

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-0138479

Owner: Doolittle Trailer Mfg., Inc.
Address: 2455 Doolittle Drive, Holts Summit, MO 65043

Continuing Authority: Doolittle Trailer Mfg., Inc.
Address: 2455 Doolittle Drive, Holts Summit, MO 65043

Facility Name: Doolittle Trailer Mfg., Inc.
Facility Address: 2455 Doolittle Drive, Holts Summit, MO 65043

Legal Description: see page two
UTM Coordinates: see page two

Receiving Stream: see page two
First Classified Stream and ID: see page two
USGS Basin & Sub-watershed No.: see page two

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

FACILITY DESCRIPTION

SIC Code: 3799; NAICS # 336214 – Manufacture of Trailers

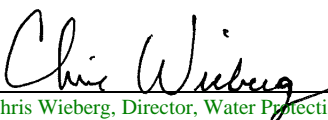
This facility builds trailers for multiple private and commercial uses. Trailers are fabricated on site and shipped to vendors for sale. This facility does not require a certified wastewater operator per 10 CSR 20-9.030 as this facility is privately owned. Domestic wastewater is managed by sending to POTW. This facility stores manufacturing materials outdoors exposed to stormwater.

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

April 1, 2021
Effective Date


Edward B. Galbraith, Director, Division of Environmental Quality

June 30, 2025
Expiration Date


Chris Wieberg, Director, Water Protection Program

FACILITY DESCRIPTION (CONTINUED)

OUTFALL #001 – Stormwater; SIC # 3799; NAICS # 336214

Stormwater – northern portion of facility

Legal Description:	NW¼, SW¼, Sec.19, T45N, R10W, Callaway County
UTM Coordinates:	X = 578214, Y = 4279980
Receiving Stream:	Tributary to Rivaux Creek (C)
First Classified Stream and ID:	100K Extent-Remaining Streams 3960; Losing
USGS Basin & Sub-watershed No.:	Lower Missouri- Moreau (10300102-1306)
Average Flow:	Dependent on precipitation
Maximum Reported Flow:	0.214 MGD

OUTFALL #002 – Stormwater; SIC # 3799; NAICS # 336214

Stormwater – southern portion of facility

Legal Description:	NW¼, SW¼, Sec.19, T45N, R10W, Callaway County
UTM Coordinates:	X = 578252, Y = 4279310
Receiving Stream:	Tributary to Rivaux Creek (C)
First Classified Stream and ID:	100K Extent-Remaining Streams 3960; Losing
USGS Basin & Sub-watershed No.:	Lower Missouri- Moreau (10300102-1306)
Average Flow:	Dependent on precipitation
Maximum Reported Flow:	0.188 MGD

OUTFALL #003 – Stormwater; SIC # 3799; NAICS # 336214

Stormwater – southwest portion of facility

Legal Description:	NW¼, SW¼, Sec.19, T45N, R10W, Callaway County
UTM Coordinates:	X = 578094, Y = 4279520
Receiving Stream:	Tributary to Rivaux Creek (C); Losing
First Classified Stream and ID:	100K Extent-Remaining Streams 3960; Losing
USGS Basin & Sub-watershed No.:	Lower Missouri- Moreau (10300102-1306)
Average Flow:	Dependent on precipitation
Maximum Reported Flow:	0.124 MGD

OUTFALL #004 – Stormwater; SIC # 3799; NAICS # 336214

Stormwater – southwest portion of facility

Legal Description:	NW¼, SW¼, Sec.19, T45N, R10W, Callaway County
UTM Coordinates:	X = 578056, Y = 4279679
Receiving Stream:	Tributary to Rivaux Creek (C); Losing
First Classified Stream and ID:	100K Extent-Remaining Streams 3960; Losing
USGS Basin & Sub-watershed No.:	Lower Missouri- Moreau (10300102-1306)
Average Flow:	Dependent on precipitation
Maximum Reported Flow:	0.095 MGD

OUTFALL #005 – Stormwater; SIC # 3799; NAICS # 336214

Stormwater – western portion of facility

Legal Description:	NW¼, SW¼, Sec.19, T45N, R10W, Callaway County
UTM Coordinates:	X = 577992, Y = 4279886
Receiving Stream:	Tributary to Rivaux Creek (C); Losing
First Classified Stream and ID:	100K Extent-Remaining Streams 3960; Losing
USGS Basin & Sub-watershed No.:	Lower Missouri- Moreau (10300102-1306)
Average Flow:	Dependent on precipitation
Maximum Reported Flow:	0.045 MGD

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

OUTFALLS #001, #002, #003, #004, & #005 <i>Stormwater Only</i>		TABLE A-1 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 April 1, 2021 and remain in effect until expiration of the permit. Discharges shall be controlled, limited and monitored by the facility as specified below:						
EFFLUENT PARAMETERS	UNITS	FINAL LIMITATIONS		BENCH- MARKS	MONITORING REQUIREMENTS	
		DAILY MAXIMUM	MONTHLY AVERAGE		MEASUREMENT FREQUENCY	SAMPLE TYPE
PHYSICAL						
Flow	MGD	*		-	once/quarter ◇	24 Hr Est.
Precipitation	inches	**		-	once/quarter ◇	measured
CONVENTIONAL						
Chemical Oxygen Demand	mg/L	**		120	once/quarter ◇	grab
Oil & Grease	mg/L	**		10	once/quarter ◇	grab
pH †	SU	6.5- 9.0		-	once/quarter ◇	grab
Settleable Solids	mL/L/hr	**		1.0	once/quarter ◇	grab
Total Suspended Solids	mg/L	**		100	once/quarter ◇	grab
METALS						
Aluminum, Total Recoverable	µg/L	**		750	once/quarter ◇	grab
Copper, Total Recoverable	µg/L	**		21.2	once/quarter ◇	grab
Iron, Total Recoverable	µg/L	**	4000	once/quarter ◇	grab	
Zinc, Total Recoverable	µg/L	**	176.7	once/quarter ◇	grab	
MONITORING REPORTS SHALL BE SUBMITTED QUARTERLY; THE FIRST REPORT IS DUE JULY 28, 2021 . THERE SHALL BE NO DISCHARGE OF FLOATING SOLIDS OR VISIBLE FOAM IN OTHER THAN TRACE AMOUNTS.						

* Monitoring and reporting requirement only

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

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

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

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

B. STANDARD CONDITIONS

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

C. SPECIAL CONDITIONS

1. Spills, Overflows, and Other Unauthorized Discharges.

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

2. Electronic Discharge Monitoring Report (eDMR) Submission System

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

- (a) eDMR Registration Requirements. The facility must register with 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, Section B, #7, the eDMR system is currently the only Department approved reporting method for this permit unless a waiver is granted by the department. See paragraph (c) below.
- (b) Electronic Submissions. To access the eDMR system, use the following link in your web browser: <https://apps5.mo.gov/mogems/welcome.action> If you experience difficulties with using the eDMR system you may contact edmr@dnr.mo.gov or call 855-789-3889 or 573-526-2082 for assistance.
- (c) Waivers from Electronic Reporting. The facility must electronically submit compliance monitoring data and reports unless a waiver is granted by the department in compliance with 40 CFR Part 127. Only facilities with an approved waiver request may submit monitoring data and reports on paper to the Department for the period the approved electronic reporting waiver is effective. Facilities may obtain an electronic reporting waiver by first submitting an eDMR Waiver Request Form: <http://dnr.mo.gov/forms/780-2692-f.pdf>. The department will either approve or deny this electronic reporting waiver request within 120 calendar days.

3. Stormwater Pollution Prevention Plan (SWPPP).

The facility's SIC code or description is found in 40 CFR 122.26(b)(14) and/or 10 CSR 20-6.200(2) and hence shall implement a Stormwater Pollution Prevention Plan (SWPPP) which must be prepared and implemented upon permit effective date. The SWPPP must be kept on-site and should not be sent to the Department unless specifically requested. The SWPPP must be reviewed and updated annually or if site conditions affecting stormwater change. The facility shall select, install, use, operate, and maintain the Best Management Practices prescribed in the SWPPP in accordance with the concepts and methods described in: *Developing Your Stormwater Pollution Prevention Plan, A Guide for Industrial Operators*, (EPA 833-B-09-002) published by the EPA in 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) A map with all outfalls and structural BMPs marked.
- (c) A schedule for at least once per month site inspections and brief written reports. The inspection report must include precipitation information for the entire period since last inspection, as well as observations and evaluations of BMP effectiveness. Throughout coverage under this permit, the facility must perform ongoing SWPPP review and revision to incorporate any site condition changes.
 - (1) Operational deficiencies must be corrected within seven (7) calendar days.
 - (2) Minor structural deficiencies must be corrected within fourteen (14) calendar days.
 - (3) Major structural deficiencies (deficiencies projected to take longer than 14 days to correct) must be reported as an uploaded attachment through the eDMR system with the DMRs. The initial report shall consist of the deficiency noted, the proposed remedies, the interim or temporary remedies (including proposed timing of the placement of the interim measures), and an estimate of the timeframe needed to wholly complete the repairs or construction. If required by the Department, the facility shall work with the regional office to determine the best course of action. The facility should consider temporary structures to control stormwater runoff. The facility shall correct the major structural deficiency as soon as reasonably achievable.

C. SPECIAL CONDITIONS (CONTINUED)

- (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.
 - (d) A provision for designating an individual to be responsible for environmental matters and a provision for providing training to all personnel involved in housekeeping, material handling (including but not limited to loading and unloading), storage, and staging of all operational, maintenance, storage, and cleaning areas. Proof of training shall be submitted upon request by the Department.
4. Site-wide minimum Best Management Practices (BMPs). At a minimum, the facility shall adhere to the following:
- (a) Prevent the spillage or loss of fluids, oil, grease, fuel, etc. from vehicle maintenance, equipment cleaning, warehouse activities, and other areas, and thereby prevent the contamination of stormwater from these substances.
 - (b) Provide collection facilities and arrange for proper disposal of waste products including but not limited to petroleum waste products, and solvents.
 - (c) Store all paint, solvents, petroleum products and petroleum waste products (except fuels), and storage containers (such as drums, cans, or cartons) so 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.
5. Stormwater Benchmarks. This permit stipulates pollutant benchmarks applicable to your stormwater discharges.
- (a) The benchmarks do not constitute direct numeric effluent limitations; therefore, a benchmark exceedance alone is not a permit violation. Benchmark monitoring and visual inspections shall be used to determine the overall effectiveness of the SWPPP and to assist you in knowing when additional corrective action may be necessary to protect water quality. If a sample exceeds a benchmark concentration you must review your SWPPP and your BMPs to determine what improvements or additional controls are needed to reduce the pollutant in your stormwater discharge(s).
 - (b) Any time a benchmark exceedance occurs, a Corrective Action Report (CAR) must be completed. A CAR is a document recording the efforts undertaken by the facility to improve BMPs to meet benchmarks in future samples. CARs must be retained with the SWPPP and be available to the Department upon request. If the efforts taken by the facility are not sufficient and subsequent exceedances of a benchmark occur, the facility must contact the Department if a benchmark value cannot be achieved. Failure to take corrective action to address a benchmark exceedance and failure to make measureable progress towards achieving the benchmarks is a permit violation.
6. Diesel Fuel Secondary Containment.
- Before releasing water accumulated in the diesel Fuel 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.

C. SPECIAL CONDITIONS (CONTINUED)

7. The full implementation of this operating permit, which includes implementation of any applicable schedules of compliance, shall constitute compliance with all applicable federal and state statutes and regulations in accordance with RSMo 644.051.16, and the CWA section 402(k); however, this permit may be reopened and modified, or alternatively revoked and reissued to comply with any applicable effluent standard or limitation issued or approved under Clean Water Act Sections 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 limited in the permit. This permit may be modified, revoked and reissued, or terminated for cause. 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.
8. All outfalls must be clearly marked in the field.
9. 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.
10. The Department may require sampling and reporting as a result of illegal discharges from the site, compliance issues related to water quality concerns or BMP effectiveness, or evidence of off-site impacts from activities or discharges at the facility.
11. **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).
12. **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, Section A, #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).
13. Failure to pay fees associated with this permit is a violation of the Missouri Clean Water Law (644.055 RSMo).
14. This permit does not cover land disturbance activities.

C. SPECIAL CONDITIONS (CONTINUED)

15. 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.
16. Renewal Application Requirements.
 - (a) This facility shall submit an appropriate and complete application to the Department no less than 180 days prior to the expiration date listed on page 1 of the permit.
 - (b) Application materials shall include complete Form A and Form C. If the form names have changed, then the facility should ensure they are submitting the correct forms as required by regulation.
 - (c) The facility may use the electronic submission system to submit the application to the Program, if available.
 - (d) This facility must submit all corrective action reports completed for the last permit term if a benchmark exceedance occurred.

D. 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 Sections 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
OF
MO-0138479
DOOLITTLE TRAILER MANUFACTURING INC.

The Federal Water Pollution Control Act ("Clean Water Act" Section 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 (Section 301 of the "Clean Water Act"). After a permit is obtained, a discharge not in compliance with all permit terms and conditions is unlawful. Missouri State Operating Permits (MSOPs) are issued by the Director of the Missouri Department of Natural Resources (Department) under an approved program, operating in accordance with federal and state laws (Federal "Clean Water Act" and "Missouri Clean Water Law" Section 644 as amended). MSOPs are issued for a period of five (5) years unless otherwise specified for less.

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

PART I. FACILITY INFORMATION

Facility Type: Industrial; stormwater < 1 MGD
SIC Code(s): 3799
NAICS Code(s): 336214
Application Date: 11/27/2019
Expiration Date: 06/30/2020
Last Inspection: 08/01/2019

FACILITY DESCRIPTION:

This facility builds trailers for multiple private and commercial uses. Trailers are fabricated on site and shipped to vendors for sale.

In accordance with 40 CFR 122.21(f)(6), this facility holds the following permits MO Generator ID 031990 and EPA Generator ID MOR000009407.

PERMITTED FEATURES TABLE:

OUTFALL	EST MAXIMUM FLOW	TREATMENT LEVEL	EFFLUENT TYPE
#001	0.214 MGD	None	Stormwater
#002	0.188 MGD	None	Stormwater
#003	0.124 MGD	None	Stormwater
#004	0.095 MGD	None	Stormwater
#005	0.045 MGD	None	Stormwater

FACILITY PERFORMANCE HISTORY & COMMENTS:

The electronic discharge monitoring reports were reviewed for the last permit term. During the last permit cycle the DMRs showed that the facility had a few benchmark exceedances for Aluminum, TSS, and COD. The facility was last inspected on 8/1/2019; at the time of inspection the facility had unsatisfactory findings for failure to perform effluent testing with approved methods, failure to complete corrective action reports for benchmark exceedances. On 9/16/2019 the Department received a written response to the unsatisfactory findings which brought the facility back into compliance.

CONTINUING AUTHORITY:

The Missouri Secretary of State continuing authority charter number for this facility is 00292969; this number was verified by the permit writer to be associated with the facility and precisely matches the continuing authority confirmed by the facility in an email on 11/16/2020.

FACILITY MAP:



PART II. RECEIVING WATERBODY INFORMATION

RECEIVING WATERBODY TABLE:

OUTFALL	WATERBODY NAME	CLASS	WBID	DESIGNATED USES	DISTANCE TO SEGMENT	12-DIGIT HUC
#001	Tributary to Rivaux Creek	n/a	n/a	GEN	0.0 mi	10300102-1306 Lower Missouri-Moreau
	100K Extent-Remaining Stream	C	3960	GEN, HHP, IRR, LWW, SCR, WBC-B, WWH (ALP)	0.23 mi	
#002	Tributary to Rivaux Creek	n/a	n/a	GEN	0.0 mi	
	100K Extent-Remaining Stream	C	3960	GEN, HHP, IRR, LWW, SCR, WBC-B, WWH (ALP)	0.02 mi	
#003	Tributary to Rivaux Creek	n/a	n/a	GEN	0.0 mi	
	100K Extent-Remaining Stream	C	3960	GEN, HHP, IRR, LWW, SCR, WBC-B, WWH (ALP)	0.1 mi	
#004	Tributary to Rivaux Creek	n/a	n/a	GEN	0.0 mi	
	100K Extent-Remaining Stream	C	3960	GEN, HHP, IRR, LWW, SCR, WBC-B, WWH (ALP)	0.19 mi	
#005	Tributary to Rivaux Creek	n/a	n/a	GEN	0.0 mi	
	100K Extent-Remaining Stream	C	3960	GEN, HHP, IRR, LWW, SCR, WBC-B, WWH (ALP)	0.38 mi	

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

WBID = Waterbody Identification: Missouri Use Designation Dataset per 10 CSR 20-7.031(1)(Q) and (S) as 100K Extant-Remaining Streams or newer; data can be found as an ArcGIS shapefile on MSDIS at ftp://msdis.missouri.edu/pub/Inland_Water_Resources/MO_2014_WQS_Stream_Classifications_and_Use.shp.zip; New C streams described on the dataset per 10 CSR 20-7.031(2)(A)3. as 100K Extent Remaining Streams.

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

EXISTING WATER QUALITY:

The receiving waterbody has no relevant water quality data available. The streams surrounding the facility are predominately losing.

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 may be developed. The TMDL shall include the WLA calculation. <http://dnr.mo.gov/env/wpp/tmdl/>

✓ Not applicable; this facility does not discharge to a waterbody/watershed with a TMDL.

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 or downstream impairments near this facility.

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.

✓ Losing streams (streams contributing 30% or more of their flow to subsurface water)

✓ All other waters

LAKE NUMERIC NUTRIENT CRITERIA:

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 or the lake is less than 10 acres.

✓ This is a stormwater only permit therefore not subject to provisions found in 10 CSR 20-7.015 per 10 CSR 20-7.015(1)(C).

RECEIVING WATERBODY MONITORING REQUIREMENTS:

No receiving water monitoring requirements are recommended at this time.

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 is an existing facility.

ANTIBACKSLIDING:

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

✓ Limitations in this operating permit for the reissuance conform to the anti-backsliding provisions of Section 402(o) of the Clean Water Act, and 40 CFR Part 122.44.

✓ The Department determined technical mistakes or mistaken interpretations of law were made in issuing the permit under section 402(a)(1)(b).

- The previous permit special condition stated: “Any pesticide discharge from any point source shall comply with the requirements of Federal Insecticide, Fungicide and Rodenticide Act, as amended (7 U.S.C. 136 et. seq.) and the use of such pesticides shall be in a manner consistent with its label.”

The permit writer has determined this special condition was outside the scope of NPDES permitting and was removed.

- The previous permit special condition indicated spills from hazardous waste substances must be reported to the department. However, this condition is covered under standard conditions therefore was removed from special conditions.

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 RSMo 644.011 and 644.016 (17).

COST ANALYSIS FOR COMPLIANCE (CAFCOM):

Pursuant to Section 644.145, RSMo, when incorporating a new requirement for discharges from publicly owned facilities, or when enforcing provisions of this chapter or the Federal Water Pollution Control Act, 33 U.S.C. 1251 et seq., pertaining to any portion of a publicly owned facility, the Department of Natural Resources 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 Federal Water Pollution Control Act. This process is completed through a cost analysis for compliance. 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) and 122.42(a)(1). 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 found in 40 CFR 401.15. The facility should also consider any other toxic pollutant in the discharge as reportable under this condition.

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/facility is not currently under Water Protection Program enforcement action.

DOMESTIC WASTEWATER, SLUDGE, AND BIOSOLIDS:

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

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

Sewage sludge is solid, semi-solid, or liquid residue generated during the treatment of domestic sewage in a treatment works; including but not limited to, domestic septage; scum or solids removed in primary, secondary, or advanced wastewater treatment process; and material derived from sewage sludge. Sewage sludge does not include ash generated during the firing of sewage sludge in a sewage sludge incinerator or grit and screening generated during preliminary treatment of domestic sewage in a treatment works. Biosolids are solid materials resulting from domestic wastewater treatment meeting federal and state criteria for productive use (i.e. fertilizer) and after having pathogens removed.

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

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

EFFLUENT LIMITATIONS:

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

ELECTRONIC DISCHARGE MONITORING REPORT (EDMR) SUBMISSION SYSTEM:

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

Per 40 CFR 127.15 and 127.24, permitted facilities may request a temporary waiver for up to 5 years or a permanent waiver from electronic reporting from the Department. To obtain an electronic reporting waiver, a facility must first submit an eDMR Waiver Request Form: <http://dnr.mo.gov/forms/780-2692-f.pdf>. A request must be made for each facility. If more than one facility is owned or operated by a single entity, then the entity must submit a separate request for each facility based on its specific circumstances. An approved waiver is not transferable.

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

To assist the facility in entering data into the eDMR system, the permit describes limit sets in each table in Part A of the permit. The data entry personnel should use these identifiers to ensure data entry is being completed appropriately.

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

FEDERAL EFFLUENT LIMITATION GUIDELINE:

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

- ✓ The facility 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, RSMo 644.076.1, as well as Section D – Administrative Requirements of Standard Conditions Part I of 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 sections 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 RSMo 644.016(27), 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 RSMo 644.026.

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

LAND DISTURBANCE:

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

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

MAJOR WATER USER:

Any surface or groundwater user with a water source and the equipment necessary to withdraw or divert 100,000 gallons (or 70 gallons per minute) or more per day combined from all sources from any stream, river, lake, well, spring, or other water source is considered a major water user in Missouri. All major water users are required by law to register water use annually (Missouri Revised Statutes Chapter 256.400 Geology, Water Resources and Geodetic Survey Section). <https://dnr.mo.gov/pubs/pub2236.htm>

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

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 is a stormwater only permit therefore not subject to provisions found in 10 CSR 20-7.015 per 10 CSR 20-7.015(1)(C).

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.

- ✓ Not applicable; the facility has not disclosed the use of any oil water separators they wish to include under the NPDES permit at this facility and therefore oil water separator tanks are not authorized by this permit.

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). 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.

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 RSMo 644.016 are limitations on the introduction of pollutants or water contaminants into publicly owned treatment works or facilities.

- ✓ Not applicable; this facility discharges wastewater to a POTW but reported the discharge is not subject to pretreatment effluent limitations.

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

RENEWAL REQUIREMENTS:

The renewal special condition permit requirement is designed to guide the facility to prepare and include all relevant and applicable information in accordance with 10 CSR 20-6.010(7)(A)-(C), and if applicable, federal regulations. The special condition may not include all requirements and requests for additional information may be made at the time of permit renewal under RSMo 644.051.13(5) 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 disclose 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 RSMo 644.051.16.

