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, 92nd Congress) as amended,

Permit No.	MO-0137006
Owner:	Hallmark Cards, Incorporated
Address:	2501 McGee Street, Kansas City, MO 64108-2615
Continuing Authority:	Same as above
Address:	Same as above
Facility Name:	Hallmark Cards – Liberty Distribution Center
Facility Address:	2101 North Lightburne Street, Liberty, MO 64068
Legal Description:	See following page
UTM Coordinates:	See following page
Receiving Stream:	See following page
First Classified Stream and ID:	See following page
USGS Basin & Sub-watershed No.:	See following page

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

FACILITY DESCRIPTION

Shipping and Receiving; SIC # 4225, NAICS # 493110
No process wastewater or sludge is produced at 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 a publically owned treatment works (POTW). See page 2 for outfall information.

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

June 1, 2021
Effective Date

Edward B. Galbraith, Director, Division of Environmental Quality

May 31, 2026
Expiration Date

Chris Wieberg, Director, Water Protection Program

FACILITY DESCRIPTION (CONTINUED)

OUTFALL #001 – Non-industrial stormwater; outfall removed in 2018 renewal.

OUTFALL #002 – Stormwater
Unmonitored outfall with Stormwater Pollution Prevention Plan (SWPPP) and Best Management Practices (BMP) requirements. Receives industrially exposed stormwater. Fire suppression water may also discharge through this outfall; however, NPDES requirements do not apply to water used in emergency fire suppression. Sediment basin treatment.

Legal Description:	Sec.5, T51N, R31W, Clay County
UTM Coordinates:	X = 378398, Y = 4347282
Receiving Waterbody:	Tributary to Rush Creek
First Classified Waterbody and ID:	100K Extent-Remaining Streams (C); WBID# 3960
USGS Basin & Sub-watershed No.:	Lower Missouri-Crooked (10300101-0306)

OUTFALL #003 – Outfall removed in 2018 renewal. This outfall was capturing agricultural flows.

OUTFALL #004 – Outfall removed in 2018 renewal. This outfall was capturing agricultural flows.

OUTFALL #005 – Cooling tower blowdown, stormwater
Unmonitored outfall with SWPPP and BMP requirements. Receives seasonal blowdown from the cooling tower (March-October). Receives industrially exposed stormwater. Fire suppression water may also discharge through this outfall; however, NPDES requirements do not apply to water used in emergency fire suppression. This outfall receives effluent previously associated with outfall #003. The blowdown from this outfall is monitored at outfall #010.

Legal Description:	Sec.32, T52N, R31W, Clay County
UTM Coordinates:	X = 378742, Y = 4347350
Receiving Waterbody:	Tributary to Rush Creek
First Classified Waterbody and ID:	100K Extent-Remaining Streams (C); WBID# 3960
USGS Basin & Sub-watershed No.:	Lower Missouri-Crooked (10300101-0306)

OUTFALL #006 – Stormwater
Unmonitored outfall with SWPPP and BMP requirements. Receives industrially exposed stormwater. Fire suppression water may also discharge through this outfall; however, NPDES requirements do not apply to water used in emergency fire suppression

Legal Description:	Sec.32, T52N, R31W, Clay County
UTM Coordinates:	X = 378752, Y = 4347492
Receiving Waterbody:	Tributary to Rush Creek
First Classified Waterbody and ID:	100K Extent-Remaining Streams (C); WBID# 3960
USGS Basin & Sub-watershed No.:	Lower Missouri-Crooked (10300101-0306)

OUTFALL #007 – Cooling tower blowdown, stormwater
Receives seasonal blowdown from the cooling tower (March-October) which mixes with industrially exposed stormwater. Fire suppression water may also discharge through this outfall; however, NPDES requirements do not apply to water used in emergency fire suppression.

Legal Description:	Sec.32, T52N, R31W, Clay County
UTM Coordinates:	X = 378742, Y = 4347350
Receiving Waterbody:	Tributary to Rush Creek
First Classified Waterbody and ID:	100K Extent-Remaining Streams (C); WBID# 3960
USGS Basin & Sub-watershed No.:	Lower Missouri-Crooked (10300101-0306)
Est. Max Flow (cooling water):	0.007 MGD

OUTFALL #008 – Stormwater
Unmonitored outfall with SWPPP and BMP requirements. Receives industrially exposed stormwater, including petroleum storage and fueling activities. Fire suppression water may also discharge through this outfall; however, NPDES requirements do not apply to water used in emergency fire suppression.

Legal Description:	Sec.32, T52N, R31W, Clay County
UTM Coordinates:	X = 378798, Y = 4347725
Receiving Waterbody:	Tributary to Rush Creek
First Classified Waterbody and ID:	100K Extent-Remaining Streams (C); WBID# 3960
USGS Basin & Sub-watershed No.:	Lower Missouri-Crooked (10300101-0306)

OUTFALL #009 – Stormwater

Unmonitored outfall with SWPPP and BMP requirements. Receives industrially exposed stormwater, including petroleum storage and fueling activities. Fire suppression water may also discharge through this outfall; however, NPDES requirements do not apply to water used in emergency fire suppression.

Legal Description:	Sec.32, T52N, R31W, Clay County
UTM Coordinates:	X = 378828, Y = 4348117
Receiving Waterbody:	Tributary to Rush Creek
First Classified Waterbody and ID:	100K Extent-Remaining Streams (C); WBID# 3960
USGS Basin & Sub-watershed No.:	Lower Missouri-Crooked (10300101-0306)

OUTFALL #010 – Cooling tower blowdown

Receives seasonal blowdown from the cooling tower (March-October). Effluent is monitored directly at end of pipe. Before discharge to the unclassified tributary to Rush Creek, effluent travels overland approximately 0.1 miles. Fire suppression water may also discharge through this outfall; however, NPDES requirements do not apply to water used in emergency fire suppression.

Legal Description:	Sec.32, T52N, R31W, Clay County
UTM Coordinates:	X = 378742, Y = 4347350
Receiving Waterbody:	Tributary to Rush Creek
First Classified Waterbody and ID:	100K Extent-Remaining Streams (C); WBID# 3960
USGS Basin & Sub-watershed No.:	Lower Missouri-Crooked (10300101-0306)
Est. Flow (cooling water):	0.0009 MGD

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

OUTFALLS #007, #010 *Non-contact cooling water*	**TABLE A-1** **INTERIM EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS**

The facility is authorized to discharge from outfall(s) as specified. In accordance with 10 CSR 20-7.031, the final effluent limitations outlined in Table A-2 must be achieved as soon as possible but no later than **June 1, 2024**. These interim effluent limitations are effective beginning **June 1, 2021** and remain in effect through **May 31, 2024** or as soon as possible. Discharges shall be controlled, limited, and monitored by the facility as specified below:

EFFLUENT PARAMETERS	UNITS	INTERIM EFFLUENT LIMITATIONS			MONITORING REQUIREMENTS	
		DAILY MAXIMUM	WEEKLY AVERAGE	MONTHLY AVERAGE	MEASUREMENT FREQUENCY	SAMPLE TYPE
LIMIT SET: M						
PHYSICAL						
Flow	MGD	*		*	once/month**	24 hr. total
Temperature	°F	*		*	once/month**	measured
CONVENTIONAL						
Chlorine, Total Residual ‡	µg/L	*		*	once/month**	grab
pH †	SU	6.5-9.0		-	once/month**	grab
NUTRIENTS						
Ammonia as N	mg/L	*		*	once/month**	grab
MONITORING REPORTS SHALL BE SUBMITTED MONTHLY; THE FIRST REPORT IS DUE JULY 28, 2021. THERE SHALL BE NO DISCHARGE OF FLOATING SOLIDS OR VISIBLE FOAM IN OTHER THAN TRACE AMOUNTS.						
LIMIT SET: Q						
CONVENTIONAL						
Chemical Oxygen Demand	mg/L	*		*	once/quarter ◊	grab
Total Suspended Solids	mg/L	*		*	once/quarter ◊	grab
OTHER						
Chloride	mg/L	*		*	once/quarter ◊	grab
Chloride and Sulfate	mg/L	*		*	once/quarter ◊	grab
Sulfate	mg/L	*		*	once/quarter ◊	grab
MONITORING REPORTS SHALL BE SUBMITTED QUARTERLY; THE FIRST REPORT IS DUE OCTOBER 28, 2021. THERE SHALL BE NO DISCHARGE OF FLOATING SOLIDS OR VISIBLE FOAM IN OTHER THAN TRACE AMOUNTS.						

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS (CONTINUED)

OUTFALLS #007, #010 *Non-contact cooling water*	**TABLE A-2** **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 **June 1, 2024** 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 EFFLUENT LIMITATIONS			MONITORING REQUIREMENTS	
		DAILY MAXIMUM	WEEKLY AVERAGE	MONTHLY AVERAGE	MEASUREMENT FREQUENCY	SAMPLE TYPE
LIMIT SET: M						
PHYSICAL						
Flow	MGD	*		*	once/month**	24 hr. total
Temperature	°F	*		*	once/month**	measured
CONVENTIONAL						
Chlorine, Total Residual ‡	µg/L	19‡ 130 ML		11‡ 130 ML	once/month**	grab
pH †	SU	6.5-9.0		-	once/month**	grab
NUTRIENTS						
Ammonia as N	mg/L	*		*	once/month**	grab
MONITORING REPORTS SHALL BE SUBMITTED MONTHLY; THE FIRST REPORT IS DUE JULY 28, 2024. THERE SHALL BE NO DISCHARGE OF FLOATING SOLIDS OR VISIBLE FOAM IN OTHER THAN TRACE AMOUNTS.						
LIMIT SET: Q						
CONVENTIONAL						
Chemical Oxygen Demand	mg/L	*		*	once/quarter ◊	grab
Total Suspended Solids	mg/L	*		*	once/quarter ◊	grab
OTHER						
Chloride	mg/L	*		*	once/quarter ◊	grab
Chloride and Sulfate	mg/L	*		*	once/quarter ◊	grab
Sulfate	mg/L	*		*	once/quarter ◊	grab
MONITORING REPORTS SHALL BE SUBMITTED QUARTERLY; THE FIRST REPORT IS DUE OCTOBER 28, 2024. THERE SHALL BE NO DISCHARGE OF FLOATING SOLIDS OR VISIBLE FOAM IN OTHER THAN TRACE AMOUNTS.						

See table notes on next page

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS (CONTINUED)

* Monitoring and reporting requirement only

** Monthly monitoring and reporting is required only during months where cooling units were reported as being used at the facility as reported in the application materials, March-October. No monitoring or reporting is required for November, December, January, or February.

‡ Chlorine, Total Residual. This permit contains a Total Residual Chlorine (TRC) limit.
(a) This effluent limit is below the minimum quantification level of the most sensitive EPA approved CLTRC methods. The Department has determined the current acceptable minimum level (ML) for total residual chlorine to be 130 µg/L when using the DPD Colorimetric Method #4500 – CL G. from Standard Methods for the Examination of Waters and Wastewater. The facility 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 130 µg/L will be considered violations of the permit and values less than the minimum quantification level of 130 µg/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) Do not chemically dechlorinate if it is not needed to meet the permit limits.

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

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

B. SCHEDULE OF COMPLIANCE

Schedules of compliance are allowed per 40 CFR 122.47 and 10 CSR 20-7.031(11). The facility shall attain compliance with final effluent limitations established in this permit as soon as reasonably achievable:

1. Within six months of the effective date of this permit, the facility shall report progress made in attaining compliance with the final effluent limits.

2. The facility shall submit interim progress reports detailing progress made in attaining compliance with the final effluent limits every 12 months from effective date. The first report is due June 1, 2022.

3. Within 3 years of the effective date of this permit, the facility shall attain compliance with the final effluent limits for chlorine at outfall #007 and #010.

C. STANDARD CONDITIONS

In addition to the 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. This permit does not authorize the discharge of vehicle/equipment/surface wash water. Such effluent must be discharged to a sanitary sewer in accordance with applicable industrial pretreatment requirements or recycled onsite.

3. 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) 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) To access the eDMR system, use: https://apps5.mo.gov/mogems/welcome.action For assistance using the eDMR system, contact edmr@dnr.mo.gov or call 855-789-3889 or 573-526-2082.
   (c) 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 through the mail 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.

