discharge begins.
- <u>Escherichia coli (E. coli)</u>. This facility may be required to have *E. coli* effluent limitations when Missouri adopts the implementation of the *E. coli* standards, as per [10 CSR 20-7.031(4)(C)].
- <u>Fecal Coliform</u>. Discharge shall not contain more than a monthly geometric mean of 400 colonies/100 mL and a daily maximum of 1000 colonies/100 mL during the recreational season (April 1 October 31), please see the **APPLICABLE DESIGNATION OF**WATERS OF THE STATE sub-section of the <u>Receiving Stream Information</u>. Future renewals of the facility operating permit will contain effluent limitations for E. coli, which will replace fecal coliform as the applicable bacteria criteria in Missouri's water quality standards.
- Oil & Grease. Conventional pollutant, effluent limitation for protection of aquatic life; 10 mg/L monthly average, 15 mg/L daily maximum.
- <u>Chemical Oxygen Demand (COD)</u>. Effluent limitations from the previous state operating permit have been reassessed and verified that they are still protective of the receiving stream's Water Quality. Therefore, effluent limitations have been retained from previous state operating permit, please see the <u>APPLICABLE DESIGNATION OF WATERS OF THE STATE</u> sub-section of the <u>Receiving Stream Information</u>.

WET Test. WET Testing schedules and intervals are established in accordance with the department's Permit Manual; Section

 Chronic Acute No less than ONCE/PERMIT CYCLE: Municipality or domestic facility with a design flow ≥ 22,500 gpd, but less than 1.0 MGD. Other The facility has not submitted Discharge Monitoring Reports for the last two years. A WET test is being recommon to determine the toxicity of the site's effluent. No less than ONCE/YEAR: Facility is designated as a Major facility or has a design flow ≥ 1.0 MGD. Facility continuously or routinely exceeds their design flow. Facility exceeds its design population equivalent (PE) for BOD₅ whether or not its design flow is being exceeded. Facility has Water Quality-based effluent limitations for toxic substances (other than NH₃). No less than Twice/YEAR: Facility is subject to production processes alterations throughout the year. Facility handles large quantities of toxic substances, or substances that are toxic in large amounts. Facility has been granted seasonal relief of numeric limitations. 		5.2 Effluent Limits / WET Testing for Compliance Bio-monitoring. It is recommended that WET testing be conducted during the period of lowest stream flow.
 Municipality or domestic facility with a design flow ≥ 22,500 gpd, but less than 1.0 MGD. Other The facility has not submitted Discharge Monitoring Reports for the last two years. A WET test is being received determine the toxicity of the site's effluent. No less than ONCE/YEAR: Facility is designated as a Major facility or has a design flow ≥ 1.0 MGD. Facility continuously or routinely exceeds their design flow. Facility exceeds its design population equivalent (PE) for BOD₅ whether or not its design flow is being exceeded. Facility has Water Quality-based effluent limitations for toxic substances (other than NH₃). No less than TWICE/YEAR: Facility is subject to production processes alterations throughout the year. Facility handles large quantities of toxic substances, or substances that are toxic in large amounts. 	•	
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Facility is subject to production processes alterations throughout the year. Facility handles large quantities of toxic substances, or substances that are toxic in large amounts.		 Facility is designated as a Major facility or has a design flow ≥ 1.0 MGD. Facility continuously or routinely exceeds their design flow. Facility exceeds its design population equivalent (PE) for BOD₅ whether or not its design flow is being exceeded.
		Facility is subject to production processes alterations throughout the year. Facility handles large quantities of toxic substances, or substances that are toxic in large amounts.

• <u>Surfactants</u> Monitoring carried over from previous permit. Permittee must control amount of surfactants to avoid toxic effects on the receiving stream, but no water quality standard has been established for total surfactants.

Acute and/or Chronic Allowable Effluent Concentrations (AECs) for facilities that discharge to unclassified, Class C, Class P (with default Mixing Considerations), or Lakes [10 CSR 20-7.031(4)(A)4.B.(IV)(b)] are 100%, 50%, 25%, 12.5%, & 6.25%.

• <u>Chloride, Lead, Zinc, Copper, Chlorine</u> Water quality based effluent limits. See calculations below.