SAMPLING FREQUENCY JUSTIFICATION:

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

Sampling frequency for stormwater-only outfalls is typically quarterly even though BMP inspection occurs monthly. The facility may sample more frequently if additional data is required to determine if best management operations and technology are performing as expected.

SAMPLING TYPE JUSTIFICATION:

Sampling type was continued from the previous permit. The sampling types are representative of the discharges, and are protective of water quality. Discharges with altering effluent should have composite sampling; discharges with uniform effluent can have grab samples. Grab samples are usually appropriate for stormwater. Parameters which must have grab sampling are: pH, ammonia, *E. coli*, total residual chlorine, free available chlorine, hexavalent chromium, dissolved oxygen, total phosphorus, volatile organic compounds, and others. For further information on sampling and testing methods see 10 CSR 20-7.015(9)(D)2.

SCHEDULE OF COMPLIANCE (SOC):

A schedule of remedial measures included in a permit, including an enforceable sequence of interim requirements (actions, effluent limits, operations, or milestone events) leading to compliance with the Missouri Clean Water Law, its implementing regulations, and/or the terms and conditions of an operating permit. SOC's are allowed under 40 CFR 122.47 and 10 CSR 20-7.031(11) providing certain conditions are met. An SOC is not allowed:

- For effluent limitations based on technology-based standards established in accordance with federal requirements, if the deadline for compliance established in federal regulations has passed in accordance with 40 CFR 125.3.
- For a newly constructed facility in most cases per RSMo 644.029. 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 granted for conducting these activities.

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

✓ Not applicable; this permit does not contain a SOC. Limits have not become more restrictive.

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.

✓ Not applicable; industrial sludge is not generated at this facility.

STANDARD CONDITIONS:

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

Water Act. 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) Section 3.1 indicates most procedures within the document apply only to water quality based approaches, not end-of-pipe technology-based controls. Hence, stormwater-only outfalls will generally only contain a maximum daily limit (MDL), a benchmark, or a monitoring requirement as dictated by site specific conditions, the BMPs in place, the BMPs proposed, past performance of the facility, and the receiving water's current quality.

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

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

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

Numeric benchmark values are based on site specific requirements taking in to account a number of factors but cannot be applied to any process water discharges. First, the technology in place at the site to control pollutant discharges in stormwater is evaluated. The permit writer also evaluates other similar permits for similar activities. A review of the guidance forming the basis of Environmental Protection Agency's (EPA's) *Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity* (MSGP) may also occur. Because precipitation events are sudden and momentary, benchmarks based on state or federal standards or recommendations use the Criteria Maximum Concentration (CMC) value, or acute standard may also be used. The CMC is the estimate of the highest concentration of a material in surface water to which an aquatic community can be exposed briefly without resulting in an unacceptable effect. The CMC for aquatic life is intended to be protective of the vast majority of the aquatic communities in the United States. If a facility has not disclosed BMPs applicable to the pollutants for the site, the facility may not be eligible for benchmarks.

40 CFR 122.44(b)(1) requires the permit implement the most stringent limitations for each discharge, including industrially exposed stormwater; and 40 CFR 122.44(d)(1)(i) and (iii) requires the permit to include water-quality based effluent limitations where reasonable potential has been found. However, because of the non-continuous nature of stormwater discharges, staff are unable to perform statistical Reasonable Potential Analysis (RPA) under most stormwater discharge scenarios. Reasonable potential determinations (RPDs; see REASONABLE POTENTIAL above) using best professional judgment are performed.

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

BMP inspections typically occur more frequently than sampling. Sampling frequencies are based on the facility's ability to comply with the benchmarks and the requirements of the permit. Inspections should occur after large rain events and any other time an issue is noted; sampling after a benchmark exceedance may need to occur to show the corrective action taken was meaningful.

When a permitted feature or outfall consists of only stormwater, a benchmark may be implemented at the discretion of the permit writer, if there is no RP for water quality excursions.

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

STORMWATER POLLUTION PREVENTION PLAN (SWPPP):

In accordance with 40 CFR 122.44(k), Best Management Practices (BMPs) must be used to control or abate the discharge of pollutants when: 1) Authorized under section 304(e) of the Clean Water Act (CWA) for the control of toxic pollutants and hazardous substances from ancillary industrial activities; 2) Authorized under section 402(p) of the CWA for the control of stormwater discharges; 3) Numeric effluent limitations are infeasible; or 4) the practices are reasonably necessary to achieve effluent limitations and standards or to carry out the purposes and intent of the CWA. In accordance with the EPA's *Developing Your Stormwater Pollution Prevention Plan, A Guide for Industrial Operators*, (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).

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), Section 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, section A, number 4. The analytical and sampling methods used shall conform to the reference methods listed in 10 CSR 20-7.015 and/or 40 CFR 136 unless alternates are approved by the Department 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 section 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 RSMo 577.155; 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 RSMo 577.155; 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.

✓ 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 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). Total Maximum Daily Loads, if required for this facility, were also reviewed.

✓ Not applicable; wasteload allocations were either not calculated or were not based on standard TSD methods.

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 section 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 LIMITS DETERMINATIONS

OUTFALL #001, #002, #003, #004, AND #005 – FACILITY STORMWATER OUTFALLS

EFFLUENT LIMITATIONS TABLE:

PARAMETERS	UNIT	DAILY MAXIMUM LIMIT	BENCH- MARK	PREVIOUS PERMIT LIMITS	MINIMUM SAMPLING FREQUENCY	REPORTING FREQUENCY	SAMPLE TYPE
PHYSICAL							
FLOW	MGD	*	-	*	ONCE/QUARTER	ONCE/QUARTER	24 HR. ESTIMATE
PRECIPITATION	inches	*	-	*	ONCE/QUARTER	ONCE/QUARTER	24 HR. TOT
CONVENTIONAL							
COD	mg/L	**	120	SAME	ONCE/QUARTER	ONCE/QUARTER	GRAB
OIL & GREASE	mg/L	**	10	SAME	ONCE/QUARTER	ONCE/QUARTER	GRAB
pH †	SU	6.5 TO 9.0		*	ONCE/QUARTER	ONCE/QUARTER	GRAB
SETTLEABLE SOLIDS	mL/L/hr	**	1.0	SAME	ONCE/QUARTER	ONCE/QUARTER	GRAB
TSS	mg/L	**	100	SAME	ONCE/QUARTER	ONCE/QUARTER	GRAB
METALS							
ALUMINUM, TR	µg/L	**	750	SAME	ONCE/QUARTER	ONCE/QUARTER	GRAB
COPPER, TR	µg/L	**	21.2	*	ONCE/QUARTER	ONCE/QUARTER	GRAB
IRON, TR	µg/L	**	4000	*	ONCE/QUARTER	ONCE/QUARTER	GRAB
NICKEL, TR	µg/L	REMOVED FROM SAMPLING					
ZINC, TR	µg/L	**	176.7	*	ONCE/QUARTER	ONCE/QUARTER	GRAB

- * monitoring and reporting requirement only
- ** monitoring with associated benchmark
- † report the minimum and maximum pH values; pH is not to be averaged

DERIVATION AND DISCUSSION OF LIMITS:

PHYSICAL:

Flow

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

Precipitation

Monitoring only requirement; measuring the amount of precipitation [(10 CSR 20-6.200(2)(C)1.E(VI)] during an event is necessary to ensure adequate stormwater management exists at the site. Knowing the amount of potential stormwater runoff can provide the facility a better understanding of any specific control measures be employed to ensure protection of water quality. The facility will provide the 24 hour accumulation value of precipitation from the day of sampling the other parameters.

CONVENTIONAL:

Chemical Oxygen Demand (COD)

Monitoring with 120 mg/L daily maximum benchmark, continued from the previous permit. There is no numeric water quality standard for COD; however, increased oxygen demand may impact instream water quality. COD is also a valuable indicator parameter. COD monitoring allows the facility to identify increases in COD may indicate materials/chemicals coming into contact with stormwater causing an increase in oxygen demand. Increases in COD may indicate a need for maintenance or improvement of BMPs. The benchmark value falls within the range of values implemented in other permits having similar industrial activities and is achievable through proper BMP controls.

Oil & Grease

Monitoring with a daily maximum benchmark of 10 mg/L. Oil and grease is considered a conventional pollutant. Oil and grease is a comprehensive test which measures for gasoline, diesel, crude oil, creosote, kerosene, heating oils, heavy fuel oils, lubricating oils, waxes, and some asphalt and pitch. The test can also detect some volatile organics such as benzene, toluene, ethylbenzene, or toluene, but these constituents are often lost during testing due to their boiling points. It is recommended to perform separate testing for these constituents if they are a known pollutant of concern at the site, i.e. aquatic life toxicity or human health is a concern. Results do not allow for separation of specific pollutants within the test, they are reported, totaled, as "oil and grease". Per 10 CSR 20-7.031 Table A1: *Criteria for Designated Uses*; 10 mg/L is the standard for protection of aquatic life. This standard will also be used to protect the general criteria found at 10 CSR 20-7.031(4). Ten mg/L is the level at which sheen is expected to form on receiving waters. Oils and greases of different densities will possibly form sheen or unsightly bottom deposits at levels which vary from 10 mg/L. To protect the general criteria, it is the responsibility of the facility to visually observe the discharge and receiving waters for sheen or bottom deposits. The benchmark is achievable through proper operational and maintenance of BMPs and falls within the range of values implemented in other permits having similar industrial activities.

pH

6.0 to 9.0 SU. Technology based limits [10 CSR 20-7.015(9)(I)1.] are applicable to this outfall. The permit writer has determined there is no reasonable potential to affect water quality therefore technology limitations for wastewater are applied. The limits are known to be achievable across a wide range of industries utilizing standard stormwater BMPs.

Settleable Solids (SS)

Stormwater: Monitoring with a daily maximum benchmark of 1.0 mL/L/hour. There is no numeric water quality standard for SS; however, sediment discharges can negatively impact aquatic life habitat. Settleable solids are also a valuable indicator parameter. Solids monitoring allows the facility to identify increases in sediment and solids may indicate uncontrolled materials leaving the site. The benchmark value falls within the range of values implemented in other permits having similar industrial activities.

Total Suspended Solids (TSS)

Monitoring with a daily maximum benchmark of 100 mg/L. There is no numeric water quality standard for TSS; however, sediment discharges can negatively impact aquatic life habitat. TSS is also a valuable indicator parameter. TSS monitoring allows the facility to identify increases in TSS indicating uncontrolled materials leaving the site. Increased suspended solids in runoff can lead to decreased available oxygen for aquatic life and an increase of surface water temperatures in a receiving stream. Suspended solids can also be carriers of toxins, which can adsorb to the suspended particles; therefore, total suspended solids are a valuable indicator parameter for other pollution. The benchmark is achievable through proper operational and maintenance of BMPs and falls within the range of values implemented in other permits having similar industrial activities.

METALS:

Aluminum, Total Recoverable

Monitoring, with a daily maximum benchmark of 750 µg/L, continued from the previous permit. The benchmark at 750 µg/L is a known achievable value in industries utilizing BMPs for stormwater control. Aluminum is a pollutant of concern at this site. DMR data for Aluminum ranges from 23- 4460 µg/L.

Zinc, Total Recoverable

Monitoring, with a daily maximum benchmark of 180 µg/L. After evaluating water quality, the permit writer determined no water quality concerns for this pollutant in the discharge at 180 µg/L. The permit writer applies the benchmark at 180 µg/L as it is a known achievable value in industries utilizing BMPs for stormwater control. Zinc is a pollutant of concern at this site. DMR data for Zinc ranges from 0.8- 422 µg/L.

Copper, Total Recoverable

Monitoring, with a daily maximum benchmark of 22 µg/L. The permit writer applies the benchmark at 22 µg/L as it is a known achievable value in industries utilizing BMPs for stormwater control. Copper is a pollutant of concern at this site. DMR data ranges from 5- 131 µg/L.

Nickel, Total Recoverable

Monitoring is removed for this pollutant. DMR data shows that this is not a pollutant of concern at this site per the data provided on DMRs.

Iron, Total Recoverable

Monitoring, with a daily maximum benchmark of 4,000 µg/L. The permit writer applies the benchmark at 4,000 µg/L as it is a known achievable value in industries utilizing BMPs for stormwater control. Iron is a pollutant of concern at this site. DMR data ranges from 242- 13300 µg/L.

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:

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

✓ This permit will maintain synchronization by expiring the end of the 2nd quarter, 2025.

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 water quality concerns related to a draft permit. No public notice is required when a request for a permit modification or termination is denied; however, the requester and 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 or of a new or reissued statewide general permit. The public comment period is the length of time not less than 30 days following the date of the public notice which interested persons may submit written comments about the proposed permit.

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

✓ The Public Notice period for this operating permit was from January 15, 2021 to February 15, 2021. No responses were received.

DATE OF FACT SHEET: (12/11/2020)

COMPLETED BY:

GORDEN WRAY, ENVIRONMENTAL ANALYST
MISSOURI DEPARTMENT OF NATURAL RESOURCES
WATER PROTECTION PROGRAM
OPERATING PERMITS SECTION - INDUSTRIAL UNIT
(573) 751-1398
Gorden.wray@dnr.mo.gov



STANDARD CONDITIONS FOR NPDES PERMITS
ISSUED BY
THE MISSOURI DEPARTMENT OF NATURAL RESOURCES
MISSOURI CLEAN WATER COMMISSION
REVISED
AUGUST 1, 2014

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

Part I – General Conditions

Section A – Sampling, Monitoring, and Recording

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

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

Section B – Reporting Requirements

1. **Planned Changes.**
 - a. The permittee shall give notice to the Department as soon as possible of any planned physical alterations or additions to the permitted facility when:
 - i. The alteration or addition to a permitted facility may meet one of the criteria for determining whether a facility is a new source in 40 CFR 122.29(b); or
 - ii. The alteration or addition could significantly change the nature or increase the quantity of pollutants discharged. This notification applies to pollutants which are subject neither to effluent limitations in the permit, nor to notification requirements under 40 CFR 122.42;
 - iii. The alteration or addition results in a significant change in the permittee’s sludge use or disposal practices, and such alteration, addition, or change may justify the application of permit conditions that are different from or absent in the existing permit, including notification of additional use or disposal sites not reported during the permit application process or not reported pursuant to an approved land application plan;
 - iv. Any facility expansions, production increases, or process modifications which will result in a new or substantially different discharge or sludge characteristics must be reported to the Department 60 days before the facility or process modification begins. Notification may be accomplished by application for a new permit. If the discharge does not violate effluent limitations specified in the permit, the facility is to submit a notice to the Department of the changed discharge at least 30 days before such changes. The Department may require a construction permit and/or permit modification as a result of the proposed changes at the facility.
2. **Non-compliance Reporting.**
 - a. The permittee shall report any noncompliance which may endanger health or the environment. Relevant information shall be provided orally or via the current electronic method approved by the Department, within 24 hours from the time the permittee becomes aware of the circumstances, and shall be reported to the appropriate Regional Office during normal business hours or the Environmental Emergency Response hotline at 573-634-2436 outside of normal business hours. A written submission shall also be provided within five (5) business days of the time the permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the period of noncompliance, including exact dates and times, and if the noncompliance has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent reoccurrence of the noncompliance.



STANDARD CONDITIONS FOR NPDES PERMITS
ISSUED BY
THE MISSOURI DEPARTMENT OF NATURAL RESOURCES
MISSOURI CLEAN WATER COMMISSION
REVISED
AUGUST 1, 2014

- 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.
- 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 C – Bypass/Upset Requirements

1. **Definitions.**
 - a. *Bypass*: the intentional diversion of waste streams from any portion of a treatment facility, except in the case of blending.
 - b. *Severe Property Damage*: substantial physical damage to property, damage to the treatment facilities which causes them to become inoperable, or substantial and permanent loss of natural resources which can reasonably be expected to occur in the absence of a bypass. Severe property damage does not mean economic loss caused by delays in production.
 - c. *Upset*: an exceptional incident in which there is unintentional and temporary noncompliance with technology based permit effluent limitations because of factors beyond the reasonable control of the permittee. An upset does not include noncompliance to the extent caused by operational error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventive maintenance, or careless or improper operation.
2. **Bypass Requirements.**
 - a. Bypass not exceeding limitations. The permittee may allow any bypass to occur which does not cause effluent limitations to be exceeded, but only if it also is for essential maintenance to assure efficient operation. These bypasses are not subject to the provisions of paragraphs 2. b. and 2. c. of this section.

Section D – Administrative Requirements

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



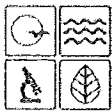
STANDARD CONDITIONS FOR NPDES PERMITS
ISSUED BY
THE MISSOURI DEPARTMENT OF NATURAL RESOURCES
MISSOURI CLEAN WATER COMMISSION
REVISED
AUGUST 1, 2014

- imposed in a pretreatment program approved under section 402(a)(3) or 402(b)(8) of the Act, is subject to criminal penalties of \$2,500 to \$25,000 per day of violation, or imprisonment of not more than one (1) year, or both. In the case of a second or subsequent conviction for a negligent violation, a person shall be subject to criminal penalties of not more than \$50,000 per day of violation, or by imprisonment of not more than two (2) years, or both. Any person who knowingly violates such sections, or such conditions or limitations is subject to criminal penalties of \$5,000 to \$50,000 per day of violation, or imprisonment for not more than three (3) years, or both. In the case of a second or subsequent conviction for a knowing violation, a person shall be subject to criminal penalties of not more than \$100,000 per day of violation, or imprisonment of not more than six (6) years, or both. Any person who knowingly violates section 301, 302, 303, 306, 307, 308, 318 or 405 of the Act, or any permit condition or limitation implementing any of such sections in a permit issued under section 402 of the Act, and who knows at that time that he thereby places another person in imminent danger of death or serious bodily injury, shall, upon conviction, be subject to a fine of not more than \$250,000 or imprisonment of not more than 15 years, or both. In the case of a second or subsequent conviction for a knowing endangerment violation, a person shall be subject to a fine of not more than \$500,000 or by imprisonment of not more than 30 years, or both. An organization, as defined in section 309(c)(3)(B)(iii) of the CWA, shall, upon conviction of violating the imminent danger provision, be subject to a fine of not more than \$1,000,000 and can be fined up to \$2,000,000 for second or subsequent convictions.
- c. Any person may be assessed an administrative penalty by the EPA Director for violating section 301, 302, 306, 307, 308, 318 or 405 of this Act, or any permit condition or limitation implementing any of such sections in a permit issued under section 402 of this Act. Administrative penalties for Class I violations are not to exceed \$10,000 per violation, with the maximum amount of any Class I penalty assessed not to exceed \$25,000. Penalties for Class II violations are not to exceed \$10,000 per day for each day during which the violation continues, with the maximum amount of any Class II penalty not to exceed \$125,000.
- d. It is unlawful for any person to cause or permit any discharge of water contaminants from any water contaminant or point source located in Missouri in violation of sections 644.006 to 644.141 of the Missouri Clean Water Law, or any standard, rule or regulation promulgated by the commission. In the event the commission or the director determines that any provision of sections 644.006 to 644.141 of the Missouri Clean Water Law or standard, rules, limitations or regulations promulgated pursuant thereto, or permits issued by, or any final abatement order, other order, or determination made by the commission or the director, or any filing requirement pursuant to sections 644.006 to 644.141 of the Missouri Clean Water Law or any other provision which this state is required to enforce pursuant to any federal water pollution control act, is being, was, or is in imminent danger of being violated, the commission or director may cause to have instituted a civil action in any court of competent jurisdiction for the injunctive relief to prevent any such violation or further violation or for the assessment of a penalty not to exceed \$10,000 per day for each day, or part thereof, the violation occurred and continues to occur, or both, as the court deems proper. Any person who willfully or negligently commits any violation in this paragraph shall, upon conviction, be punished by a fine of not less than \$2,500 nor more than \$25,000 per day of violation, or by imprisonment for not more than one year, or both. Second and successive convictions for violation of the same provision of this paragraph by any person shall be punished by a fine of not more than \$50,000 per day of violation, or by imprisonment for not more than two (2) years, or both.
2. **Duty to Reapply.**
- a. If the permittee wishes to continue an activity regulated by this permit after the expiration date of this permit, the permittee must apply for and obtain a new permit.
- b. A permittee with a currently effective site-specific permit shall submit an application for renewal at least 180 days before the expiration date of the existing permit, unless permission for a later date has been granted by the Department. (The Department shall not grant permission for applications to be submitted later than the expiration date of the existing permit.)
- c. A permittee with currently effective general permit shall submit an application for renewal at least 30 days before the existing permit expires, unless the permittee has been notified by the Department that an earlier application must be made. The Department may grant permission for a later submission date. (The Department shall not grant permission for applications to be submitted later than the expiration date of the existing permit.)
3. **Need to Halt or Reduce Activity Not a Defense.** It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
4. **Duty to Mitigate.** The permittee shall take all reasonable steps to minimize or prevent any discharge or sludge use or disposal in violation of this permit which has a reasonable likelihood of adversely affecting human health or the environment.
5. **Proper Operation and Maintenance.** The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems which are installed by a permittee only when the operation is necessary to achieve compliance with the conditions of the permit.
6. **Permit Actions.**
- a. Subject to compliance with statutory requirements of the Law and Regulations and applicable Court Order, this permit may be modified, suspended, or revoked in whole or in part during its term for cause including, but not limited to, the following:
- i. Violations of any terms or conditions of this permit or the law;
- ii. Having obtained this permit by misrepresentation or failure to disclose fully any relevant facts;
- iii. A change in any circumstances or conditions that requires either a temporary or permanent reduction or elimination of the authorized discharge; or
- iv. Any reason set forth in the Law or Regulations.
- b. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance does not stay any permit condition.
7. **Permit Transfer.**
- a. Subject to 10 CSR 20-6.010, an operating permit may be transferred upon submission to the Department of an application to transfer signed by the existing owner and the new owner, unless prohibited by the terms of the permit. Until such time the permit is officially transferred, the original permittee remains responsible for complying with the terms and conditions of the existing permit.
- b. The Department may require modification or revocation and reissuance of the permit to change the name of the permittee and incorporate such other requirements as may be necessary under the Missouri Clean Water Law or the Federal Clean Water Act.
- c. The Department, within 30 days of receipt of the application, shall notify the new permittee of its intent to revoke or reissue or transfer the permit.
8. **Toxic Pollutants.** The permittee shall comply with effluent standards or prohibitions established under section 307(a) of the Federal Clean Water Act for toxic pollutants and with standards for sewage sludge use or disposal established under section 405(d) of the Federal Clean Water Act within the time provided in the regulations that establish these standards or prohibitions or standards for sewage sludge use or disposal, even if the permit has not yet been modified to incorporate the requirement.
9. **Property Rights.** This permit does not convey any property rights of any sort, or any exclusive privilege.



