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-0140996
Owner:	PHILLIPS 66 PIPELINE LLC
Address:	2311 CityWest Blvd., Houston, TX 77042
Continuing Authority:	Same as above
Address:	Same as above
Facility Name:	Jefferson City Products Terminal
Facility Address:	2116 Idlewood Drive, Jefferson City, MO 65110
Legal Description:	S23, T44N, R12W; Cole County
UTM Coordinates:	#001 and #002: X = 568132, Y = 4266835 #003: X = 568102, Y = 4266552
Receiving Stream:	Presumed Use Stream (C)
First Classified Stream and ID:	Presumed Use Stream (C) WBID# 5016
USGS Basin & Sub-watershed No.:	103001021207: Moreau River

authorizes activities pursuant to the terms and conditions of this permit in accordance with the Missouri Clean Water Law and the National Pollutant Discharge Elimination System; it does not apply to other regulated activities.

FACILITY DESCRIPTION

Outfall #001 is hydrostatic testing wastewater; outfalls #002 and #003 are stormwater from petroleum transportation activities and bulk tanks. Outfall #001 and #002 are co-located and have a settling basin as treatment.
Hydrostatic Testing Design Flow: 1.152 MGD
Hydrostatic Testing Average Flow: as needed; 1.152 MGD
Domestic wastewater is managed by piping to POTW.

December 1, 2025
Effective Date

November 30, 2030
Expiration Date

Heather S. Peters, Director, Water Protection Program

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

OUTFALL #001 *hydrostatic testing wastewater*	**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 **December 1, 2025** and remain in effect until expiration of the permit. Discharges shall be controlled, limited, and monitored by the facility as specified below:				
EFFLUENT PARAMETERS	UNITS	FINAL EFFLUENT LIMITATIONS		MONITORING REQUIREMENTS	
		DAILY MAXIMUM	MONTHLY AVERAGE	MINIMUM MEASUREMENT FREQUENCY ♠	SAMPLE TYPE
LIMIT SET: M - MONTHLY					
PHYSICAL					
Flow	MGD	1.152	*	♠	24 hr. total
CONVENTIONAL					
Chlorine, Total Residual ‡	µg/L	18.1 (ML130)	9 (ML130)	♠	grab
Oil & Grease	mg/L	15	10	♠	grab
pH †	SU	6.5 to 9.0	-	♠	grab
Total Suspended Solids	mg/L	100	100	♠	grab
PETROLEUM CONSTITUENTS					
Benzene ♦	mg/L	0.005	0.005	♠	grab
Ethylbenzene ♦	mg/L	0.32	0.32	♠	grab
Toluene ♦	mg/L	1.0	1.0	♠	grab
Xylene ♦	mg/L	10.0	10.0	♠	grab
MONITORING REPORTS SHALL BE SUBMITTED BY THE 28TH DAY OF THE MONTH FOLLOWING DISCHARGE. ♠					

* Monitoring and reporting requirement only

‡ Chlorine, Total Residual. This permit contains a Total Residual Chlorine (TRC) limit. The effluent limit is below the minimum quantification level of the most sensitive EPA approved CLTRC methods. The department has determined the current acceptable minimum level (ML) for total residual chlorine is 130 µg/L when using the DPD Colorimetric Method #4500 – CL G from Standard Methods for the Examination of Waters and Wastewater. The facility will conduct analyses in accordance with this method, or equivalent, and report actual analytical values. Measured and detection values greater than or equal to the ML of 130 µg/L will be considered violations of the permit and non-detect values less than the ML of 130 µg/L will be considered to be in compliance with the permit limitation. The minimum quantification level does not authorize the discharge of chlorine in excess of the effluent limits stated in the permit. The facility shall report less than "<" the value obtained on the meter for non-detections. The less than symbol shall not be used for detections. The facility shall not log the ML as the quantified value unless the quantified value is the ML. Do not chemically dechlorinate unless it is necessary to meet permit limits.

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

♠ The facility will sample each day of hydrostatic testing water discharge. A report for outfall #001 is only due if hydrostatic testing has occurred. Otherwise, no report is needed.

♦ The facility does not have to test for BETX if the piping or tank is new and has never contained petroleum products.

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. Stormwater Management Areas:
   Permitted features #002 and #003 and the respective drainage (watershed) areas are covered under this special condition. No design flow is established for stormwater as the actual discharge flows are completely dependent on precipitation, hypsography, ground cover, and BMPs employed. The facility deeded acreage is 48.82 total acres. The entire facility stormwatershed is characterized by paved and graveled roads, buildings, graveled and vegetated banks, secondary roadways, some impervious surfaces, tank farm (liquid petroleum and compressed gas), chemical totes, secondary containments, surfacing pipeline, pipeline and tank appurtenances, and petroleum loading and unloading. Vegetative buffers are utilized to decrease stormwater velocity. The vegetation consists of primarily grasses maintained by seasonal mowing. These areas are subject to 40 CFR 122.44(k) stormwater regulations. Stormwater which has contacted petroleum is not permissible for discharge until remediated.
   The following are established as minimum Best Available Technology (BAT) requirements for stormwater: This facility is required to complete monthly inspections of the drainage areas of the plant's stormwater point sources and will initiate maintenance as necessary to prevent contamination.
   (a) Timely maintenance shall be performed, regrading and/or revegetation of: facility access roads, drainage swales, and perimeter yards to avoid excessive erosion and/or creation of new stormwater discharge locations.
   (b) Procedural controls (such as visual inspections) to prevent materials, contamination from equipment storage, and/or contamination from laydown areas within stormwater drainage areas.
   (c) Case by case evaluation of non-routine projects (such as berm maintenance) within stormwater drainage areas to prevent unauthorized discharges; assess the potential for contamination of runoff, and to implement appropriate protective measures.
   (d) Provide for slope stability to protect against sloughing or movement of the berms.
   (e) The facility shall inspect the secondary containments as provided in the "Secondary Containment" special condition. The facility shall inspect the facility per the SPCC plan; the SPCC plan and the records required by the SPCC plan may be requested by the department and must be made available to department personnel upon request.
   (f) This permit does not require that an engineer inspect the facility. Any person trained in inspections may perform the inspections required under this permit. A record of annual training must be kept with the SPCC plan.
   (g) The inspections will note any leaks or drips from any pipes, pumps, appurtenances, or pressure relief valves and indicate a method of remediation. The remedial activates will be logged when complete.

2. Secondary Containments
   The drainage area around the secondary containment areas and the interior of the containment areas shall be inspected monthly. Solids, sludge, and soluble debris shall not be allowed to accumulate in the secondary containment.
   (a) The interior of the secondary containment area(s) shall be checked at least monthly for signs of leaks, spills, or releases of petroleum and other materials or goods held within secondary containment(s).
   (b) All non-stormwater captured in the secondary containment area shall be expeditiously removed and the source of the leak or spill determined. Leaks or otherwise compromised equipment or appurtenances shall be promptly addressed and repaired.
   (c) Before releasing water accumulated in petroleum secondary containment areas, the water and area must be examined for hydrocarbon odor and presence of sheen to protect the general criteria found at 10 CSR 20-7.031(4).
   (d) Unimpacted stormwater (i.e. free from hydrocarbon odor and presence of sheen) or other leaks and spills, must be drained from the secondary containment as soon as reasonably possible after a precipitation event.
   (e) If subparts (a) and (b) above were not followed, impacted stormwater shall not be discharged from the secondary containment and shall instead be managed in accordance with legally approved methods for disposal of process wastewater, such as being piped or transported to an accepting wastewater treatment facility.
   (f) If subparts (a) and (b) were followed, impacted stormwater can only be drained from the secondary containment after removal of all odor or sheen utilizing appropriate methods.
   (g) The area surrounding the secondary containment must be free of signs of vegetative stress or other indicia of petroleum discharge.
   (h) The area below the outlet of the secondary containment area must be maintained to minimize soil washout, such as with stabilized vegetation, rip rap, or by releasing accumulated water slowly.
   (i) Records of all inspections, testing, and/or treatment of water accumulated in secondary containment shall be available on demand to the department. These records should be kept on site; can be kept with the SWPPP or SPCC plan and may be electronic.

3. All records required by this permit may be retained electronically. These records should be saved in a searchable format, if possible.

C. SPECIAL CONDITIONS (CONTINUED)

4. Site-wide minimum Best Management Practices (BMPs)
   At a minimum, the facility shall adhere to the following:
   (a) Provide good housekeeping practices on the site to keep trash from entry into waters of the state. Dumpsters must remain closed when not in use.
   (b) Prevent the spillage or loss of fluids, oil, grease, fuel, etc. from vehicle maintenance, equipment cleaning, warehouse activities, and other areas, to prevent the contamination of stormwater from these substances.
   (c) Provide collection facilities and arrange for proper disposal of waste products including but not limited to petroleum waste products, and solvents.
   (d) Store all paint, solvents, petroleum products, petroleum waste products, 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 shall be retained on-site or readily accessible electronically.
   (e) The facility shall not discharge substances resulting from an on-site spill.
   (f) Provide sediment and erosion control sufficient to prevent or minimize sediment loss off the property, and to protect embankments from erosion.
   (g) Wash water for vehicles, building(s), or pavement must be handled in a no-discharge manner (infiltration, hauled off-site, etc.). Describe the no-discharge method used and include all pertinent information (quantity/frequency, soap use, hauled effluent destination, BMPs, etc.) in the application for renewal. If wash water is not produced, note this instead. Soap and chlorinated water runoff must not occur.
   (h) If chlorinated, outdoor fire protection test water must be handled in a no-discharge manner (infiltration, hauled off-site, etc.) to protect receiving waterbodies from chlorine toxicity.
   (i) The facility shall not apply salt or sand (traction control) in excess of what is required to maintain safe roadways and walkways. In the spring, after potential for additional snow or ice accumulation, if there is evidence of significant excess traction control materials, the facility shall remove excess sand or salt as soon as possible to minimize and control the discharge of salt and solids. At all times the facility shall use salt judiciously to minimize freshwater salinization.
   (j) Salt and sand shall be stored in a manner minimizing mobilization in stormwater (for example: under roof, in covered container, under tarp, etc.).

5. Oil Water Separators (OWS)
   This site is authorized to operate oil water separator tanks for the treatment of wastewater or stormwater and falls under 10 CSR 26-2.010(2)(B) if treating water with petroleum oils. OWS, serving this facility are hereby authorized and shall be operated per manufacturer's specifications. The specifications and operating records must be made accessible to department staff upon request. Petroleum oil water separator sludge is considered used oil; sludge must be disposed of in accordance with 10 CSR 25-11.279. OWS treating animal, vegetable, or food grade oils are not required to be authorized under these regulations. All applicable best management practices for all OWS systems must be adhered.

6. Spills, Overflows, and Other Unauthorized Discharges
   (a) Any spill, overflow, or other discharge(s) not specifically authorized are unauthorized discharges.
   (b) If 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.

7. The Electronic Reporting Rule, 40 CFR Part 127, requires 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 for the NPDES program. The eDMR system is currently the only department-approved reporting method unless specified elsewhere in this permit, or a waiver is granted by the department. The facility must register in the department's eDMR system through the Missouri Gateway for Environmental Management (MoGEM) before the first report is due.

C. SPECIAL CONDITIONS (CONTINUED)

8. Reporting Non-Detects
   (a) Compliance analysis conducted by the facility, or any contracted laboratory shall be conducted in such a way the precision and accuracy of the analyzed result can be enumerated. See sufficiently sensitive test method requirements in Standard Conditions Part I, A, No. 4 regarding proper testing and detection limits used for sample analysis. For the purposes of this permit, the definitions in 40 CFR 136 apply.
   (b) Method detection limit (MDL) and laboratory-established reporting limit (RL) may be used interchangeably in this permit. The reporting limits established by the laboratory must be below the lowest effluent limits established for the specified parameter (including any parameter's future limit after an SOC) in the permit unless the permit provides for a minimum level (ML). A minimum level is a permit-established MDL, or refers to a sufficiently sensitive method.
   (c) The facility shall not report a sample result as "non-detect" without also reporting the MDL or ML. Reporting "non-detect" without also including the MDL or ML will be considered failure to report, which is a violation of this permit.
   (d) 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 highest value of the MDL, RL, or ML. (e.g. <6).
   (e) 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, RL, or ML, the highest MDL, RL, or ML shall be reported as "<#" for the average.