WATER QUALITY BASED EFFLUENT LIMIT CALCULATIONS:

	Aquatic Life Acute (Cwq)	Aquatic Life Chronic (Cwq)	Irrigation	Receiving Stream Concentration (Cs)	WLAa	WLAc	LTAa	LTAc	MDL	AML
Copper	22.1	11.7	N.A.	0.0	22.10	11.70	7.1	6.2	19.2	9.6
Lead	151.2	5.8	N.A.	0.0	151.20	5.80	48.5	3.1	9.5	4.7
Zinc	180.0	163	N.A.	0.0	180.00	163.00	57.8	86.0	180.0	89.7
Chlorine, Residual	19.0	10	N.A.	0.0	19.00	10	6.1	5.3	16.4	8.2
Chloride	860.0	250	N.A.	0.0	860.00	230.00	276.1	121.3	377.8	188.3

Parameters	Standard Deviation	Mean	Coefficient of Variation		Acute		C	Chronic			
				σ^2	σ	LTA	$\sigma_4^{\ 2}$	σ_4	LTA	MDL	AML
Copper	0.6	1.0	0.600	0.307	0.555	0.321	0.086	0.294	0.527	3.11	1.55
Lead	0.6	1.0	0.600	0.307	0.555	0.321	0.086	0.294	0.527	3.11	1.55
Zinc	0.6	1.0	0.600	0.307	0.555	0.321	0.086	0.294	0.527	3.11	1.55
Chlorine, Residual	0.6	1.0	0.600	0.307	0.555	0.321	0.086	0.294	0.527	3.11	1.55
Chloride	0.6	1.0	0.600	0.307	0.555	0.321	0.086	0.294	0.527	3.11	1.55

Acute LTA: $e^{[0.5\sigma^2 - z\sigma]}$ where $\sigma^2 = \ln(CV^2 + 1)$, z = 2.326 for 99th percentile

Chronic LTA: $e^{[0.5\sigma_4^2 - z\sigma_4]}$ where $\sigma_4^2 = \ln(CV^2/4 + 1)$, z = 2.326 for 99th percentile **MDL:** $e^{[z\sigma - 0.5\sigma_2]}$ where $\sigma_4^2 = \ln(CV^2 + 1)$, z = 2.326 for 99th percentile **AML:** $e^{[z\sigma_4 - 0.5\sigma_4^2]}$ where $\sigma_4^2 = \ln(CV^2/4 + 1)$, z = 1.645 for 95th percentile

Assumptions and Basis

For LTA, MDL the 99th Percentile was used.

For AML, the 95th Percentile was used.

Default hardness of 162 mg/L was used to calculate criteria for metals that are hardness dependent.

Mixing Zone (MZ): Not allowed. [10 CSR 20-7.031(4)(A)4.B.(I)(a)].

Zone of Initial Dilution (ZID): Not allowed. [10 CSR 20-7.031(4)(A)4.B.(I)(b)].

Minimum Sampling and Reporting Frequency Requirements.

PARAMETER	SAMPLING FREQUENCY	REPORTING FREQUENCY	
Flow	once/quarter	once/quarter	
Biochemical Oxygen Demand ₅	once/quarter	once/quarter	
Total Suspended Solids	once/quarter	once/quarter	
pH	once/quarter	once/quarter	
Temperature	once/quarter	once/quarter	
Ammonia as N	once/quarter	once/quarter	
Oil & Grease	once/quarter	once/quarter	
Fecal Coliform	once/quarter	once/quarter	
Total Residual Chlorine	once/quarter	once/quarter	
Chemical Oxygen Demand	once/quarter	once/quarter	
Chloride	once/quarter	once/quarter	
Lead, Total Recoverable	once/quarter	once/quarter	

Zinc, Total Recoverable	once/quarter	once/quarter
Copper, Total Recoverable	once/quarter	once/quarter
Surfactants	once/quarter	once/quarter

The monitoring frequency has been changed from annual to quarterly to provide better data on the condition of the site's effluent.

Part VI – Administrative Requirements

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

Date of Statement of Ba Date of Public Notice:	3 /		
Submitted by		Reviewed by	
Matt Sperry, Environmer Northeast Regional Office (660) 385-8000 matt.sperry@dnr.mo.gov	ce	Lantz Tipton, Environme Northeast Regional Office (660) 385-8000 lantz.tipton@dnr.mo.gov	ce
Matt Sperry	Date	Lantz Tipton	Date