STANDARD CONDITIONS FOR NPDES PERMITS
ISSUED BY
THE MISSOURI DEPARTMENT OF NATURAL RESOURCES
MISSOURI CLEAN WATER COMMISSION
REVISED
AUGUST 1, 2014

10. **Duty to Provide Information.** The permittee shall furnish to the Department, within a reasonable time, any information which the Department may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit or to determine compliance with this permit. The permittee shall also furnish to the Department upon request, copies of records required to be kept by this permit.
11. **Inspection and Entry.** The permittee shall allow the Department, or an authorized representative (including an authorized contractor acting as a representative of the Department), upon presentation of credentials and other documents as may be required by law, to:
 - a. Enter upon the permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of the permit;
 - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - c. Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and
 - d. Sample or monitor at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by the Federal Clean Water Act or Missouri Clean Water Law, any substances or parameters at any location.
12. **Closure of Treatment Facilities.**
 - a. Persons who cease operation or plan to cease operation of waste, wastewater, and sludge handling and treatment facilities shall close the facilities in accordance with a closure plan approved by the Department.
 - b. Operating Permits under 10 CSR 20-6.010 or under 10 CSR 20-6.015 are required until all waste, wastewater, and sludges have been disposed of in accordance with the closure plan approved by the Department and any disturbed areas have been properly stabilized. Disturbed areas will be considered stabilized when perennial vegetation, pavement, or structures using permanent materials cover all areas that have been disturbed. Vegetative cover, if used, shall be at least 70% plant density over 100% of the disturbed area.
13. **Signatory Requirement.**
 - a. All permit applications, reports required by the permit, or information requested by the Department shall be signed and certified. (See 40 CFR 122.22 and 10 CSR 20-6.010)
 - b. The Federal Clean Water Act provides that any person who knowingly makes any false statement, representation, or certification in any record or other document submitted or required to be maintained under this permit, including monitoring reports or reports of compliance or non-compliance shall, upon conviction, be punished by a fine of not more than \$10,000 per violation, or by imprisonment for not more than six (6) months per violation, or by both.
 - c. The Missouri Clean Water Law provides that any person who knowingly makes any false statement, representation or certification in any application, record, report, plan, or other document filed or required to be maintained pursuant to sections 644.006 to 644.141 shall, upon conviction, be punished by a fine of not more than ten thousand dollars, or by imprisonment for not more than six months, or by both.
14. **Severability.** The provisions of the permit are severable, and if any provision of the permit, or the application of any provision of the permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of the permit, shall not be affected thereby.



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

RECEIVED
NOV 27 2019
Water Protection Program

34039

FOR AGENCY USE ONLY	
CHECK NUMBER	
DATE RECEIVED 11-27-19	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 – 0138479, 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 Doolittle Trailer Manufacturing Inc		TELEPHONE NUMBER WITH AREA CODE 573-896-5155	
ADDRESS (PHYSICAL) 2455 Doolittle Drive	CITY Holts Summit	STATE MO	ZIP CODE 65043

3. OWNER

NAME Fred Werdehausen et al dba Doolittle Trailer Manufacturing Inc		TELEPHONE NUMBER WITH AREA CODE 573-896-5155	
EMAIL ADDRESS Doolittletrailers.com			
ADDRESS (MAILING) 2455 Doolittle Drive	CITY Holts Summit	STATE MO	ZIP CODE 65043

4. CONTINUING AUTHORITY

NAME Doolittle Trailer Manufacturing Inc		TELEPHONE NUMBER WITH AREA CODE 573-896-5155	
EMAIL ADDRESS Doolittletrailers.com			
ADDRESS (MAILING) 2455 Doolittle Drive	CITY Holts Summit	STATE MO	ZIP CODE 65043

5. OPERATOR CERTIFICATION

NAME Ryan Werdehausen	CERTIFICATE NUMBER	TELEPHONE NUMBER WITH AREA CODE 573-896-5155	
ADDRESS (MAILING) ryan@doolittletrailers.com	CITY Holts Summit	STATE MO	ZIP CODE 65043

6. FACILITY CONTACT

NAME Chuck Frank	TITLE VP Operations	TELEPHONE NUMBER WITH AREA CODE 573-896-5155	
E-MAIL ADDRESS chuck@doolittletrailers.com			

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

NAME Elmer Werdehausen			
ADDRESS RT 1 Box 1050	CITY Holts Summit	STATE MO	ZIP CODE 65043

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

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

001	NW 1/4	SW 1/4	Sec 19	T 45+	R 10W	Callaway	County
UTM Coordinates Easting (X):		578214	Northing (Y):		4279980		
002	NW 1/4	SW 1/4	Sec 19	T 45+	R 10W	Callaway	County
UTM Coordinates Easting (X):		578252	Northing (Y):		4279310		
003	NW 1/4	SW 1/4	Sec 19	T 45+	R 10W	Callaway	County
UTM Coordinates Easting (X):		578094	Northing (Y):		4279520		
004	NW 1/4	SW 1/4	Sec 19	T 45+	R 10W	Callaway	County
UTM Coordinates Easting (X):		578056	Northing (Y):		4279679		

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

Primary SIC <u>3799</u>	and NAICS <u>33621</u>	SIC <u>3799</u>	and NAICS <u>33621</u>
SIC <u>3799</u>	and NAICS <u>33621</u>	SIC <u>3799</u>	and NAICS <u>33621</u>

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)

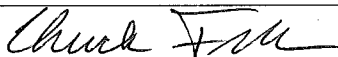
Chuck Frank

VP Operations

TELEPHONE NUMBER WITH AREA CODE

573-230-8897

SIGNATURE



DATE SIGNED

11/26/19

FACILITY DESCRIPTION

OUTFALL #001 – Stormwater; SIC # 3799; NAICS # 336214

Stormwater – northern portion of facility

Legal Description: NW¼, SW¼, Sec.19, T45N, R10W, Callaway County
UTM Coordinates: X = 578214, Y = 4279980
Receiving Stream: Tributary to Rivaux Creek
First Classified Stream and ID: 8-20-13 MUDD V1.0 (C) WBID# 3960; Losing
USGS Basin & Sub-watershed No.: Rivaux Creek – Missouri River (10300102-1306)
Average Flow: 0 MGD
Design Flow: 0.214 MGD

OUTFALL #002 – Stormwater; SIC # 3799; NAICS # 336214

Stormwater – southern portion of facility

Legal Description: NW¼, SW¼, Sec.19, T45N, R10W, Callaway County
UTM Coordinates: X = 578252, Y = 4279310
Receiving Stream: Rivaux Creek (C); Losing
First Classified Stream and ID: 8-20-13 MUDD V1.0 (C) WBID# 3960; Losing; also known as Rivaux Creek
USGS Basin & Sub-watershed No.: Rivaux Creek – Missouri River (10300102-1306)
Average Flow: 0 MGD
Design Flow: 0.188 MGD

OUTFALL #003 – Stormwater; SIC # 3799; NAICS # 336214

Stormwater – southwest portion of facility

Legal Description: NW¼, SW¼, Sec.19, T45N, R10W, Callaway County
UTM Coordinates: X = 578094, Y = 4279520
Receiving Stream: Tributary to Rivaux Creek; Losing
First Classified Stream and ID: 8-20-13 MUDD V1.0 (C) WBID# 3960; Losing
USGS Basin & Sub-watershed No.: Rivaux Creek – Missouri River (10300102-1306)
Average Flow: 0 MGD
Design Flow: 0.124 MGD

OUTFALL #004 – Stormwater; SIC # 3799; NAICS # 336214

Stormwater – southwest portion of facility

Legal Description: NW¼, SW¼, Sec.19, T45N, R10W, Callaway County
UTM Coordinates: X = 578056, Y = 4279679
Receiving Stream: Tributary to Rivaux Creek; Losing
First Classified Stream and ID: 8-20-13 MUDD V1.0 (C) WBID# 3960; Losing
USGS Basin & Sub-watershed No.: Rivaux Creek – Missouri River (10300102-1306)
Average Flow: 0 MGD
Design Flow: 0.095 MGD

OUTFALL #005 – Stormwater; SIC # 3799; NAICS # 336214

Stormwater – western portion of facility

Legal Description: NW¼, SW¼, Sec.19, T45N, R10W, Callaway County
UTM Coordinates: X = 577992, Y = 4279886
Receiving Stream: Tributary to Rivaux Creek; Losing
First Classified Stream and ID: 8-20-13 MUDD V1.0 (C) WBID# 3960; Losing
USGS Basin & Sub-watershed No.: Rivaux Creek – Missouri River (10300102-1306)
Average Flow: 0 MGD
Design Flow: 0.045 MGD

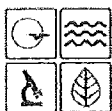
9. Additional Permit Information

Hazardous Waste

MO Generator ID 031990 EPA Generator MOR000009407

Construction/Operation

032009-001 *no DNR*



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**

RECEIVED
NOV 27 2019
Water Pollution Program

GENERAL INFORMATION (PLEASE SEE INSTRUCTIONS)

1.0 NAME OF FACILITY

Doolittle Trailer Manufacturing Inc

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

MO0138479

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

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.

Doolittle Trailer Manufacturing Inc. builds trailers for multiple private and commercial uses. Trailers are fabricated on site and shipped to vendors for sale. Materials used include steel plate, tubing and I beam, as well as metal sheeting for roofs and sides. Trailers are stored outside pending shipment.

FLows, TYPE, AND FREQUENCY

2.0 Attach a line drawing showing the water flow through the facility. Indicate sources of intake water, operations contributing wastewater to the effluent, and treatment units labeled to correspond to the more detailed descriptions in item B. Construct a water balance on the line drawing by showing average and maximum flows between intakes, operations, treatment units, evaporation, public sewers, and outfalls. If a water balance cannot be determined (e.g., for certain mining activities), provide a pictorial description of the nature and amount of any sources of water and any collection or treatment measures.

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
1	storm runoff	0.214 MGD MAX	none	NA
2	storm runoff	0.188 MGD MAX	none	NA
3	storm runoff	0.124 MGD MAX	none	NA
4	storm runoff	0.095 MGD MAX	none	NA
5	storm runoff	0.045 MGD MAX	none	NA

Attach additional pages if necessary.

2.2 INTERMITTENT DISCHARGES

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

☐ Yes (complete the following table)

☒ No (go to section 2.3)

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

2.3 PRODUCTION

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

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

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

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

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

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

2.4 IMPROVEMENTS

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

☐ Yes (complete the following table)

☐ No (go to 2.6)

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

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

2.5 SLUDGE MANAGEMENT

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

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)

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)
Inovatia Laboratories	120 East Davis Street, PO Box 30, Fayette, MO 65248	660-248-1911	COD, HEM, PH, Settleable Matter, TSS, Al, Fe, Ni, Cu, Zn

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
1	2.94 Acres	Vegetated, gravel, paved	Flow directed though gavel area to grassed areas to filter and reduce flow.
2	10.22 Acres	Vegetated Area	Maintain grass and wooded areas to filter and reduce flow.
3	5.17 Acres	Gravel, vegetated	Gravel flows into grass areas to filter and reduce flow.
4	1.93 Acres	Gravel	Vegetated area in drainage area to filter and reduce flow. Straw matting used.
5	0.75	Paved	flow passes into gravel area to filter and slow flow.

4.2 STORMWATER FLOWS

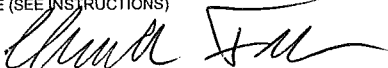
Provide the date of sampling with the flows, and how the flows were estimated.

Flows were calculated by Dave Seidel of Seidel Research for initial permit development December 11, 2015. No changes since this time to size or layout of the lot.

SIGNATORY REQUIREMENTS

5.0 CERTIFICATION

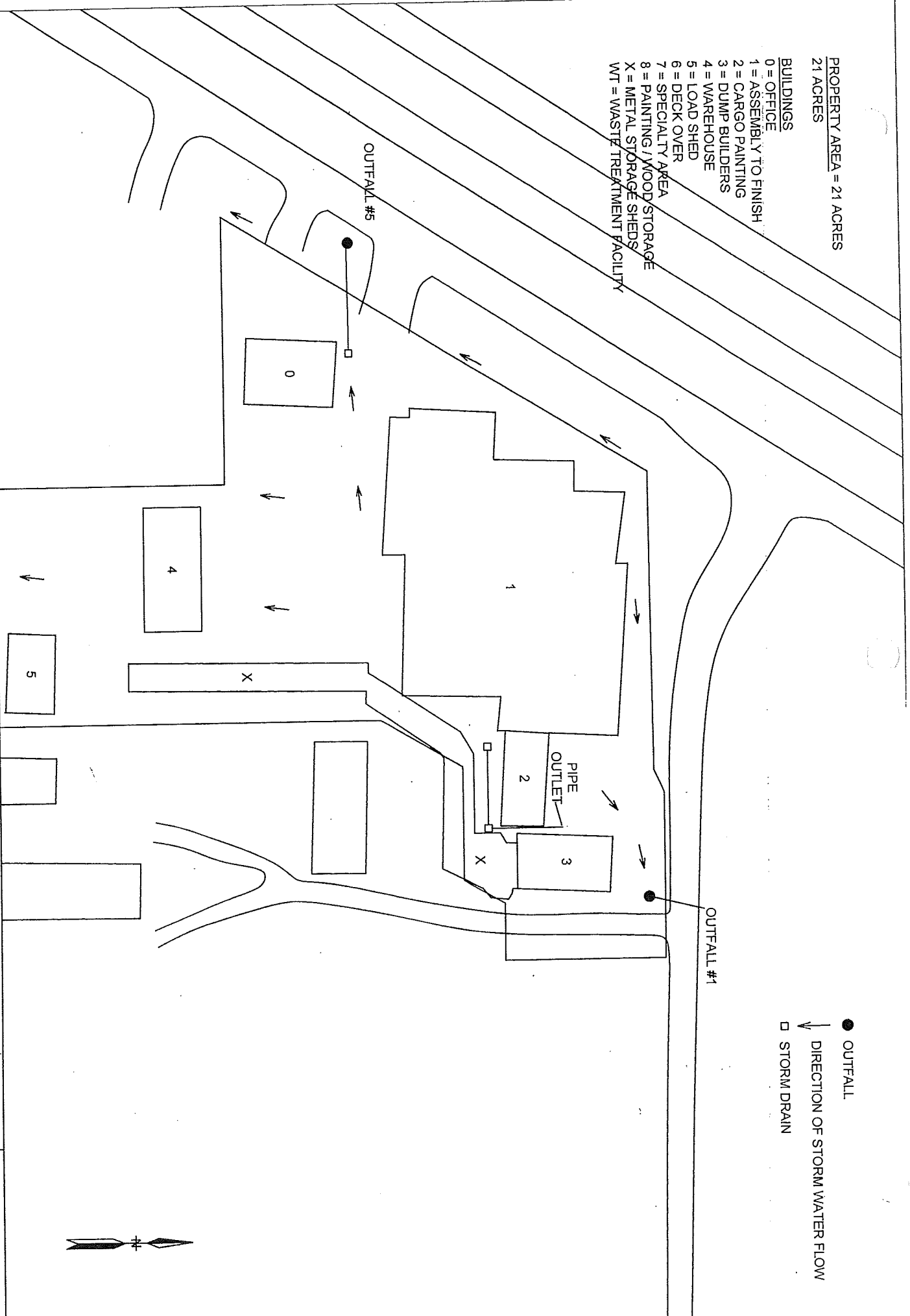
I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage 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
Chuck Frank OWNER	573-230-8897
SIGNATURE (SEE INSTRUCTIONS)	DATE SIGNED
	11/26/19

PROPERTY AREA = 21 ACRES
21 ACRES

BUILDINGS

- 0 = OFFICE
- 1 = ASSEMBLY TO FINISH
- 2 = CARGO PAINTING
- 3 = DUMP BUILDERS
- 4 = WAREHOUSE
- 5 = LOAD SHED
- 6 = DECK OVER
- 7 = SPECIALTY AREA
- 8 = PAINTING / WOOD STORAGE
- X = METAL STORAGE SHEDS
- WT = WASTE TREATMENT FACILITY



- OUTFALL
- ↓ DIRECTION OF STORM WATER FLOW
- - - STORM DRAIN



SEIDEL RESEARCH AND DEVELOPMENT CO.
1907 N SOUTHEAST TRAILS DR.
COLUMBIA MO 65202
(573) 445-7581
WWW.SRADCO.COM

DOOLITTLE TRAILER MANUFACTURING
2455 DOOLITTLE DR.
HOLTS SUMMIT, MO 65043
573-896-5155

STORM WATER DISCHARGE PERMIT
STORM WATER RUN-OFF SITE PLAN
PROPERTY DETAIL NORTH

0 133 F

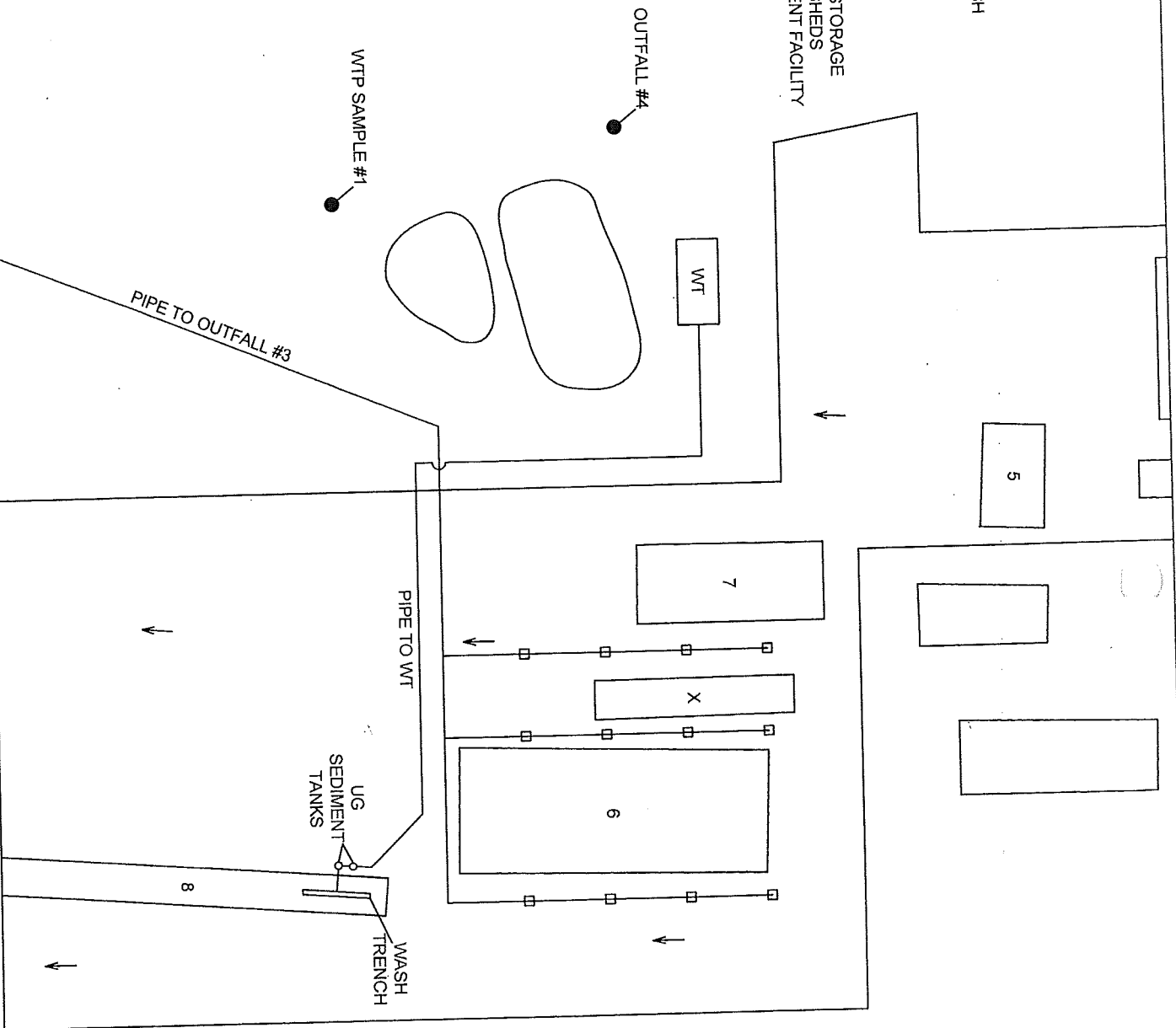
10DEC15

SHEET 1 OF 2

PROPERTY AREA
21 ACRES

BUILDINGS

- 0 = OFFICE
- 1 = ASSEMBLY TO FINISH
- 2 = CARGO PAINTING
- 3 = DUMP BUILDERS
- 4 = WAREHOUSE
- 5 = LOAD SHED
- 6 = DECK OVER
- 7 = SPECIALTY AREA
- 8 = PAINTING / WOOD STORAGE
- X = METAL STORAGE SHEDS
- WT = WASTE TREATMENT FACILITY