9. All outfalls must be clearly marked in the field. The facility has 90 days from permit effective date, to place signs for this new permit.

10. Changes in Discharges of Toxic Pollutant.
    In addition to the reporting requirements under 40 CFR 122.41, all existing manufacturing, commercial, mining, and silvicultural dischargers must notify the Director per 40 CFR 122.42(a)(1) and (2) as soon as recognizing:
    (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 the 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).
    (c) Authorization of new or expanded pollutant discharges may be required under a permit modification or renewal and may require an antidegradation review.

11. The full implementation of this operating permit, which includes implementation of any applicable schedules of compliance, shall constitute compliance with Sections 301, 302, 306, 307, and 403 of the federal Clean Water Act, except for standards imposed under Section 307 for toxic pollutants injurious to human health, and with equivalent provisions of the Missouri Clean Water Law, in accordance with Section 644.051.22 RSMo and CWA §402(k). This permit may be reopened and modified, or alternatively revoked and reissued to comply with any applicable effluent standard or limitation issued or approved under CWA §§301(b)(2)(C) and (D), §304(b)(2), and §307(a)(2), if the effluent standard or limitation so issued or approved contains different conditions or is otherwise more stringent than any effluent limitation in the permit, or controls any pollutant not already limited in the permit. This permit may be modified, revoked and reissued, or terminated for cause, including determination new pollutants found in the discharge not identified in the application for the new or revised permit. The filing of a request by the facility for a permit modification, termination, notice of planned changes, or anticipated non-compliance does not stay any permit condition.

12. This permit does not authorize the facility to accept, treat, or discharge wastewater from other sources unless explicitly authorized herein. If the facility would like to accept, treat, or discharge wastewater from another activity or facility, the permit must be modified to include external wastewater pollutant sources in the permit.

C. Special Conditions (Continued)

13. 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, the facility must ensure they are submitting the correct forms as required by regulation.
    (c) The facility must sample the stormwater at outfalls #002 and #003 and provide analysis for every parameter listed within outfall #001 in the permit in accordance with 10 CSR 20-6.200(2)(C)1.E(I) and (II)
    (d) Sufficiently sensitive analytical methods must be used. A sufficiently sensitive method can effectively describe the presence or absence of a pollutant at or below the permit limit or water quality standard. For most metals, use method 200.8 or equivalent, or more sensitive.
    (e) The facility may use the electronic submission system to submit the application to the Program, if available.

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 621.250 and 644.051.12 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 shall 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 A NEW PERMIT FOR MO-0140996
JEFFERSON CITY PRODUCTS TERMINAL (PHILLIPS 66)

The Federal Water Pollution Control Act (Clean Water Act (CWA)) §402 Public Law 92-500 as amended established the National Pollutant Discharge Elimination System (NPDES) permit program. This program regulates the discharge of pollutants from point sources and the release of stormwater from certain point sources. All such discharges are unlawful without a permit pursuant to CWA §301. After a permit is obtained, a discharge not in compliance with all permit terms and conditions is unlawful. Missouri State Operating Permits (MSOPs) are issued by the Director of the Missouri Department of Natural Resources (department) under an approved program, operating in accordance with federal and state laws (Federal Clean Water Act and Missouri Clean Water Law 644 RSMo as amended). MSOPs may also cover underground injection, non-discharging facilities, and land application facilities. Permits are issued for a period of five years unless otherwise specified for less. Per 40 CFR Part 124.8(a) and 10 CSR 20-6.020(1)(A)2 a factsheet shall be prepared to give pertinent information regarding applicable regulations, rationale for the development of limitations and conditions, and the public participation process for the Missouri State Operating Permit (MSOP or permit). A factsheet is not an enforceable part of a permit.

PART I. FACILITY INFORMATION

FACILITY DESCRIPTION

This facility is a bulk petroleum storage terminal, which transfers, and stores additives and finished products from pipelines. This facility operates 17 tanks with a total capacity of approximately 3.25 million gallons. This facility is required to hold an operating permit for the discharge of hydrostatic testing wastewater and stormwater.

The department has taken action to require a stormwater permit pursuant to 10 CSR 20-6.200(1)(B) citing significant materials kept on site. The facility falls under 10 CSR 20-6.200(2)(B)2 (petroleum bulk station terminal), 10 CSR 20-6.200(2)(B)4 (tank farms), and 10 CSR 20-6.200(1)(D)27.B for fuels stored and transferred on site. The facility applied for this site-specific permit under 10 CSR 20-6.200(2)(C) when requested.

Secondary containment is present. This facility utilizes semi trucks' cargo tanks to distribute petroleum products (a transportation terminal); and operates under SIC codes 4613 (Refined Petroleum Pipelines; NAICS 486910) and 5171 (Petroleum Bulk Stations and Terminals; NAICS 424710). The transfer of most petroleum products to trucks occurs under roof; no outdoor maintenance activities occur at this site. The facility has tanks for gasoline, diesel, denatured alcohol, Shell (brand) and Phillips (brand) additives, dye, methanol additives, and lubricants on site.

This facility is required to have a permit pursuant to 10 CSR 20-6.200(2)(C)2.B where a facility "has had a discharge of stormwater resulting in the discharge of a reportable quantity for which notification is or was required at any time since November 16, 1987." A reportable quantity is 25 gallons or more to the ground's surface; or any amount of petroleum products that have entered a waterway. The department noted that 7 reports were submitted to the department's Environmental Emergency Response section: 1308151220CRJ; 1210171550EJS; 1303111411PAH; 1408020612BWH; 1212141000EJS; 1501231810DLK; 0001061641NRB. These reports contained information relating to spills and releases at the site but there were likely no releases specifically to stormwater. All except for one were propane releases to the air. Report #0001061641NRB indicated that 45 barrels (1,417.5 gallons) of gasoline were released into secondary containment. Because the secondary containment is earthen, the department has noted that potential residuals of gasoline may have remained and were discharged with a subsequent storm event. As this was a reportable quantity, 10 CSR 20-6.200(2)(C)2.B applies.

This facility falls under the requirements of Section 311 of the Clean Water Act; codified regulations are found at 40 CFR 112: Oil Pollution Prevention. While OPP regulations stipulate that this facility is a non-transportation related facility, the state stormwater regulations for tank farms are more stringent, therefore must be applied under an NPDES permit, given that a petroleum related discharge had occurred January 6, 2000. Per CWA 311(a)(1), "oil" means oil of any kind or in any form, including, but not limited to, petroleum, fuel oil, sludge, oil refuse, and oil mixed with wastes other than dredged spoil; and (2) "discharge" includes, but is not limited to, any spilling, leaking, pumping, pouring, emitting, emptying or dumping but excludes (A) discharges in compliance with a permit under section 1342 of this title, (B) discharges resulting from circumstances identified and reviewed and made a part of the public record with respect to a permit issued or modified under section 1342 of this title, and subject to a condition in such permit, (C) continuous or anticipated intermittent discharges from a point source, identified in a permit or permit application under section 1342 of this title, which are caused by events occurring within the scope of relevant operating or treatment systems." As this facility has requested to discharge hydrostatic testing water, an NPDES permit is required.

PERMITTED FEATURES TABLE

OUTFALL	AVERAGE FLOW	DESIGN FLOW	TREATMENT LEVEL	EFFLUENT TYPE
#001	0 MGD	1.152 MGD	BMPs ♦	hydrostatic testing water
#002	unknown	2.050 MGD ♣	BMPs ♦	stormwater
#003	unknown	1.066 MGD ♣	BMPs ♦	stormwater

♦ best management practices
♣ Flow was calculated using the Rational Equation for stormwater

Items listed in the facility (or outfall) description, applicable to the operation, maintenance, control, and resultant effluent quality are required to be enumerated in the facility description. The facility description ensures the facility continues to operate the wastewater (or stormwater) controls listed in the permit to preserve and maintain the effluent quality pursuant to 40 CFR 122.21(e). Any planned changes to the facility (which changes the facility or outfall description) are required to be reported to the department pursuant to 40 CFR 122.41(l)(1)(ii). If the facility does not or cannot use all of their disclosed treatment devices, this is considered bypassing pursuant to 40 CFR 122.41(m) in the case of wastewater, and BMP disruption in the case of stormwater.

APPLICATION

The application was received July 28, 2025. Prior to public notice, the facility has reviewed the permit draft and coordinated with the department ensuring that the draft permit is representative of the facility operations and the application received for this facility. The department chose to exempt the facility filling out Form C Part 3.0 analytical tables because 1) the facility type is familiar, and the potential pollutants of concern in stormwater are well understood; and the pollutants are visible or odiferous if released; and 2) the facility has not discharged hydrostatic testing water in several years; and the hydrostatic testing water was well categorized under the general permit. The facility has provided sufficient information to the department, and the application was deemed complete pursuant to 40 CFR 122.21(e)(1); and application consolidation is permissible pursuant to 40 CFR 124.4(c)(1).

CONTINUING AUTHORITY

Pursuant to 10 CSR 20-6.010(2)(A) and (E), the department has received the appropriate continuing authority authorized signature from the facility. The Missouri Secretary of State continuing authority charter number for this facility is FL1266624; this number was verified to be associated with the facility and precisely matches the continuing authority reported by the facility. Pursuant to 10 CSR 20-6.010(2)(B)4, this facility is a Level 4 Authority.

NEW SITE SPECIFIC PERMIT REQUIREMENTS

Per 40 CFR 122.21(l), this facility is not a new source. This facility was previously covered under MOG670353 for hydrostatic testing wastewater.

OTHER ENVIRONMENTAL PERMITS

In accordance with 40 CFR 122.21(f)(6), the department evaluated other environmental permits currently held by this facility. This facility is a very small quantity generator (VSQG) for hazardous waste under MOD098641848 using waste codes D001, D002, D008, D018, D035, D039, F002, F005, and F005. The facility has applied for a Part 70 Air operating permit under installation ID 051-0042.

This facility does not require a certified wastewater operator per 10 CSR 20-9.030 because this facility does not fall under the requirements of the regulation; this facility is not a domestic wastewater treatment facility.

FACILITY MAP

PART II. RECEIVING WATERBODY INFORMATION

RECEIVING WATERBODY TABLE:

OUTFALL	WATERBODY NAME	CLASS	WBID	DESIGNATED USES	DISTANCE TO SEGMENT	12-DIGIT HUC
#001 #002 #003	Presumed Use Stream	C	5016	GEN, HHP, IRR, LWW, SCR, WBC-B, WWH (ALP)	0 mi	103001021207: Moreau River

Classes are representations of hydrologic flow volume or lake basin size per 10 CSR 20-7.031(1)(E).
Designated uses are described in 10 CSR 20-7.031(1)(F).
WBID: Waterbody Identification Number per 10 CSR 20-7.031(1)(Q) and (S)
HUC: Hydrologic Unit Code https://water.usgs.gov/GIS/huc.html
Water Quality Standards Search https://apps5.mo.gov/mocwis_public/waterQualityStandardsSearch

EXISTING WATER QUALITY & IMPAIRMENTS

The receiving waterbody(s) segment(s), upstream, and downstream confluence water quality was reviewed. The USGS water quality information page https://waterdata.usgs.gov/nwis/sw and/or the department's quality data database https://apps5.mo.gov/mocwis_public/wqa/waterbodySearch was reviewed. Impaired waterbodies which may be impacted by discharges from this facility were determined. Impairments include waterbodies on the 305(b) or 303(d) list and those waterbodies or watersheds under a TMDL. https://dnr.mo.gov/water/what-were-doing/water-planning/quality-standards-impaired-waters-total-maximum-daily-loads/tmdls Section 303(d) of the federal Clean Water Act requires each state identify waters not meeting water quality standards. https://dnr.mo.gov/water/what-were-doing/water-planning/quality-standards-impaired-waters-total-maximum-daily-loads/impaired-waters Water quality standards protect designated uses of water provided in 10 CSR 20-7.031(1)(F). The 303(d) list helps state and federal agencies keep track of impaired waters not addressed by normal water pollution control programs. 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.