4. 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 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) Wash water for vehicles, building, or pavement must be handled in a no-discharge manner (infiltration, hauled off-site, etc.). Describe the disposal method and include all pertinent information (destination for effluent, BMPs, etc.) in the SWPPP. If wash water is not produced, note this instead.
   (c) A map with all outfalls and structural BMPs marked.
   (d) A schedule for at least once per month site inspections, which shall include each stormwater outfall and all BMPs, and brief written reports of the inspections. 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

consider temporary structures to control stormwater runoff. The facility shall correct the major structural deficiency as soon as reasonably achievable.

(4) 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.

(5) BMP failure causing discharge through an unregistered outfall is considered an illicit discharge and must be reported in accordance with Standard Conditions Part I.

(6) 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.

(e) 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.

5. 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. This might include, for example, utilizing drip pans.

(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 prevent or control sediment loss off of the property.

(f) 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.).

(g) 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.

6. Oil/Water Separators. This site operates oil water separator tanks for the treatment of stormwater and falls under 10 CSR 26-2.010(2)(B). Oil/water separator tanks and discharges are hereby authorized under this permit. The oil/water separators 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.

7. 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.

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. Outfalls #007 and #010 must be clearly marked in the field. Stormwater outfalls must be designated and marked on the map kept with the SWPPP.

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 additional 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).

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. The facility must contact the U.S. Army Corps of Engineers (Corps) to determine if a CWA §404 Department of Army permit or §401 water quality certification is required for the project.

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. Due to site specific challenges in obtaining reliable and accurate stormwater data, the facility may, in lieu of the monitoring required by Form C for stormwater outfalls, submit a report detailing the following information:
        i. Site conditions contributing to each outfall, including groundcover type and percentage of ground covered by each type, which flows travel via pipe/manmade conveyance and which are overland, and slopes of the hills where flows travel overland.
        ii. Pollutants of concern for each outfall and their source.
        iii. BMPs utilized at each outfall, including operational BMPs, and which pollutants they are designed to treat in the effluent.
        iv. Schedule of maintenance for each BMP at each outfall.
        v. Photographs of each outfall location, labeled with outfall number.
        vi. A report detailing any BMP failures in the previous permit cycle and the corrective actions taken to repair or replace them.
        vii. The above stormwater application requirements are in place of and supersede the application requirements in 10 CSR 20-6.200.
    (c) The facility may use the electronic submission system to submit the application to the Program, if available.

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
FACT SHEET
FOR THE PURPOSE OF RENEWAL
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MO-0137006
HALLMARK CARDS – LIBERTY DISTRIBUTION CENTER

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; <1 MGD
SIC Code(s): 4225
NAICS Code(s): 493110
Application Date: 09/28/2020; 10/07/2020-amendment
Modification Date: 06/01/2020
Expiration Date: 03/31/2021
Last Inspection: no inspection on record.

FACILITY DESCRIPTION:
Shipping and Receiving Facility; SIC # 4225, NAICS # 493110
This facility discharges industrial stormwater and non-contact cooling water. The non-contact cooling water contains chlorine, as the water supply is from a potable public water supplier. The cooling water is also treated with sodium hydroxide (CS-877) for corrosion control. The facility is in a rural area and leases surrounding properties to local farmers. No process wastewater or sludge is produced at 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. This facility also operates two oil/water separators, which are authorized to discharge under this permit as long as they are operated and maintained per manufacturer's specifications.

PERMITTED FEATURES TABLE:

OUTFALL	DESIGN FLOW	TREATMENT LEVEL	EFFLUENT TYPE
#002, #006, #008, #009	NA	BMPs	Unmonitored industrial stormwater
#005	NA	BMPs	Unmonitored industrial stormwater and cooling water; cooling water measured at outfall #010
#007	0.007 MGD cooling water	BMPs	Seasonal cooling tower blowdown, incidental industrial stormwater
#010	0.0009 MGD cooling water	BMPs	Seasonal cooling tower blowdown

FACILITY MAP:

FACILITY PERFORMANCE HISTORY & COMMENTS:
The electronic discharge monitoring reports were reviewed for the last permit term. Only two samples were taken since the issuance of the permit modification, which was issued June 1, 2020.

The permit writer made a site visit on 12/19/2019 at the request of the permittee. The outfalls were viewed, and the permit writer and another Department employee assisted the permittee in using their chlorine analyzer. The initial site visit request was made by the facility to request raising the detection limit required for chlorine in the permit. However, during the site visit, the permittee showed the test methods they were using appeared to be correct. The Department determined the issue was likely interference from the high TSS and discoloration in the samples from mingling with stormwater. After re-assessing discharge monitoring locations found in the permit prior to the modification in June 2020, it was determined the locations are not giving useful monitoring information to the Department. The permit writer moved the monitoring locations in the last permit renewal; however, the new locations did not prove more representative than the last monitoring points, therefore they were moved again in the modification.

This site offers unique challenges to permitting. The location of the site makes accurate monitoring of stormwater nearly impossible. It is located in the center of a swath of agricultural land, used for cattle, at the top of a hill. Stormwater is transported through storm drains to exit points on the sides of the very large hill. During precipitation events, reaching the outfalls is dangerous, and the next accessible place to measure the effluent, also dangerous to access during precipitation, is an unclassified tributary where the stormwater mingles with agricultural effluent. The site monitored these outfalls for many years (despite the dangers of access!), reporting elevated TSS and other pollutants due to the agricultural contributions. After multiple site visits and discussions with the facility, it was determined there was no reasonable way to obtain stormwater data from these outfalls. The permit writer believes additional monitoring pipes could likely be installed or monitoring might be able to be done at various drain inlets; however, after viewing the site, the permit writer believes this is unnecessary. Few materials are stored outdoors at the site, and included trailers used for hauling and some covered trash containers. Shipping and receiving is done largely under roof, and most pollution potential comes from the heavy truck traffic and fueling at the site. The parking lot seemed well maintained, and the facility reported cleaning up any spills of oil or fueling materials as soon as possible with absorbent materials. The permit writer noted the biggest stormwater issue at the site appeared to be the application of salt and sand in the winter, which, prior to the permit mod in June 2020, were not required to be swept up following snow melt. The permit writer added special conditions to address the removal of the sand and salt following snow or ice melt.

The site also has two cooling towers, which discharge directly to the parking lot and enter the storm drains. These discharges exit the storm drains at two very different locations on the site. Outfall #007 exits the storm drain at a culvert, which then quickly drains downhill into the agricultural tributary mentioned previously. However, the culvert is not dangerous to access, especially during non-precipitation events, and the permit writer believes a fairly accurate sample can be obtained of the cooling water at this point. The facility is urged to attempt to monitor the cooling water only when it is not commingled with stormwater, if possible, to increase the accuracy of the chlorine test by reducing TSS interference. Outfall #010 exits the storm drain system on the side of a hill, where it is immediately subjected to overland flow. The area where this begins is muddy and difficult to access. The permit writer believes obtaining an accurate sample at this location would be difficult; therefore, monitoring for outfall #010 is required at the end of pipe, prior to the effluent entering the storm drain system. Monitoring data at the pipe has shown elevated levels of chlorine. The permit writer assessed the discharge's potential path to waters which would receive protections of designated uses or the general criteria. The discharge crosses the muddy area mentioned previously, then enters the agricultural tributary, and then flows off the property. It is some distance before the discharge would enter classified waters of the state; however, the unclassified tributary does receive the protections of the general criteria. The chlorine reported at outfall #010 was very high. Chlorine is known to break down over time as it is exposed to sunlight and the air; however, the permit writer is unsure the travel time from the muddy hill to the unclassified tributary is sufficient to provide complete decomposition of chlorine, as, depending on environmental conditions and volume of water, this may take anywhere from 2 to 24 hours or more. In order to protect the general criteria in the receiving stream, the permit writer has applied limitations on chlorine in this permit cycle for the discharges from outfall #007 and #010. A three year schedule of compliance is provided to meet this new limit. The permit writer urges the facility to consider discharging the cooling water to a POTW, or to install dechlorination units at the two outfalls. Either of these would likely solve the facility's issues in permitting by removing the primary pollutant of concern from the cooling water outfalls, or by removing the cooling water from the permit entirely.

CONTINUING AUTHORITY:
The Missouri Secretary of State continuing authority charter number for this facility is 0041315; 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 holds an air permit with the Department: #OP2106-023.

PART II. RECEIVING WATERBODY INFORMATION

RECEIVING WATERBODY TABLE:

OUTFALL	WATERBODY NAME	CLASS	WBID	DESIGNATED USES	DISTANCE TO SEGMENT	12-DIGIT HUC
#002, #005, #006,#007, #008, #009, #010	Tributary to Rush Creek	n/a	n/a	GEN	0.0 mi	10300101-0306 Rush Creek-Missouri River
	100K Extent-Remaining Stream	C	3960	GEN, HHP, IRR, LWW, SCR, WBC-B, WWH (ALP)	various	

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; 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.

✓ All other waters; identified at 10 CSR 20-7.015(B)7 and 10 CSR 20-7.015(8)

EXISTING WATER QUALITY:
The receiving waterbody has no relevant water quality data available.

UPSTREAM OR DOWNSTREAM IMPAIRMENTS:
The permit writer has reviewed upstream and downstream stream segments of this facility for impairments.
- ✓ The permit writer has noted no upstream impairments near this facility.
- ✓ The permit writer has noted downstream of the facility the stream is on the §303(d) list/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
- ✓ Not applicable; this facility does not discharge to an impaired segment of a 303(d) listed stream.

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; the Missouri River Watershed is associated with the 2002 EPA approved TMDL for chlordane and PCBs.
  - ✓ 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.
- ✓ All limits in this operating permit are at least as protective as those previously established; therefore, backsliding does not apply.

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.

CHANGES IN DISCHARGES OF TOXIC POLLUTANT:

This special condition reiterates the federal rules found in 40 CFR 122.44(f) for technology treatments and 122.42(a)(1) for all other toxic substances. In these rules, the facility is required to report changes in amounts of toxic substances discharged. Toxic substances are defined in 40 CFR 122.2 as "…any pollutant listed as toxic under section 307(a)(1)" or, in the case of "sludge use or disposal practices," any pollutant identified in regulations implementing section 405(d) of the CWA." Section 307 of the clean water act then refers to those parameters listed in 40 CFR 401.15 and any other toxic parameter the Department determines is applicable for reporting under these rules in the permit. The facility should also consider any other toxic pollutant in the discharge as reportable under this condition and must report all increases to the Department as soon as discovered in the effluent. The Department may open the permit to implement any required effluent limits pursuant to CWA §402(k) where sufficient data was not supplied within the application but was supplied at a later date by either the permittee or other resource determined to be representative of the discharge, such as sampling by Department personnel.

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 electronic data reporting. 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.

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. Facility personnel will use these identifiers to ensure data entry is being completed appropriately. For example, M for monthly, Q for quarterly, and others as identified.

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 does not have an associated 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.

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 Statues 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 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.
✓ Not applicable; the total design flow is less than 0.1 MGD for all wastewater outfalls.

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, are authorized by this permit. 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 or the domestic wastewater population equivalent (PE) is less than two hundred (200) individuals. 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.
✓ Not applicable, this facility does not discharge industrial wastewater to a POTW. Domestic wastewater is not subject to pretreatment requirements.

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.

- ✓ Not applicable; a mathematical RPA was not conducted on the wastewater discharge for this facility. This is a new discharge or limited data exist. Effluent limits are applicable based on the likelihood pollutants are present at levels which may have or have reasonable potential to exceed in-stream water quality standards. RPD decisions are based on minimal samples, the type of effluent proposed for discharge, or the unavailability of numerical RPA for a parameter, such as pH, or oil and grease. Absent effluent data, effluent limits are derived without consideration of effluent variability and is assumed to be present unless found to be absent to meet the requirements of antidegradation review found in 10 CSR 20-7.031(3) and reporting of toxic substances pursuant to 40 CFR 122.44(f).
- ✓ 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:
Monitoring was increased to monthly in this permit; however, it was adjusted to be seasonal when the cooling water is being discharged. Monthly monitoring is appropriate to ensure full characterization of the wastewater.

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. SOCs 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 SOCs, and to attain a greater level of consistency, the Department issued a policy on development of SOCs 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.