- OUTFALL
- ↓ DIRECTION OF STORM WATER FLOW
- STORM DRAIN



SEIDEL RESEARCH AND DEVELOPMENT CO.
1907 N SOUTHEAST TRAILS DR.
COLUMBIA MO 65202
(573) 445-7581
WWW.SRADCO.COM

DOOLITTLE TRAILER MANUFACTURING
2455 DOOLITTLE DR.
HOLTS SUMMIT, MO 65043
573-898-5155

STORM WATER DISCHARGE PERMIT
STORM WATER RUN-OFF SITE PLAN
PROPERTY DETAIL SOUTH

0 133 1

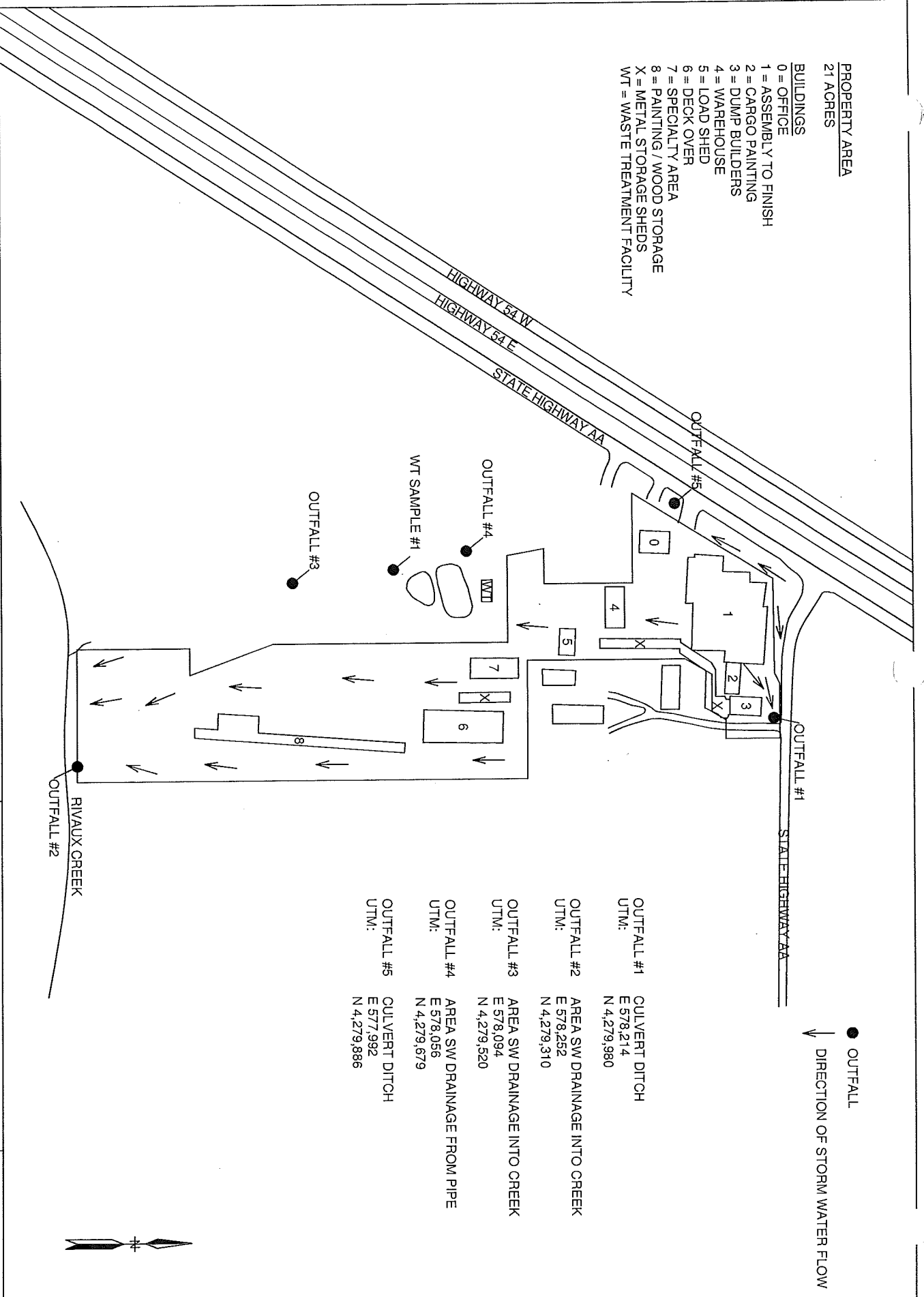
10DEC15

SHEET 2 OF 2

PROPERTY AREA
21 ACRES

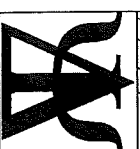
BUILDINGS

- 0 = OFFICE
- 1 = ASSEMBLY TO FINISH
- 2 = CARGO PAINTING
- 3 = DUMP BUILDERS
- 4 = WAREHOUSE
- 5 = LOAD SHED
- 6 = DECK OVER
- 7 = SPECIALTY AREA
- 8 = PAINTING / WOOD STORAGE
- X = METAL STORAGE SHEDS
- WT = WASTE TREATMENT FACILITY



● OUTFALL
↓ DIRECTION OF STORM WATER FLOW

- OUTFALL #1 CULVERT DITCH
UTM: E 578,214
N 4,279,980
- OUTFALL #2 AREA SW DRAINAGE INTO CREEK
UTM: E 578,252
N 4,279,310
- OUTFALL #3 AREA SW DRAINAGE INTO CREEK
UTM: E 578,094
N 4,279,520
- OUTFALL #4 AREA SW DRAINAGE FROM PIPE
UTM: E 578,056
N 4,279,679
- OUTFALL #5 CULVERT DITCH
UTM: E 577,992
N 4,279,886

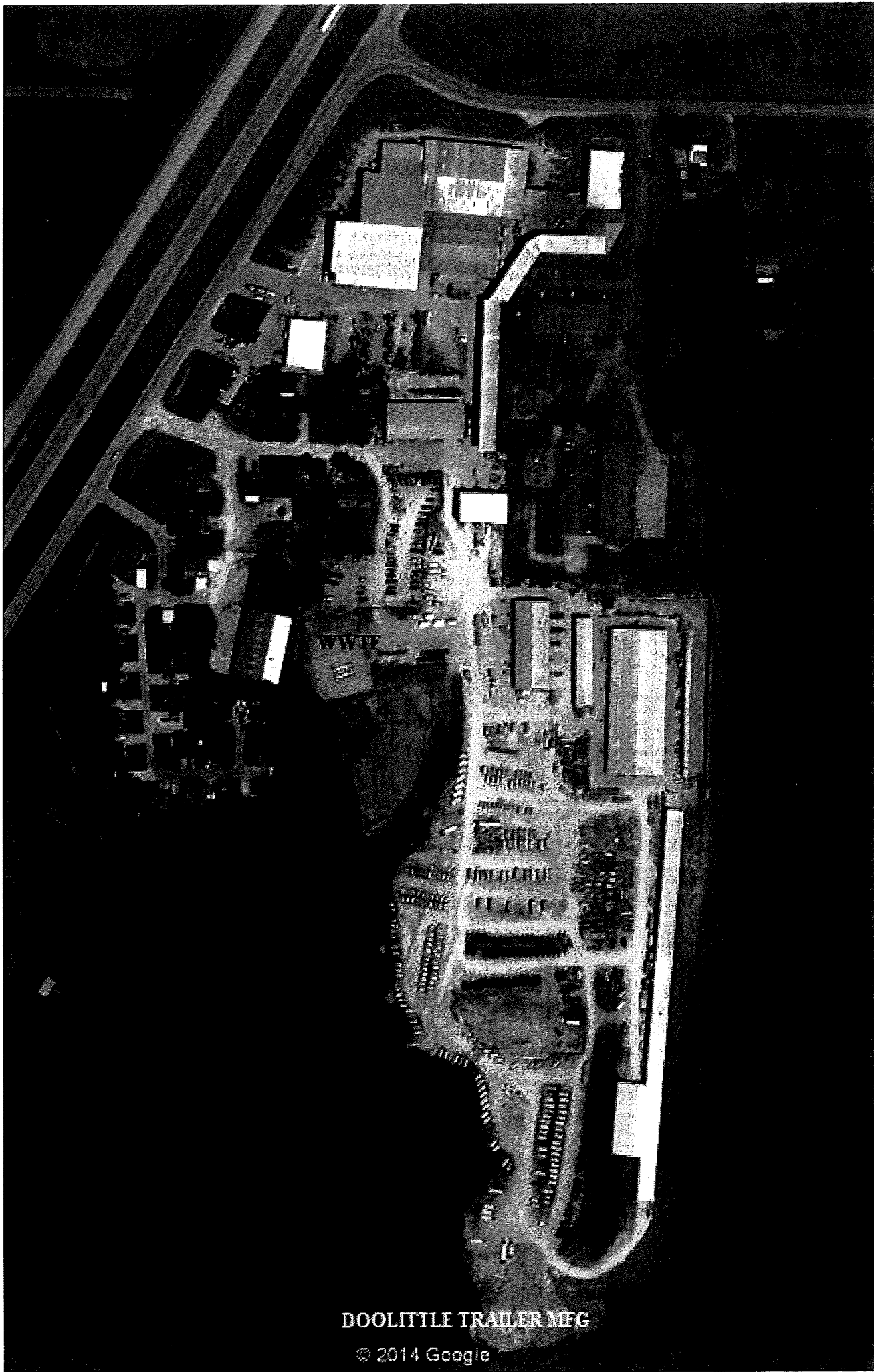


SEIDEL RESEARCH AND DEVELOPMENT CO.
1907 N SOUTHEAST TRAILS DR.
COLUMBIA MO 65202
(573) 445-7581
WWW.SRADCO.COM

DOOLITTLE TRAILER MANUFACTURING
2455 DOOLITTLE DR.
HOLTS SUMMIT, MO 65043
573-896-5155

STORM WATER DISCHARGE PERMIT
STORM WATER RUN-OFF SITE PLAN
PROPERTY BOUNDARIES DRAWING

10EC15
SHEET 1 OF 1



DOOLITTLE TRAILER MFG

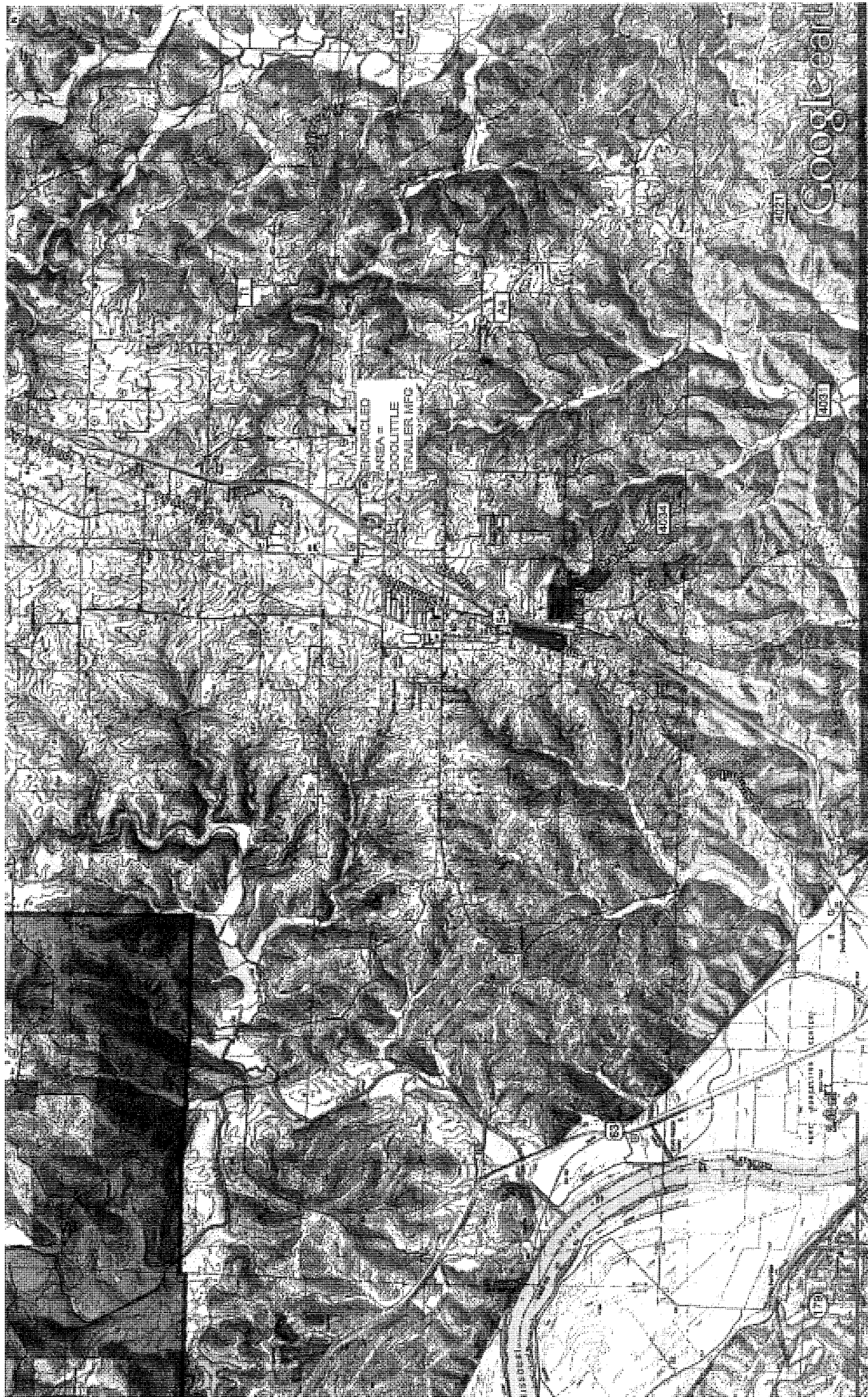
© 2014 Google

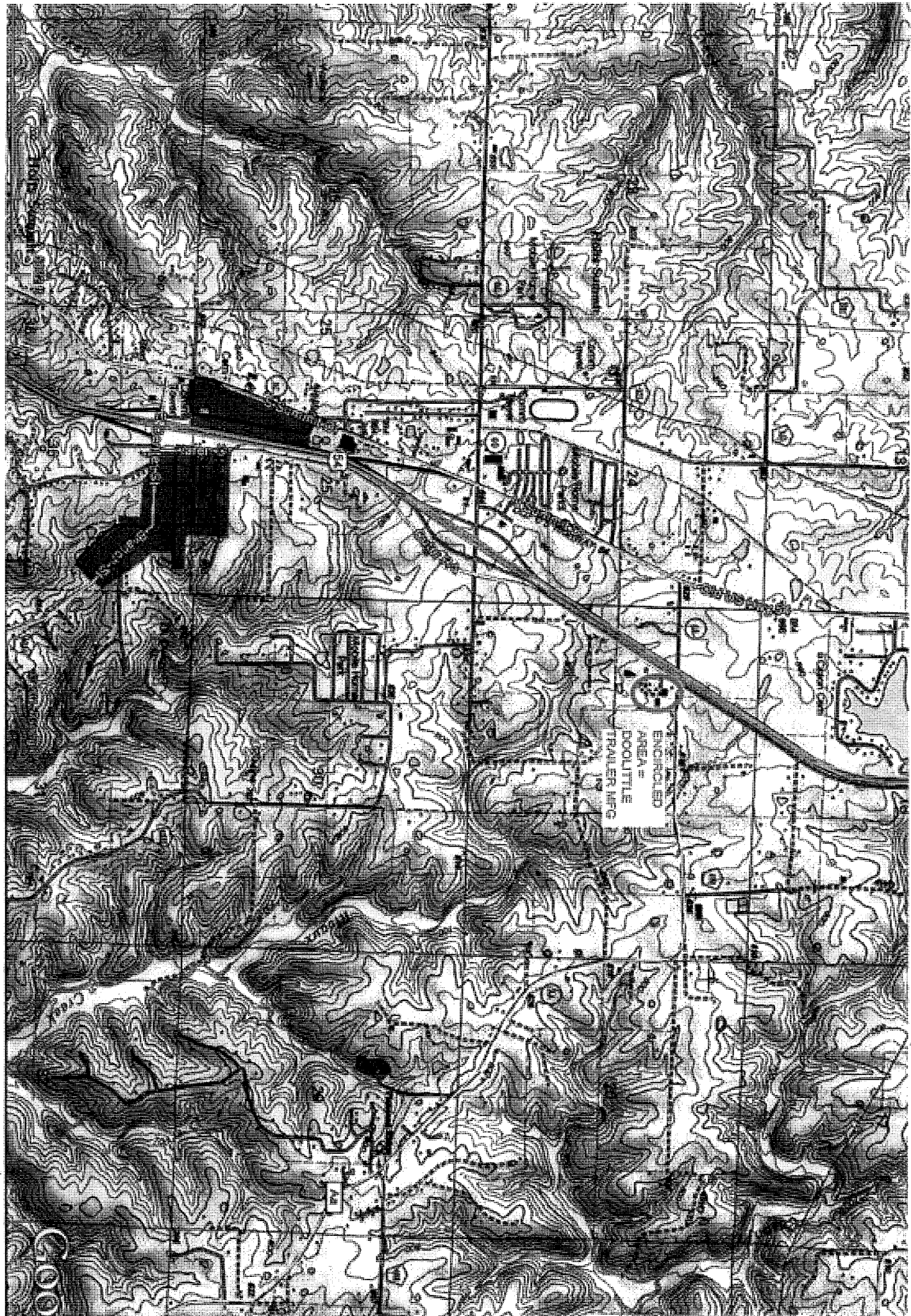


Google earth

Imagery Date: 5/13/2013 38° 39.717' N 92° 6.059' W elev 831 ft eye alt 6073 ft

© 2015 Google





ENCIRCLED
AREA =
DOOLITTLE
TRAILER MFG

Charles Neiheisel

From: Hacker, Pam <pam.hackler@dnr.mo.gov>
Sent: Monday, November 4, 2019 11:34 AM
To: Charles Neiheisel
Subject: RE: Doolittle Trailer Permit Renewal MO0138479

Hi Charles,

I have reviewed your request. I have exempted this facility from testing in the application for the below listed pollutants. This exemption does not protect the facility under permit shield in accordance with the Clean Water Act.

Thanks,
Pam

Pam Hackler

Pam Hackler, Environmental Scientist
Missouri Department of Natural Resources
Water Protection Program: Industrial Wastewater Unit: NPDES Permitting
Tel: 573-526-3386
Email: pam.hackler@dnr.mo.gov

We'd like your feedback on the service you received from the Missouri Department of Natural Resources. Please consider taking a few minutes to complete the Department's Customer Satisfaction Survey at <https://www.surveymonkey.com/r/MoDNRsurvey>. Thank you.

My normal office hours are from 7-3:30 M-F. Thanks!

From: Charles Neiheisel <cneiheisel@doolittletrailers.com>
Sent: Monday, November 4, 2019 11:17 AM
To: Hacker, Pam <pam.hackler@dnr.mo.gov>
Subject: Doolittle Trailer Permit Renewal MO0138479

Pam,

Thank you for helping clarify a few things on our renewal. As discussed, on Section 3.0 Part A, I do not test for BOD, TOC, Ammonia and have not been required to measure temperature based on our current storm water testing requirements. I am requesting that these be waived from our reporting for the upcoming renewal.

Thanks again for your help.

Charles Neiheisel
2455 Doolittle Drive
Holts Summit, MO 65403
573-415-0339
compliance@doolittletrailers.com

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: Northern Portion of facility

OUTFALL NO. 1

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)												
B. Chemical Oxygen Demand (COD)	45 mg/L				34.5 mg/L		8					
C. Total Organic Carbon (TOC)												
D. Total Suspended Solids (TSS)	<5 mg/L				11.75 mg/L		8					
E. Ammonia as N												
F. Flow	VALUE	.214 MGD	VALUE		VALUE	.214 MGD	8	MILLIONS OF GALLONS PER DAY (MGD)				
G. Temperature (winter)	VALUE		VALUE		VALUE			°F				
H. Temperature (summer)	VALUE		VALUE		VALUE			°F				
I. pH	MINIMUM	8.49	MAXIMUM		AVERAGE	7.72	8	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					
A. Alkalinity (CaCO ₃)	X		MINIMUM		MINIMUM		MINIMUM					
B. Bromide (24959-67-9)	X											
C. Chloride (16887-00-6)	X											
D. Chlorine, Total Residual	X											
E. Color	X											
F. Conductivity	X											
F. Cyanide, Amenable to Chlorination	X											

1. POLLUTANT AND CAS NUMBER (if available)	2. MARK "X"		3. VALUES						4. UNITS			
	A. BELIEVED PRESENT	B. BELIEVED ABSENT	A. MAXIMUM DAILY VALUE		B. MAXIMUM 30 DAY VALUE		C. LONG TERM AVERAGE VALUE		D. NO. OF ANALYSES	A. CONCENTRATION	B. MASS	
			CONCENTRATION	MASS	CONCENTRATION	MASS	CONCENTRATION	MASS				
Subpart 1 – Conventional and Non-Conventional Pollutants (Continued)												
G. <i>E. coli</i>		X										
H. Fluoride (16984-48-8)		X										
I. Nitrate plus Nitrate (as N)		X										
J. Kjeldahl, Total (as N)		X										
K. Nitrogen, Total Organic (as N)		X										
L. Oil and Grease	X		<5 mg/L				5.12 mg/L		8			
M. Phenols, Total		X										
N. Phosphorus (as P), Total (7723-14-0)		X										
O. Sulfate (as SO ₄) (14808-79-8)		X										
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		109 ug/L				342 ug/L		8			
2M. Antimony, Total Recoverable (7440-36-9)		X										
3M. Arsenic, Total Recoverable (7440-38-2)		X										
4M. Barium, Total Recoverable (7440-39-3)		X										
5M. Beryllium, Total Recoverable (7440-41-7)		X										
6M. Boron, Total Recoverable (7440-42-8)		X										
7M. Cadmium, Total Recoverable (7440-43-9)		X										
8M. Chromium III Total Recoverable (16065-83-1)		X										
9M. Chromium VI, Dissolved (18540-29-9)		X										
10M. Cobalt, Total Recoverable (7440-48-4)		X										

1. POLLUTANT AND CAS NUMBER (if available)	2. MARK "X"		3. VALUES						4. UNITS			
	A. BELIEVED PRESENT	B. BELIEVED ABSENT	A. MAXIMUM DAILY VALUE		B. MAXIMUM 30 DAY VALUE		C. LONG TERM AVERAGE VALUE		D. NO. OF ANALYSES	A. CONCENTRATION	B. MASS	
			CONCENTRATION	MASS	CONCENTRATION	MASS	CONCENTRATION	MASS				
Subpart 2 – Metals (Continued)												
11M. Copper, Total Recoverable (7440-50-8)	X		<8 ug/L				14 ug/L		8			
12M. Iron, Total Recoverable (7439-89-6)	X		284 ug/L				392 ug/L		8			
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		<8 ug/L				11.75 ug/L		8			
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		25 ug/L				32.75 ug/L		8			
Subpart 3 – Radioactivity												
1R. Alpha Total		X										
2R. Beta Total		X										
3R. Radium Total		X										
4R. Radium 226 plus 228 Total		X										



120 East Davis Street
P.O. Box 30
Fayette, MO 65248-0030

Phone: (660) 248-1911
Fax: (660) 248-1921
www.inovatia.com

ANALYSIS REPORT

Chain of Custody Number: 18-0139
Project Name / Number: 1st Qtr. 18 Test / N/A
Date Collected: 02/20/18
Time Collected: 08:45

Sample Number: 1
Lab Number: 180536
Sample Matrix: Water
Sample Type: Grab

Analysis	Result	Units	Reporting Limit	Analysis Method	Date - Analyst
Chemical Oxygen Demand (COD)	74	mg/L	25	SM 5220D	2/26/2018 - DS
Hexane Extractable Material (HEM)	< 5	mg/L	5	EPA 1664 B	2/23/2018 - BD
pH (Liquid)	7.77	SU	N/A	SM 4500-H+/B	2/20/2018 - BD
Settleable Matter	< 0.2	mL/L/hr	0.2	SM 2540 F	2/20/2018 - BD
Total Suspended Solids (TSS)	5	mg/L	5	SM 2540 D	2/21/2018 - CD
Aluminum, Total	0.697	mg/L	0.150	EPA 200.8	2/26/2018 - DS
Iron, Total	0.755	mg/L	0.250	EPA 200.8	2/21/2018 - DS
Nickel, Total	< 0.015	mg/L	0.015	EPA 200.8	2/26/2018 - DS
Copper, Total	0.032	mg/L	0.015	EPA 200.8	2/26/2018 - DS
Zinc, Total	0.058	mg/L	0.015	EPA 200.8	2/26/2018 - DS

Notes:

Report Date: 02/28/18
Page Number: 2 of 6



120 East Davis Street
P.O. Box 30
Fayette, MO 65248-0030

Phone: (660) 248-1911
Fax: (660) 248-1921
www.inovaitia.com

ANALYSIS REPORT

Chain of Custody Number: 18-05222

Project Name / Number: 2nd Qtr Storm Water / N/A

Date Collected: 05/21/18

Time Collected: 09:00

Sample Number: 1

Lab Number: 181905

Sample Matrix: Water

Sample Type: Grab

Analysis	Result	Units	Reporting Limit	Analysis Method	Date - Analyst
Chemical Oxygen Demand (COD)	< 25	mg/L	25	SM 5220D	5/24/2018 - DS
Hexane Extractable Material (HEM)	< 5	mg/L	5	EPA 1664 B	5/22/2018 - BD
pH (Liquid)	7.84	SU	N/A	SM 4500-H+/B	5/21/2018 - HM
Settleable Matter	< 0.2	mL/L/hr	0.2	EPA 160.5	5/21/2018 - HM/BD
Total Suspended Solids (TSS)	< 5	mg/L	5	SM 2540 D	5/24/2018 - HM/BD
Aluminum, Total	0.287	mg/L	0.015	EPA 200.8	5/23/2018 - DS
Iron, Total	0.263	mg/L	0.250	EPA 200.8	5/31/2018 - DS
Nickel, Total	< 0.015	mg/L	0.015	EPA 200.8	5/23/2018 - DS
Copper, Total	< 0.015	mg/L	0.015	EPA 200.8	5/23/2018 - DS
Zinc, Total	0.030	mg/L	0.015	EPA 200.8	5/23/2018 - DS

Notes:

Report Date: 06/01/18
Page Number: 2 of 6

This report has been produced for the exclusive and confidential use of our clients. Reference to the analyses, the results, or the company in any news releases, advertising, or other public announcement is prohibited without obtaining prior written consent.