- ✓ This facility discharges to reach code 10300102001845. This facility is near the top of the watershed and there are no upstream impairments. Downstream, this facility discharged into the Moreau River (P) WBID# 0941, and the finally into the Missouri River (P) WBID# 0701.
- ✓ The Missouri River is associated with the 2006 Missouri CWA EPA approved TMDL for PCBs and chlordane. This facility is not considered a source of the above listed pollutants or considered to contribute to the impairment.

WATERBODY MIXING CONSIDERATIONS

For outfall #001 (wastewater), 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. For information how this regulation is used in determining effluent limits with or without mixing, see WASTELOAD ALLOCATION in Part III. If the base stream flow is above 0.1 cfs, mixing may be applied if 1) zones of passage are present, 2) mixing velocities are sufficient and stream bank configuration allows, 3) the aquatic life support system is maintained, 4) mixing zones do not overlap, 5) there are no drinking water intakes in the vicinity downstream, 6) the stream or lake has available pollutant loading to be allocated, and 7) downstream uses are protected.

PART III. RATIONALE AND DERIVATION OF PERMIT CONDITIONS

ANTIBACKSLIDING

Backsliding is implementing a less stringent limit in a subsequent permit, which the CWA generally disallows, except in certain situations. Therefore, the department must evaluate any less stringent limits for evidence of prohibited backsliding. Federal antibacksliding requirements generally prohibit a reissued permit from containing effluent limitations that are less stringent than the previous permit unless an exception is met. All renewed permits are analyzed for evidence of backsliding. There are several express statutory prohibitions and exceptions to the antibacksliding requirements. Parameters are discussed individually in Part IV of the fact sheet.

BACKSLIDING PROHIBITIONS

The first strict prohibition on backsliding, pursuant to CWA 402(o)(1), first sentence, is a requirement that a permit contain any effluent limitation guideline (ELG) limit, if applicable, or a more stringent WQBEL in its place. See FEDERAL EFFLUENT LIMITATION GUIDELINES section for more information.

The second fundamental prohibition to backsliding, pursuant to CWA 402(o)(1), second sentence, applies to non-attainment waters and prevents renewal, reissuance, or modification of a permit to contain effluent limitations which are less stringent except in compliance with CWA 303(d)(4)(A). A non-attainment water is when the receiving or downstream waterbody is impaired, or the watershed or waterbody has a total maximum daily load (TMDL) assigned; see Part II RECEIVING WATERBODY for information about the status of the receiving waterbodies.

Third, if the limits applied in the permit were based on an antidegradation review, those limits cannot become less stringent without the completion of another antidegradation review, pursuant to CWA 402(o)(1), second sentence, and 303(d)(4)(B).

And finally, pursuant to the "Safety Clause" CWA 402(o)(3), a limit must be implemented to protect water quality if there is reasonable potential, even if an exception to antibacksliding applies. See REASONABLE POTENTIAL (RP) for more information.

BACKSLIDING EXCEPTIONS

There are several statutory exceptions that allow backsliding of either water quality-based effluent limits (WQBELs) or technology based effluent limits (TBELs). CWA 402(o)(2) delineates the exceptions that, if satisfied, means that a permit to which CWA 402(o)(1) applies *may* be renewed, reissued, or modified to contain a less stringent limit in a subsequent permit. Below is a brief summary of each exception.

-(A) Material and substantial alterations or additions to the facility occurred after permit issuance that justify the less stringent limit.
-(B)(i) Information is available which was not available at the time of the previous permit issuance, other than revised regulations, guidance, or test methods, that would have justified the less stringent limit at the time of the previous permit issuance.
-(B)(ii) A technical mistake or mistaken interpretation(s) of law were made in issuing the previous permit.
-(C) A less stringent effluent limitation is necessary because of events over which the facility has no control and there is no reasonably available remedy.
-(D) The facility has received a permit modification for, among other factors, innovative technology, a thermal variance, or the facility has been designated to have fundamentally different factors (40 CFR 125.31) than the established ELG considered.
-(E) The facility has installed the treatment required to meet the effluent limitations in the previous permit and has properly operated and maintained the facility but has nevertheless been unable to achieve the previous effluent limitations, in which case the revised limitations may reflect the level of pollutant control actually achieved.

The department expects that exceptions A, C, D, and E to be rarely used. For exception (A), the department generally prohibits removing treatment without a major permit modification to review the treatment type and to change the FACILITY DESCRIPTION in the permit. When there is no Reasonable Potential, a limit may be removed under an exception. See REASONABLE POTENTIAL section for additional information.

For TBELs based on manufacturing values or production numbers, effluent limits will be recalculated appropriately, and the exception (B)(i) for new information is met. For WQBELs, recalculation of effluent limits may be based on new information, such as metals translator values, or other reasonable new information, which would meet the exception under (B)(i). If a technical mistake was made in the previous permit, the fact sheet will identify what the technical mistake was and cite the exception under (B)(ii). If an exception cannot be established, the facility has the choice to perform an antidegradation review pursuant to CWA 303(d)(4)(B) to try to justify less stringent effluent limits.

EXCEPTIONS TO THE EXCEPTIONS IN 402(O)(2)(B)

The end of CWA 402(o)(2), contains the following paragraph that limits the applicability of 402(o)(2)(B), acting as an exception to the two exceptions in (B), but then itself contains another exception that would allow the application of 402(o)(2)(B) if met: "Subparagraph (B) shall not apply to any revised waste load allocations or any alternative grounds for translating water quality criteria into effluent limitations, except where the cumulative effect of such revised allocations results in a decrease in the amount of

pollutants discharged into the concerned waters, and such revised allocations are not the result of a discharger eliminating or substantially reducing its discharge of pollutants due to complying with the requirements of this chapter or for reasons otherwise unrelated to water quality."

Antibacksliding Summary
For receiving waterbodies where no mixing is afforded, the WLA is equal to the water quality criteria (but also accounts for dissolved to total ratio for certain metals). Where mixing is afforded, the WLA is based on the stream's available load compared to the facility's flow. See WASTELOAD ALLOCATIONS (WLA) AND WQBEL CALCULATION METHODS for more information. The effluent limit calculator (ELC) uses the data the facility submitted over the last permit term for each renewal. For example, the ELC uses long term averages, standard deviations, effluent variability, and probabilities to determine RP and effluent limits, therefore, effluent data would generally be considered new information.

✓ The requirements for MOG670353 were reviewed and this permit is not less stringent than the previous permit.

ANTIDEGRADATION REVIEW
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. See https://dnr.mo.gov/document-search/antidegradation-implementation-procedure The prescribed minimum BMPs required in the permit for stormwater are developed by the department pursuant to 10 CSR 20-7.031(3), and BMP use for stormwater discharges is authorized under 40 CFR 122.44(k)(2). The facility must pay for the department to complete the review. 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. Per 10 CSR 20-7.015(4)(A), new discharges to losing streams shall be permitted only after other alternatives including land application, discharges to a gaining stream, or 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 has not submitted information proposing new or expanded discharge based on permit MOG670353; no further degradation proposed therefore no further review necessary.

BEST MANAGEMENT PRACTICES (BMPS)
Minimum site-wide best management practices (BMPs) 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) or 10 CSR 20-6.200(2), these best management practices are not specifically included only 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 per 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 Missouri Clean Water Law. The prescribed minimum BMPs required in the permit are developed by the department pursuant to 10 CSR 20-7.031(3), and BMPs use is authorized under 40 CFR 122.44(k)(2).

CLOSURE
To properly decontaminate and close a wastewater storage structure, treatment structure, lagoon, basin, or device, the facility must draft a complete closure plan, and include the Closure Request Form #2512 https://dnr.mo.gov/document-search/facility-closure-request-form-mo-780-2512 The publication, Wastewater Treatment Plant Closure - PUB2568 found at https://dnr.mo.gov/print/document-search/pub2568 may be helpful to develop the closure plan. The regional office will then approve the closure plan, and provide authorization to begin the work. The regional office contact information can be found here: https://dnr.mo.gov/about-us/division-environmental-quality/regional-office

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

COMPLIANCE AND ENFORCEMENT
Enforcement is the action taken by the Water Protection Program (WPP) to bring an entity into compliance with the Missouri Clean Water Law, its implementing regulations, and/or any terms and conditions of an operating permit. The primary purpose of the enforcement activity in the WPP is to resolve violations and return the entity to compliance.
✓ Not applicable; the facility is not currently under Water Protection Program enforcement action.

DISCHARGE MONITORING REPORTING – ELECTRONIC (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 requiring electronic data reporting. To comply with the federal rule, the department is requiring all facilities to submit discharge monitoring data and reports online.

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

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

DOMESTIC WASTEWATER, SLUDGE, AND BIOSOLIDS
Domestic wastewater is defined as wastewater originating primarily from the sanitary conveyances of bathrooms and kitchens. Domestic wastewater excludes stormwater, wash water, animal waste, process, or ancillary wastewater.
✓ Not applicable; this facility discharges domestic wastewater to an off-site permitted wastewater treatment facility (POTW).

EFFLUENT LIMITATIONS
Two general types of effluent limitations, technology-based effluent limits (TBELs) and water quality-based effluent limits (WQBELs) are reviewed. Permits are required to establish the most stringent or most protective limit per 10 CSR 20-7.015(9)(A) and 40 CFR 122.44(b)(1). The department has regulatory authorization to implement limits based on best professional judgment per 10 CSR 20-7.015(9)(I)1. Effluent limitations derived and established for this permit are based on current operations of the facility. Any flow through the outfall is considered a discharge and must be sampled and reported per permit requirements. Daily maximums and monthly averages are required for continuous discharges per 40 CFR 122.45(d)(1). Weekly limits are not available for non-POTWs.

EXCLUSIONS
The authorizations of this permit are limited to The Clean Water Act, Missouri Clean Water Law, and implementing regulations in 40 CFR and Title 10 of Missouri State Regulations; and for UIC, the Safe Drinking Water Act. Historically, permits have listed activities or discharges which were not authorized under this permit. However, permits are meant to be positive declarations of allowances under the regulatory framework. While historic permits have listed numerous statements such as "This permit does not cover…" those statements have been removed. While they have been removed, this is not considered backsliding, because those prohibitive statements were not limiting the facility to be covered under other permits or via other means. This MSOP is meant to be permissive and appropriately restrictive for only the activities disclosed in the permit application and during permit renewal or modification. If entities are allowed to perform other activities under separate regulations or other co-located permits, this permit should not restrict those activities. Historically listed were statements such as 1) land disturbance activities; 2) fertilizer products receiving another exemption; 3) stream channel or wetland alterations; or 4) 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. While wetland alterations, placement of fill in flood plains or waterways, or changing the course of a stream are prohibited until authorized, those authorizations are found under other authorities, not the MSOP. Other activities that may be authorized by rule include hydrostatic test water, and other exclusions from permitting listed in 10 CSR 20-6.010(1)(B).