✓ Applicable; the time given for effluent limitations of this permit listed under Interim Effluent Limitations and Final Effluent Limitations were established in accordance with [10 CSR 20-7.031(11)]. The facility has been given a schedule of compliance to meet final effluent limits. See permit Sections A and B for compliance dates.

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; OWS sludge is generated by this facility. Oil water separator sludge is considered used oil; sludge must be disposed of in accordance with 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 statues, federal regulations, and the Clean Water Act. Standard Conditions Part III, if attached to this permit, incorporate requirements dealing with domestic wastewater, domestic sludge, and land application of domestic wastes.

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 capricious measures of 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.

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.
✓ Not applicable; this facility does not have any stormwater-only outfalls with benchmarks.

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, 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.

$$C = \frac{(Cs \times Qs) + (Ce \times Qe)}{(Qe + Qs)}$$

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.

WASTELOAD ALLOCATION (WLA) MODELING:

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

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

WATER QUALITY 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 #007, #010 – COOLING WATER OUTFALLS

EFFLUENT LIMITATIONS TABLE:

PARAMETERS	UNIT	DAILY MAX	MONTHLY AVG.	PREVIOUS PERMIT LIMITS	MINIMUM SAMPLING FREQUENCY	REPORTING FREQUENCY	SAMPLE TYPE
PHYSICAL							
FLOW	MGD	*	*	SAME	ONCE/MONTH**	ONCE/MONTH**	24 HR. TOT
TEMPERATURE	°F	*	*	SAME	ONCE/MONTH**	ONCE/MONTH**	MEASURED
CONVENTIONAL							
COD	mg/L	*	*	SAME	ONCE/QUARTER	ONCE/QUARTER	GRAB
CHLORINE, TOTAL RESIDUAL	µg/L	19 ML 130	11 ML 130	*/*	ONCE/MONTH**	ONCE/MONTH**	GRAB
OIL & GREASE	MONITORING REMOVED FROM OUTFALL #007, NOT PRESENT IN PREVIOUS PERMIT AT OUTFALL #010						
pH †	SU	6.5-9.0	-	***	ONCE/MONTH**	ONCE/MONTH**	GRAB
TOTAL SUSPENDED SOLIDS (TSS)	mg/L	*	*	SAME	ONCE/QUARTER	ONCE/QUARTER	GRAB
NUTRIENTS							
AMMONIA AS N	mg/L	*	*	NEW	ONCE/MONTH**	ONCE/MONTH**	GRAB
OTHER							
CHLORIDE	mg/L	*	*	SAME	ONCE/QUARTER	ONCE/QUARTER	GRAB
SULFATE	mg/L	*	*	SAME	ONCE/QUARTER	ONCE/QUARTER	GRAB
CHLORIDE PLUS SULFATE	mg/L	*	*	SAME	ONCE/QUARTER	ONCE/QUARTER	GRAB

* Monitoring and reporting requirement only
** Monthly monitoring and reporting is required only during months where cooling units were reported as being used at the facility as reported in the application materials, March-October. No monitoring or reporting is required for November, December, January, or February.
*** pH was limited in the previous permit cycle at outfall #007 to 6.5-9.0 SU; at outfall #010, requirements were monitoring only.
† Report the minimum and maximum pH values; pH is not to be averaged
new Parameter not established in previous state operating permit

DERIVATION AND DISCUSSION OF LIMITS:

PHYSICAL:

Flow
Monthly monitoring. 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).

Temperature
Monthly monitoring. The effluent being monitored is cooling water. Temperature is an expected pollutant in cooling water. 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. The COD data reported in the last permit cycle did not indicate any values which would lead to excursions from the general narrative water quality standards found at 10 CSR 20-7.031(4); however, the data did show COD is a pollutant of concern, especially with discharges from outfall #010. 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 chemicals in the effluent causing an increase in oxygen demand. Increases in COD may indicate a need for maintenance or improvement of BMPs.

Chlorine, Total Residual (TRC)
Monthly monitoring, with a daily maximum limit of 19 µg/L, with a monthly average limit of 11 µg/L. An ML of 130 µg/L is provided as the limitations are below the monitoring capabilities of the commonly used analytical methods for this pollutant. The ML does not authorize discharges in excess of the limitations in this permit. See table notes in the permit for more information on the ML. This facility discharges chlorinated cooling water treated with biocides. In the previous permit, following the modification, this parameter was monitoring only. However, after review of the available data, the permit writer determines a limitation on this parameter is appropriate to protect the general criteria at 10 CSR 20-7.031(4) (see FACILITY PERFORMANCE HISTORY & COMMENTS above for more information). The facility is provided a three year schedule of compliance to meet the new limits.

Oil & Grease
This pollutant is removed from outfall #007, and was not present in the requirements for outfall #010 in the previous permit cycle. If the facility is monitoring when stormwater is not present, this is not expected to be a pollutant of concern in the cooling water discharges. Additionally, data from the previous permit cycle was reported as non-detect.

pH
Monthly 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. The previous permit cycle required limits on discharges from outfall #007 but not outfall #010. Data shows water quality based limits are required at these outfalls, with data ranging up to 8.94 SU. A schedule of compliance is not provided at outfall #010 as the data shows the limits are already achievable at the outfall. pH is a fundamental water quality indicator. Additionally, metals leachability and ammonia availability in wastewater is influenced by 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.

Total Suspended Solids (TSS)
Quarterly monitoring, continued from the previous permit. DMR values reported by the facility do not indicate reasonable potential to cause excursions from the general narrative water quality criteria found at 10 CSR 20-7.031(4); however, it does show this is a pollutant of concern at the site. There is no numeric water quality standard for TSS; however, sediment discharges can negatively impact aquatic life habitat. TSS monitoring allows the facility to identify increases in TSS indicating uncontrolled materials leaving the site. Increased suspended solids in effluent 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.

NUTRIENTS:

Ammonia, Total as Nitrogen
Monthly monitoring. Monitoring is new to this permit, and is added due to application materials showing the presence of ammonia at outfall #010. As outfall #010 is monitored directly at end of pipe, this likely indicates that a product added to the cooling water contains ammonia. As #007 and #010 have the same additives, monitoring is required at both outfalls.

OTHER:

Chloride
Quarterly monitoring continued from the previous permit. Monitoring is required to determine chloride plus sulfate below. Chloride is believed to be a possible pollutant of concern in the cooling water due to additives. Values reported did not indicate reasonable potential to exceed water quality standards found at 10 CSR 20-7.031; however, very little data is available. Data will be reassessed at renewal.

Sulfate
Quarterly monitoring required to determine chloride plus sulfate below. The facility shall sample and independently report the analytical value of sulfate. Sulfate is believed to be a possible pollutant of concern in the cooling water due to additives.

Chloride Plus Sulfate
Quarterly monitoring continued from the previous permit. Monitoring is required to determine chloride plus sulfate below. Chloride and sulfate are believed to be possible pollutants of concern in the cooling water due to additives. Values reported did not indicate reasonable potential to exceed water quality standards found at 10 CSR 20-7.031; however, very little data is available. Data will be reassessed at renewal.

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.

- ✓ Due to the schedule of compliance the permit writer has determined having early expiration of this permit will be too complicated, therefore this permit will have a full five year permit cycle, and will not be synched at this time.

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 starts March 26, 2021 and ends April 26, 2021. No comments were received.

DATE OF FACT SHEET: 03/03/2021
COMPLETED BY:
AMBERLY SCHULZ, 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.

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 28th day of the month following the end of the reporting period.

Section C – Bypass/Upset Requirements

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

2. **Bypass Requirements.**
   a. Bypass not exceeding limitations. The permittee may allow any bypass to occur which does not cause effluent limitations to be exceeded, but only if it also is for essential maintenance to assure efficient operation. These bypasses are not subject to the provisions of paragraphs 2. b. and 2. c. of this section.
   b. Notice.
      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.
   b. Conditions necessary for a demonstration of upset. A permittee who wishes to establish the affirmative defense of upset shall demonstrate, through properly signed, contemporaneous operating logs, or other relevant evidence that:
      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.
   c. Burden of proof. In any enforcement proceeding, the permittee seeking to establish the occurrence of an upset has the burden of proof.

Section D – Administrative Requirements

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

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 permittees with currently effective general permit shall submit an application for renewal at least 30 days before the existing permit expires, unless the permittee has been notified by the Department that an earlier application must be made. The Department may grant permission for a later submission date. (The Department shall not grant permission for applications to be submitted later than the expiration date of the existing permit.)

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.

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.

RECEIVED

SEP 28 2020

Water Protection Program

355564

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 9-28-20	FEE SUBMITTED 0
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 – 0137006, 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 – _____ and is requesting a modification to the permit. Antidegradation Review may be required. Modification fee is required.

2. FACILITY

NAME		TELEPHONE NUMBER WITH AREA CODE	
Hallmark Cards- Liberty Distribution Center		816-792-7316	
ADDRESS (PHYSICAL)	CITY	STATE	ZIP CODE
2101 N. Lightburne St.	Liberty	MO	64068

3. OWNER

NAME		TELEPHONE NUMBER WITH AREA CODE	
Hallmark Cards, Inc.		816-545-6650	
EMAIL ADDRESS			
N/A			
ADDRESS (MAILING)	CITY	STATE	ZIP CODE
2501 McGee	Kansas City	MO	64108

4. CONTINUING AUTHORITY

NAME		TELEPHONE NUMBER WITH AREA CODE	
Rick Morovits		816-792-7370	
EMAIL ADDRESS			
rick.morovits@hallmark.com			
ADDRESS (MAILING)	CITY	STATE	ZIP CODE
2101 N. Lightburne St.	Liberty	MO	64068

5. OPERATOR CERTIFICATION

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

6. FACILITY CONTACT

NAME	TITLE	TELEPHONE NUMBER WITH AREA CODE
Wendy Mayes	EHS Administrator	816-792-6239
E-MAIL ADDRESS		
wmayes3@hallmark.com		

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

NAME			
William Jewell College (old golf course)			
ADDRESS	CITY	STATE	ZIP CODE
500 College Hill	Liberty	MO	64068

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)

007 SW ¼ SW ¼ Sec 32 T 52N R 31W Clay County
UTM Coordinates Easting (X): 378831 Northing (Y): 4347632

010 SW ¼ SW ¼ Sec 32 T 52N R 31W Clay County
UTM Coordinates Easting (X): 378620 Northing (Y): 4347393

____ ¼ ____ ¼ Sec ____ T ____ R ____ County
UTM Coordinates Easting (X): ____ Northing (Y): ____

____ ¼ ____ ¼ Sec ____ T ____ R ____ County
UTM Coordinates Easting (X): ____ Northing (Y): ____

8.2 Primary Standard Industrial Classification (SIC) and Facility North American Industrial Classification System (NAICS) Codes.
Primary SIC 4225 and NAICS 493110 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.

F. Do you use cooling water in your operations at this facility? YES ☐ NO ☑
If yes, please indicate the source of the water: _____

G. Attach a map showing all outfalls and the receiving stream at 1" = 2,000' scale.

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 http://dnr.mo.gov/env/wpp/edmr.htm to access the Facility Participation Package.

☐ - You have completed and submitted with this permit application the required documentation to participate in the eDMR system.

☑ - You have previously submitted the required documentation to participate in the eDMR system and/or you are currently using the eDMR system.

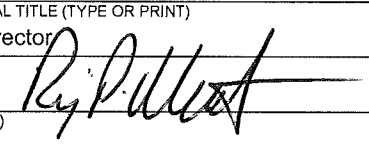
☐ - You have submitted a written request for a waiver from electronic reporting. See instructions for further information regarding waivers.

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: https://magic.collectorsolutions.com/magic-ui/payments/mo-natural-resources/

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.