120 East Davis Street
P.O. Box 30
Fayette, MO 65248-0030

Phone: (660) 248-1911
Fax: (660) 248-1921
www.inovattia.com

ANALYSIS REPORT

Chain of Custody Number: 18-0901
Project Name / Number: Qtrly Water Test / N/A
Date Collected: 08/29/18
Time Collected: 08:00

Sample Number: 1
Lab Number: 183461
Sample Matrix: Water
Sample Type: Grab

Analysis	Result	Units	Reporting Limit	Analysis Method	Date - Analyst
Chemical Oxygen Demand (COD)	< 25	mg/L	25	SM 5220D	9/5/2018 - DS
Hexane Extractable Material (HEM)	< 5	mg/L	5	EPA 1664 B	9/6/2018 - BD
pH (Liquid)	6.77	SU	N/A	SM 4500-H+/B	8/29/2018 - BD
Settleable Matter	0.29	mL/L/hr	0.2	EPA 160.5	8/29/2018 - HM
Total Suspended Solids (TSS)	32	mg/L	5	SM 2540 D	8/29/2018 - BD
Aluminum, Total	0.362	mg/L	0.015	EPA 200.8	9/10/2018 - DS
Iron, Total	0.364	mg/L	0.250	EPA 200.8	9/10/2018 - DS
Nickel, Total	< 0.015	mg/L	0.015	EPA 200.8	9/10/2018 - DS
Copper, Total	< 0.015	mg/L	0.015	EPA 200.8	9/10/2018 - DS
Zinc, Total	0.039	mg/L	0.015	EPA 200.8	9/10/2018 - DS

Notes:

Report Date: 09/17/18
Page Number: 2 of 6

This report has been produced for the exclusive and confidential use of our clients. Reference to the analyses, the results, or the company in any news releases, advertising, or other public announcement is prohibited without obtaining prior written consent.



120 East Davis Street
P.O. Box 30
Fayette, MO 65248-0030

Phone: (660) 248-1911
Fax: (660) 248-1921
www.inovatia.com

ANALYSIS REPORT

Chain of Custody Number: 18-1183
Project Name / Number: 4th Qtr / N/A
Date Collected: 10/08/18
Time Collected: 09:00

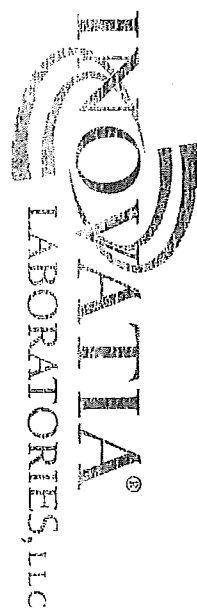
Sample Number: 1
Lab Number: 184246
Sample Matrix: Water
Sample Type: Grab

Analysis	Result	Units	Reporting Limit	Analysis Method	Date - Analyst
Chemical Oxygen Demand (COD)	< 25	mg/L	25	SM 5220D	10/12/2018 - DS
Hexane Extractable Material (HEM)	< 5	mg/L	5	EPA 1664 B	10/16/2018 - BD
pH (Liquid)	7.75	SU	N/A	SM 4500-H ⁺ /B	10/8/2018 - HM
Settleable Matter	< 0.2	mL/L/hr	0.2	SM 2540 F	10/8/2018 - HM
Total Suspended Solids (TSS)	8	mg/L	5	SM 2540 D	10/8/2018 - HM
Aluminum, Total	0.252	mg/L	0.015	EPA 200.8	10/12/2018 - DS
Iron, Total	0.339	mg/L	0.250	EPA 200.8	10/12/2018 - DS
Nickel, Total	< 0.015	mg/L	0.015	EPA 200.8	10/12/2018 - DS
Copper, Total	< 0.015	mg/L	0.015	EPA 200.8	10/12/2018 - DS
Zinc, Total	0.024	mg/L	0.015	EPA 200.8	10/12/2018 - DS

Notes:

Report Date: 10/18/18
Page Number: 2 of 6

This report has been produced for the exclusive and confidential use of our clients. Reference to the analyses, the results, or the company in any news releases, advertising, or other public announcement is prohibited without obtaining prior written consent.



120 East Davis Street
P.O. Box 30
Fayette, MO 65243-0030

Phone: (660) 248-1911
Fax: (660) 248-1921
www.inovatia.com

ANALYSIS REPORT

Chain of Custody Number: 19-0291
Project Name / Number: 1st Qtr Test / N/A
Date Collected: 03/14/19
Time Collected: 09:15

Sample Number: 1
Lab Number: 190908
Sample Matrix: Water
Sample Type: Grab

Parameter	Result	Reporting Unit	Analysis Method	Date - Analyst
Chemical Oxygen Demand (COD)	<25	mg/L	SM 5220D	3/22/2019 - HM
Hexane Extractable Material (HEM)	<6	mg/L	EPA 1664 B	3/19/2019 - HM
pH (Liquid)	7.51	SI	SM 4500-H+ B	3/14/2019 - HM
Settleable Matter	<0.2	mL/L/hr	EPA 160.5	3/14/2019 - HM
Total Suspended Solids (TSS)	29	mg/L	SM 2540 D	3/19/2019 - HM
Aluminum, Total	0.372	mg/L	EPA 200.8	3/27/2019 - BD
Iron, Total	0.291	mg/L	EPA 200.8	4/2/2019 - BD
Nickel, Total	<0.010	mg/L	EPA 200.8	3/27/2019 - BD
Copper, Total	<0.010	mg/L	EPA 200.8	3/27/2019 - BD
Zinc, Total	0.038	mg/L	EPA 200.8	3/27/2019 - BD

Notes:

Report Date: 04/03/19
Page Number: 2 of 6

This report has been produced for the exclusive and confidential use of our clients. Reference to the analyses, the results, or the company in any news releases, advertising, or other public announcement is prohibited without obtaining prior written consent.



120 East Davis Street
P.O. Box 39
Fayette, MO 65248-0030

Phone: (660) 248-1911
Fax: (660) 248-1921
www.novatia.com

ANALYSIS REPORT

Chain of Custody Number: 19-0578
Project Name / Number: 2nd QTR Samples 2019 / N/A
Date Collected: 05/22/19
Time Collected: 08:45
Sample Number: 1
Sample Matrix: Water
Sample Type: Grab

Analysis	Result	Unit	Reporting Limit	Agency Method	Date of Analysis
Chemical Oxygen Demand (COD)	32	mg/L	25	SM 5220D	5/4/2019 - HM
Hexane Extractable Solids (HES)	< 5	mg/L	N/A	EPA 1664 B	5/23/2019 - HM
pH (Liquid)	7.85	SU	N/A	SM 4500-H+ B	5/22/2019 - HM
Settleable Matter	< 0.2	mg/L/hr	0.2	EPA 160.5	5/22/2019 - HM
Total Suspended Solids (TSS)	< 5	mg/L	5	SM 2540 D	5/24/2019 - HM
Aluminum, Total	0.476	mg/L	0.008	EPA 200.8	5/31/2019 - BD
Iron, Total	0.499	mg/L	0.008	EPA 200.8	6/6/2019 - BD
Nickel, Total	< 0.008	mg/L	0.008	EPA 200.8	5/31/2019 - BD
Copper, Total	< 0.008	mg/L	0.008	EPA 200.8	5/31/2019 - BD
Zinc, Total	< 0.009	mg/L	0.009	EPA 200.3	5/31/2019 - BD

Notes:

Report Date: 06/06/19
Page Number: 2 of 6

This report has been reviewed for the exclusive use of our clients. Reference to the analyses, the results, or the company in any news releases, advertising, or other public communication is prohibited without obtaining prior written consent.



120 East Davis Street
P.O. Box 30
Fayette, MO 65248-0030

Phone: (660) 248-1911
Fax: (660) 248-1921
www.inovatia.com

ANALYSIS REPORT

Chain of Custody Number: 19-0923
Project Name / Number: 3rd Qtr Sample / N/A
Date Collected: 08/22/19
Time Collected: 09:00

Sample Number: 1
Lab Number: 193287
Sample Matrix: Water
Sample Type: Grab

Analysis	Result	Units	Reporting Limit	Analysis Method	Date - Analyst
Chemical Oxygen Demand (COD)	< 25	mg/L	25	SM 5220D	8/23/2019 - HM
Hexane Extractable Material (HEM)	< 5	mg/L	5	EPA 1664 B	8/28/2019 - HM
pH (Liquid)	7.83	SU	N/A	SM 4500-H+/B	8/22/2019 - HM
Settleable Matter	< 0.2	mL/L/hr	0.2	EPA 160.5	8/22/2019 - HM
Total Suspended Solids (TSS)	< 5	mg/L	5	SM 2540 D	8/23/2019 - HM
Aluminum, Total	0.187	mg/L	0.008	EPA 200.8	8/26/2019 - BD
Iron, Total	0.348	mg/L	0.050	EPA 200.8	8/26/2019 - BD
Nickel, Total	< 0.008	mg/L	0.008	EPA 200.8	8/26/2019 - BD
Copper, Total	< 0.008	mg/L	0.008	EPA 200.8	8/26/2019 - BD
Zinc, Total	0.038	mg/L	0.008	EPA 200.8	8/26/2019 - BD

Notes:

Report Date: 08/29/19
Page Number: 2 of 6

This report has been produced for the exclusive and confidential use of our clients. Reference to the analyses, the results, or the company in any news releases, advertising, or other public announcement is prohibited without obtaining prior written consent.



120 East Davis Street
P.O. Box 30
Fayette, MO 65248-0030

Phone: (660) 248-1911
Fax: (660) 248-1921
www.inovattia.com

ANALYSIS REPORT

Chain of Custody Number: 19-1130
Project Name / Number: 4th Qtr Sample / N/A
Date Collected: 10/11/19
Time Collected: 08:30

Sample Number: 1
Lab Number: 194008
Sample Matrix: Water
Sample Type: Grab

Analysis	Result	Units	Reporting Limit	Analysis Method	Date - Analyst
Chemical Oxygen Demand (COD)	45	mg/L	25	SM 5220D	10/16/2019 - HM
pH (Liquid)	7.80	SU	N/A	SM 4500-H+/B	10/11/2019 - HM
Settleable Matter	< 0.2	mL/L/hr	0.2	EPA 160.5	10/11/2019 - HM
Total Suspended Solids (TSS)	< 5	mg/L	5	SM 2540 D	10/15/2019 - HM
Aluminum, Total	0.109	mg/L	0.008	EPA 200.8	10/22/2019 - BD
Iron, Total	0.284	mg/L	0.008	EPA 200.8	10/22/2019 - BD
Nickel, Total	< 0.008	mg/L	0.008	EPA 200.8	10/22/2019 - BD
Copper, Total	< 0.008	mg/L	0.008	EPA 200.8	10/22/2019 - BD
Zinc, Total	0.025	mg/L	0.008	EPA 200.8	10/22/2019 - BD
Hexane Extractable Material (HEM)	< 5	mg/L	5	EPA 1664	10/14/2019 - HM

Notes:

Report Date: 10/29/19
Page Number: 2 of 6

This report has been produced for the exclusive and confidential use of our clients. Reference to the analyses, the results, or the company in any news releases, advertising, or other public announcement is prohibited without obtaining prior written consent.

8.49 pH at the collection on

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										OUTFALL NO. 2	
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)											
B. Chemical Oxygen Demand (COD)	32 mg/L				26.75 mg/L		8				
C. Total Organic Carbon (TOC)											
D. Total Suspended Solids (TSS)	<5 mg/L				15.25 mg/L		8				
E. Ammonia as N											
F. Flow	VALUE	.1888 MGD			VALUE	.188 MGD	8		MILLIONS OF GALLONS PER DAY (MGD)		
G. Temperature (winter)	VALUE				VALUE				°F		
H. Temperature (summer)	VALUE				VALUE				°F		
I. pH	MINIMUM	7.93			MAXIMUM		AVERAGE	7.64	8	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
Subpart 1 - Conventional and Non-Conventional Pollutants											
A. Alkalinity (CaCO ₃)	X		MINIMUM			MINIMUM					
B. Bromide (24959-67-9)		X									
C. Chloride (16887-00-6)		X									
D. Chlorine, Total Residual		X									
E. Color		X									
F. Conductivity		X									
F. Cyanide, Amenable to Chlorination		X									

1. POLLUTANT AND CAS NUMBER (if available)	2. MARK "X"		3. VALUES								4. UNITS	
	A. BELIEVED PRESENT	B. BELIEVED ABSENT	A. MAXIMUM DAILY VALUE		B. MAXIMUM 30 DAY VALUE		C. LONG TERM AVERAGE VALUE		D. NO. OF ANALYSES	A. CONCENTRATION	B. MASS	
			CONCENTRATION	MASS	CONCENTRATION	MASS	CONCENTRATION	MASS				
Subpart 1 – Conventional and Non-Conventional Pollutants (Continued)												
G. <i>E. coli</i>		X										
H. Fluoride (16984-48-8)		X										
I. Nitrate plus Nitrate (as N)		X										
J. Kjeldahl, Total (as N)		X										
K. Nitrogen, Total Organic (as N)		X										
L. Oil and Grease	X		<5 mg/L				<5 mg/L		8			
M. Phenols, Total		X										
N. Phosphorus (as P), Total (7723-14-0)		X										
O. Sulfate (as SO ⁴) (14808-79-8)		X										
P. Sulfide (as S)		X										
Q. Sulfite (as SO ³) (14265-45-3)		X										
R. Surfactants		X										
S. Trichloromethanes, Total		X										
Subpart 2 – Metals												
1M. Aluminum, Total Recoverable (7429-90-5)	X		242 ug/L				440 ug/L		8			
2M. Antimony, Total Recoverable (7440-36-9)		X										
3M. Arsenic, Total Recoverable (7440-38-2)		X										
4M. Barium, Total Recoverable (7440-39-3)		X										
5M. Beryllium, Total Recoverable (7440-41-7)		X										
6M. Boron, Total Recoverable (7440-42-8)		X										
7M. Cadmium, Total Recoverable (7440-43-9)		X										
8M. Chromium III Total Recoverable (16065-83-1)		X										
9M. Chromium VI, Dissolved (18540-29-9)		X										
10M. Cobalt, Total Recoverable (7440-48-4)		X										

1. POLLUTANT AND CAS NUMBER (if available)	2. MARK "X"		3. VALUES						4. UNITS			
	A. BELIEVED PRESENT	B. BELIEVED ABSENT	A. MAXIMUM DAILY VALUE		B. MAXIMUM 30 DAY VALUE		C. LONG TERM AVERAGE VALUE		D. NO. OF ANALYSES	A. CONCEN- TRATION	B. MASS	
			CONCENTRATION	MASS	CONCENTRATION	MASS	CONCENTRATION	MASS				
Subpart 2 – Metals (Continued)												
11M. Copper, Total Recoverable (7440-50-8)	X		<8 ug/L				25 ug/L		8			
12M. Iron, Total Recoverable (7439-89-6)	X		535 ug/L				441.5 ug/L		8			
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		<8 ug/L				11.75 ug/L		8			
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		<8 ug/L				17.87 ug/L		8			
Subpart 3 – Radioactivity												
1R. Alpha Total		X										
2R. Beta Total		X										
3R. Radium Total		X										
4R. Radium 226 plus 228 Total		X										



120 East Davis Street
P.O. Box 30
Fayette, MO 65248-0030

Phone: (660) 248-1911
Fax: (660) 248-1921
www.inovatia.com

ANALYSIS REPORT

Chain of Custody Number: 18-0139
Project Name / Number: 1st Qtr. 18 Test / N/A
Date Collected: 02/20/18
Time Collected: 08:17

Sample Number: 2
Lab Number: 180537
Sample Matrix: Water
Sample Type: Grab

Analysis	Result	Units	Reporting Limit	Analysis Method	Date - Analyst
Chemical Oxygen Demand (COD)	26	mg/L	25	SM 5220D	2/26/2018 - DS
Hexane Extractable Material (HEM)	< 5	mg/L	5	EPA 1664 B	2/23/2018 - BD
pH (Liquid)	7.68	SU	N/A	SM 4500-H ⁺ /B	2/20/2018 - BD
Settleable Matter	< 0.2	mL/L/hr	0.2	SM 2540 F	2/20/2018 - BD
Total Suspended Solids (TSS)	< 5	mg/L	5	SM 2540 D	2/21/2018 - CD
Aluminum, Total	1.15	mg/L	0.150	EPA 200.8	2/26/2018 - DS
Iron, Total	0.847	mg/L	0.250	EPA 200.8	2/21/2018 - DS
Nickel, Total	< 0.015	mg/L	0.015	EPA 200.8	2/26/2018 - DS
Copper, Total	0.095	mg/L	0.015	EPA 200.8	2/26/2018 - DS
Zinc, Total	0.053	mg/L	0.015	EPA 200.8	2/26/2018 - DS

Notes:

Report Date: 02/28/18
Page Number: 3 of 6

This report has been produced for the exclusive and confidential use of our clients. Reference to the analyses, the results, or the company in any news releases, advertising, or other public announcement is prohibited without obtaining prior written consent.



120 East Davis Street
P.O. Box 30
Fayette, MO 65248-0030

Phone: (660) 248-1911
Fax: (660) 248-1921
www.inovaitia.com

ANALYSIS REPORT

Chain of Custody Number: 18-0522

Project Name / Number: 2nd Qtr Storm Water / N/A

Date Collected: 05/21/18

Time Collected: 09:10

Sample Number: 2

Lab Number: 181906

Sample Matrix: Water

Sample Type: Grab

Analysis	Result	Units	Reporting Limit	Analysis Method	Date - Analyst
Chemical Oxygen Demand (COD)	< 25	mg/L	25	SM 5220D	5/24/2018 - DS
Hexane Extractable Material (HEM)	< 5	mg/L	5	EPA 1664 B	5/22/2018 - BD
pH (Liquid)	7.66	SU	N/A	SM 4500-H ⁺ /B	5/21/2018 - HM
Settleable Matter	< 0.2	mL/L/hr	0.2	EPA 160.5	5/21/2018 - HM/BD
Total Suspended Solids (TSS)	< 5	mg/L	5	SM 2540 D	5/24/2018 - HM/BD
Aluminum, Total	0.248	mg/L	0.015	EPA 200.8	5/23/2018 - DS
Iron, Total	0.323	mg/L	0.250	EPA 200.8	5/31/2018 - DS
Nickel, Total	< 0.015	mg/L	0.015	EPA 200.8	5/23/2018 - DS
Copper, Total	< 0.015	mg/L	0.015	EPA 200.8	5/23/2018 - DS
Zinc, Total	< 0.015	mg/L	0.015	EPA 200.8	5/23/2018 - DS

Notes:

Report Date: 06/01/18
Page Number: 3 of 6

This report has been produced for the exclusive and confidential use of our clients. Reference to the analyses, the results, or the company in any news releases, advertising, or other public announcement is prohibited without obtaining prior written consent.