FEDERAL EFFLUENT LIMITATION GUIDELINES
Effluent Limitation Guidelines (ELGs) are found at 40 CFR 400-499. https://www.ecfr.gov/current/title-40/chapter-I/subchapter-N These are limitations established by the EPA based on the type of activities a facility is conducting. Most ELGs are for process wastewater and some address stormwater. Effluent guidelines are not always established for every pollutant present in a point source discharge. In many instances, EPA promulgates effluent guidelines for an indicator pollutant. Industrial facilities complying with the effluent guidelines for the indicator pollutant will also control other pollutants (e.g. pollutants with a similar chemical structure). For example, EPA may choose to regulate only one of several metals present in the effluent from an industrial category, and compliance with the effluent guidelines will ensure similar metals present in the discharge are adequately controlled. All are technology-based limitations which must be met by the applicable facility at all times. If Reasonable Potential is established for any particular parameter, and water-quality based effluent limits are more protective of the receiving water's quality, the WQBEL will be used as the limiting factor in accordance with 40 CFR 122.44(d) and 10 CSR 20-7.015(9)(A).

✓ The facility does not have an associated ELG.

FEES

Failure to pay fees associated with this permit is a violation of the Missouri Clean Water Law (644.055 RSMo). Fee amounts are listed in 644.052 and 644.053 RSMo. Fees are due pursuant to 644.054 RSMo, which is each annual anniversary date of initial permit issuance until the permit is terminated. Fees are due the same month each year, regardless of whether a renewal has occurred or is occurring that year. https://dnr.mo.gov/water/business-industry-other-entities/permits-certification-engineering-fees/water-fees.

Annual fees are due the same month each subsequent year; late fees may also accrue. An operating permit fee is based on the volume of wastewater produced and stormwater status. The facility has two options to pay annual or other fees. Option #1 incurs a processing fee but is faster – to pay online, use JetPay: https://magic.collectorsolutions.com/magic-ui/Login/mo-natural-resources click make a one-time payment, and follow the prompts. After selecting Water Protection Program for Payment Category, select WP13 for annual fees, select WP18 for antidegradation review, select WP03 for new site specific permits, select WP08 for a modification, or select WP12 for UIC permits. Option #2 is to mail a check with the exact amount due (no processing fee) to: Department of Natural Resources, Water Protection Program Fees, P.O. Box 176, Jefferson City, MO 65102-0176. For assistance from someone in the fees unit, please email WPPFEES@dnr.mo.gov or call 573-751-8347.

FIRE PROTECTION (HYDRANT) TESTING WATER (OUTDOOR)

The regulatory discharge permitting exclusion allowance only extends to actual fire-fighting activities. These regulations are only found in 10 CSR 20-6.200(1)(D). Hydrant testing wastewater can be considered a water contaminant source pursuant to 644.016(29), dependent on the management strategies, which is why the department asks for additional information about these wastewaters. The Federal and State requirements necessitate a reasonable potential determination for all wastewater; hydrant testing is a type of wastewater with intermittent discharge, and is not considered an emergency. Information regarding fire protection is included under illicit discharges for MS4s, and no other regulation allows for any further exemptions, unless the department makes a finding of *de minimis*. Missouri Clean Water Law requires the department to perform due diligence for all wastewater discharges and all permits (general and site specific). Permit conditions now have specific requirements to manage outdoor hydrant testing logically; and relevant to the pollutants contained in the fire protection testing wastewater. If the facility follows the no-discharge management strategy for chlorinated water, the permit will cover the discharges. If the facility does not use chlorinated water in the fire protection system, then the facility may allow the wastewater to directly enter a stream or storm collection system, given that sufficient energy dissipation strategies are followed to ensure that solids from soils or other sources are not being entrained in the wastewater.

✓ For facilities with chlorinated fire protection testing water, the facility must utilize a strategy to ensure chlorinated water is not being introduced into the waterbody. This could be by allowing the water to soak into the surrounding vegetation, or by retaining the water through a permanent or temporary berm for sufficient time to infiltrate, or other appropriate BMP. Other management strategies exist, and it is the responsibility of the facility to operate all systems to minimize pollution to receiving waters.

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, permit decisions were made by completing 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). See Part III REASONABLE POTENTIAL for more information. In instances where reasonable potential exists, the permit includes limitations 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. Part I §D – Administrative Requirements of Standard Conditions included in this permit state it shall be unlawful for any person to cause or allow any discharge of water contaminants from any water contaminant or point source located in Missouri in violation of the Missouri Clean Water Law or any standard, rule, or regulation promulgated by the commission. See Part IV for specific determinations.

GOOD HOUSEKEEPING PRACTICES

Good housekeeping is a practical, cost-effective way to maintain a clean and orderly facility to prevent potential pollution sources from coming into contact with stormwater. It includes establishing protocols to reduce the possibility of mishandling materials or equipment and employee training. Common areas where good housekeeping practices should be followed include trash containers and adjacent areas, material storage areas, vehicle and equipment maintenance areas, and loading docks. Good housekeeping practices must include a schedule for regular pickup and disposal of garbage and waste materials and routine inspections of drums, tanks, and containers for leaks and structural conditions. Practices also include containing and covering garbage, waste materials, and debris. Involving employees in routine monitoring of housekeeping practices is an effective means of ensuring the continued implementation of these measures.

Specific good housekeeping may include:

◆ Spill and overflow protection under chemical or fuel connectors to contain spillage at liquid storage tanks
◆ Load covers on residue hauling vehicles and ensure gates on trucks are sealed and the truck body is in good condition
◆ Containment curbs around loading/unloading areas or tanks

- ◆ Techniques to reduce solids residue which may be tracked on to access roads traveled by residue trucks or residue handling vehicles.
- ◆ Techniques to reduce solid residue on exit roads leading into and out of residue handling areas

Where feasible, minimizing exposure of potential pollutant sources to precipitation is an important control option. Minimizing exposure prevents pollutants, including debris, from coming into contact with precipitation and can reduce the need for BMPs to treat contaminated stormwater runoff. It can also prevent debris from being picked up by stormwater and carried into drains and surface waters. Examples of BMPs for exposure minimization include covering materials or activities with temporary structures (e.g., tarps) when wet weather is expected or moving materials or activities to existing or new permanent structures (e.g., buildings, silos, sheds). Even the simple practice of keeping a dumpster lid closed can be a very effective pollution prevention measure. For erosion and sediment control, BMPs must be selected and implemented to limit erosion on areas of the site that, due to topography, activities, soils, cover, materials, or other factors, are likely to experience erosion. Erosion control BMPs such as seeding, mulching, and sodding prevent soil from becoming dislodged and should be considered first. Sediment control BMPs such as silt fences, sediment ponds, and stabilized entrances trap sediment after it has eroded. Sediment control BMPs should be used to back-up erosion control BMPs.

GROUNDWATER MONITORING

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

✓ This facility is not required to monitor groundwater for the Water Protection Program under this permit.

ICE-MELT PRODUCT REMOVAL

The department is authorized to require BMPs for facilities per 40 CFR 122.44(k)(2). The facility must apply traction control materials judiciously. The facility should, to the extent practicable, remove large pieces of salt as soon as possible. After winter weather has ceased for the year, the facility should inspect all low-lying areas for extra salt and sand and remove these as soon as possible. Salt applied to large areas has the potential to cause freshwater salinization which could result in a fish kill of sensitive species. To reduce potential for solids entering a stream, sand or other traction control materials, will need to be evaluated against the probability that these materials could cause general criteria violations of solids and bottom deposits per 10 CSR 20-7.031(4)(A), -(C), and -(E) or toxicity per 10 CSR 20-7.031(4)(D), -(G), and -(H).

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/water/business-industry-other-entities/permits-certification-engineering-fees/stormwater/construction-land-disturbance MORA permits may 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 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. https://dnr.mo.gov/water/business-industry-other-entities/reporting/major-water-users All major water users are required by 256.400 RSMo to register water use annually. https://dnr.mo.gov/document-search/frequently-asked-major-water-user-questions-pub2236/pub2236

METALS

Effluent limitations for total recoverable metals are developed using methods and procedures outlined in the *Technical Support Document For Water Quality-based Toxic Controls* (EPA/505/2-90-001) and *The Metals Translator: Guidance For Calculating a Total Recoverable Permit Limit From a Dissolved Criterion* (EPA 823-B-96-007). “Aquatic Life Protection” in 10 CSR 20-7.031 Tables A1 and A2, and general criteria protections in 10 CSR 20-7.031(4). The hardness value used for hardness-dependent metals calculations is typically based on the ecoregion’s 50th percentile (also known as the median) per 10 CSR 20-7.015(1)(CC), and is reported in the calculations, Per a memorandum dated August 6, 2019, the Director has determined limit derivation must use the median of the Level III Ecoregion to calculate permit limits, or site specific data if determined applicable. Additional use criterion (HHP, DWS, GRW, IRR, or LWW) may also be used, as applicable, to determine the most protective effluent limit for the receiving waterbody’s class and uses. HHP, DWS, GRW, IRR, or LWW do not take hardness into account. Most metals require use of Standard Method 200.8 or similar; generally Method 200.7 is insufficient, particularly for cadmium, selenium, and thallium. Without a sufficiently sensitive method, the facility will be required to resample for the permit application to show the actual presence or absence of a pollutant. Reporting “non-detect” where the detection limit of the test is above the permit limit, benchmark, or water

quality standard will be considered a detection since less sensitive tests can not confirm the absence of the pollutant. Standard Conditions Part I has legally binding requirements for sufficiently sensitive methods.

MODIFICATION REQUESTS

Facilities have the option to request a permit modification from the department at any time under RSMo 644.052.8. Requests must be submitted to the Water Protection Program with the appropriate forms and fees paid per 10 CSR 20-6.011. It is recommended facilities contact the program early so the correct forms and fees are submitted, and the modification request can be completed in a timely fashion. Minor modifications, found in 40 CFR 122.63, are processed without the need for a public comment period. Major modifications, those requests not explicitly fitting under 40 CFR 122.63, do require a public notice period. Modifications to permits must be completed when: a new pollutant is found in the discharge; operational or functional changes occur which affect the technology, function, or outcome of treatment; the facility desires alternate numeric benchmarks; or other changes are needed to the permit.

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

MUNICIPAL SEPARATE STORM SEWER SYSTEMS (MS4)

This permit allows discharge to waters of the state. The discharges this permit allows may flow into and through a city's stormwater collection system. Per 40 CFR 122.26(a)(4), any facility discharging stormwater associated with industrial activity to an MS4 shall submit no later than 180 days prior to commencing such discharge, to the MS4 receiving the discharge: the name of the facility; a contact person and phone number; the location of the discharge; a description, including Standard Industrial Classification, which best reflects the principal products or services provided by each facility; and any/all existing NPDES permit number(s).

Regulated MS4s are managed by public entities, cities, municipalities, or counties. Phase I MS4s are Kansas City, Independence, and Springfield. Phase II MS4s are determined by population or location in an urbanized area. Regulated MS4s are required to develop and maintain a stormwater management program. These programs have requirements for developing and implementing a plan to detect and eliminate unapproved discharges to the storm sewer system. Phase I MS4s also maintain oversight programs for industrial and high-risk runoff. Regulated MS4s may keep a list of all of the other regulated dischargers (wastewater and stormwater) flowing through their system. Regulated MS4 operators may request to inspect facilities discharging into their system; a list of regulated MS4s can be viewed at https://dnr.mo.gov/document-search/missouris-regulated-municipal-separate-storm-sewer-systems-ms4s or at https://apps5.mo.gov/mocwis_public/permitSearch.do to determine if this facility needs to contact a local stormwater authority.

NUTRIENT MONITORING

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

✓ Nutrients are not present in the discharge based on the type of facility, therefore no nutrient monitoring is required at this time.