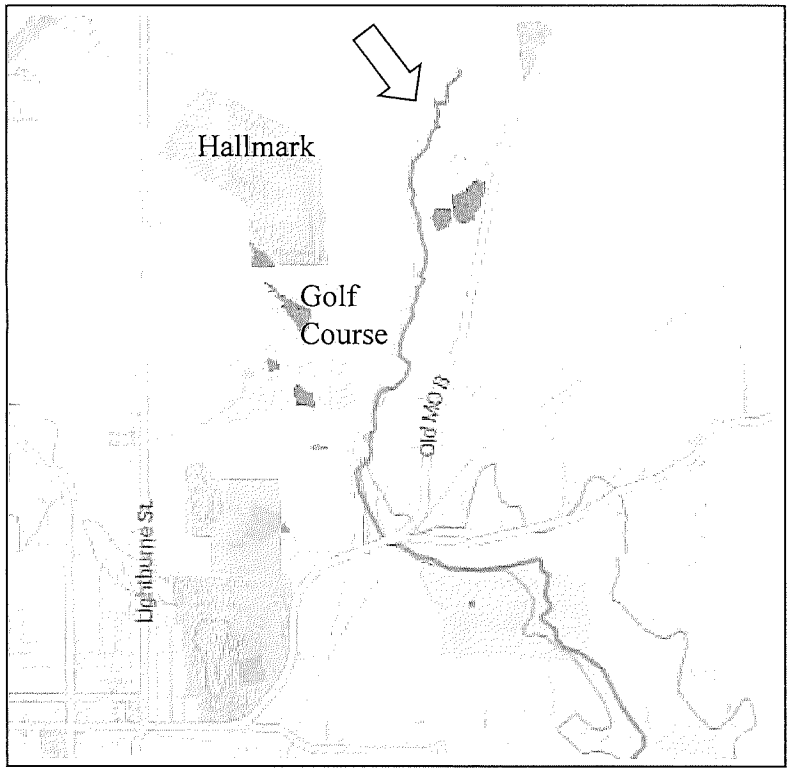
NAME AND OFFICIAL TITLE (TYPE OR PRINT)	TELEPHONE NUMBER WITH AREA CODE
Distribution Director	816-792-7370
SIGNATURE	DATE SIGNED
	9/23/2020

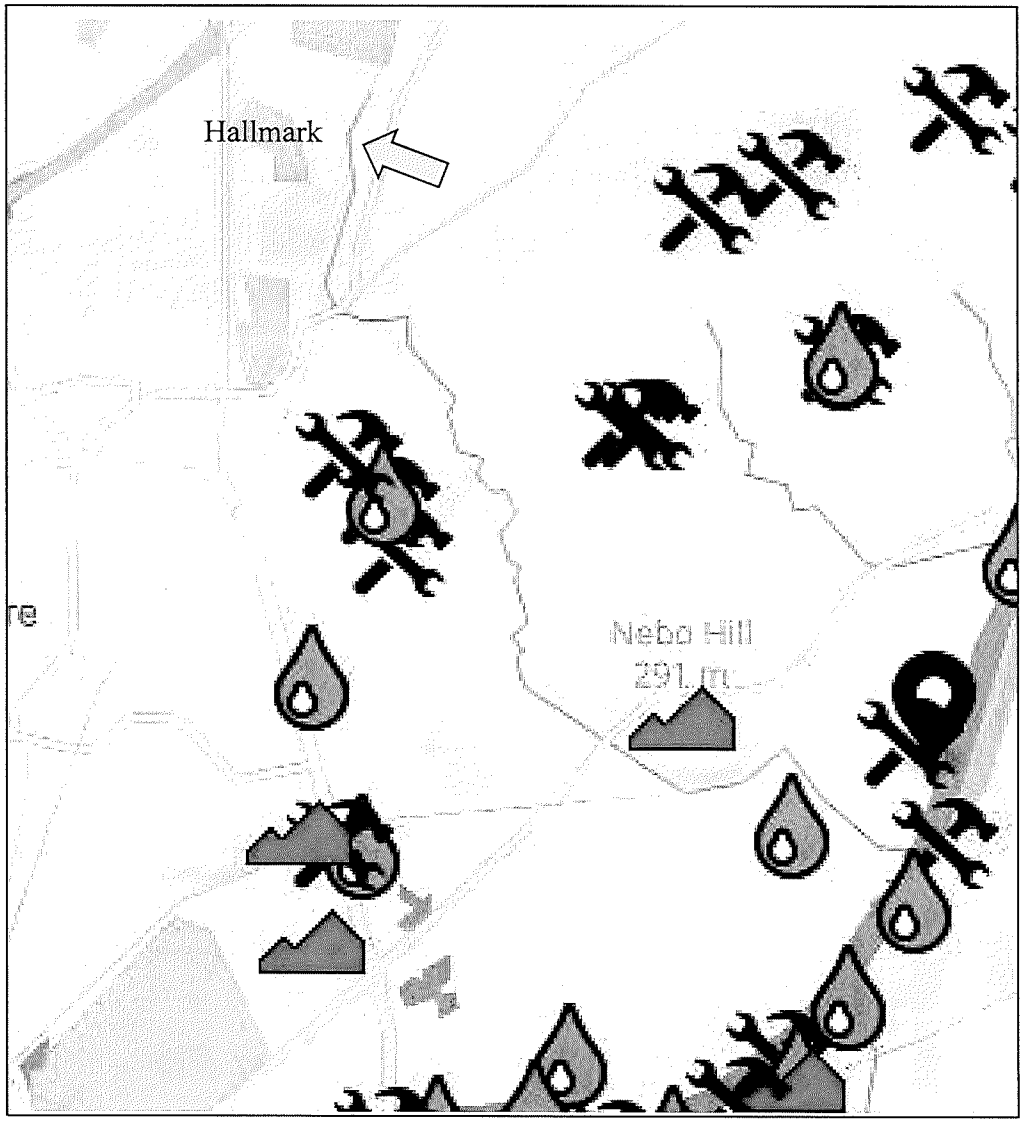
MO 780-1479 (02-19)

Form A Section 9 Map @ 1-inch=2000ft: Hallmark Liberty #MO0137006

Form A Section 9 Map Receiving Stream: Hallmark Liberty #MO0137006

On site ditches to unnamed tributaries to Rush Creek to Missouri River.





https://www.anyplaceamerica.com/directory/mo/clay-county-29047/streams/rush-creek-730203/ (2000ft=1 inch)

RECEIVED
SEP 28 2020
Water Protection Program

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

Hallmark Cards Liberty Distribution Center

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

MO0137006

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

No.

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.

Warehousing and distribution of Hallmark products, such as cards, paper goods, gifts, and store displays. Transit vehicles on property unloaded/loaded at covered docks, some stored on paved parking lots. Groundskeeping equipment used to mow greenscape or maintain parking lots in winter, including salting or sanding. Two ASTs for diesel fueling of hostling vehicle and groundskeeping equipment outdoors with secondary containment. Extra metal components for storage racks or supporting structure of conveyors stored outside. Two covered garbage compactors and between 5-7 outdoor collection dumpsters (several open top) for garbage, scrap metal recycling, or other household recycling, one covered grease collection container for the cafeteria. Two cooling towers that both discharge blowdown or drainage to stormwater outfalls #007 and #010. Periodic testing of fire sprinkler systems including end of line testing and hydrant flushing; possible run-off from fire-fighting activities. One covered outdoor diesel powered generator.

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 by determined (e.g., for certain mining activities), provide a pictorial description of the nature and amount of any sources of water and any collection or treatment measures.

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
007	Stormwater and /fire suppression;	varies/ unmetered	none	4-A
	Cooling tower discharges	avg 205,000 gal/mo	biocide, descaler, potable watr	4-A
010	Stormwater	varies / unmetered	none	4-A
	Cooling tower discharge- end of pipe	avg 28,000 gal/mo	biocide, descaler, potable watr	4-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	
All	Fire Suppression-unmetered	unknow	n/a	n/a	n/a	unknown	n/a	n/a
007	Cool'g Tower discharge (Mar-Oct)	4.2	8	unknown	0.00652	0.007mgd	unknown	220-245 d/yr
010	Cool'g Tower discharge (Mar-Oct)	4.2	8	unknown	0.00089	0.0009mgd	unknown	220-245 d/yr

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.

N/A.

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.

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)
None			

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)*
Pace Analytical	528 N. 9th, Salina, KS. 67401	785-823-7830	COS, TSS, oil & grease (HEM), Benzene, Chloride, Sulfate, BOD-5, TOC, Ammonia as N.

4.0 STORMWATER

4.1
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.

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
002	2,475,000 sf	veg65%,pave15%,bldg21%	See attached narrative of industrial stormwater outfalls.
006	250,000sqft	veg85%,pave1%	See attached narrative of industrial stormwater outfalls.
008	495,000sqft	veg60%,pave20%,bldg10%,	See attached narrative of industrial stormwater outfalls.
		gravel10%	
009	4,000,000sf	veg90%,pave10%	See attached narrative of industrial stormwater outfalls.
007	1,500,000sf	veg21%,pave21%,bldg58%	See attached narrative of industrial stormwater outfalls.
010	40,000sqft	building 100%	See attached narrative of industrial stormwater outfalls.

4.2 STORMWATER FLOWS
Provide the date of sampling with the flows, and how the flows were estimated.
See attached ~~narrative of industrial stormwater outfalls~~. Stormflow Determination.
WM
9-23-20

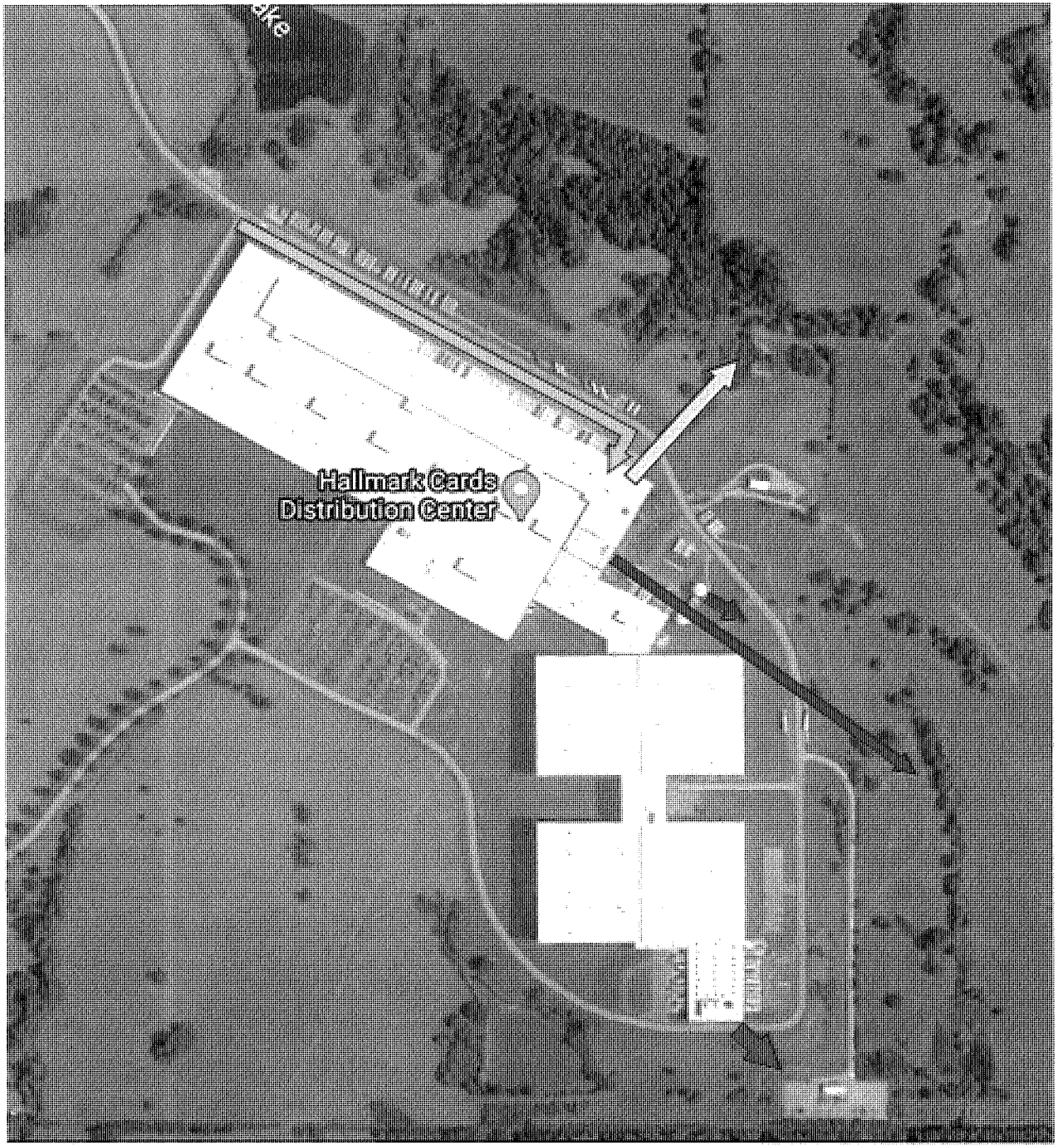
SIGNATORY REQUIREMENTS

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)	TELEPHONE NUMBER WITH AREA CODE
Rick Morovits Distribution Director	816-792-7370
SIGNATURE (SEE INSTRUCTIONS)	DATE SIGNED
	9/23/2020

Form C 2.0 Line Drawing of Water Flow: Hallmark Liberty #MO0137006



- City Water Supply
- City Sewer
- Main Cooling Tower Blowdown
- Receiving Cooling Tower Blowdown
- Fire Water Tanks

Main Cooling Tower:

- Evaporation 2/3 of intake: 2.4-3.8 MMgal/yr
- Blowdown 1/3 of intake: 1.2-1.9 MMgal/yr. Average: 0.00652 MMgal/day.
- Treatment: biocide, descaler, potable water.