120 East Davis Street
P.O. Box 30
Fayette, MO 65248-0030

Phone: (660) 248-1911
Fax: (660) 248-1921
www.inovatia.com

ANALYSIS REPORT

Chain of Custody Number: 18-0901
Project Name / Number: Qrty Water Test / N/A
Date Collected: 08/29/18
Time Collected: 08:10

Sample Number: 2
Lab Number: 183462
Sample Matrix: Water
Sample Type: Grab

Analysis	Result	Units	Reporting Limit	Analysis Method	Date - Analyst
Chemical Oxygen Demand (COD)	27	mg/L	25	SM 5220D	9/5/2018 - DS
Hexane Extractable Material (HEM)	< 5	mg/L	5	EPA 1664 B	9/6/2018 - BD
pH (Liquid)	6.80	SU	N/A	SM 4500-H+/B	8/29/2018 - BD
Settleable Matter	< 0.2	mL/L/hr	0.2	EPA 160.5	8/29/2018 - HM
Total Suspended Solids (TSS)	14	mg/L	5	SM 2540 D	8/29/2018 - BD
Aluminum, Total	0.462	mg/L	0.015	EPA 200.8	9/10/2018 - DS
Iron, Total	0.302	mg/L	0.250	EPA 200.8	9/10/2018 - DS
Nickel, Total	< 0.015	mg/L	0.015	EPA 200.8	9/10/2018 - DS
Copper, Total	< 0.015	mg/L	0.015	EPA 200.8	9/10/2018 - DS
Zinc, Total	0.026	mg/L	0.015	EPA 200.8	9/10/2018 - DS

Notes:

Report Date: 09/17/18
Page Number: 3 of 6

This report has been produced for the exclusive and confidential use of our clients. Reference to the analyses, the results, or the company in any news releases, advertising, or other public announcement is prohibited without obtaining prior written consent.



120 East Davis Street
P.O. Box 30
Fayette, MO 65248-0030

Phone: (660) 248-1911
Fax: (660) 248-1921
www.inovatia.com

ANALYSIS REPORT

Chain of Custody Number: 18-1183
Project Name / Number: 4th Qtr / N/A
Date Collected: 10/08/18
Time Collected: 09:15

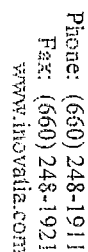
Sample Number: 2
Lab Number: 184247
Sample Matrix: Water
Sample Type: Grab

Analysis	Result	Units	Reporting Limit	Analysis Method	Date - Analyst
Chemical Oxygen Demand (COD)	29	mg/L	25	SM 5220D	10/12/2018 - DS
Hexane Extractable Material (HEM)	< 5	mg/L	5	EPA 1664 B	10/16/2018 - BD
pH (Liquid)	7.78	SU	N/A	SM 4500-H+/B	10/8/2018 - HM
Settleable Matter	< 0.2	mL/L/hr	0.2	SM 2540 F	10/8/2018 - HM
Total Suspended Solids (TSS)	< 5	mg/L	5	SM 2540 D	10/8/2018 - HM
Aluminum, Total	0.159	mg/L	0.015	EPA 200.8	10/12/2018 - DS
Iron, Total	0.362	mg/L	0.250	EPA 200.8	10/12/2018 - DS
Nickel, Total	< 0.015	mg/L	0.015	EPA 200.8	10/12/2018 - DS
Copper, Total	< 0.015	mg/L	0.015	EPA 200.8	10/12/2018 - DS
Zinc, Total	< 0.015	mg/L	0.015	EPA 200.8	10/12/2018 - DS

Notes:

Report Date: 10/18/18
Page Number: 3 of 6

This report has been produced for the exclusive and confidential use of our clients. Reference to the analyses, the results, or the company in any news releases, advertising, or other public announcement is prohibited without obtaining prior written consent.



Order of Custody: Member 19-0261

Project Name / Number: 18 QUT 151 / N/A

Date Collected: 03/14/19

Time Collected: 09:20

Seaside Number: 2

190903
FEBRUARY
190903

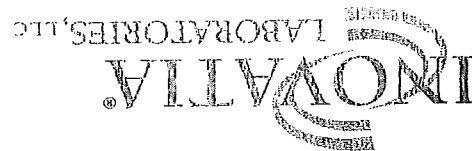
Sampling Water

Sample Type: Grab

Parameter	Value	Unit	Standard	Method
Chemical Oxygen Demand (COD)	< 25	mg/L	25	SM 5220D
Hexane Extractable Material (HEM)	< 5	mg/L	5	EPA 1664B
Oil (Liquid)	7.47	SD	N/A	SM 4500-H14E
Settleable Matter	< 0.2	mL/L/hr	0.2	EPA 160.5
Total Suspended Solids (TSS)	73	mg/L	5	SM 2540D
Aluminum, Total	0.267	mg/L	0.010	EPA 200.8
Iron, Total	0.299	mg/L	0.050	EPA 200.8
Nickel, Total	< 0.010	mg/L	0.010	EPA 200.8
Copper, Total	< 0.010	mg/L	0.010	EPA 200.8
Zinc, Total	< 0.010	mg/L	0.010	EPA 200.8

Report Date: 04/03/19
Page Number: 3 of 6

This report has been produced for the exclusive and confidential use of our clients. Reference to the analyses, the results, or the company in any news releases, advertising, or other public announcement is prohibited without obtaining prior written consent.



120 East Davis Street
P.O. Box 30
Fayette, MO 65248-0030

Phone: (660) 248-1911
Fax: (660) 248-1921
www.inovalta.com

ANALYSIS REPORT

Chain of Custody Number: 19-0378
Project Name / Number: 2nd QTR Samples 2019 / N/A
Date Collected: 05/22/19
Time Collected: 08:50
Sample Number: 2
Lab Number: 191993
Sample Matrix: Water
Sample Type: Grab

Analysis	Result	Units	Reporting Lab	Analysis Method	Date Analyzed
Chemical Oxygen Demand (COD)	< 25	mg/L	25	SM 5220D	6/4/2019 - HM
Hexane Extractable Material (HEM)	< 5	mg/L	5	EPA 1604 B	5/23/2019 - HM
pH (Liquid)	7.91	SI	N/A	SM 4500-H+/B	5/22/2019 - HM
Settleable Matter	< 0.2	mL/Ltr	0.2	EPA 160.5	5/22/2019 - HM
Total Suspended Solids (TSS)	< 2	mg/L	5	SM 2540 D	5/24/2019 - HM
Aluminum, Total	0.323	mg/L	0.008	EPA 200.8	5/31/2019 - BD
Iron, Total	0.515	mg/L	0.008	EPA 200.8	6/6/2019 - BD
Nickel, Total	< 0.008	mg/L	0.008	EPA 200.8	5/31/2019 - BD
Copper, Total	< 0.008	mg/L	0.008	EPA 200.8	5/31/2019 - BD
Zinc, Total	< 0.008	mg/L	0.008	EPA 200.8	5/31/2019 - BD

Notes:

Report Date: 06/06/19
Page Number: 3 of 6

This report has been provided for the exclusive and confidential use of our clients. Reference to the analyses, the results, or the company in any news releases, advertising, or other public announcement is prohibited without obtaining prior written consent.



120 East Davis Street
P.O. Box 30
Fayette, MO 65248-0030

Phone: (660) 248-1911
Fax: (660) 248-1921
www.inovattia.com

ANALYSIS REPORT

Chain of Custody Number: 19-0923
Project Name / Number: 3rd Qtr Sample / N/A
Date Collected: 08/22/19
Time Collected: 09:10

Sample Number: 2
Lab Number: 193288
Sample Matrix: Water
Sample Type: Grab

Analysis	Result	Units	Reporting Limit	Analysis Method	Date - Analyst
Chemical Oxygen Demand (COD)	< 25	mg/L	25	SM 5220D	8/23/2019 - HM
Hexane Extractable Material (HEM)	< 5	mg/L	5	EPA 1664 B	8/28/2019 - HM
pH (Liquid)	7.96	SU	N/A	SM 4500-H+/B	8/22/2019 - HM
Settleable Matter	< 0.2	mL/L/hr	0.2	EPA 160.5	8/22/2019 - HM
Total Suspended Solids (TSS)	< 5	mg/L	5	SM 2540 D	8/23/2019 - HM
Aluminum, Total	0.736	mg/L	0.008	EPA 200.8	8/26/2019 - BD
Iron, Total	0.349	mg/L	0.050	EPA 200.8	8/26/2019 - BD
Nickel, Total	< 0.008	mg/L	0.008	EPA 200.8	8/26/2019 - BD
Copper, Total	0.034	mg/L	0.008	EPA 200.8	8/26/2019 - BD
Zinc, Total	< 0.008	mg/L	0.008	EPA 200.8	8/26/2019 - BD

Notes:

Report Date: 08/29/19
Page Number: 3 of 6

This report has been produced for the exclusive and confidential use of our clients. Reference to the analyses, the results, or the company in any news releases, advertising, or other public announcement is prohibited without obtaining prior written consent.



ANALYSIS REPORT

120 East Davis Street
P.O. Box 30
Fayette, MO 65248-0030

Phone: (660) 248-1911
Fax: (660) 248-1921
www.inovatia.com

Chain of Custody Number: 19-1130
Project Name / Number: 4th Qtr Sample / N/A
Date Collected: 10/11/19
Time Collected: 08:35

Sample Number: 2
Lab Number: 194009
Sample Matrix: Water
Sample Type: Grab

Analysis	Result	Units	Reporting Limit	Analysis Method	Date - Analyst
Chemical Oxygen Demand (COD)	32	mg/L	25	SM 5220D	10/16/2019 - HM
pH (Liquid)	7.71	SU	N/A	SM 4500-H+B	10/11/2019 - HM
Settleable Matter	< 0.2	mg/L/hr	0.2	EPA 160.5	10/11/2019 - HM
Total Suspended Solids (TSS)	10	mg/L	5	SM 2540 D	10/15/2019 - HM
Aluminum, Total	0.242	mg/L	0.008	EPA 200.8	10/22/2019 - BD
Iron, Total	0.535	mg/L	0.050	EPA 200.8	10/22/2019 - BD
Nickel, Total	< 0.008	mg/L	0.008	EPA 200.8	10/22/2019 - BD
Copper, Total	< 0.008	mg/L	0.008	EPA 200.8	10/22/2019 - BD
Zinc, Total	< 0.008	mg/L	0.008	EPA 200.8	10/22/2019 - BD
Hexane Extractable Material (HEM)	< 5	mg/L	5	EPA 1664	10/14/2019 - HM

7.93 pH at collection time

Notes:

Report Date: 10/29/19
Page Number: 3 of 6

This report has been produced for the exclusive and confidential use of our clients. Reference to the analyses, the results, or the company in any news releases, advertising, or other public announcement is prohibited without obtaining prior written consent.

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: Southwest Portion of Facility

OUTFALL NO. 3

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)									
B. Chemical Oxygen Demand (COD)	27 mg/L				32.75 mg/L		8		
C. Total Organic Carbon (TOC)									
D. Total Suspended Solids (TSS)	46 mg/L				17.87 mg/L		8		
E. Ammonia as N									
F. Flow	VALUE	.124 MGD	VALUE		VALUE	.124 MGD	8	MILLIONS OF GALLONS PER DAY (MGD)	
G. Temperature (winter)	VALUE		VALUE		VALUE			°F	
H. Temperature (summer)	VALUE		VALUE		VALUE			°F	
I. pH	MINIMUM	8.53	MAXIMUM		AVERAGE	7.95	8	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				
B. Bromide (24959-67-9)	X										
C. Chloride (16887-00-6)	X										
D. Chlorine, Total Residual	X										
E. Color	X										
F. Conductivity	X										
F. Cyanide, Amenable to Chlorination	X										

1. POLLUTANT AND CAS NUMBER (if available)	2. MARK "X"		3. VALUES								4. UNITS	
	A. BELIEVED PRESENT	B. BELIEVED ABSENT	A. MAXIMUM DAILY VALUE		B. MAXIMUM 30 DAY VALUE		C. LONG TERM AVERAGE VALUE		D. NO. OF ANALYSES	A. CONCENTRATION	B. MASS	
			CONCENTRATION	MASS	CONCENTRATION	MASS	CONCENTRATION	MASS				
Subpart 1 – Conventional and Non-Conventional Pollutants (Continued)												
G. <i>E. coli</i>		X										
H. Fluoride (16984-48-8)		X										
I. Nitrate plus Nitrate (as N)		X										
J. Kjeldahl, Total (as N)		X										
K. Nitrogen, Total Organic (as N)		X										
L. Oil and Grease	X		<5 mg/L				5.12 mg/L		8			
M. Phenols, Total		X										
N. Phosphorus (as P), Total (7723-14-0)		X										
O. Sulfate (as SO ₄) (14808-79-8)		X										
P. Sulfide (as S)		X										
Q. Sulfite (as SO ₃) (14265-45-3)		X										
R. Surfactants		X										
S. Trichloroethanes, Total		X										
Subpart 2 – Metals												
1M. Aluminum, Total Recoverable (7429-90-5)	X		553 ug/L				644 ug/L		8			
2M. Antimony, Total Recoverable (7440-36-9)		X										
3M. Arsenic, Total Recoverable (7440-38-2)		X										
4M. Barium, Total Recoverable (7440-39-3)		X										
5M. Beryllium, Total Recoverable (7440-41-7)		X										
6M. Boron, Total Recoverable (7440-42-8)		X										
7M. Cadmium, Total Recoverable (7440-43-9)		X										
8M. Chromium III Total Recoverable (16065-83-1)		X										
9M. Chromium VI, Dissolved (18540-29-9)		X										
10M. Cobalt, Total Recoverable (7440-48-4)		X										

1. POLLUTANT AND CAS NUMBER (if available)	2. MARK "X"	3. VALUES								4. UNITS			
		A. BELIEVED PRESENT	B. BELIEVED ABSENT	A. MAXIMUM DAILY VALUE		B. MAXIMUM 30 DAY VALUE		C. LONG TERM AVERAGE VALUE		D. NO. OF ANALYSES	A. CONCENTRATION	B. MASS	
				CONCENTRATION	MASS	CONCENTRATION	MASS	CONCENTRATION	MASS				
Subpart 2 – Metals (Continued)													
11M. Copper, Total Recoverable (7440-50-8)	X			14 ug/L				12.87 ug/L		8			
12M. Iron, Total Recoverable (7439-89-6)	X			1270 ug/L				653 ug/L		8			
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			<8 ug/L				11.75 ug/L		8			
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			9 ug/L				33.3 ug/L		8			
Subpart 3 – Radioactivity													
1R. Alpha Total			X										
2R. Beta Total			X										
3R. Radium Total			X										
4R. Radium 226 plus 228 Total			X										



120 East Davis Street
P.O. Box 30
Fayette, MO 65248-0030

Phone: (660) 248-1911
Fax: (660) 248-1921
www.inovatia.com

ANALYSIS REPORT

Chain of Custody Number: 19-1130
Project Name / Number: 4th Qtr Sample / N/A
Date Collected: 10/11
Time Collected: 08:40

Sample Number: 3
Lab Number: 194010
Sample Matrix: Water
Sample Type: Grab

Analysis	Result	Units	Reporting Limit	Analysis Method	Date - Analyst
Chemical Oxygen Demand (COD)	27	mg/L	25	SM 5220D	10/16/2019 - HM
pH (Liquid)	8.03	SU	N/A	SM 4500-H+/B	10/11/2019 - HM
Settleable Matter	< 0.2	mL/L/hr	0.2	EPA 160.5	10/11/2019 - HM
Total Suspended Solids (TSS)	46	mg/L	5	SM 2540 D	10/15/2019 - HM
Aluminum, Total	0.553	mg/L	0.038	EPA 200.8	10/22/2019 - BD
Iron, Total	1.27	mg/L	0.050	EPA 200.8	10/22/2019 - BD
Nickel, Total	< 0.008	mg/L	0.008	EPA 200.8	10/22/2019 - BD
Copper, Total	0.014	mg/L	0.008	EPA 200.8	10/22/2019 - BD
Zinc, Total	0.009	mg/L	0.008	EPA 200.8	10/22/2019 - BD
Hexane Extractable Material (HEM)	< 6	mg/L	6	EPA 1664	10/14/2019 - HM

8.53 pH
J
collected line

Notes:

Report Date: 10/29/19
Page Number: 4 of 6

This report has been produced for the exclusive and confidential use of our clients. Reference to the analyses, the results, or the company in any news releases, advertising, or other public announcement is prohibited without obtaining prior written consent.



120 East Davis Street
P.O. Box 30
Fayette, MO 65248-0030

Phone: (660) 248-1911
Fax: (660) 248-1921
www.inovattia.com

ANALYSIS REPORT

Chain of Custody Number: 18-0139
Project Name / Number: 1st Qtr. 18 Test / N/A
Date Collected: 02/20/18
Time Collected: 08:55

Sample Number: 3
Lab Number: 180538
Sample Matrix: Water
Sample Type: Grab

Analysis	Result	Units	Reporting Limit	Analysis Method	Date - Analyst
Chemical Oxygen Demand (COD)	40	mg/L	25	SM 5220D	2/26/2018 - DS
Hexane Extractable Material (HEM)	< 5	mg/L	5	EPA 1664 B	2/23/2018 - BD
pH (Liquid)	7.67	SU	N/A	SM 4500-H ⁺ /B	2/20/2018 - BD
Settleable Matter	< 0.2	mL/L/hr	0.2	SM 2540 F	2/20/2018 - BD
Total Suspended Solids (TSS)	< 5	mg/L	5	SM 2540 D	2/21/2018 - CD
Aluminum, Total	0.028	mg/L	0.015	EPA 200.8	2/26/2018 - DS
Iron, Total	0.428	mg/L	0.250	EPA 200.8	2/21/2018 - DS
Nickel, Total	< 0.015	mg/L	0.015	EPA 200.8	2/26/2018 - DS
Copper, Total	< 0.015	mg/L	0.015	EPA 200.8	2/26/2018 - DS
Zinc, Total	0.075	mg/L	0.015	EPA 200.8	2/26/2018 - DS

Notes:

Report Date: 02/28/18
Page Number: 4 of 6

This report has been produced for the exclusive and confidential use of our clients. Reference to the analyses, the results, or the company in any news releases, advertising, or other public announcement is prohibited without obtaining prior written consent.



120 East Davis Street
P.O. Box 30
Fayette, MO 65248-0030

Phone: (660) 248-1911
Fax: (660) 248-1921
www.inovatia.com

ANALYSIS REPORT

Chain of Custody Number: 18-0522

Project Name / Number: 2nd Qtr Storm Water / N/A

Date Collected: 5/21

Time Collected: 09:15

Sample Number: 3

Lab Number: 181907

Sample Matrix: Water

Sample Type: Grab

Analysis	Result	Units	Reporting Limit	Analysis Method	Date - Analyst
Chemical Oxygen Demand (COD)	< 25	mg/L	25	SM 5220D	5/24/2018 - DS
Hexane Extractable Material (HEM)	< 5	mg/L	5	EPA 1664 B	5/22/2018 - BD
pH (Liquid)	7.81	SU	N/A	SM 4500-H+/B	5/21/2018 - HM
Settleable Matter	< 0.2	mL/L/hr	0.2	EPA 160.5	5/21/2018 - HM/BD
Total Suspended Solids (TSS)	6	mg/L	5	SM 2540 D	5/24/2018 - HM/BD
Aluminum, Total	0.868	mg/L	0.015	EPA 200.8	5/23/2018 - DS
Iron, Total	0.273	mg/L	0.250	EPA 200.8	5/31/2018 - DS
Nickel, Total	< 0.015	mg/L	0.015	EPA 200.8	5/23/2018 - DS
Copper, Total	< 0.015	mg/L	0.015	EPA 200.8	5/23/2018 - DS
Zinc, Total	< 0.015	mg/L	0.015	EPA 200.8	5/23/2018 - DS

Notes:

Report Date: 06/01/18

Page Number: 4 of 6

This report has been produced for the exclusive and confidential use of our clients. Reference to the analyses, the results, or the company in any news releases, advertising, or other public announcement is prohibited without obtaining prior written consent.



120 East Davis Street
P.O. Box 30
Fayette, MO 65248-0030

Phone: (660) 248-1911
Fax: (660) 248-1921
www.inovaitia.com

ANALYSIS REPORT

Chain of Custody Number: 18-0901
Project Name / Number: Qtrly Water Test / N/A
Date Collected: 08/29/18
Time Collected: 08:15

Sample Number: 3
Lab Number: 183463
Sample Matrix: Water
Sample Type: Grab

Analysis	Result	Units	Reporting Limit	Analysis Method	Date - Analyst
Chemical Oxygen Demand (COD)	36	mg/L	25	SM 5220D	9/5/2018 - DS
Hexane Extractable Material (HEM)	< 5	mg/L	5	EPA 1664 B	9/6/2018 - BD
pH (Liquid)	7.09	SU	N/A	SM 4500-H+/B	8/29/2018 - BD
Settleable Matter	< 0.2	mL/L/hr	0.2	EPA 160.5	8/29/2018 - HM
Total Suspended Solids (TSS)	16	mg/L	5	SM 2540 D	8/29/2018 - BD
Aluminum, Total	1.27	mg/L	0.015	EPA 200.8	9/10/2018 - DS
Iron, Total	0.579	mg/L	0.250	EPA 200.8	9/10/2018 - DS
Nickel, Total	< 0.015	mg/L	0.015	EPA 200.8	9/10/2018 - DS
Copper, Total	< 0.015	mg/L	0.015	EPA 200.8	9/10/2018 - DS
Zinc, Total	< 0.015	mg/L	0.015	EPA 200.8	9/10/2018 - DS

Notes:

Report Date: 09/17/18
Page Number: 4 of 6

This report has been produced for the exclusive and confidential use of our clients. Reference to the analyses, the results, or the company in any news releases, advertising, or other public announcement is prohibited without obtaining prior written consent.