OIL/WATER SEPARATOR SYSTEMS AND USED OIL

Oil water separator (OWS) systems are frequently found at industrial sites where process water, wastewater, or stormwater may contain oils, petroleum, greases, oily wastewaters, or other immiscible liquids requiring separation. Food industry discharges typically require treatment prior to discharge to publicly owned treatment works. Per 10 CSR 26-2.010(2)(B), all oil water separators classified as underground storage tanks (UST) which meet the volume requirements, must be operated according to manufacturer's specifications. OWS which are USTs may be authorized in NPDES permits per 10 CSR 26-2.010(2)(B) or otherwise will be regulated as a underground petroleum storage tank under tank rules. A facility may operate an OWS which is not considered a UST for the wastewater or stormwater at any facility without specific NPDES permit authorization. Alternatively, a facility is not required to cover a UST OWS under the NPDES permit if they desire to obtain alternative regulatory compliance. OWS treating animal, vegetable, or food grade oils are not required to be authorized under 10 CSR 20-26-2.020(2)(B). All best management practices for all OWS systems must be adhered. In 2017, field-poured concrete tanks, previously exempted from the tanks rules, lost their exempt status. Facilities must re-evaluate these concrete structures pursuant to these now relevant rules. Adjacent USTs are not covered by these regulations.

Any and all water treatment systems designed to remove floating immiscible oils are termed oil water separators. If a device is intended to capture oil and separate it from water which is to be discharged, this generally qualifies that oil as used oil (if it is petroleum-based in nature). Used oil and oily sludge must be disposed of in accordance with 10 CSR 25-11.279. Pursuant to 40 CFR 279.20(b)(2)(ii)(B), separating used petroleum-based oil from wastewater generated on-site (to make the wastewater acceptable for

discharge or reuse pursuant to Federal or state regulations governing the management or discharge of wastewaters) are considered used oil generators and not processors under self-implementing 40 CFR 279 Standards For The Management Of Used Oil. Oily wastes generated by OWS are also generally subject to Spill Prevention, Control, and Countermeasure (SPCC) regulations.

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 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.
- ✓ Not applicable; this facility is not required to have a certified operator.

PERMIT SHIELD

The permit shield provision of the Clean Water Act (Section 402(k)) and Missouri Clean Water Law (644.051.22 RSMo) provides that when a permit holder is in compliance with its NPDES permit or MSOP, it is effectively in compliance with certain sections of the Clean Water Act, and equivalent sections of the Missouri Clean Water Law. In general, the permit shield is a legal defense against certain enforcement actions but is only available when the facility is in compliance with its permit and satisfies other specific conditions, including having completely disclosed all discharges and all facility processes and activities to the department at time of application. It is the facility's responsibility to ensure that all potential pollutants, waste streams, discharges, and activities, including wastewater land application, storage, and treatment areas, are all fully disclosed to the department at the time of application or during the draft permit review process. Previous permit applications are not necessarily evaluated or considered during permit renewal actions. All relevant disclosures must be provided with each permit application, including renewal applications, even when the same information was previously disclosed in a past permit application. Subsequent requests for authorization to discharge additional pollutants, expanded or newly disclosed flows, or for authorization for previously unpermitted and undisclosed activities or discharges, will likely require an official permit modification, including another public participation process. Additionally, the use of insufficiently sensitive analytical methods to disclose the absence of any pollutant may not provide permit shield coverage.

Any discharges (or qualified activities such as land application) not expressly authorized in this permit, and not clearly disclosed in the permit application, cannot become authorized or shielded from liability under CWA section 402(k) or Section 644.051 RSMo, by disclosure to EPA, state, or local authorities after issuance of this permit via any means, including any other permit applications, funding applications, the SWPPP, discharge monitoring reporting, or during an inspection. Submit a permit modification application, and an antidegradation determination if appropriate, to request authorization of new or expanded discharges, or new activities.

PRETREATMENT

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

Hauled waste may also be subject to pretreatment program requirements. https://www.epa.gov/npdes/national-pretreatment-program-hauled-waste Hauled waste is waste transported by haulers and discharged to a publicly owned treatment works (POTW) by a conveyance other than a pipe (e.g., by truck or rail). Hauled waste might be sewage or domestic waste, or it might include non-domestic waste, or a combination of both types of waste. The term "hauled waste" merely refers to the wastes' transportation method to the POTW. Hauled waste might include: chemical toilet waste, domestic septage, ground water remediation site waste, grease and sand trap waste, restaurant grease, hazardous waste, landfill leachate, nonhazardous commercial and industrial (categorical and noncategorical) waste, and wastewater from hydrofracturing or other drilling processes. Hauled waste can cause adverse impacts to a POTW because it is usually more concentrated than typical domestic wastewater and might not be equalized when discharged. Adverse impacts could include: pass through, interference, sludge contamination, and hazards to POTW personnel. To help prevent these adverse impacts, the POTW must adequately control the discharge of hauled waste to its treatment plant.

- ✓ This facility discharges only domestic wastewater to a POTW.

REASONABLE POTENTIAL (RP)

Pursuant to 40 CFR 122.44(d)(1)(i) and 10 CSR 20-7.031(9)(A)2, all permits must contain effluent limits for any parameter which is or may be discharged at a level which will cause, have the reasonable potential to cause, or contribute to an excursion above any state narrative criteria or water quality standard found within 10 CSR 20-7.031. Per 10 CSR 20-7.031(4), general criteria shall be applicable to all waters of the state at all times with few exceptions.

A reasonable potential analysis (RPA) is a numeric RP decision calculated using effluent data provided by the facility for parameters that have a numeric Water Quality Standard (WQS), and reasonable potential determinations (RPD) are made using non-numeric factors. The department must implement WQBELs for parameters with RP.

Technology requirements, or technology based effluent limits (TBELs) are not subject to RP. This section only applies to water quality-based effluent limits (WQBELs). TBELs may have been developed by an antidegradation review, or are nationally required via a federal Effluent Limitation Guideline (ELG). TBEL limits are not subject to RP analysis. TBEL limits apply to the site type, regardless if there is RP.

To review historical data for any permit, the department has a publicly facing database search engine, available at https://apps5.mo.gov/mocwis_public/

Reasonable Potential Analysis (RPA): Determining Quantitative Reasonable Potential
A reasonable potential analysis (RPA) is a quantitative or numeric evaluation of reasonable potential to cause or contribute to exceedances of Missouri's water quality criteria. If any given pollutant has the reasonable potential to cause or contribute to an in-stream excursion above the WQS or derived WQBEL, the permit must contain a WQBEL 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). The RPA is performed using the *Technical Support Document for Water Quality Based Toxics Control* (TSD) methods (EPA/505/2-90-001) for continuous discharges. TSD methods encountered may be § 3.3.2, § 5.7.3 for metals, and § 5.4.1 for chloride. See additional considerations for deriving permit limits under Part II WATERBODY MIXING CONSIDERATIONS and Part III WASTELOAD ALLOCATIONS.

RPAs calculated based on effluent data provided by the facility use an RPA spreadsheet. The effluent data supplied by the facility is used to calculate effluent variability (existing controls). Background data, gathered by the Watershed Section, and mixing (background information is calculated only if the receiving stream provides mixing) is evaluated utilizing USGS Stream Gauges or USGS StreamStats. Pollutants which are bioaccumulative, where the water quality criteria (WQC) were not calculated with bioconcentration factors (BCFs); do not receive mixing considerations using guidance in the Technical Support Document for Water Quality Based Toxics Control EPA/505/2-90-001, 1991.

Wasteload allocations are determined utilizing the same equations and statistical methodology. Absent sufficient effluent data, WQBELs may be derived without consideration of effluent variability and some parameters may be assumed to be present unless found to be absent to meet the requirements of antidegradation review found in 10 CSR 20-7.031(3) and reporting of toxic substances pursuant to 40 CFR 122.44(f).

The department's permit writer's manual https://dnr.mo.gov/document-search the EPA's permit writer's manual (https://www.epa.gov/npdes/npdes-permit-writers-manual), program policies, and best professional judgment guide each decision.

For parameters where less than 10 (n<10) data were available, the default multiplying factor may be changed. The default multiplying factor is 13.1 and because the default MF value is so high, it typically provides false positive RP results. By changing the MF, the permit identifies only actual pollutants with RP. This method attempts to standardize RPAs for limited datasets, such as application data. By using a different multiplying factor, permits will contain appropriate measures for protecting water quality and considering a more appropriate impact of the effluent value of in-stream receiving water concentrations.

For data where an RPA are not appropriate, such as pH and Oil & Grease, a Reasonable Potential Determination is conducted along with the numeric data reported. pH is a logarithmic scale where an RPA is not designed for logarithmic parameter; and oil and grease is not technically a toxic parameter, but the water quality criteria is instead protecting visual general criteria and contact of aquatic species where contact causes mortality from gill coating instead of what is thought of as traditional toxicity. Neither of these pollutants receive mixing considerations.

Determining Qualitative Reasonable Potential
Reasonable potential determinations (RPD) are based on physical conditions of the site as provided in Sections 3.1.2, 3.1.3, and 3.2 of the TSD using best professional judgement. See also the EPA permit Writer's Manual[1] section 6.3.3. Pursuant to 40 CFR 122.44(d)(1)(vi), where a state has not established a numeric water quality criterion for a specific chemical pollutant that is present in an effluent at a concentration causing, has the reasonable potential to cause, or contributes to an excursion above a narrative criterion within an applicable state water quality standard, the permitting authority must establish effluent limits for that parameter or an indicator parameter, in accordance with 10 CSR 20-7.031(1)(A) and (D). The CWA requires the use of best professional judgment; and by using best professional judgment to determine reasonable potential, we can eliminate findings of RP on dischargers where detections of a pollutant in the wastewater do not necessarily mean the discharge will exceed water quality standards or cause toxicity to the waterbody. Alternatively, the absence of a detection may not mean the pollutant is not a pollutant of concern for the industry.

RPDs, can be based on any or all of the following:
- known pollutants of concern for the industry
- general criteria
- historic operating procedures

[1] https://www.epa.gov/sites/default/files/2015-09/documents/pwm_chapt_06.pdf

- activities on site
- industrial users connected to the POTW
- historic receiving water toxicity events
- watershed concerns
- treatment technology installed or proposed
- operating and maintenance procedures
- compliance with the previous permit
- existing controls on point and nonpoint sources of pollution in the watershed
- the variability of other effluent data
- the sensitivity of the species to toxicity testing (when evaluating whole effluent toxicity (WET))
- where appropriate, the dilution of the effluent in the receiving water
- additional dischargers in the watershed discharging the same or similar parameters
- or any other factor which may require a WQBEL be implemented for the permit.

Additional factors include bioaccumulation, stream uses, stream assessments, watershed uses, mixing zone studies, dissolved metals translators, and public input. Determining RP is not simply a numeric analysis. The fact sheet will identify all factors in the decision-making process when applying a WQBELs.

Narrative criteria, found in 10 CSR 20-7.031(4), with RP typically must have the specific narrative criterion converted to a numeric WQBEL. For example, a facility with orange discharge can have RP for narrative criteria like color, but a numeric iron limit may be established to account for the exceedance of the narrative criteria, instead of based on effluent data submitted by the facility.

When insufficient data is received to make a determination on RP based on numeric effluent data, the RPD decisions are based on best professional judgment considering the type of effluent discharged, the current operational controls in place, and historical overall management of the site. In the case of iron causing excursions of narrative criteria for color, if a facility has not had iron monitoring in a previous permit, adding iron monitoring would be an RPD, since numeric data isn't being used in the determination, but observable, site-specific conditions are. Historically monitoring was removed in a previous permit to only re-establish RP in the next renewal due to limited data. Some of these issues have been attributed to using an overly protective multiplying factor to derive RP, therefore best professional judgment is used at all stages of determining RP.