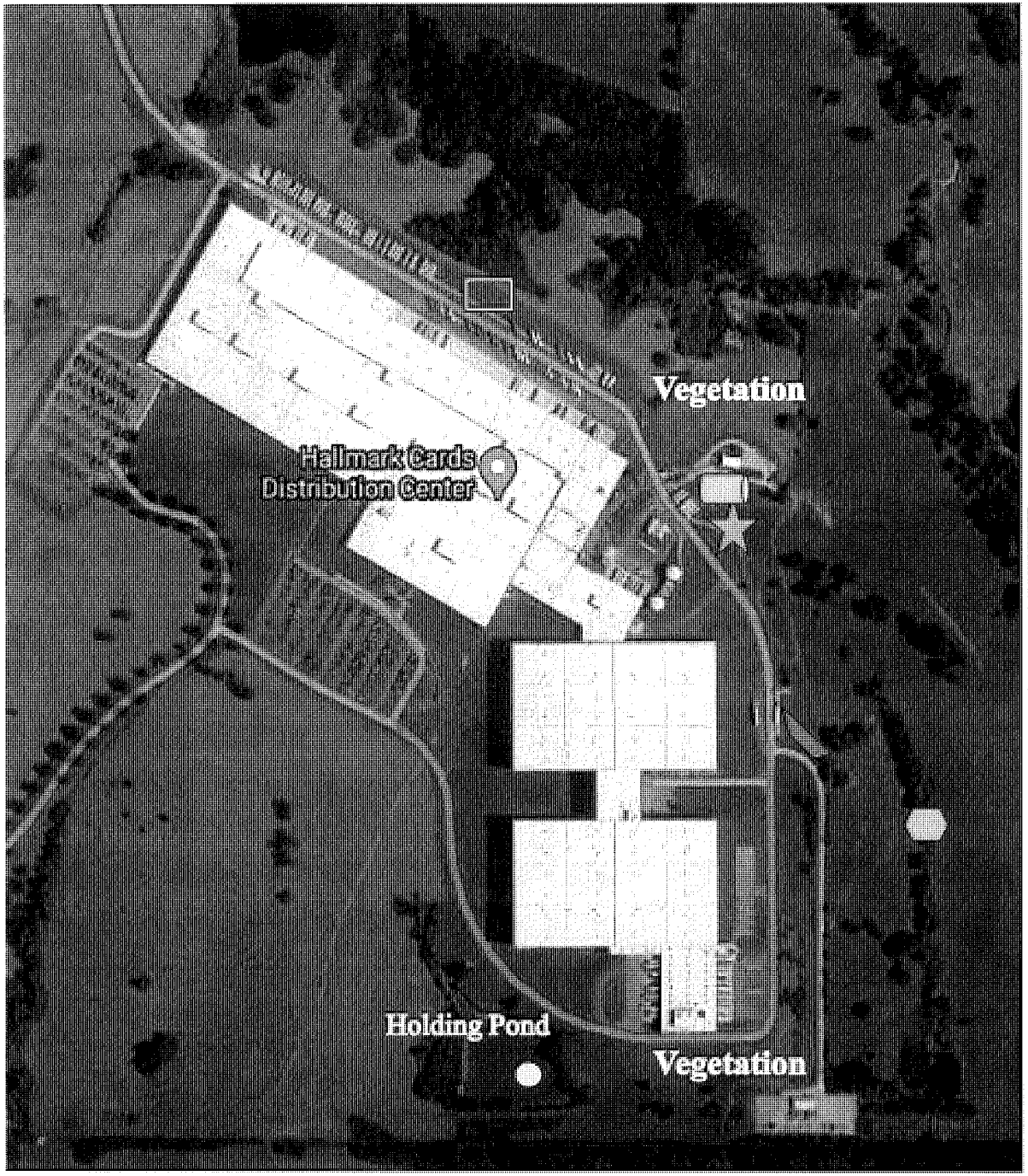
Receiving Cooling Tower:

- Evaporation 2/3 of intake: 0.3-0.42 MMgal/yr
- Blowdown 1/3 of intake: 0.15-0.21 MMgal/yr. Average: 0.00089MMgal/day.
- Treatment: biocide, descaler, potable water.

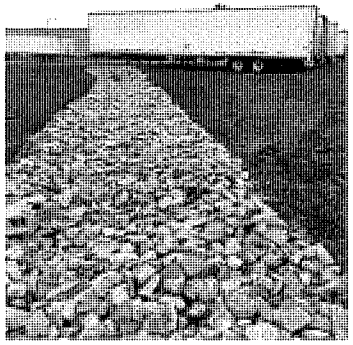
Fire Water Storage Tanks (411,000gal capacity each):

- Treatment: potable water, not treated.
- Emergency draining only: not likely unless internal tank repair needed. Drains to grass. NO average flow.

Form C 4.1 Structural Controls: Hallmark Liberty #MO0137006



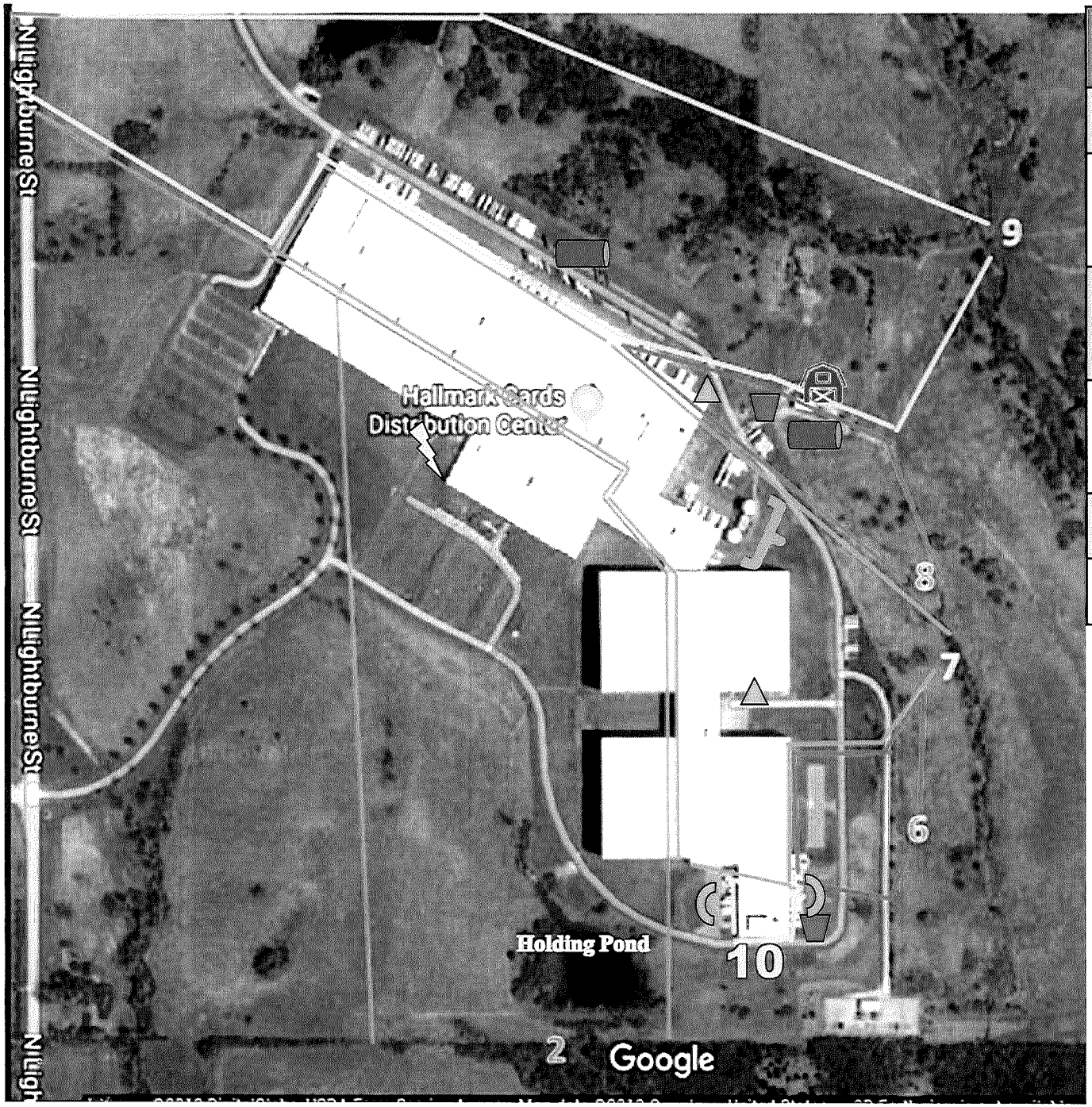
OF 008: Rock to reduce flow/ erosion	OF 006: French drain to reduce erosion



OF 008: Diesel tank with double wall to capture potential tank leaks.	OF 009: Berm around Diesel tank to capture potential tank leaks.

OF 002: Holding pond to reduce flow/ erosion and settle out solids.	OF 007: Cement blocks and large rock down ditch to reduce flow and erosion.

Form C 4.1 Stormwater Discharges: Hallmark Liberty #MO0137006



OF #	Vegetation	Paved	Building
002	65%	15%	21%
006	83%	16% +1% gravel	--
007	21%	20% + 1% gravel	58%
008	60%	20% + gravel 10%	10%
009	90%	10%	--
010	--	--	100%

- Outdoor Diesel Tank (AST) with berm or double tank wall
- Outdoor Metal Storage
- Open Top Dumpster (Trash/Recycling)
- Groundskeeping Barn
- Emergency Generator (Diesel)
- Fire Water Storage Tanks
- Dock Levelers (Hydraulic Oil)

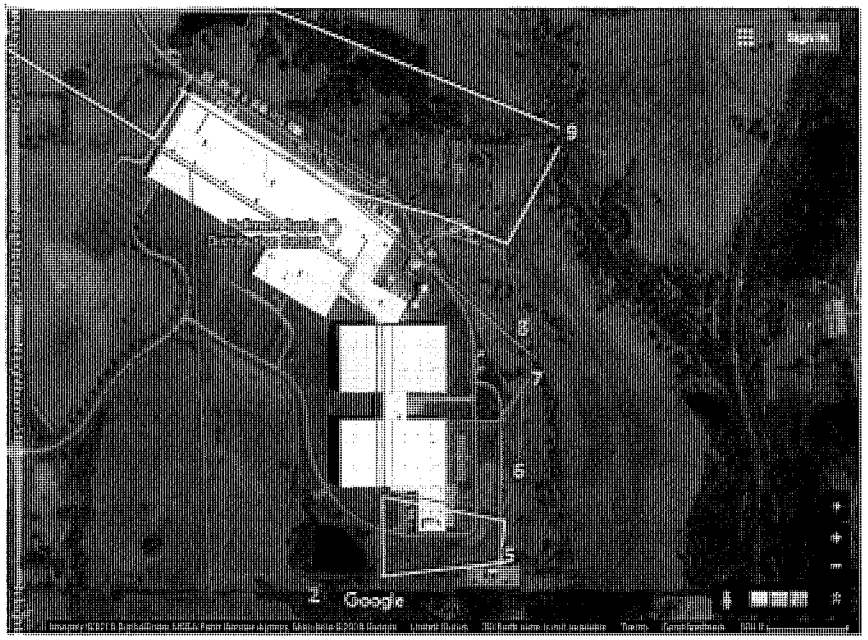
Form C Section 4.2 Stormwater Flow Determination: Hallmark Liberty #MO0137006

Area Square: h x b
Area Rt Triangle: h*(b/2)
Cooling Tower Blowdown: 1/3 of water usage (2/3 is evaporated)

27 154.286106 US gallons per acre = 4840 square yards.
1 inch of rain equals 0.623 gallons per square foot.
1 inch of rain equals 27,154 gallons per acre.