120 East Davis Street
P.O. Box 30
Fayette, MO 65248-0030

Phone: (660) 248-1911
Fax: (660) 248-1921
www.inovaitia.com

ANALYSIS REPORT

Chain of Custody Number: 18-1183
Project Name / Number: 4th Qtr / N/A
Date Collected: 10/08/18
Time Collected: 09:20

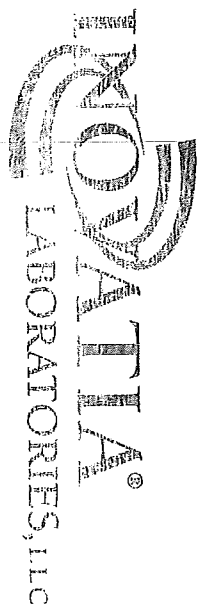
Sample Number: 3
Lab Number: 184248
Sample Matrix: Water
Sample Type: Grab

Analysis	Result	Units	Reporting Limit	Analysis Method	Date - Analyst
Chemical Oxygen Demand (COD)	29	mg/L	25	SM 5220D	10/12/2018 - DS
Hexane Extractable Material (HEM)	< 5	mg/L	5	EPA 1664 B	10/16/2018 - BD
pH (Liquid)	8.65	SU	N/A	SM 4500-H+/B	10/8/2018 - HM
Settleable Matter	< 0.2	mL/L/hr	0.2	SM 2540 F	10/8/2018 - HM
Total Suspended Solids (TSS)	< 5	mg/L	5	SM 2540 D	10/8/2018 - HM
Aluminum, Total	0.291	mg/L	0.015	EPA 200.8	10/12/2018 - DS
Iron, Total	0.446	mg/L	0.250	EPA 200.8	10/12/2018 - DS
Nickel, Total	< 0.015	mg/L	0.015	EPA 200.8	10/12/2018 - DS
Copper, Total	< 0.015	mg/L	0.015	EPA 200.8	10/12/2018 - DS
Zinc, Total	0.035	mg/L	0.015	EPA 200.8	10/12/2018 - DS

Notes:

Report Date: 10/18/18
Page Number: 4 of 6

This report has been produced for the exclusive and confidential use of our clients. Reference to the analyses, the results, or the company in any news releases, advertising, or other public announcement is prohibited without obtaining prior written consent.



120 East Davis Street
P.O. Box 30
Fayette, MO 65248-0030

Phone: (660) 248-1911
Fax: (660) 248-1921
www.novatia.com

ANALYSIS REPORT

Chain of Custody Number: 19-0291
Project Name / Number: 1st Qtr Test / N/A
Date Collected: 03/14/19
Time Collected: 09:25

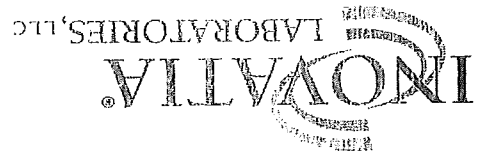
Sample Number: 3
Lab Number: 190910
Sample Matrix: Water
Sample Type: Grab

Chemical Oxygen Demand (COD)	38	mg/L	25	SM 5220D	3/22/2019 - HM
Hexane Extractable Material (HEM)	< 5	mg/L	5	EPA 1664 B	3/19/2019 - HM
pH (Liquid)	7.57	SCU	N/A	SM 4500-H ₂ O	3/14/2019 - HM
Settleable Matter	< 0.2	mL/L/hr	0.2	EPA 160.5	3/14/2019 - HM
Total Suspended Solids (TSS)	22	mg/L	5	SM 2540 D	3/19/2019 - HM
Aluminum, Total	0.032	mg/L	0.010	EPA 200.8	3/27/2019 - BD
Iron, Total	0.533	mg/L	0.050	EPA 200.8	4/2/2019 - BD
Nickel, Total	< 0.010	mg/L	0.010	EPA 200.8	3/27/2019 - BD
Copper, Total	< 0.010	mg/L	0.010	EPA 200.8	3/27/2019 - BD
Zinc, Total	0.087	mg/L	0.010	EPA 200.8	3/27/2019 - BD

Notes:

Report Date: 04/03/19
Page Number: 4 of 6

This report has been produced for the exclusive and confidential use of our clients. Reference to the analyses, the results, or the company in any news releases, advertising, or other public announcement is prohibited without obtaining prior written consent.



120 East Davis Street
P.O. Box 30
Fayette, MO 65248-0030

Phone: (660) 248-1911
Fax: (660) 248-1921
www.innovatia.com

ANALYSIS REPORT

Chain of Custody Number: 19-0578
Project Name / Location: 2nd QTR Service 2019 / N/A
Date Collected: 05/22/19
Time Collected: 08:55

Sample Number: 3
Lib Number: 191994
Sample Matrix: Water
Sample Type: Grab

Analysis	Result	Unit	Reporting Limit	Analysis Method	Date - Analysis
Chemical Oxygen Demand (COD)	38	mg/L	25	SM 5220D	6/4/2019 - HM
Hexane Extractable Material (HEM)	< 5	mg/L	5	EPA 1634 B	5/23/2019 - HM
pH (Liquid)	8.22	SI	N/A	SM 4500 H+ B	5/22/2019 - HM
Settleable Matter	< 0.2	mg/L	0.2	EPA 160.5	5/22/2019 - HM
Total Suspended Solids (TSS)	12	mg/L	5	SM 2540 D	5/24/2019 - HM
Aluminum, Total	0.667	mg/L	0.008	EPA 200.8	5/31/2019 - BD
Iron, Total	1.36	mg/L	0.008	EPA 200.8	6/6/2019 - BD
Nickel, Total	0.008	mg/L	0.008	EPA 200.8	5/31/2019 - BD
Copper, Total	0.008	mg/L	0.008	EPA 200.8	5/31/2019 - BD
Zinc, Total	< 0.003	mg/L	0.008	EPA 200.8	5/31/2019 - BD

Notes:

Report Date: 06/06/19
Page Number: 4 of 6

This report has been produced for the exclusive and confidential use of our clients. Reference to the analyses, the results, or the company in any news releases, advertising, or other public announcement is prohibited without obtaining prior written consent.



ANALYSIS REPORT

120 East Davis Street
P.O. Box 30
Fayette, MO 65248-0030

Phone: (660) 248-1911
Fax: (660) 248-1921
www.inovatia.com

Chain of Custody Number: 19-0923
Project Name / Number: 3rd Qtr Sample / N/A
Date Collected: 08/22/19
Time Collected: 09:15

Sample Number: 3
Lab Number: 193289
Sample Matrix: Water
Sample Type: Grab

Analysis	Result	Units	Reporting Limit	Analysis Method	Date - Analysis
Chemical Oxygen Demand (COD)	< 25	mg/L	25	SM 5220D	8/23/2019 - HM
Hexane Extractable Material (HEM)	< 5	mg/L	5	EPA 1664 B	8/28/2019 - HM
pH (Liquid)	8.06	SU	N/A	SM 4500-H+B	8/22/2019 - HM
Settleable Matter	< 0.2	mL/L/hr	0.2	EPA 160.5	8/22/2019 - HM
Total Suspended Solids (TSS)	31	mg/L	5	SM 2540 D	8/23/2019 - HM
Aluminum, Total	1.45	mg/L	0.008	EPA 200.8	8/26/2019 - BD
Iron, Total	0.337	mg/L	0.050	EPA 200.8	8/26/2019 - BD
Nickel, Total	< 0.008	mg/L	0.008	EPA 200.8	8/26/2019 - BD
Copper, Total	0.010	mg/L	0.008	EPA 200.8	8/26/2019 - BD
Zinc, Total	0.023	mg/L	0.008	EPA 200.8	8/26/2019 - BD

Notes:

Report Date: 08/29/19
Page Number: 4 of 6

This report has been produced for the exclusive and confidential use of our clients. Reference to the analyses, the results, or the company in any news releases, advertising, or other public announcement is prohibited without obtaining prior written consent.

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											OUTFALL NO. 4		
THIS OUTFALL IS: Southwest Portion of Facility													
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)	4. UNITS	A. CONCENTRATION	B. MASS			
	A. MAXIMUM DAILY VALUE		B. MAXIMUM 30 DAY VALUES		C. LONG TERM AVERAGE VALUES						D. NO. OF ANALYSES		
	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS							
A. Biochemical Oxygen Demand, 5-day (BOD ₅)													
B. Chemical Oxygen Demand (COD)	<25 mg/L					26.87 mg/L		8					
C. Total Organic Carbon (TOC)													
D. Total Suspended Solids (TSS)	5 mg/L					17.5 mg/L		8					
E. Ammonia as N													
F. Flow	VALUE .095 MGD		VALUE		VALUE .095 MGD		8		MILLIONS OF GALLONS PER DAY (MGD)				
G. Temperature (winter)	VALUE		VALUE		VALUE				° F				
H. Temperature (summer)	VALUE		VALUE		VALUE				° F				
I. pH	MINIMUM 8.13		MAXIMUM		AVERAGE 7.59		8		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	MASS	B. MAXIMUM 30 DAY VALUES	CONCENTRATION	MASS	C. LONG TERM AVERAGE VALUES	CONCENTRATION	MASS	D. NO. OF ANALYSES	A. CONCENTRATION	B. MASS
Subpart 1 - Conventional and Non-Conventional Pollutants													
A. Alkalinity (CaCO ₃)	X		MINIMUM					MINIMUM					
B. Bromide (24959-67-9)	X												
C. Chloride (16887-00-6)	X												
D. Chlorine, Total Residual	X												
E. Color	X												
F. Conductivity	X												
F. Cyanide, Amenable to Chlorination	X												

1. POLLUTANT AND CAS NUMBER (if available)	2. MARK "X"		3. VALUES						4. UNITS			
	A. BELIEVED PRESENT	B. BELIEVED ABSENT	A. MAXIMUM DAILY VALUE		B. MAXIMUM 30 DAY VALUE		C. LONG TERM AVERAGE VALUE		D. NO. OF ANALYSES	A. 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		<5 mg/L				<5 mg/L		8			
M. Phenols, Total		X										
N. Phosphorus (as P), Total (7723-14-0)		X										
O. Sulfate (as SO ₄) (14808-79-8)		X										
P. Sulfide (as S)		X										
Q. Sulfite (as SO ₃) (14265-45-3)		X										
R. Surfactants		X										
S. Trichloroethanes, Total		X										
Subpart 2 – Metals												
1M. Aluminum, Total Recoverable (7429-90-5)	X		23 ug/L				447 ug/L		8			
2M. Antimony, Total Recoverable (7440-36-9)		X										
3M. Arsenic, Total Recoverable (7440-38-2)		X										
4M. Barium, Total Recoverable (7440-39-3)		X										
5M. Beryllium, Total Recoverable (7440-41-7)		X										
6M. Boron, Total Recoverable (7440-42-8)		X										
7M. Cadmium, Total Recoverable (7440-43-9)		X										
8M. Chromium III Total Recoverable (16065-83-1)		X										
9M. Chromium VI, Dissolved (18540-29-9)		X										
10M. Cobalt, Total Recoverable (7440-48-4)		X										

1. POLLUTANT AND CAS NUMBER (if available)	2. MARK "X"		3. VALUES							4. UNITS		
	A. BELIEVED PRESENT	B. BELIEVED ABSENT	A. MAXIMUM DAILY VALUE		B. MAXIMUM 30 DAY VALUE		C. LONG TERM AVERAGE VALUE		D. NO. OF ANALYSES	A. CONCENTRATION	B. MASS	
			CONCENTRATION	MASS	CONCENTRATION	MASS	CONCENTRATION	MASS				
Subpart 2 – Metals (Continued)												
11M. Copper, Total Recoverable (7440-50-8)	X		<8 ug/L				11.75 ug/L		8			
12M. Iron, Total Recoverable (7439-89-6)	X		427 ug/L				781 ug/L		8			
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		<8 ug/L				11.87 ug/L		8			
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		<8 ug/L				11.02 ug/L		8			
Subpart 3 – Radioactivity												
1R. Alpha Total		X										
2R. Beta Total		X										
3R. Radium Total		X										
4R. Radium 226 plus 228 Total		X										



120 East Davis Street
P.O. Box 30
Fayette, MO 65248-0030

Phone: (660) 248-1911
Fax: (660) 248-1921
www.inovattia.com

ANALYSIS REPORT

Chain of Custody Number: 18-0139
Project Name / Number: 1st Qtr. 18 Test / N/A
Date Collected: 02/20/18
Time Collected: 09:00

Sample Number: 4
Lab Number: 180539
Sample Matrix: Water
Sample Type: Grab

Analysis	Result	Units	Reporting Limit	Analysis Method	Date - Analyst
Chemical Oxygen Demand (COD)	31	mg/L	25	SM 5220D	2/26/2018 - DS
Hexane Extractable Material (HEM)	< 5	mg/L	5	EPA 1664 B	2/23/2018 - BD
pH (Liquid)	7.61	SU	N/A	SM 4500-H+/B	2/20/2018 - BD
Settleable Matter	< 0.2	mL/L/hr	0.2	SM 2540 F	2/20/2018 - BD
Total Suspended Solids (TSS)	20	mg/L	5	SM 2540 D	2/21/2018 - CD
Aluminum, Total	0.282	mg/L	0.015	EPA 200.8	2/26/2018 - DS
Iron, Total	1.24	mg/L	0.250	EPA 200.8	2/21/2018 - DS
Nickel, Total	< 0.015	mg/L	0.015	EPA 200.8	2/26/2018 - DS
Copper, Total	< 0.015	mg/L	0.015	EPA 200.8	2/26/2018 - DS
Zinc, Total	< 0.015	mg/L	0.015	EPA 200.8	2/26/2018 - DS

Notes:

Report Date: 02/28/18
Page Number: 5 of 6

This report has been produced for the exclusive and confidential use of our clients. Reference to the analyses, the results, or the company in any news releases, advertising, or other public announcement is prohibited without obtaining prior written consent.



120 East Davis Street
P.O. Box 30
Fayette, MO 65248-0030

Phone: (660) 248-1911
Fax: (660) 248-1921
www.inovatia.com

ANALYSIS REPORT

Chain of Custody Number: 18-0522

Project Name / Number: 2nd Qtr Storm Water / N/A

Date Collected: 5/21

Time Collected: 09:20

Sample Number: 4

Lab Number: 181908

Sample Matrix: Water

Sample Type: Grab

Analysis	Result	Units	Reporting Limit	Analysis Method	Date - Analyst
Chemical Oxygen Demand (COD)	< 25	mg/L	25	SM 5220D	5/24/2018 - DS
Hexane Extractable Material (HEM)	< 5	mg/L	5	EPA 1664 B	5/22/2018 - BD
pH (Liquid)	7.40	SU	N/A	SM 4500-H ⁺ /B	5/21/2018 - HM
Settleable Matter	< 0.2	mL/L/hr	0.2	EPA 160.5	5/21/2018 - HM/BD
Total Suspended Solids (TSS)	6	mg/L	5	SM 2540 D	5/24/2018 - HM/BD
Aluminum, Total	0.240	mg/L	0.015	EPA 200.8	5/23/2018 - DS
Iron, Total	1.52	mg/L	0.250	EPA 200.8	5/31/2018 - DS
Nickel, Total	< 0.015	mg/L	0.015	EPA 200.8	5/23/2018 - DS
Copper, Total	< 0.015	mg/L	0.015	EPA 200.8	5/23/2018 - DS
Zinc, Total	0.024	mg/L	0.015	EPA 200.8	5/23/2018 - DS

Notes:

Report Date: 06/01/18

Page Number: 5 of 6

This report has been produced for the exclusive and confidential use of our clients. Reference to the analyses, the results, or the company in any news releases, advertising, or other public announcement is prohibited without obtaining prior written consent.



120 East Davis Street
P O Box 30
Fayette, MO 65248-0030

Phone: (660) 248-1911
Fax: (660) 248-1921
www.inovaitia.com

ANALYSIS REPORT

Chain of Custody Number: 18-0901

Project Name / Number: Qtrly Water Test / N/A

Date Collected: 08/29/18

Time Collected: 08:20

Sample Number: 4

Lab Number: 183464

Sample Matrix: Water

Sample Type: Grab

Analysis	Result	Units	Reporting Limit	Analysis Method	Date - Analyst
Chemical Oxygen Demand (COD)	< 25	mg/L	25	SM 5220D	9/5/2018 - DS
Hexane Extractable Material (HEM)	< 5	mg/L	5	EPA 1664 B	9/6/2018 - BD
pH (Liquid)	7.09	SU	N/A	SM 4500-H+/B	8/29/2018 - BD
Settleable Matter	< 0.2	mL/L/hr	0.2	EPA 160.5	8/29/2018 - HM
Total Suspended Solids (TSS)	46	mg/L	5	SM 2540 D	8/29/2018 - BD
Aluminum, Total	1.63	mg/L	0.015	EPA 200.8	9/10/2018 - DS
Iron, Total	0.524	mg/L	0.250	EPA 200.8	9/10/2018 - DS
Nickel, Total	< 0.015	mg/L	0.015	EPA 200.8	9/10/2018 - DS
Copper, Total	< 0.015	mg/L	0.015	EPA 200.8	9/10/2018 - DS
Zinc, Total	< 0.015	mg/L	0.015	EPA 200.8	9/10/2018 - DS

Notes:

Report Date: 09/17/18
Page Number: 5 of 6

This report has been produced for the exclusive and confidential use of our clients. Reference to the analyses, the results, or the company in any news releases, advertising, or other public announcement is prohibited without obtaining prior written consent.



120 East Davis Street
P.O. Box 30
Fayette, MO 65248-0030

Phone: (660) 248-1911
Fax: (660) 248-1921
www.inovatia.com

ANALYSIS REPORT

Chain of Custody Number: 18-1183
Project Name / Number: 4th Qtr / N/A
Date Collected: 10/08/18
Time Collected: 09:25

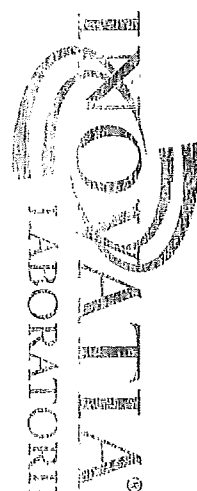
Sample Number: 4
Lab Number: 184249
Sample Matrix: Water
Sample Type: Grab

Analysis	Result	Units	Reporting Limit	Analysis Method	Date - Analyst
Chemical Oxygen Demand (COD)	34	mg/L	25	SM 5220D	10/12/2018 - DS
Hexane Extractable Material (HEM)	< 5	mg/L	5	EPA 1664 B	10/16/2018 - BD
pH (Liquid)	7.92	SU	N/A	SM 4500-H+/B	10/8/2018 - HM
Settleable Matter	< 0.2	mL/L/hr	0.2	SM 2540 F	10/8/2018 - HM
Total Suspended Solids (TSS)	7	mg/L	5	SM 2540 D	10/8/2018 - HM
Aluminum, Total	0.191	mg/L	0.015	EPA 200.8	10/12/2018 - DS
Iron, Total	0.311	mg/L	0.250	EPA 200.8	10/12/2018 - DS
Nickel, Total	< 0.015	mg/L	0.015	EPA 200.8	10/12/2018 - DS
Copper, Total	< 0.015	mg/L	0.015	EPA 200.8	10/12/2018 - DS
Zinc, Total	0.178	mg/L	0.015	EPA 200.8	10/12/2018 - DS

Notes:

Report Date: 10/18/18
Page Number: 5 of 6

This report has been produced for the exclusive and confidential use of our clients. Reference to the analyses, the results, or the company in any news releases, advertising, or other public announcement is prohibited without obtaining prior written consent.



120 East Davis Street
P.O. Box 30
Fayette, MO 65248-0030

Phone: (660) 248-1911
Fax: (660) 248-1921
www.innovatia.com

ANALYSIS REPORT

Chain of Custody Number: 19-0291
Project Name / Number: 1st Qtr Test / N/A
Date Collected: 03/14/19
Time Collected: 09:30

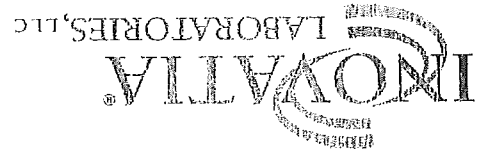
Sample Number: 4
Lab Number: 193911
Sample Matrix: Water
Sample Type: Grab

Chemical Oxygen Demand (COD)	< 25	mg/L	25	SM 5220D	3/22/2019 - HM
Hexane Extractable Material (HEM)	< 5	ug/L	5	EPA 1664 B	3/19/2019 - HM
pH (Liquid)	7.60	SI	N/A	SM 4500-H+7B	3/14/2019 - HM
Settleable Matter	< 0.2	ml/L/hr	0.2	EPA 160.5	3/14/2019 - HM
Total Suspended Solids (TSS)	38	mg/L	5	SM 2540 D	3/14/2019 - HM
Aluminum, Total	0.246	mg/L	0.010	EPA 200.8	3/27/2019 - BD
Iron, Total	0.450	mg/L	0.650	EPA 200.8	4/2/2019 - BD
Nickel, Total	< 0.010	mg/L	0.010	EPA 200.8	3/27/2019 - BD
Copper, Total	< 0.010	mg/L	0.010	EPA 200.8	3/27/2019 - BD
Zinc, Total	< 0.010	mg/L	0.010	EPA 200.8	3/27/2019 - BD

Notes:

Report Date: 04/03/19
Page Number: 5 of 6

This report has been produced for the exclusive and confidential use of our clients. Reference to the analyses, the results, or the company in any news releases, advertising, or other public announcement is prohibited without obtaining prior written consent.



120 East Davis Street
P.O. Box 30
Fayette, MO 65248-0030

Phone: (660) 248-1911
Fax: (660) 248-1921
www.inovatia.com

ANALYSIS REPORT

Sample Number: 4
Lab Number: 191995
Sample Matrix: Water
Sample Type: Grab

Chain of Custody Number: 19-0578
Project Name: Number 2nd QTR Samples 2019 / N/A
Date Collected: 05/22/19
Time Collected: 09:00

Analysis	Result	Units	Reporting Limit	Analysis Method	Date - Analyst
Chemical Oxygen Demand (COD)	< 25	mg/L	25	SM 5220D	6/4/2019 - HM
Hexane Extractable Material (HEM)	< 5	mg/L	5	EPA 1664 B	5/23/2019 - HM
pH (Liquid)	7.71	SI	N/A	SM 4500-H4+B	5/22/2019 - HM
Settleable Matter	< 0.2	mg/L	0.2	EPA 160.5	5/22/2019 - HM
Total Suspended Solids (TSS)	9	mg/L	5	SM 2540 D	5/24/2019 - HM
Aluminum, Total	0.026	mg/L	0.008	EPA 200.8	5/31/2019 - BD
Iron, Total	0.026	mg/L	0.008	EPA 200.8	6/6/2019 - BD
Nickel, Total	0.009	mg/L	0.008	EPA 200.8	5/31/2019 - BD
Copper, Total	< 0.008	mg/L	0.008	EPA 200.8	5/31/2019 - BD
Zinc, Total	< 0.003	mg/L	0.008	EPA 200.8	5/31/2019 - BD

Notes:

Report Date: 06/06/19
Page Number: 5 of 6

This report has been provided for the exclusive and confidential use of our clients. Reference to the analyses, the results, or the company in any news releases, advertising, or other public announcement is prohibited without obtaining prior written consent.