RPDs are also performed for WET testing in wastewater. While no WET regulations specific to industrial wastewater exist, 40 CFR 122.21(j)(5) implies the following can be considered: 1) the variability of the pollutants; 2) the ratio of wastewater flow to receiving stream flow; and 3) current technology employed to remove toxic pollutants. Generally, sufficient data does not exist to mathematically determine RPA for WET. Instead, the permit conditions are based on data for other toxic parameters in the wastewater. When toxic parameters exhibit RP, WET testing is generally included in the permit as an RPD. However, if all toxic parameters are controlled via limitations or have exhibited no toxicity in the past, then WET testing may be monitoring only or waived. Only in instances where the wastewater is well characterized and appropriately limited, can WET testing be waived.

Land Application or UIC
When the facility is performing surficial land application, underground injection (UIC), or subsurface land dispersal (also considered UIC), the volume of water, frequency of application, type of vegetation, soil type, land slopes, and general overall operating conditions are considered. Site conditions are compared to regulations, soil sampling, pollutant profile, and other pertinent conditions.

Stormwater
The TSD RPA method cannot be performed on stormwater as the flow is intermittent and highly variable. A stormwater RPD consists of reviewing application data and discharge monitoring data and comparing those data to narrative or numeric water quality criteria. For stormwater outfalls, considerations are required per 10 CSR 20-6.200(6)(B)2: A. application and other information supplied by the facility; B. effluent guidelines; C. best professional judgment; D. water quality; and E. BMPs.

Stormwater discharges do not adhere to the same principles as wastewater discharges because stormwater discharges are not continuous, and at the time of precipitation discharge, the receiving stream is also no longer at base (0) flow. This means using RPA to develop permit requirements for stormwater is generally unrepresentative.

Part IV EFFLUENT LIMIT DETERMINATIONS provides specific decisions related to this permit.
✓ No statistical RPAs were performed for this permit, RPDs were used to determine permit conditions.

REGIONAL OFFICES (ROS)
Regional Offices will provide a compliance assistance visit at a facility's request; a regional map with links to phone numbers can be found here: https://dnr.mo.gov/about-us/division-environmental-quality/regional-office. Or use https://dnr.mo.gov/compliance-assistance-enforcement to request assistance from the Region online.

RENEWAL REQUIREMENTS

Pursuant to 644.051.19, the renewal application is due at least 180 days prior to expiration. 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 any applicable federal regulations. The department may request additional information at the time of permit renewal under 644.051.19(5) RSMo and 40 CFR 122.21(h). Prior to submittal, the facility must review the entire submittal to confirm all required information and data is provided; it is the facility's responsibility to discern if additional information is required. Failure to fully 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 644.051.22 RSMo. 644.076.1 RSMo indicates false statements and negligent acts are prohibited. Sufficiently sensitive analytical methods must be used. A sufficiently sensitive method can effectively describe the presence or absence of a pollutant at or below the pollutant's permit limit or water quality standard, whichever is less. Forms are located here https://dnr.mo.gov/forms-applications 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. The facility may email cleanwaterpermits@dnr.mo.gov to submit the application to the Program. A paper copy is not necessary if submitted electronically. For larger applications, a drop-box type service may also be used. To review applications in process, use https://apps5.mo.gov/mocwis_public/applicationInprocessSearch

✓ Application materials shall include complete Form A, and Form C.

SAMPLING FREQUENCY JUSTIFICATION

Sampling and reporting frequencies are described in the fact sheet and are found within the permit tables. 40 CFR 122.45(d)(1) indicates all continuous discharges, such as wastewater discharges, shall be permitted with daily maximum and monthly average limits. Minimum sampling frequency for continuous discharges is annually per 40 CFR 122.44(i)(2).

SAMPLING TYPE JUSTIFICATION

Sampling types are continued from the previous permit. The sampling types are representative of the discharges and are protective of water quality. Discharges with altering effluent will consider implementing 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 compliance is time allowed to meet future more stringent limitations. The SOC can also be 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 the terms and conditions of an operating permit. SOCs are allowed under 40 CFR 122.47 and 10 CSR 20-7.031(11) providing certain conditions are met.

An SOC is not allowed:

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

In order to provide guidance in developing SOCs, and to attain a greater level of consistency, the department issued a policy on development of SOCs on October 25, 2012. The policy provides guidance for 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.

SECONDARY CONTAINMENT:

The department has established minimum requirements for secondary containment areas. These conditions are necessary to prevent contamination in stormwater before storm events, and before stormwater has a risk for contamination in these areas. By including dry inspection requirements, the department can be confident in the site's operational controls. By fixing all leaks and removing debris from the secondary containment areas prior to precipitation events, stormwater collected in the areas are unlikely to yield contamination or elicit sheen thereby allowing immediate removal of stormwater which is in compliance with SPCC plans.

The department is establishing a permit requirement for visual inspection frequency commiserate with the potential for contamination for secondary containment(s) to protect waters of the state from petroleum contamination, oils and greases, or sheen pursuant to 10 CSR 20-7.031(4)(B); and other water contaminants as necessary. These conditions establish permissible allowances for the facility to discharge stormwater either free of sheen or has been cleaned of sheen, but only if the facility has demonstrated, through inspections, the facility has been effectively maintaining tanks and appurtenances in the secondary containment areas.

By allowing on-site sheen removal, then discharge, the department is allowing expedited drainage of the secondary containment without delay. When a facility properly maintains tanks and appurtenances via these series of inspections and provides sheen removal prior to release, then the facility can maintain compliance with Missouri's requirements for the safe storage and handling of flammable and combustible liquids (2 CSR 90-30.050), storage tank secondary containment volume requirements (40 CFR 112), and Missouri's general water quality criteria 10 CSR 20-7.031(4)(B).

These petroleum secondary containment special conditions are based on National Fire Protection Association (NFPA) standards (mainly NFPA 30), enforceable under Missouri fire prevention codes per 2 CSR 90-30.050, and Spill Prevention, Control, and Countermeasure (SPCC) of 40 CFR 112 requirements. 2 CSR 90-30.050(20) and (21) specifically reference the Department of Natural Resources' environmental regulations. To apply these referenced conditions, this permit requires periodic secondary containment inspections.

It is acceptable for the inspections this permit requires to contradict the facility's SPCC plan inspection frequency, as these two requirements have different goals; the frequencies designated in the SPCC plan are based on the facility's evaluation of a tankage system's potential for catastrophic failure, not small leaks resulting in sheeny stormwater. The inspection frequency this permit identifies for secondary containments have the capability to identify small leaks from appurtenances which have the possibility to cause contamination in standing stormwater, not simply a catastrophic failure. SPCC requirements pursuant to 40 CFR 112.8(c)(3)(iv) and 40 CFR 112.12(c)(3)(iv) also dictate releases of contaminated stormwater is prohibited unless regulated under an NPDES permit which allows for bypassing pursuant to 40 CFR 122.41(m)(3). As this permit does not allow bypassing, the facility must follow the inspection steps listed in the special conditions of this permit.

Many facilities are subject to the requirements outlined by the EPA in 40 CFR 112.3, also known as the SPCC plan: detailing the equipment, workforce, procedures, and steps necessary to prevent, control, and provide adequate countermeasures to a discharge. These regulations minimally require secondary containment and diversion structures be maintained. Title 40 regulations are developed by the Environmental Protection Agency. The self-certified SPCC plan a facility designs, while aimed to protect all waters, may differ considerably from site to site. This permit's conditions serve to treat similar facilities similarly. The EPA did not establish minimum frequency container or containment inspections; this permit does establish a minimum frequency, and concurrent inspections for this permit and per the SPCC plan may occur. This permit does not require a professional engineer (PE) inspect the tankage systems.

These secondary containment inspection requirements may also be applied to non-petroleum secondary containments.

SPILLS, OVERFLOWS, AND OTHER UNAUTHORIZED DISCHARGE REPORTING
Any emergency involving a hazardous substance must be reported to the department's 24-hour Environmental Emergency Response hotline at (573) 634-2436 (or the National Response Center) at the earliest possible moment after discovery pursuant to 260.500-260.550 RSMo. 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. https://revisor.mo.gov/main/OneSection.aspx?section=260.500&bid=13989&hl=

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.

Certain industrial facilities are subject to the self-implementing regulations for Oil Pollution Prevention in 40 CFR 112, and are required to initiate and follow Spill Prevention, Control, and Countermeasure (SPCC) Plans. This permit, as issued, is not intended to be a replacement for any SPCC plan, nor can this permit's conditions be automatically relaxed based on the SPCC plan if the permit is more stringent than the plan.

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 holding structure dredging or other similar maintenance activities. Certain oil sludge, like those from oil water separators, are subject to self-implementing federal regulations under 40 CFR 279 for used oils.
✓ 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 must be

reviewed by the facility to ascertain compliance with this permit, state regulations, state statutes, federal regulations, and the Clean Water Act.

STORMWATER

A permit must require appropriate stormwater conditions if the SIC code or facility description type is found in 40 CFR 122.26(b)(14) and/or 10 CSR 20-6.200(2). Also, a SWPPP may be required of other facilities where stormwater has been identified as necessitating better management. The purpose of permit requirements for stormwater discharges is to comply with all applicable stormwater regulations, by creating an adaptive management plan to control and mitigate stream pollution from stormwater runoff under a SWPPP. Stormwater discharge associated with industrial activity, the term includes, but is not limited to: storm water discharges from industrial plant yards; immediate access roads and rail lines used or traveled by carriers of raw materials, manufactured products, waste material, or by-products used or created by the facility; material handling sites; sites used for the application or disposal of process wastewaters; sites used for the storage and maintenance of material handling equipment; sites used for residual treatment, storage, or disposal; shipping and receiving areas; manufacturing buildings; storage areas (including tank farms) for raw materials and intermediate and finished products unless material is in closed cars or trailers and the loading/unloading operation does not expose material to storm water or otherwise pose risk of storm water contamination and areas where industrial activity has taken place in the past and where significant materials remain and are exposed to storm water.

✓ Applicable; see requirements on page one of the fact sheet under FACILITY DESCRIPTION regarding new coverage for stormwater at this facility.

Stormwater Pollution Prevention Plan (SWPPP)

Pursuant to 40 CFR 122.44(k), Best Management Practices (BMPs) can be used to control or abate the discharge of pollutants when: 1) Authorized under §304(e) of the Clean Water Act (CWA) for the control of toxic pollutants and hazardous substances from ancillary industrial activities; 2) Authorized under §402(p) of the CWA for the control of stormwater discharges; 3) Numeric effluent limitations are infeasible; or 4) the practices are reasonably necessary to achieve effluent limitations and standards or to carry out the purposes and intent of the CWA. A BMP may take the form of a numeric benchmark. 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 and again in 2021 https://www.epa.gov/sites/default/files/2021-03/documents/swppp_guide_industrial_2021_030121.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 can 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 necessary to meet the requirements of the permit. At renewal, the facility may attach the SWPPP and/or corrective action reports (CARs) to provide overall knowledge about specific BMPs at the site.

The facility can review the precipitation frequency maps for development of appropriate BMPs. The online map https://hdsc.nws.noaa.gov/hdsc/pfds/pfds_map_cont.html?bkmrk=mo can be targeted to the facility location and is useful when designing detention structures and planning for any structural BMP component. The stormwater map can also be used to determine if the volume of stormwater caused a disrupted BMP; and if the BMP must be re-designed to incorporate additional stormwater flows.

Areas which must be included in the SWPPP are identified in 10 CSR 20-6.200(2)(A). These areas include but are not limited to: industrial plant yards; immediate access roads and rail lines used or traveled by carriers of raw materials, manufactured products, waste material, or by-products used or created by the facility; material handling sites; sites used for the application or disposal of process wastewaters (includes UIC and Land Application); sites used for the storage and maintenance of material handling equipment; sites used for residual treatment, storage, or disposal; shipping and receiving areas; manufacturing buildings; storage areas (including tank farms) for raw materials and intermediate and finished products unless material is in closed cars or trailers and the loading/unloading operation does not expose material to storm water or otherwise pose risk of storm water contamination; and areas where industrial activity has taken place in the past and where significant materials remain and are exposed to storm water.