1 inch of rain equals 17.38 million gallons of water per square mile.

Cooling Tower Avg Daily Blowdown in 2018 Season		Area Square Feet	Est. Gal/ 1" Rain Event	Sample Date: / Event Rainfall inches:	Event 3rd Q 9/5/2018 / 0.67	Cooling Tower Blowdown 3 Q / Avg Daily Blowdn month of sampling	no Discharge	Daily Max	Monthly Total (month precip over area+blowdn/mo)	Event 4th Q 12/26/2018 / 1.5	Cooling Tower Blowdown 4 Q / Not running
None Expected		2,475,000	1,541,925	Outfall 2	1,033,090	None Expected				2,312,888	
	11	375,000	233,625	Outfall 5	156,529	6	X	156,535		350,438	
None Expected		250,000	155,750	Outfall 6	104,353	None Expected	X			233,625	
	73	1,500,000	934,500	Outfall 7	626,115	45		626,160	1,216,208	1,401,750	
None Expected		495,000	308,385	Outfall 8	206,618	None Expected				462,578	
None Expected		4,000,000	2,492,000	Outfall 9	1,669,640	None Expected				3,738,000	



The stormwater flow was determined using Google Maps at 500-ft. Each drainage area was roughly mapped based on topographical knowledge and observation of water flows, but some areas were assumed to be part of the drainage area of an outfall. Each drainage area size was estimated via Google Maps and calculated for 1-inch of rainfall. Data used is listed above. Outfall 010 was added June 2020 and OF#005 eliminated. Building roof top area calculated same way.

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: 007 - Stormwater + Cooling Tower Blowdown — OUTFALL NO. 007

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_5)	AWAITING LAB RESULTS		—						
B. Chemical Oxygen Demand (COD)	34.1 mg/L		—		17.02 mg/L		7		
C. Total Organic Carbon (TOC)	AWAITING LAB RESULTS		—						
D. Total Suspended Solids (TSS)	211 mg/L		—		39 mg/L		7		
E. Ammonia as N	AWAITING LAB RESULTS		—						
F. Flow cool tower + rainevents of mo.	VALUE 0.62 MM gal/day		VALUE —		VALUE 0.27 MM gal/day		6	MILLIONS OF GALLONS PER DAY (MGD)	
G. Temperature *(winter)*	VALUE 60.2 °F		VALUE —		VALUE 48.4 °F		3	°F	
H. Temperature *(summer)*	VALUE 75.7 °F		VALUE —		VALUE 71.05 °F		4	°F	
I. pH	MINIMUM 7.51		MAXIMUM 8.67		AVERAGE 7.88		7	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 ($CaCO_3$)		X	MINIMUM		MINIMUM		MINIMUM				
B. Bromide (24959-67-9)		X									
C. Chloride (16887-00-6)	X		67.3 mg/L		—		67.3 mg/L		1 (new parameter 2020)		
D. Chlorine, Total Residual	X		0.34 mg/L		—		0.09 mg/L		7		
E. Color		X									
F. Conductivity		X									
F. Cyanide, Amenable to Chlorination		X									

OF 007

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. CONCENTRATION	B. MASS
			CONCENTRATION	MASS	CONCENTRATION	MASS	CONCENTRATION	MASS			
Subpart 1 – Conventional and Non-Conventional Pollutants (Continued)											
G. *E. coli*		X									
H. Fluoride (16984-48-8)		X									
I. Nitrate plus Nitrate *(as N)*		X									
J. Kjeldahl, Total (as N)		X									
K. Nitrogen, Total Organic *(as N)*		X									
L. Oil and Grease	X		<4.8 mg/L		—		<4.8 mg/L		7		
M. Phenols, Total		X									
N. Phosphorus *(as P)*, Total (7723-14-0)		X									
O. Sulfate *(as SO^4)* (14808-79-8)	X		100 mg/L		—		100 mg/L		1 (new 2022 parameter)		
P. Sulfide *(as S)*		X									
Q. Sulfite (as SO^3) (14265-45-3)		X									
R. Surfactants		X									
S. Trihalomethanes, Total		X									
Subpart 2 – Metals											
1M. Aluminum, Total Recoverable (7429-90-5)		X									
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									

OF 007

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. CONCENTRATION	B. MASS
			CONCENTRATION	MASS	CONCENTRATION	MASS	CONCENTRATION	MASS			
Subpart 2 – Metals (Continued)											
11M. Copper, Total Recoverable (7440-50-8)		X									
12M. Iron, Total Recoverable (7439-89-6)		X									
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 (Q2) New Outfall 2020

EFFLUENT (AND INTAKE) CHARACTERISTICS THIS OUTFALL IS: 010 Cooling Tower Blowdown; Roof Stormwater Runoff 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						D. NO. OF ANALYSES	3. UNITS *(specify if blank)*	
	A. MAXIMUM DAILY VALUE		B. MAXIMUM 30 DAY VALUES		C. LONG TERM AVERAGE VALUES			A. CONCENTRATION	B. MASS
	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS			
A. Biochemical Oxygen Demand, 5-day (BOD_5)	AWAITING LAB RESULTS								
B. Chemical Oxygen Demand (COD)	178 mg/L		—		178 mg/L		1		
C. Total Organic Carbon (TOC)	AWAITING LAB RESULTS								
D. Total Suspended Solids (TSS)	<5 mg/L		—		<5 mg/L		1		
E. Ammonia as N	AWAITING LAB RESULTS								
F. Flow cool tower only	VALUE 0.0016 MMgal/day		VALUE		VALUE			MILLIONS OF GALLONS PER DAY (MGD)	
G. Temperature *(winter)*	VALUE none taken yet - new 2020		VALUE		VALUE			°F	
H. Temperature *(summer)*	VALUE 73.8°F		VALUE —		VALUE 73.3°F		2	°F	
I. pH	MINIMUM 8.75		MAXIMUM 8.91		AVERAGE 8.83		2	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						D. NO. OF ANALYSES	4. UNITS	
	A. BELIEVED PRESENT	B. BELIEVED ABSENT	A. MAXIMUM DAILY VALUE		B. MAXIMUM 30 DAY VALUES		C. LONG TERM AVERAGE VALUES			A. CONCENTRATION	B. MASS
			CONCENTRATION	MASS	CONCENTRATION	MASS	CONCENTRATION	MASS			
Subpart 1 – Conventional and Non-Conventional Pollutants											
A. Alkalinity ($CaCO_3$)		X	MINIMUM		MINIMUM		MINIMUM				
B. Bromide (24959-67-9)		X									
C. Chloride (16887-00-6)	X		123 mg/L		—		123 mg/L		1		
D. Chlorine, Total Residual	X		1.78 mg/L		—		1.14 mg/L		2		
E. Color		X									
F. Conductivity		X									
F. Cyanide, Amenable to Chlorination		X									

OF 010

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. CONCENTRATION	B. MASS
			CONCENTRATION	MASS	CONCENTRATION	MASS	CONCENTRATION	MASS			
Subpart 1 – Conventional and Non-Conventional Pollutants (Continued)											
G. *E. coli*		X									
H. Fluoride (16984-48-8)		X									
I. Nitrate plus Nitrate *(as N)*		X									
J. Kjeldahl, Total (as N)		X									
K. Nitrogen, Total Organic *(as N)*		X									
L. Oil and Grease		X	< 4.8 mg/L		—		< 4.8 mg/L		1		
M. Phenols, Total		X									
N. Phosphorus *(as P)*, Total (7723-14-0)		X									
O. Sulfate *(as SO^4)* (14808-79-8)	X		193 mg/L		—		193 mg/L		1		
P. Sulfide *(as S)*		X									
Q. Sulfite (as SO^3) (14265-45-3)		X									
R. Surfactants		X									
S. Trihalomethanes, Total		X									
Subpart 2 – Metals											
1M. Aluminum, Total Recoverable (7429-90-5)		X									
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									

OF 010

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. CONCENTRATION	B. MASS
			CONCENTRATION	MASS	CONCENTRATION	MASS	CONCENTRATION	MASS			
Subpart 2 – Metals (Continued)											
11M. Copper, Total Recoverable (7440-50-8)		X									
12M. Iron, Total Recoverable (7439-89-6)		X									
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									

Outfall 5 and Outfall 7 (Cooling Tower Blowdown and Stormwater) September 5, 2018					
Parameter	**Outfall 5**	**Outfall 7**	**Units**	**Permit Limitations**	**Permit Benchmarks**
Flow	0.156	0.626	MGPD	*	
COD	No Flow	ND	mg/L	*	120 mg/L
TSS	No Flow	ND	mg/L	*	100 mg/L
Chlorine (Total Residual)	No Flow	ND	µg/L	*	50 µg/L
Benzene	No Flow	ND	mg/L		
HEM, Oil and Grease	No Flow	ND	mg/L		10 mg/L
pH	No Flow	8.5		6.5-9.0	

Outfalls 2, 6, 8, and 9 (Stormwater Only) September 5, 2018							
Parameter	**Outfall 2**	**Outfall 6**	**Outfall 8**	**Outfall 9**	**Units**	**Permit Limitations**	**Permit Benchmarks**
Flow	1.033	0.104	0.206	1.66	MGPD	*	
COD	12.5	No Flow	43.9	35.5	mg/L	*	120 mg/L
TSS	8.6	No Flow	52.8	171	mg/L	*	100 mg/L
Chlorine (Total Residual)	60	No Flow	120	610	µg/L	*	50 µg/L
Benzene	ND	No Flow	ND	ND	mg/L		
HEM, Oil and Grease	ND	No Flow	ND	ND	mg/L		10 mg/L
pH	8.28	No Flow	8.01	8.28		6.5-9.0	

Temperature of coolers:
#60279812 5.0°C
#60279813 5.5°C
#60279814 6.1°C
#60279815 4.6°C

ND - None Detected

*Monitoring only required

Outfall 5 and Outfall 7 (Cooling Tower Blowdown and Stormwater) December 16 2018					
Parameter	**Outfall 5**	**Outfall 7**	**Units**	**Permit Limitations**	**Permit Benchmarks**
Flow	350,438	1,401,750	MGPD	*	
COD	67.1	ND	mg/L	*	120 mg/L
TSS	20.5	ND	mg/L	*	100 mg/L
Chlorine (Total Residual)	0.00	0.34	µg/L	*	50 µg/L
Benzene	ND	ND	mg/L		
HEM, Oil and Grease	ND	ND	mg/L		10 mg/L
pH	8.3	7.67		6.5-9.0	

Outfalls 2, 6, 8, and 9 (Stormwater Only) December 16, 2018							
Parameter	**Outfall 2**	**Outfall 6**	**Outfall 8**	**Outfall 9**	**Units**	**Permit Limitations**	**Permit Benchmarks**
Flow	2,312,888	233,625	462,578	3,738,000	MGPD	*	
COD	17.9	25.6	30.1	39.5	mg/L	*	120 mg/L
TSS	7.0	7.5	7.0	78.0	mg/L	*	100 mg/L
Chlorine (Total Residual)	0.00	0.00	0.07	0.00	µg/L	*	50 µg/L
Benzene	ND	ND	ND	ND	mg/L		
HEM, Oil and Grease	ND	ND	ND	ND	mg/L		10 mg/L
pH	7.92	7.97	7.49	7.61		6.5-9.0	

Temperature of coolers:
#60290684 0.2°C
#60290680 1.2°C
#60290686 1.4°C
#60290681 0.9°C
#60290685 1.5°C
#60290683 0.5°C