ANALYSIS REPORT

120 East Davis Street
P.O. Box 30
Fayette, MO 65248-0030

Phone: (660) 248-1911
Fax: (660) 248-1921
www.inovattia.com

Chain of Custody Number: 19-0923
Project Name / Number: 3rd Qtr Sample / N/A
Date Collected: 08/22/19
Time Collected: 09:20

Sample Number: 4
Lab Number: 193290
Sample Matrix: Water
Sample Type: Grab

Analysis	Result	Units	Reporting Limit	Analysis Method	Date - Analyst
Chemical Oxygen Demand (COD)	< 25	mg/L	25	SM 5220D	8/23/2019 - HM
Hexane Extractable Material (HEM)	< 5	mg/L	5	EPA 1664 B	8/28/2019 - HM
pH (Liquid)	7.43	SU	N/A	SM 4500-H+IB	8/22/2019 - HM
Settleable Matter	< 0.2	mL/L/hr	0.2	EPA 160.5	8/23/2019 - HM
Total Suspended Solids (TSS)	9	mg/L	5	SM 2540 D	8/23/2019 - HM
Aluminum, Total	0.909	mg/L	0.008	EPA 200.8	8/26/2019 - BD
Iron, Total	0.862	mg/L	0.050	EPA 200.8	8/26/2019 - BD
Nickel, Total	< 0.008	mg/L	0.008	EPA 200.8	8/26/2019 - BD
Copper, Total	< 0.008	mg/L	0.008	EPA 200.8	8/26/2019 - BD
Zinc, Total	0.008	mg/L	0.008	EPA 200.8	8/26/2019 - BD

Notes:

Report Date: 08/29/19
Page Number: 5 of 6

This report has been produced for the exclusive and confidential use of our clients. Reference to the analyses, the results, or the company in any news releases, advertising, or other public announcement is prohibited without obtaining prior written consent.



ANALYSIS REPORT

120 East Davis Street
P.O. Box 30
Fayette, MO 65248-0030

Phone: (660) 248-1911
Fax: (660) 248-1921
www.inovatia.com

Chain of Custody Number: 19-1248
Project Name / Number: Q4-Site 4 / N/A
Date Collected: 11/08/19
Time Collected: 08:00

Sample Number: 4
Lab Number: 194370
Sample Matrix: Water
Sample Type: Grab

Analysis	Result	Units	Reporting Limit	Analysis Method	Date - Analyst
Chemical Oxygen Demand (COD)	< 25	mg/L	25	SM 5220D	11/15/2019 - HM
Hexane Extractable Material (HEM)	< 5	mg/L	5	EPA 1664 B	11/11/2019 - HM
pH (Liquid)	8.00	SU	N/A	SM 4500-H+/B	11/8/2019 - HM
Settleable Matter	< 0.2	mg/L/hr	0.2	EPA 160.5	11/11/2019 - BD
Total Suspended Solids (TSS)	< 5	mg/L	5	SM 2540 D	11/14/2019 - BD
Aluminum, Total	0.023	mg/L	0.008	EPA 200.8	11/14/2019 - BD
Iron, Total	0.427	mg/L	0.250	EPA 200.8	11/14/2019 - BD
Nickel, Total	0.011	mg/L	0.008	EPA 200.8	11/14/2019 - BD
Copper, Total	0.008	mg/L	0.008	EPA 200.8	11/14/2019 - BD
Zinc, Total	0.277	mg/L	0.008	EPA 200.8	11/14/2019 - BD

8.13 pH at
cylinder line

Notes:

Report Date: 11/15/19
Page Number: 2 of 2

This report has been produced for the exclusive and confidential use of our clients. Reference to the analyses, the results, or the company in any news releases, advertising, or other public announcement is prohibited without obtaining prior written consent.

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: Western Portion of the Facility		OUTFALL NO. 5	
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. VALUES				4. UNITS				
	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)													
B. Chemical Oxygen Demand (COD)	<25 mg/L				27.25 mg/L			8					
C. Total Organic Carbon (TOC)													
D. Total Suspended Solids (TSS)	15 mg/L				14.75 mg/L			8					
E. Ammonia as N													
F. Flow	VALUE .045 MGD				VALUE .045 MGD			8	MILLIONS OF GALLONS PER DAY (MGD)				
G. Temperature (winter)	VALUE				VALUE				°F				
H. Temperature (summer)	VALUE				VALUE				°F				
I. pH	MINIMUM 8.65				MAXIMUM			AVERAGE 7.81	8	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								
B. Bromide (24959-67-9)	X												
C. Chloride (16887-00-6)	X												
D. Chlorine, Total Residual	X												
E. Color	X												
F. Conductivity	X												
F. Cyanide, Amenable to Chlorination	X												

1. POLLUTANT AND CAS NUMBER (if available)	2. MARK "X"		3. VALUES						4. UNITS			
	A. BELIEVED PRESENT	B. BELIEVED ABSENT	A. MAXIMUM DAILY VALUE		B. MAXIMUM 30 DAY VALUE		C. LONG TERM AVERAGE VALUE		D. NO. OF ANALYSES	A. CONCEN- TRATION	B. MASS	
			CONCENTRATION	MASS	CONCENTRATION	MASS	CONCENTRATION	MASS				
Subpart 1 – Conventional and Non-Conventional Pollutants (Continued)												
G. <i>E. coli</i>		X										
H. Fluoride (16984-48-8)		X										
I. Nitrate plus Nitrate (as N)		X										
J. Kjeldahl, Total (as N)		X										
K. Nitrogen, Total Organic (as N)		X										
L. Oil and Grease	X		<5 mg/L				<5 mg/L		8			
M. Phenols, Total		X										
N. Phosphorus (as P), Total (7723-14-0)		X										
O. Sulfate (as SO ₄) (14808-79-8)		X										
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		315 ug/L				265 ug/L		8			
2M. Antimony, Total Recoverable (7440-36-9)		X										
3M. Arsenic, Total Recoverable (7440-38-2)		X										
4M. Barium, Total Recoverable (7440-39-3)		X										
5M. Beryllium, Total Recoverable (7440-41-7)		X										
6M. Boron, Total Recoverable (7440-42-8)		X										
7M. Cadmium, Total Recoverable (7440-43-9)		X										
8M. Chromium III Total Recoverable (16065-83-1)		X										
9M. Chromium VI, Dissolved (18540-29-9)		X										
10M. Cobalt, Total Recoverable (7440-48-4)		X										

1. POLLUTANT AND CAS NUMBER (if available)	2. MARK "X"		3. VALUES						4. UNITS			
	A. BELIEVED PRESENT	B. BELIEVED ABSENT	A. MAXIMUM DAILY VALUE		B. MAXIMUM 30 DAY VALUE		C. LONG TERM AVERAGE VALUE		D. NO. OF ANALYSES	A. CONCEN- TRATION	B. MASS	
			CONCENTRATION	MASS	CONCENTRATION	MASS	CONCENTRATION	MASS				
Subpart 2 – Metals (Continued)												
11M. Copper, Total Recoverable (7440-50-8)	X		<8 ug/L				11.75 ug/L		8			
12M. Iron, Total Recoverable (7439-89-6)	X		420 ug/L				360.5 ug/L		8			
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		<8 ug/L				11.75 ug/L		8			
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		11 ug/L				25 ug/L		8			
Subpart 3 – Radioactivity												
1R. Alpha Total		X										
2R. Beta Total		X										
3R. Radium Total		X										
4R. Radium 226 plus 228 Total		X										



120 East Davis Street
P.O. Box 30
Fayette, MO 65248-0030

Phone: (660) 248-1911
Fax: (660) 248-1921
www.inovatia.com

ANALYSIS REPORT

Chain of Custody Number: 18-0139
Project Name / Number: 1st Qtr. 18 Test / N/A
Date Collected: 02/20/18
Time Collected: 09:05

Sample Number: 5
Lab Number: 180540
Sample Matrix: Water
Sample Type: Grab

Analysis	Result	Units	Reporting Limit	Analysis Method	Date - Analyst
Chemical Oxygen Demand (COD)	31	mg/L	25	SM 5220D	2/26/2018 - DS
Hexane Extractable Material (HEM)	< 5	mg/L	5	EPA 1664 B	2/23/2018 - BD
pH (Liquid)	7.68	SU	N/A	SM 4500-H+/B	2/20/2018 - BD
Settleable Matter	< 0.2	mL/L/hr	0.2	SM 2540 F	2/20/2018 - BD
Total Suspended Solids (TSS)	32	mg/L	5	SM 2540 D	2/21/2018 - CD
Aluminum, Total	0.421	mg/L	0.015	EPA 200.8	2/26/2018 - DS
Iron, Total	0.598	mg/L	0.250	EPA 200.8	2/21/2018 - DS
Nickel, Total	< 0.015	mg/L	0.015	EPA 200.8	2/26/2018 - DS
Copper, Total	< 0.015	mg/L	0.015	EPA 200.8	2/26/2018 - DS
Zinc, Total	0.048	mg/L	0.015	EPA 200.8	2/26/2018 - DS

Notes:

Report Date: 02/28/18
Page Number: 6 of 6

This report has been produced for the exclusive and confidential use of our clients. Reference to the analyses, the results, or the company in any news releases, advertising, or other public announcement is prohibited without obtaining prior written consent.



120 East Davis Street
P.O. Box 30
Fayette, MO 65248-0030

Phone: (660) 248-1911
Fax: (660) 248-1921
www.inovatia.com

ANALYSIS REPORT

Chain of Custody Number: 18-0522

Project Name / Number: 2nd Qtr Storm Water / N/A

Date Collected: 5/21

Time Collected: 09:25

Sample Number: 5

Lab Number: 181909

Sample Matrix: Water

Sample Type: Grab

Analysis	Result	Units	Reporting Limit	Analysis Method	Date - Analyst
Chemical Oxygen Demand (COD)	< 25	mg/L	25	SM 5220D	5/24/2018 - DS
Hexane Extractable Material (HEM)	< 5	mg/L	5	EPA 1664 B	5/22/2018 - BD
pH (Liquid)	7.78	SU	N/A	SM 4500-H+/B	5/21/2018 - HM
Settleable Matter	< 0.2	mL/L/hr	0.2	EPA 160.5	5/21/2018 - HM/BD
Total Suspended Solids (TSS)	6	mg/L	5	SM 2540 D	5/24/2018 - HM/BD
Aluminum, Total	0.209	mg/L	0.015	EPA 200.8	5/23/2018 - DS
Iron, Total	< 0.250	mg/L	0.250	EPA 200.8	5/31/2018 - DS
Nickel, Total	< 0.015	mg/L	0.015	EPA 200.8	5/23/2018 - DS
Copper, Total	< 0.015	mg/L	0.015	EPA 200.8	5/23/2018 - DS
Zinc, Total	0.021	mg/L	0.015	EPA 200.8	5/23/2018 - DS

Notes:

Report Date: 06/01/18
Page Number: 6 of 6

This report has been produced for the exclusive and confidential use of our clients. Reference to the analyses, the results, or the company in any news releases, advertising, or other public announcement is prohibited without obtaining prior written consent.



120 East Davis Street
P.O. Box 30
Fayette, MO 65248-0030

Phone: (660) 248-1911
Fax: (660) 248-1921
www.inovatia.com

ANALYSIS REPORT

Chain of Custody Number: 18-0901

Project Name / Number: Qrtly Water Test / N/A

Date Collected: 08/29/18

Time Collected: 08:25

Sample Number: 5

Lab Number: 183465

Sample Matrix: Water

Sample Type: Grab

Analysis	Result	Units	Reporting Limit	Analysis Method	Date - Analyst
Chemical Oxygen Demand (COD)	30	mg/L	25	SM 5220D	9/5/2018 - DS
Hexane Extractable Material (HEM)	< 5	mg/L	5	EPA 1664 B	9/6/2018 - BD
pH (Liquid)	7.15	SU	N/A	SM 4500-H+/B	8/29/2018 - BD
Settleable Matter	< 0.2	mL/L/hr	0.2	EPA 160.5	8/29/2018 - HM
Total Suspended Solids (TSS)	< 5	mg/L	5	SM 2540 D	8/29/2018 - BD
Aluminum, Total	0.119	mg/L	0.015	EPA 200.8	9/10/2018 - DS
Iron, Total	< 0.250	mg/L	0.250	EPA 200.8	9/10/2018 - DS
Nickel, Total	< 0.015	mg/L	0.015	EPA 200.8	9/10/2018 - DS
Copper, Total	< 0.015	mg/L	0.015	EPA 200.8	9/10/2018 - DS
Zinc, Total	< 0.015	mg/L	0.015	EPA 200.8	9/10/2018 - DS

Notes:

Report Date: 09/17/18

Page Number: 6 of 6

This report has been produced for the exclusive and confidential use of our clients. Reference to the analyses, the results, or the company in any news releases, advertising, or other public announcement is prohibited without obtaining prior written consent.



120 East Davis Street
P.O. Box 30
Fayette, MO 65248-0030

Phone: (660) 248-1911
Fax: (660) 248-1921
www.inovatia.com

ANALYSIS REPORT

Chain of Custody Number: 18-1183
Project Name / Number: 4th Qtr / N/A
Date Collected: 10/08/18
Time Collected: 10:00

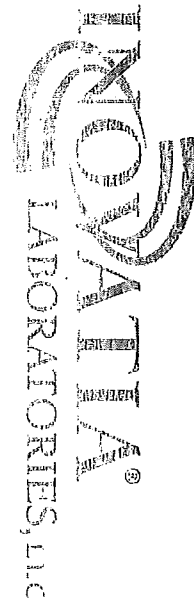
Sample Number: 5
Lab Number: 184250
Sample Matrix: Water
Sample Type: Grab

Analysis	Result	Units	Reporting Limit	Analysis Method	Date - Analyst
Chemical Oxygen Demand (COD)	< 25	mg/L	25	SM 5220D	10/12/2018 - DS
Hexane Extractable Material (HEM)	< 5	mg/L	5	EPA 1664 B	10/16/2018 - BD
pH (Liquid)	7.95	SU	N/A	SM 4500-H+/B	10/8/2018 - HM
Settleable Matter	< 0.2	mL/L/hr	0.2	SM 2540 F	10/8/2018 - HM
Total Suspended Solids (TSS)	< 5	mg/L	5	SM 2540 D	10/8/2018 - HM
Aluminum, Total	0.181	mg/L	0.015	EPA 200.8	10/12/2018 - DS
Iron, Total	0.326	mg/L	0.250	EPA 200.8	10/12/2018 - DS
Nickel, Total	< 0.015	mg/L	0.015	EPA 200.8	10/12/2018 - DS
Copper, Total	< 0.015	mg/L	0.015	EPA 200.8	10/12/2018 - DS
Zinc, Total	0.034	mg/L	0.015	EPA 200.8	10/12/2018 - DS

Notes:

Report Date: 10/18/18
Page Number: 6 of 6

This report has been produced for the exclusive and confidential use of our clients. Reference to the analyses, the results, or the company in any news releases, advertising, or other public announcement is prohibited without obtaining prior written consent.



126 East Davis Street
P.O. Box 36
Troy, MO 65240-0036

Phone: (660) 248-1911
Fax: (660) 248-1921
www.iovata.com

ANALYSIS REPORT

Chain of Custody Number: 19-0201
Project Name / Number: 1st Qtr Test / N/A
Date Collected: 03/14/19
Time Collected: 09:35

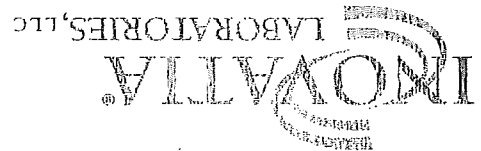
Sample Number: 5
Lab Number: 190912
Sample Matrix: Water
Sample Type: Grab

Chemical Oxygen Demand (COD)	< 25	mg/L	SM 5220D	3/22/2019 - HM
Hexane Extractable Material (HEM)	< 5	mg/L	EPA 1664 B	3/19/2019 - HM
pH (Liquid)	7.73	SI	SM 4500-H ₂ O	3/14/2019 - HM
Settleable Matter	< 0.2	mL/L/hr	EPA 160.5	3/14/2019 - HM
Total Suspended Solids (TSS)	32	mg/L	SM 2540 D	3/27/2019 - BD
Aluminum, Total	0.149	mg/L	EPA 200.8	3/27/2019 - BD
Iron, Total	0.242	mg/L	EPA 200.8	4/2/2019 - BD
Nickel, Total	< 0.010	mg/L	EPA 200.8	3/27/2019 - BD
Copper, Total	< 0.010	mg/L	EPA 200.8	3/27/2019 - BD
Zinc, Total	0.025	mg/L	EPA 200.8	3/27/2019 - BD

Notes:

Report Date: 04/03/19
Page Number: 6 of 6

This report has been produced for the exclusive and confidential use of our clients. Reference to the analyses, the results, or the company in any news releases, advertising, or other public announcement is prohibited without obtaining prior written consent.



120 East Davis Street
P.O. Box 30
Fayette, MO 65248-0030

Phone: (660) 248-1911
Fax: (660) 248-1921
www.inovatia.com

ANALYSIS REPORT

Sample Number: 5
Lab Number: 191996
Sample Matrix: Water
Sample Type: Grab

Chain of Custody Number: 19-0578
Project Name / Number: 2nd QTR Samples 2019 / N.A.
Date Collected: 05/22/19
Time Collected: 09:05

Parameter	Result	Unit	Method	Date	Analyst
Chemical Oxygen Demand (COD)	< 25	mg/L	SM 5220D	6/4/2019	HM
Hexane Extractable Material (HEM)	< 5	mg/L	EPA 1664 B	5/23/2019	HM
pH (Liquid)	7.79	SU	SM 4500-H4/B	5/22/2019	HM
Settleable Matter	< 0.2	mL/L/hr	EPA 160.5	5/22/2019	HM
Total Suspended Solids (TSS)	12	mg/L	SM 2540 D	5/24/2019	HM
Aluminum, Total	0.009	mg/L	EPA 200.8	5/31/2019	BD
Iron, Total	0.070	mg/L	EPA 200.8	6/6/2019	BD
Nickel, Total	< 0.008	mg/L	EPA 200.8	5/31/2019	BD
Copper, Total	< 0.008	mg/L	EPA 200.8	5/31/2019	BD
Zinc, Total	0.025	mg/L	EPA 200.8	5/31/2019	BD

Notes:

Report Date: 06/06/19
Page Number: 6 of 6

This report has been prepared for the exclusive and confidential use of our clients. Reference to the analyses, the results, or the company in any news releases, advertising, or other public announcement is prohibited without obtaining prior written consent.



ANALYSIS REPORT

Phone: (660) 248-1911
Fax: (660) 248-1921
www.inovattia.com

120 East Davis Street
P.O. Box 30
Fayette, MO 65248-0030

Chain of Custody Number: 19-0923
Project Name / Number: 3rd Qtr Sample / N/A
Date Collected: 08/22/19
Time Collected: 09:25

Sample Number: 5
Lab Number: 193291
Sample Matrix: Water
Sample Type: Grab

Analysis	Result	Units	Reporting Limit	Analysis Method	Date - Analyst
Chemical Oxygen Demand (COD)	32	mg/L	25	SM 5220D	8/23/2019 - HM
Hexane Extractable Material (HEM)	< 5	mg/L	5	EPA 1664 B	8/28/2019 - HM
pH (Liquid)	7.80	SU	N/A	SM 4500-H+/B	8/22/2019 - HM
Settleable Matter	< 0.2	mL/L/hr	0.2	EPA 160.5	8/23/2019 - HM
Total Suspended Solids (TSS)	11	mg/L	5	SM 2540 D	8/23/2019 - HM
Aluminum, Total	0.439	mg/L	0.008	EPA 200.8	8/26/2019 - BD
Iron, Total	0.288	mg/L	0.050	EPA 200.8	8/26/2019 - BD
Nickel, Total	< 0.008	mg/L	0.008	EPA 200.8	8/26/2019 - BD
Copper, Total	< 0.008	mg/L	0.008	EPA 200.8	8/26/2019 - BD
Zinc, Total	0.023	mg/L	0.008	EPA 200.8	8/26/2019 - BD

Notes:

Report Date: 08/29/19
Page Number: 6 of 6

This report has been produced for the exclusive and confidential use of our clients. Reference to the analyses, the results, or the company in any news releases, advertising, or other public announcement is prohibited without obtaining prior written consent.



120 East Davis Street
P.O. Box 30
Fayette, MO 65248-0030

ANALYSIS REPORT

Phone: (660) 248-1911
Fax: (660) 248-1921
www.inovatia.com

Chain of Custody Number: 19-1130
Project Name / Number: 4th Qtr Sample / N/A
Date Collected: 10/11
Time Collected: 08:50

Sample Number: 5
Lab Number: 194012
Sample Matrix: Water
Sample Type: Grab

Analysis	Result	Units	Reporting Limit	Analysis Method	Date - Analyst
Chemical Oxygen Demand (COD)	< 25	mg/L	25	SM 5220D	10/16/2019 - HM
pH (Liquid)	7.83	SU	N/A	SM 4500-H+/B	10/11/2019 - HM
Settleable Matter	< 0.2	mL/L/hr	0.2	EPA 160.5	10/11/2019 - HM
Total Suspended Solids (TSS)	15	mg/L	5	SM 2540 D	10/15/2019 - HM
Aluminum, Total	0.315	mg/L	0.008	EPA 200.8	10/22/2019 - BD
Iron, Total	0.420	mg/L	0.050	EPA 200.8	10/22/2019 - BD
Nickel, Total	< 0.008	mg/L	0.008	EPA 200.8	10/22/2019 - BD
Copper, Total	< 0.008	mg/L	0.008	EPA 200.8	10/22/2019 - BD
Zinc, Total	0.011	mg/L	0.008	EPA 200.8	10/22/2019 - BD
Hexane Extractable Material (HEM)	< 5	mg/L	5	EPA 1664	10/14/2019 - HM

per
pk at call: fri

Notes:

Report Date: 10/29/19
Page Number: 6 of 6

This report has been produced for the exclusive and confidential use of our clients. Reference to the analyses, the results, or the company in any news releases, advertising, or other public announcement is prohibited without obtaining prior written consent.