Once the potential sources of stormwater pollution have been identified, a plan shall be formulated to best control the amount of pollutant being released and discharged by each activity or source. This must 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 must be taken to repair, improve, or replace the failing BMP. This internal evaluation is required at least once per month but may 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.

In addition to the requirements found in the beginning of the STORMWATER section, pursuant to 10 CSR 20-6.200(1)(D)27. A. The term "significant materials" includes but is not limited to: storm water discharged from industrial plant yards, immediate access roads and rail lines used or traveled by carriers of raw materials, manufactured products, waste material, or by-products used or created by the facility.

B. Significant materials having the potential to be released with storm water discharge include, but are not limited to: raw materials; fuels; materials such as solvents, detergents, and plastic pellets; finished materials such as metallic products; raw materials used in food processing or production; hazardous substances designated under Section 101(14) of the Comprehensive Environmental Response, Compensation, Liability Act of 1980 (CERCLA); any chemical the facility is required to report pursuant to Section 313 of Title III of Superfund Amendments & Reauthorization Act of 1986 (SARA); fertilizers; pesticides; and waste products such as ashes, slag, or sludge.

C. Material received in drums, totes, or other secure containers or packages which prevent contact with storm water, including run in, are exempted from the significant materials classification until the container has been opened for any reason. If the container is moved into a building or other protected area prior to opening, it will not become a significant material.

All of the enumerated locations and items will require stormwater management BMPs.

Stormwater Antidegradation
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 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 per 10 CSR 20-7.031(3). For further guidance, consult the antidegradation implementation procedure (https://dnr.mo.gov/document-search/antidegradation-implementation-procedure).

Alternative Analysis (AA) evaluation of the BMPs is a structured evaluation of BMPs which are reasonable and cost effective. The AA evaluation can 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 exposure" is not a feasible alternative at the facility. This structured analysis of BMPs serves as the antidegradation review, fulfilling the requirements of 10 CSR 20-7.031(3) Water Quality Standards and *Antidegradation Implementation Procedure* (AIP), §II.B.

If parameter-specific numeric benchmark exceedances continue to occur and the facility feels there are no practicable or cost-effective BMPs which will sufficiently reduce a pollutant concentration in the discharge to the benchmark values established in the permit, the facility can submit a request to re-evaluate the benchmark values. This request needs to include 1) a detailed explanation of why the facility is unable to comply with the permit conditions and unable to establish BMPs to achieve the benchmark values; 2) financial data of the company and documentation of cost associated with BMPs for review and 3) the SWPPP, which must 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; applications are found: https://dnr.mo.gov/water/business-industry-other-entities/permits-certification-engineering-fees/wastewater

SUFFICIENTLY SENSITIVE ANALYTICAL METHODS
Please review Standard Conditions Part 1, §A, No. 4. The analytical and sampling methods used shall conform to the reference methods listed in 10 CSR 20-7.015 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 any 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. The reporting limits established by the chosen laboratory must be below the lowest effluent limits established for the specified parameter (including any parameter's future limit after an SOC) in the permit unless the permit provides for an ML or if the facility provides a written rationale to the department. It is the facility's responsibility to ensure the laboratory has adequate equipment and controls in place to quantify the pollutant. Inflated reporting limits will not be accepted by the department if the reporting limit is above the parameter value stipulated in the permit. 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. Without a sufficiently sensitive method, the facility will be required to resample for the permit application to show the actual presence or absence of a pollutant. Reporting "non-detect" where the detection limit of the test is above the permit limit, benchmark, or water quality standard. will be considered a detection since less sensitive tests can not confirm the absence of the pollutant. Standard Conditions Part I has legally binding requirements for sufficiently sensitive methods.

TECHNOLOGY-BASED EFFLUENT LIMITATIONS (TBEL):
One of the major strategies of the Clean Water Act (CWA) in making "reasonable further progress toward the national goal of eliminating the discharge of all pollutants" is to require effluent limitations based on the capabilities of the technologies available to control those discharges. Technology-based effluent limitations (TBELs) aim to prevent pollution by requiring a minimum level of effluent quality attainable using demonstrated technologies for reducing pollutant discharges. TBELs are developed independently of the potential impact of a discharge on the receiving water, which is addressed through water-quality criteria and water-quality based effluent limitations (WQBELs). NPDES regulations at 40 CFR 125.3(a) require permits to develop technology-based treatment requirements, consistent with CWA § 301(b) and § 402(a)(1) which represent the minimum level of control imposed in a permit. The regulation also indicates permits must include additional or more stringent effluent limitations and conditions, including those necessary to protect water quality. Regardless of the technology chosen to be the basis for limitations, the facility is not required to install the technology, only to meet the established TBEL. However, technologies installed may not be removed unless a permit modification to change the FACILITY DESCRIPTION is completed. Any change in technology must be reported to the department.

✓ Not applicable; the implemented technology was reviewed. Secondary containments are present at the site and are necessary per the Spill Prevention, Control, and Countermeasures (SPCC) plan. The department has deferred to SPCC regulations for the technology requirements at this site pursuant to 40 CFR Part 112; titled Oil Pollution Prevention.

UNDERGROUND INJECTION CONTROL (UIC)
Class V wells are sub-surface dispersal or injection of any industrial wastewater; and in certain circumstances, may also be considered a Class V well if it is domestic wastewater. They can also be shallow injection wells like heat pumps. UIC systems may be described as having "septic tanks" or "lateral lines" in addition to the traditional vertical well type of injection. The UIC program for all classes of wells in the State of Missouri is administered by the Missouri Department of Natural Resources and approved by EPA pursuant to §§1422 and 1425 of the Safe Drinking Water Act (SDWA) and 40 CFR 147 Subpart AA. Injection wells are classified based on the liquids which are being injected. Class I wells are hazardous waste wells which are banned by 577.155 RSMo, Class IV wells are also banned; Class II wells are established for oil and natural gas production (not permitted by the Water Protection Program); Class III wells are used to inject fluids to extract minerals (not permitted by the Water Protection Program). 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).

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)). The department implements additional requirements for these types of operations pursuant to 10 CSR 20-6.015(4)(A)1 which instructs the department to develop permit conditions containing limitations, monitoring, reporting, and other requirements to protect soils, crops, surface waters, groundwater, public health, and the environment.

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

VARIANCE
Per the Missouri Clean Water Law §644.061.4, variances shall be granted for such period of time and under such terms and conditions as specified by the commission in its order. The variance may be extended by affirmative action of the commission. In no event shall the variance be granted for a period of time greater than is reasonably necessary for complying with the Missouri Clean Water Law §§644.006 to 644.141 or any standard, rule or regulation promulgated pursuant to Missouri Clean Water Law §§644.006 to 644.141. Thermal variances are regulated separately and are found under 644 RSMo.

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

WASTELOAD ALLOCATIONS (WLA) AND WQBEL CALCULATION METHODS
The WLA is the maximum amount of pollutant each discharger is allowed to discharge into the receiving waterbody without endangering water quality, per 10 CSR 20-2.010. Only streams with available load allocations can be granted discharge allowances. Outfalls afforded mixing allocations provide higher limits because the receiving stream is able to accept more pollutant loading without causing adverse impacts to the environment or aquatic life. The department uses the *Technical Support Document For Water Quality-Based Toxics Control* or "TSD" EPA/505/2-90-001; 3/1991 for wastewater discharges.

✓ Applicable; wasteload allocations for toxic parameters were calculated using water quality criteria, TMDLs, or water quality model results.

Pollutant Toxicity

The TSD is specifically written for water-quality based controls for "toxic pollutants". Toxics are those pollutants for which toxicity tests, and water quality standards based on these toxicity tests, are available to assess and control the specific noxiousness of the pollutant in the effluent. The established numeric criteria are then used to determine chronic and acute toxicity of the pollutant in statistical scenarios (the reasonable potential analysis). Oil & Grease (O&G) and Total Suspended Solids (TSS) are considered "conventional pollutants" and are not necessarily toxic. Oil and Grease and TSS do not behave the way toxic pollutants behave in effluent. They have a more direct, physical effect and they do not act in the same way as a pollutant the majority of the TSD was written to evaluate. O&G and TSS do not mix in the water or cause toxicity of organisms in the same way. Limitations for TSS and Oil and Grease, where they exist, are not for the toxicity of the pollutant. O&G and TSS limits may be found in the permit due to either aesthetics or as an indicator of other pollutants. A fish swimming into vegetable oil clogs the gills causing mortality, as opposed to swimming into copper-laden water where the organism's metabolic processes are damaged causing poisoning. Toxic water quality criteria are developed based on the species living in Missouri streams. Each species and developmental stage react differently to the contaminant and the exposure time; therefore, Missouri water quality criteria account for all of these factors.

Additionally, O&G and TSS are non-specific analytical tests that *aggregate* how much oil and grease and *how many* suspended solids there are in the water. These tests do not specify the type of O&G or the components of the solids. While solids may have toxic components, such as copper or iron, the results are nonspecific to the aggregate. Therefore, the statistical methods for calculating acute and chronic toxicity do not work for these pollutants because the analytical tests cannot determine composition.

For pollutants that act on metabolic processes of organisms, toxicity is a characterization that the TSD does describe; therefore, the TSD methods below are used to calculate limits for most other pollutants. TSD methods also explain how to calculate permit limits for the protection of human health, wildlife and livestock, irrigation, and drinking water criteria based on exposure and those methods are used when appropriate, but the elements of the calculations are very similar.

Example Calculation of Water Quality-Based Effluent Limits

1 Acute AQL: e^(1.0166 * ln170 – 3.062490) * (1.136672 – ln170 *0.041838) = **22.15** µg/L [at hardness 170]
2 Chronic AQL: e^(0.7977 * ln170 – 3.909) * (1.101672 – ln170*0.041938) = **14.094** µg/L
3 TR Conversion: AQL/Translator = 22.15 / **0.96** = 23.073
4 TR Conversion: AQL/Translator = 14.094 / **0.96** = 14.681
5 Acute WLA: Ce = ((2.321 cfsDF + 0.9 cfsZID) * 23.073 – (0.9 cfsZID * 0 background)) / 2.321 cfsDF = 32.02
6 Chronic WLA: Ce = ((2.321 cfsDF + 9 cfsMZ) * 14.681 – (9 cfsMZ * 0 background)) / 2.321 cfsDF = 71.611
7 LTAa: WLAa * LTAa multiplier = 32.02 * **0.321** = 10.281 [CV: 0.6, 99th %ile]
8 LTAc: WLAc * LTAc multiplier = 71.611 * **0.527** = 37.77 [CV: 0.6, 99th %ile]
9 use most protective LTA: 10.281
10 Daily Maximum: MDL = LTA * MDL multiplier = 10.281 * 3.114 = 32 µg/L [CV: 0.6, 99th %ile]
11 Monthly Average: AML = LTA * AML multiplier = 10.281 * 1.552 = 16 µg/L [CV: 0.6, 95th %ile, n=4]

Description:

- Lines 1 and 2 are the acute and chronic calculation of the water quality standards. Where metals are hardness-dependent, the hardness listed will be used at the end of the equation; see METALS for additional information. AQL is the protection of aquatic life, these values (or calculations) are found in the tables in 10 CSR 20-7.031.
- Lines 3 and 4 are the translator values. Missouri uses standardized translator values found in The Metals Translator: Guidance For Calculating A Total Recoverable Permit Limit From A Dissolved Criterion, EPA 823-B-96-007, June 1996 https://www3.epa.gov/npdes/pubs/metals_translator.pdf unless a site-specific translator study has been completed. For parameters with no translator value, or a translator value of 1, the entirety of the pollutant found in the water column is assumed to be biologically available.
- Lines 5 and 6 account for mixing, if available. The equation below is the steady-state model. Most toxic parameter's effluent limits are calculated using TSD §4.5.5. and use the steady-state model approach. Mixing is allowed when a stream's flow 7Q10 is above 0.1 cfs, (or lake width is sufficient), the discharge may be afforded mixing allowances. See Part II – WATERBODY MIXING CONSIDERATIONS, if mixing is allowed for the discharge. When there is no mixing allowed, only *Ce* and *Qe* are used to determine *C*. For mixing situations, the 7Q10 is used to determine the appropriate long term average flow of the receiving body over a 7 day period which reoccurs every 10 years. Most pollutants use the 7Q10, unless the pollutant is identified otherwise, such as pollutants listed as protection of human health (1Q10) or ammonia (30Q10).