ND - None Detected

*Monitoring only required

Outfall 5 and Outfall 7 (Cooling Tower Blowdown and Stormwater) March 9, 2019					
Parameter	**Outfall 5**	**Outfall 7**	**Units**	**Permit Limitations**	**Permit Benchmarks**
Flow	142,511	570,045	MGPD	*	
COD	27.6	ND	mg/L	*	120 mg/L
TSS	13.5	ND	mg/L	*	100 mg/L
Chlorine (Total Residual)	0.00	0.04	mg/L	*	50 µg/L
Benzene	ND	ND	mg/L		
HEM, Oil and Grease	ND	ND	mg/L		10 mg/L
pH	7.27	7.74		6.5-9.0	

Outfalls 2, 6, 8, and 9 (Stormwater Only) March 9, 2019							
Parameter	**Outfall 2**	**Outfall 6**	**Outfall 8**	**Outfall 9**	**Units**	**Permit Limitations**	**Permit Benchmarks**
Flow	940,574	95,008	188,115	1,520,120	MGPD	*	
COD	27.7	46.7	45.3	111	mg/L	*	120 mg/L
TSS	32.2	44.8	42.8	156	mg/L	*	100 mg/L
Chlorine (Total Residual)	0.02	0.28	0.00	2.2	mg/L	*	50 µg/L
Benzene	ND	ND	ND	ND	mg/L		
HEM, Oil and Grease	ND	ND	ND	ND	mg/L		10 mg/L
pH	7.22	7.52	7.24	7.15		6.5-9.0	

Temperature of coolers:
#60296410 2.8°C
#60296411 2.9°C
#60296413 1.7°C
#60296414 3.2°C
#60296415 2.2°C
#60296416 1.3°C

ND - None Detected

*Monitoring only required

Outfall 5 and Outfall 7 (Cooling Tower Blowdown and Stormwater) June 21, 2019					
Parameter	**Outfall 5**	**Outfall 7**	**Units**	**Permit Limitations**	**Permit Benchmarks**
Flow	0.472	0.15	MMgaL	*	
COD	37.0	34.1	mg/L	*	120 mg/L
TSS	47.0	ND	mg/L	*	100 mg/L
Chlorine (Total Residual)	0.00	0.00	mg/L	*	50 µg/L
Benzene	ND	ND	mg/L		
HEM, Oil and Grease	ND	ND	mg/L		10 mg/L
pH	7.47	7.51		6.5-9.0	

Outfalls 2, 6, 8, and 9 (Stormwater Only) June 21, 2019							
Parameter	**Outfall 2**	**Outfall 6**	**Outfall 8**	**Outfall 9**	**Units**	**Permit Limitations**	**Permit Benchmarks**
Flow	3.115	0.315	0.623	0.399	MMgal	*	
COD	42.9	45.7	26.1	16.8	mg/L	*	120 mg/L
TSS	19.1	40.3	15.9	24.3	mg/L	*	100 mg/L
Chlorine (Total Residual)	0.04	0.00	0.02	0.00	mg/L	*	50 µg/L
Benzene	ND	ND	ND	ND	mg/L		
HEM, Oil and Grease	ND	ND	ND	ND	mg/L		10 mg/L
pH	7.42	7.08	7.39	7.67		6.5-9.0	

Temperature of coolers:
#60306827 9.2°C
#60306841 5.0°C
#60306825 5.0°C
#60306448 5.4°C
#60306840 4.8°C
#60306447 7.6°C

ND - None Detected

*Monitoring only required

Outfall 5 and Outfall 7 (Cooling Tower Blowdown and Stormwater) August 11, 2019 and September 21, 2019					
Parameter	**Outfall 5**	**Outfall 7**	**Units**	**Permit Limitations**	**Permit Benchmarks**
Flow	0.056	0.112	MMgaL	*	
COD	49.0	25.0	mg/L	*	120 mg/L
TSS	15.1	ND	mg/L	*	100 mg/L
Chlorine (Total Residual)	0.02	0.03	mg/L	*	50 µg/L
Benzene	ND	ND	mg/L		
HEM, Oil and Grease	ND	ND	mg/L		10 mg/L
pH	7.15	7.523		6.5-9.0	

Outfalls 2, 6, 8, and 9 (Stormwater Only) August 11, 2019 and September 21, 2019							
Parameter	**Outfall 2**	**Outfall 6**	**Outfall 8**	**Outfall 9**	**Units**	**Permit Limitations**	**Permit Benchmarks**
Flow	0.185	0.037	0.037	0.299	MMgal	*	
COD	22.7	51.4	75.8	69.2	mg/L	*	120 mg/L
TSS	11.9	33.9	10.2	30.8	mg/L	*	100 mg/L
Chlorine (Total Residual)	0.07	0.05	0.07	0.00	mg/L	*	50 µg/L
Benzene	ND	ND	ND	ND	mg/L		
HEM, Oil and Grease	ND	ND	ND	ND	mg/L		10 mg/L
pH	7.66	7.13	7.33	7.42		6.5-9.0	

Temperature of coolers:
#60311612 2.9°C
#60315867 5.0°C
#60315869 1.5°C
#60311634 7.9°C
#60311611 6.0°C
#60311633 4.4°C

ND - None Detected

*Monitoring only required

Outfall 5 and Outfall 7 (Cooling Tower Blowdown and Stormwater) October 19, 2019 and December 28, 2019					
Parameter	**Outfall 5**	**Outfall 7**	**Units**	**Permit Limitations**	**Permit Benchmarks**
Flow	0.156	0.176	MMgaL	*	
COD	54.7	23.4	mg/L	*	120 mg/L
TSS	19.5	211	mg/L	*	100 mg/L
Chlorine (Total Residual)	0.01	0.03	mg/L	*	50 µg/L
Benzene	ND	ND	mg/L		
HEM, Oil and Grease	ND	ND	mg/L		10 mg/L
pH	7.31	7.59		6.5-9.0	

Outfalls 2, 6, 8, and 9 (Stormwater Only) October 19, 2019 and December 28, 2019							
Parameter	**Outfall 2**	**Outfall 6**	**Outfall 8**	**Outfall 9**	**Units**	**Permit Limitations**	**Permit Benchmarks**
Flow	0.278	0.104	0.056	0.449	MMgal	*	
COD	20.1	64.7	107	ND	mg/L	*	120 mg/L
TSS	6.5	29.2	13.9	14.1	mg/L	*	100 mg/L
Chlorine (Total Residual)	0.00	0.05	0.00	0.00	mg/L	*	50 µg/L
Benzene	ND	ND	ND	ND	mg/L		
HEM, Oil and Grease	ND	ND	ND	ND	mg/L		10 mg/L
pH	7.08	7.35	7.54	6.93		6.5-9.0	

Temperature of coolers:
#60318870 1.7°C
#60325403 0.9°C
#60325405 1.4°C
#60318869 0.6°C
#60318868 0.9°C
#60318871 4.3°C

ND - None Detected

*Monitoring only required

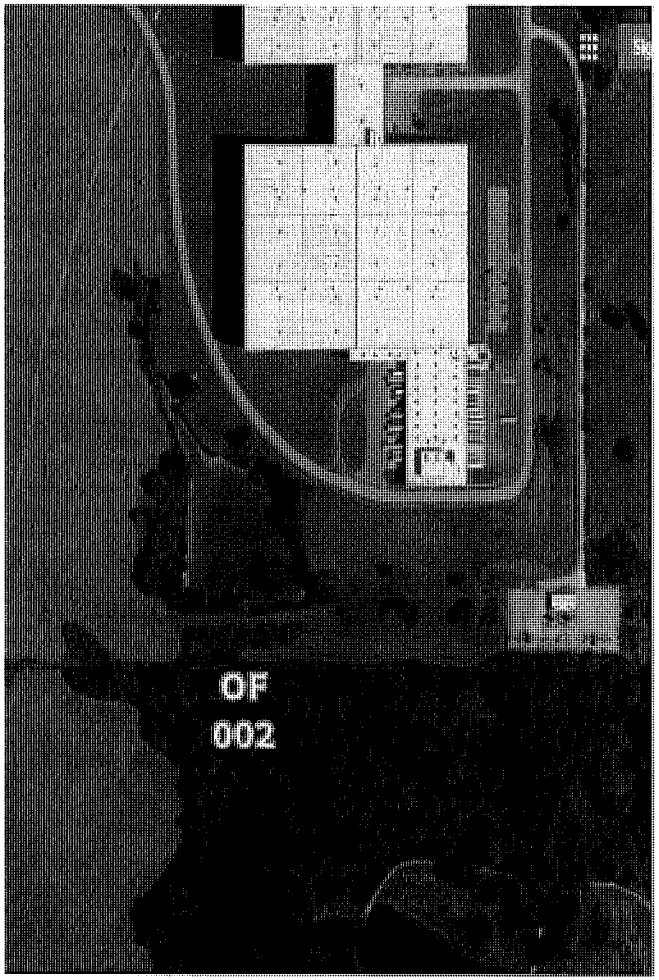
	Outfall 7 and Outfall 10 (cooling tower blowdown) Sampling Date: 6/18/2020				
Parameter	**Outfall 7 11:12 AM**	**Outfall 10 10:52 AM**	**Units**	**Permit Limitations**	**Minimum Quantification Level (ML)**
Flow			MGPD	*	
COD	27.7	178	mg/L	*	
TSS	39.2	ND (<5.0)	mg/L	*	
Chloride	67.3	123	µg/L	*	
Sulfate	100	193	mg/L	*	
Chloride+Sulfate	167.3	316	mg/L	*	
HEM, Oil & Grease	ND (<4.8)	ND (<4.8)	mg/L	*	
Chlorine (Total Residual)	0.17	0.51	µg/L	*	130 µg/L
pH	8.67	8.91	Min & Max	6.5 - 9.0	
Temp°F	70.9	72.9	°F	*	

Temperature of coolers:
#60340538 8.4 °C
#60340539 11.5 °C

Units mg/L unless otherwise noted
ND - None Detected (list detection/reporting limit of lab)
* - Monitoring Requirement Only
MGPD: Million Gallons per Day

Written Narrative for Unmonitored Outfalls: Hallmark Liberty #MO0137006

Outfall 002

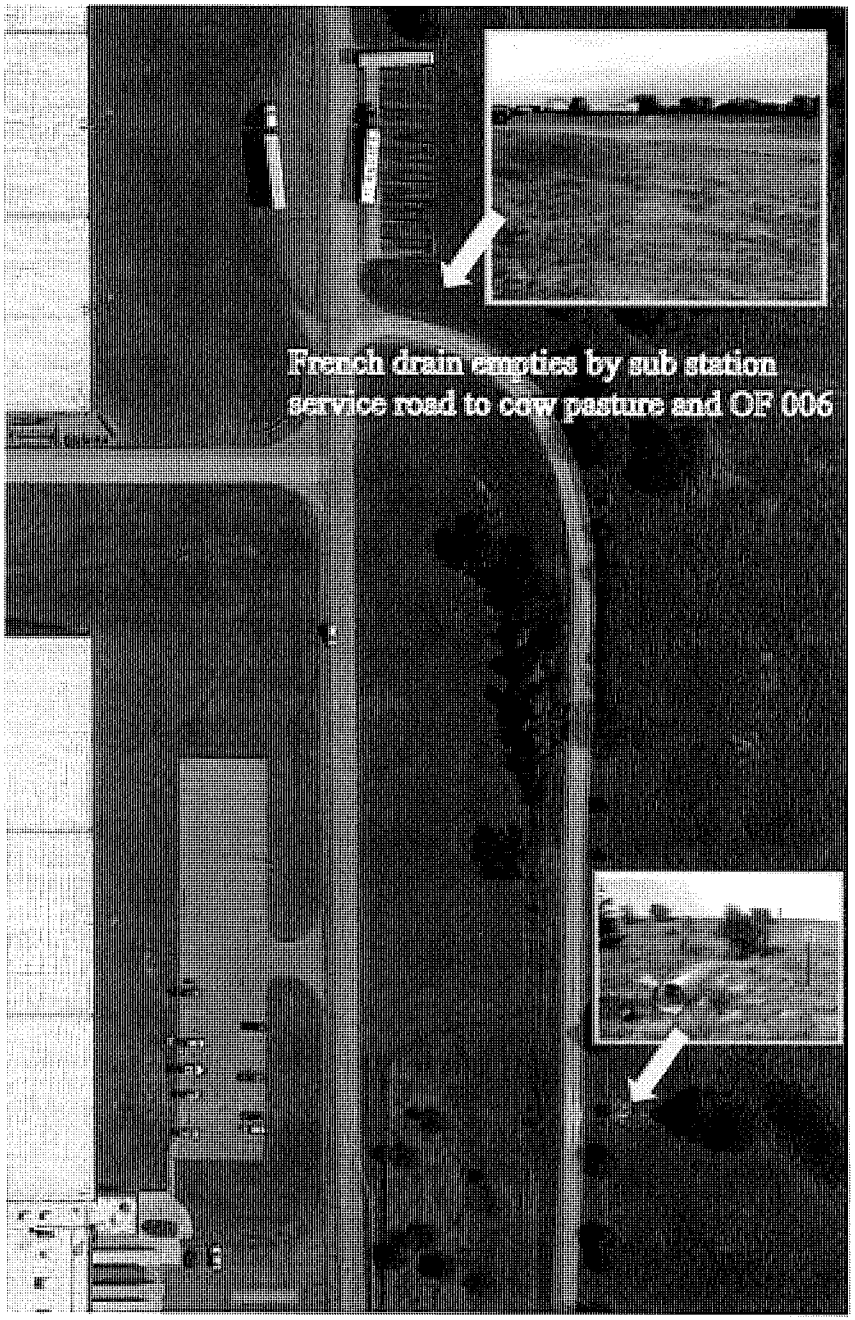


- Parking lots and holding pond continued to be during daily security patrols each shift that look for potential problems, spills, chemical containers, debris, pond level, and such.
- Building Services department regularly maintain grounds, including trimming weeds, grass, and trees to see and access outfall and surrounding area, as well as general housekeeping of lots and grounds.
- Monthly visual inspection of outfall 002 and holding pond performed by trained Building Services personnel and documented. Looking for sheens, pollution, debris, pond level issues, and concerns around the end of pipe discharge from the holding pond into outfall 002. Also observing vegetation around paved areas to help slow and filter stormwater runoff.
- Best practice to report dock leveler issues at Receiving docks to correct any potential hydraulic leak issues. Techs perform clean up of any oils in the leveler pit with absorbents and clean up immediately (not letting absorbents sit to wash away with rain water).
- Maintain pond holding ability and valve/pipe functionality. Holding pond helps settle out solids, slow run-off, and reduce erosion from property.
- Post-season clean up of lots from salting-sanding to prevent run-off of materials to storm drains or outfalls.
- Emergency contractor on call for response to potential spills to water. Spill materials available on site to respond quickly to small spills.
- Only one issue reported with this outfall in this permit cycle due to fire fighting activities from a car fire in Feb 2017. Proper actions followed for clean up and did not leave property. No other concerns noted. All previous lab tests for this outfall did not exceed permit benchmarks (not including TRC for all outfalls which was included in our modification request in 2019 believing results from interfering factors and testing type).

Written Narrative for Unmonitored Outfalls: Hallmark Liberty #MO0137006

Outfall 006

- Parking lots and external building premises continued to be during daily security patrols each shift that look for potential problems, spills, chemical containers, debris, and such.
- Building Services department regularly maintain grounds, including trimming weeds, grass, and trees to see and access outfall and surrounding area, as well as general housekeeping of lots and grounds.
- Monthly visual inspection of outfall 006 performed by trained Building Services personnel and documented. Looking for sheens, pollution, debris, and concerns around the substation roadway and pipe discharge at outfall 006. Also observing vegetation around paved areas to help slow and filter stormwater runoff.
- Monitor french drain performance for reducing erosion in the cow pasture leading to outfall 006; erosion would be visible when going to outfall for monthly inspection.
- Post-season clean up of lots from salting-sanding to prevent run-off of materials to storm drains or outfalls from Receiving lot.
- Emergency contractor on call for response to potential spills to water. Spill response materials available on site to respond quickly to small spills.
- No inspection issues have been reported or noted with this outfall in the past since it's identification as an outfall in July 2018. All previous lab tests for this outfall did not exceed permit benchmarks (not including TRC for all outfalls which was included in our modification request in 2019 believing results from interfering factors and testing type).

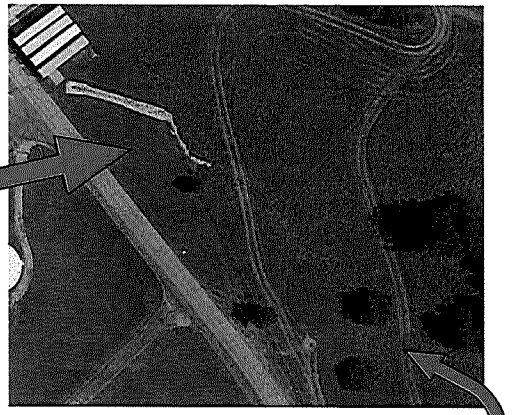


Written Narrative for Unmonitored Outfalls: Hallmark Liberty #MO0137006

Outfall 008

- Parking lots and external building premises continued to be during daily security patrols each shift that look for potential problems, spills, chemical containers, debris, and such.
- Building Services department regularly maintain grounds, including trimming weeds, grass, and trees to see and access outfall and surrounding area, as well as general housekeeping of lots and grounds.
- Monthly visual inspection of outfall 008 performed by trained Building Services personnel and documented. Looking for sheens, pollution, debris, and concerns around the cow pasture at outfall 008. Also observing vegetation around paved areas to help slow and filter stormwater runoff.
- Hostler that moves trailers watch for any type of leaks or problems with trailers on the lot.
- Monitor rocked ditch performance for reducing erosion leading to outfall 008; erosion would be visible when going to outfall for monthly inspection.
- Emergency contractor on call for response to potential spills to water. Spill response materials on site to respond quickly to small spills.
- No inspection issues have been reported or noted with this outfall in the past since it's identification as an outfall in July 2018. All previous lab tests for this outfall did not exceed permit benchmarks (not including TRC for all outfalls which was included in our modification request in 2019 believing results from interfering factors and testing type).

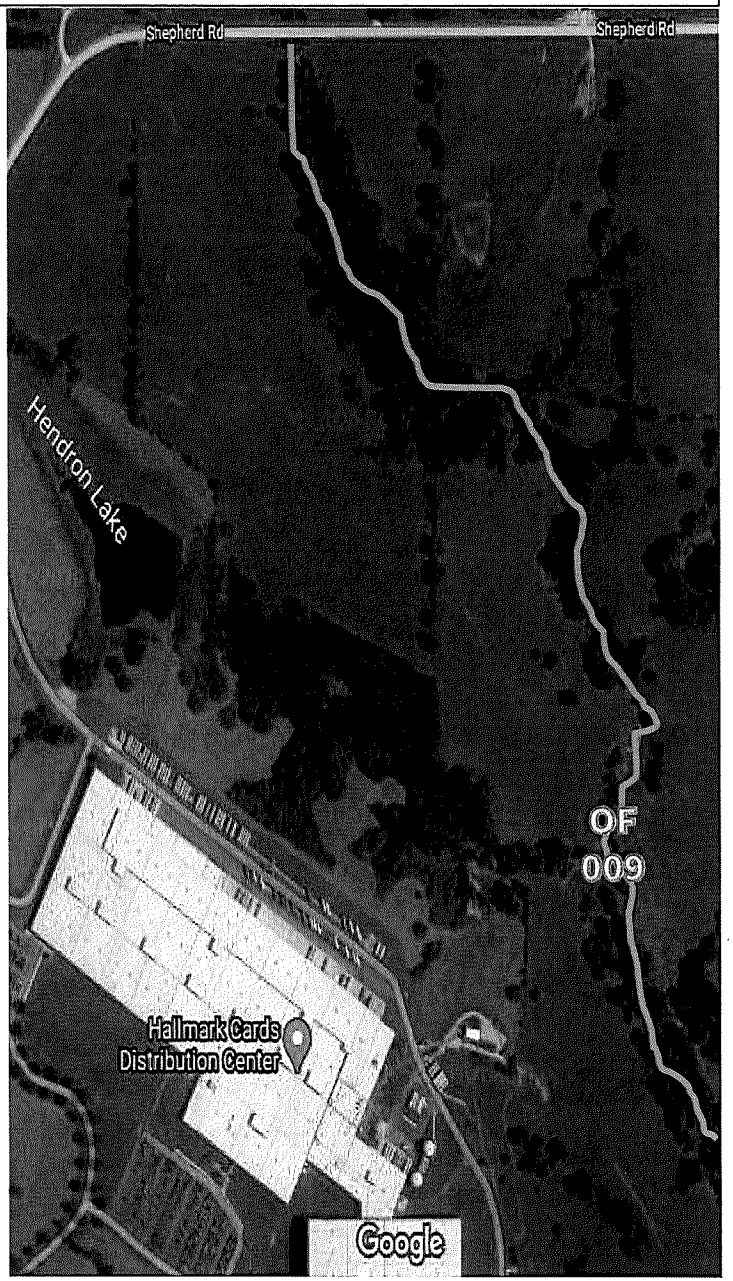
Rocked drainage ditch from trailer lot to cow pasture and OF 008



Written Narrative for Unmonitored Outfalls: Hallmark Liberty #MO0137006

Outfall 009

- Parking lots and external building premises continued to be during daily security patrols each shift that look for potential problems, spills, chemical containers, debris, and such.
- Building Services department regularly maintain grounds, including trimming weeds, grass, and trees to see and access outfall and surrounding area, as well as general housekeeping of lots and grounds. Responsible for grounds diesel tank, barn, grounds equipment, and open top dumpsters.
- Monthly visual inspection of outfall 009 performed by trained Building Services personnel and documented. Looking for sheens, pollution, debris, and concerns about the creek at outfall 009.
- Hostler that moves trailers watch for any type of leaks or problems with trailers on the Shipping lot or the hostler AST diesel tank.
- Monitor erosion when inspecting outfall. Land is leased to cattle farmer and we only go into pasture for stormwater inspections. Outfall 009 is agricultural. Grounds are often muddy from cows and ruts from farm truck. Farmer will throw down rock when path is too muddy to climb back up hill.
- Receives water from Shepherd Road. The creek is far enough into the pasture where it likely does not receive any industrial run-off from the site.
- Emergency contractor on call for response to potential spills to water. Spill response materials on site to respond quickly to small spills.
- No inspection issues have been reported or noted with this outfall in the past since it's identification as an outfall in July 2018. Previous lab tests for this outfall did not exceed permit benchmarks except TSS due to high mud content (not including TRC for all outfalls which was included in our modification request in 2019 believing results from interfering factors such as turbidity and testing type).



Creek path through cow pasture and OF 009

Hallmark Cards

To: Missouri Department of Natural Resources, Water Protection Program
PO Box 176
Jefferson City, MO. 65102-0176

From: Hallmark- Liberty Distribution Center
2101 N. Lightburne St., Liberty, MO. 64068

Date: 9/24/2020

Re: Permit renewal for stormwater permit # MO 0137006

Dear Sir or Madam,

Please find our enclosed documentation for a stormwater permit renewal of permit # MO 0137006. The first set of attachments are Form A and supporting maps. The second set of attachments is Form C and supporting documents. I called the MoDNR to confirm about permit fees and was assured if we are caught up on our annual fees, then another fee isn't required to accompany the permit renewal paperwork, we'd just pay the next scheduled annual fee.

I also reached out to MoDNR for clarification on Form C and the outfalls. I was advised on what to include with this Form C. Please note these differences and items we are waiting on (we wanted to submit the renewal on time for the 180-day requirement):

- Monitored outfalls were listed (#007 & #010)- these are currently sampled for cooling tower blowdown and not stormwater per our last permit modification.
- Section 4.0: MoDNR requested that a brief written narrative be done for the unmonitored outfalls, so you will find a narrative for outfalls # 002, 006, 008, & 009.
- For Section 3.0 Table 1 for outfalls # 007 & 010: we currently have samples at the lab awaiting results for the missing parameters in Part A for BOD-5 day, Total Organic Carbon, and Ammonia as N. We will forward an amended Table 1 for each outfall once those are received.
- A note for Table 1 for outfall #010, this is a new outfall starting June 2020, so we only had one sampling result for the year. We just sent a sample for Quarter 3 of the year to the lab last week, awaiting results. We can also send those results on the amended Table 1.

Please feel free to reach out to me if there are any questions or if there was something else needed to complete our stormwater permit renewal.

Thank you so much.

Wendy Mayes- EHS Administrator
Hallmark- Liberty D.C.
wmayes3@hallmark.com
(816) 792-6239