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

Where C = downstream concentration
Cs = upstream concentration
Qs = upstream flow
Ce = effluent concentration
Qe = effluent flow

- Lines 7, 8, and 9 show a summary of the statistical equations calculated in the background of the RP and limit calculator spreadsheet (See Part III – REASONABLE POTENTIAL) and take into account the hypothetical or actual variability of the effluent. This section of the calculation includes statistical procedures to calculate:
  - MF is the statistical Multiplying Factor (MF) using a 99% confidence level and results in a 99% probability basis. By retaining a high multiplying factor, the spreadsheet assumes correct identification of reasonable potential 99% of the time by utilizing several conservative factors. However, for limited datasets, such as the data submitted with application materials, the multiplying factor statistically defaults to 13.1. This is a multiplier used for the highest data value in the data set. When the sample size is 1 (n=1), the spreadsheet has a tendency to incorrectly predict positive RP. Because of this, the permit writer may use another MF when determining RP analytically. The permit writer may choose to use the MF of other similar datasets for similarly acting parameters (i.e. use selenium's MF for cadmium) or may choose an MF for the entire facility based on other factors. An elevated MF is particularly problematic for naturally occurring parameters, such as iron or zinc where even a relatively low detection would show positive RP if the MF was 13.1.
  - CV: Coefficient of Variation (CV) is calculated by dividing the Standard Deviation of the sample set by the mean of the same sample set. The sample set is comprised of the data the facility reported in the application or during the last renewal period, or five years worth of data.
    - When facility data are highly variable, the calculations generally result in tightened limits for the monthly average, while having a higher daily maximum limit., and The default variability is 0.6, and moderately variable effluent is usually 0.5 to 0.7. For low variability effluent data sets, below approximately 0.3, the daily maximum and monthly average are closer together, resulting in a lower daily maximum, but a higher monthly average.
    - Data variability is the strongest predictor of effluent limits and is the largest contributor to changes in effluent limits from one permit to the next.
  - The LTA multipliers are calculated using e^[zs - 0.5s2], where s2 = ln(CV2 + 1), z = 2.326 for 99th percentile for the acute, and e^[zs4 - 0.5s42], where s42 = ln(CV2/4 + 1), z = 1.645 for 95th percentile for the chronic.
  - The spreadsheet showing the actual calculations is available upon request.
- Line 10 reports the daily maximum limit. In EPA documents, the EPA lists the MDL, maximum daily limit. The daily maximum is the value the facility cannot exceed at any time.
- Line 11 reports the monthly average limit. In EPA documents, the EPA lists the AML average monthly limit. Monthly average limits are typically the most stringent limits applied. Facilities subject to AMLs may take additional samples in the month to meet the limit by averaging the results. When only one sample is taken in the month, the sample result is applied to both the daily maximum and monthly average.

Wasteload Allocation (WLA) Modeling
Entities may submit facility-specific studies to better determine the site specific wasteload allocations applied in permits. These studies may be: mixing models, metals translators, water effects ratios, pH mixing studies, biotic ligand models, or other models. All entities wishing to use a diffuser must have a mixing model on file.
✓ Not applicable; no WLA studies have been submitted.

WATER QUALITY STANDARD REVISION
In accordance with 644.058 RSMo, the department is required to utilize an evaluation of the environmental and economic impacts of modifications to water quality criteria 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. TRC WQC have changed, but was not more than 25%.

WHOLE EFFLUENT TOXICITY (WET) TEST
A WET test is a quantifiable method to conclusively determine if discharges from the facility cause toxicity to aquatic life by itself, in combination with, or through synergistic responses, typically when mixed with receiving stream water. Under the CWA §101(a)(3), requiring WET testing is reasonably appropriate for Missouri State Operating Permits to quantify toxicity. WET testing is also required by 40 CFR 122.44(d)(1) when RP is found. WET testing ensures the provisions in 10 CSR 20-6 and Missouri's Water Quality Standards in 10 CSR 20-7 are being met; the acute WQS for WET is 0.3 TUa. Under 10 CSR 20-6.010(8)(A)4, the department may require other terms and conditions it deems necessary to ensure compliance with the CWA and MCWL. Requirements found in the federal application requirements for POTWs (40 CFR 122.21(j)(5)) do not apply to industrial facilities, therefore WET testing can be implemented on a case-by-case basis following the factors outlined below. Annual testing is the minimum testing frequency if reasonable potential is found; monitoring requirements promulgated in 40 CFR 122.44(i)(2) state "requirements to report monitoring results shall be established on a case-by-case basis with a frequency dependent on the nature and effect of the discharge, but in no case less than once per year." Typically, annual WET requirements are established for the calendar year, and the report is due January 28th of the following year.

To determine reasonable potential, factors considered are: 1) history of toxicity; 2) quantity and quality of substances (either limited or not) in the permit with aquatic life protections assigned; and 3) operational controls on toxic pollutants. See Part III under REASONABLE POTENTIAL for additional information. A facility does not have to be designated as a major facility to receive WET testing; and being a major facility does not automatically require WET testing. Additionally, per 40 CFR 122.44(d)(1)(v), limits on

whole effluent toxicity are not necessary where the permitting authority demonstrates in the fact sheet, using the procedures in 40 CFR 122.44(d)(1)(ii) of this section, that chemical-specific limits or specified operational controls are sufficient to attain and maintain applicable numeric and narrative water quality standards.

If WET limits are applied to this facility, follow up testing applies. When a facility exceeds the TU established in the permit, three additional follow-up tests are triggered. The follow up test results do not negate the initial testing result. If the facility is within the prescribed TU limit for all three follow up tests, then no further testing is required until the next regularly scheduled tests. If one or more additional tests exceed the TU limit, the facility may consider beginning the Toxicity Identification Evaluation (TIE) and Toxicity Identification Reduction (TRE) processes instead of waiting for three consecutive TU exceedances. The TIE and TRE process can take up to two years, especially when toxicity is variable or transient. We urge facilities to work closely with their WET testing laboratory to follow nationwide guidance for determining causes of toxicity and curative activities to remove toxicity. Additional wastewater controls may be necessary; and while, generally, no Construction Permit (CP) is required for adding treatment at industrial facilities, the facility should check with the Engineering Section to determine a plan of action.

The department works with the Missouri Department of Conservation and has understanding of streams already exhibiting toxicity, even without the influence of industrial wastewater or stormwater. Facilities discharging to streams with historical toxicity are required to use laboratory water for dilution, instead of water from the receiving stream when performing WET tests. The permit may require that a stream sample still be obtained for these areas to determine if the effluent is contributing to toxicity.

If WET testing failures are from a known toxic parameter, and the facility is working with the department to alleviate that pollutant's toxicity in the discharge, please contact the department prior to conducting follow-up WET testing. Under certain conditions, follow-up testing may be waived when the facility is already working to reduce and eliminate toxicity in the effluent. For the purposes of reporting, the laboratory may supply either the TU value, the LC_{50}, or the NOEC. If the laboratory only supplied the LC_{50} or the NOEC value, the toxic unit is calculated by $100/LC_{50}$ for acute tests, or 100/NOEC for chronic tests. The TU value is entered in the eDMR system. Reports showing no toxicity are usually entered as <1. For WET tests with no mixing, the laboratory detection limit is <1 TU.

- ✓ Not applicable; WET testing was not implemented in this permit because, while some pollutants limited in the permit are toxic, the pollutant limits are sufficient to determine overall effluent toxicity. 40 CFR 122.44(d)(1)(v) indicates limits on whole effluent toxicity are not necessary where the permitting authority demonstrates in the fact sheet, using the procedures in 40 CFR 122.44(d)(1)(ii), chemical-specific limits for the effluent are sufficient to attain and maintain applicable numeric and narrative State water quality standards.

PART IV. EFFLUENT LIMIT DETERMINATIONS

OUTFALL #001 – HYDROSTATIC TESTING WATER

EFFLUENT LIMITATIONS TABLE:

PARAMETERS	UNIT	DAILY MAX	MONTHLY AVG.	PREVIOUS PERMIT LIMITS	MINIMUM SAMPLING FREQUENCY	REPORTING FREQUENCY	SAMPLE TYPE
PHYSICAL							
FLOW	MGD	1.152	*	NEW	♠	♠	24 HR. TOT
CONVENTIONAL							
CHLORINE, TOTAL RESIDUAL (TRC)	µg/L	18.1 (ML130)	9 (ML130)	19, 19	♠	♠	GRAB
OIL & GREASE	mg/L	15	10	NEW	♠	♠	GRAB
pH †	SU	6.5 TO 9.0	-	SAME	♠	♠	GRAB
TOTAL SUSPENDED SOLIDS (TSS)	mg/L	100	100	SAME	♠	♠	GRAB
PETROLEUM CONSTITUENTS							
BENZENE	mg/L	0.005	0.005	SAME	♠	♠	GRAB
ETHYLBENZENE	mg/L	0.32	0.32	SAME	♠	♠	GRAB
TOLUENE	mg/L	1.0	1.0	SAME	♠	♠	GRAB
XYLENE	mg/L	10.0	10.0	SAME	♠	♠	GRAB

See notes in permit.

DERIVATION AND DISCUSSION OF LIMITS:

PHYSICAL:

Flow

Per 40 CFR Part 122.44(i)(1)(ii) the volume of effluent discharged from each outfall is needed to ensure compliance with permitted effluent limitations. If the facility is unable to obtain effluent flow, then it is the responsibility of the facility to inform the department, which may require the submittal of an operating permit modification. The facility will report the total maximum daily flow and average in millions of gallons per day (MGD), once per day per discharge monitoring continued from MOG670353. The effluent limit is based on the design flow of the hydrostatic testing system and shall not be exceeded.

CONVENTIONAL:

Chlorine, Total Residual (TRC)

This pollutant has reasonable potential because potable water is used in the process. There are no technology limits established for this parameter therefore water quality limits are the most protective. The effluent limits are calculated as follows; however, the department has established an ML for this parameter; the ML is 130 µg/L, see note ‡ in the permit. This parameter must be measured within the 15-minute holding time. If the facility needs to install dechlorination equipment, a construction permit is usually not required pursuant to 10 CSR 20-6.010(5)(B)10.

The effluent limits are appropriate based on the activities at the site and are recalculated from permit MOG670353 pursuant to 10 CSR 20-7.015(9)(I)1 utilizing best professional judgment and are protective of the receiving waterbody's uses. There are no technology limits established for this parameter therefore water quality limits are the most protective.

CMC: 19 µg/L
CCC: 11 µg/L
WLAa: Ce = ((1.782 cfsDF + 0 cfsZID) * 19 – (0 cfsZID * 0 background)) / 1.782 cfsDF = 19
WLAc: Ce = ((1.782 cfsDF + 0 cfsMZ) * 11 – (0 cfsMZ * 0 background)) / 1.782 cfsDF = 11
LTAa: WLAa * LTAa multiplier = 19 * 0.321 = 6.101 [CV: 0.6, 99th %ile]
LTAc: WLAc * LTAc multiplier = 11 * 0.527 = 5.802 [CV: 0.6, 99th %ile]
use most protective LTA: 5.802
Daily Maximum: MDL = LTA * MDL multiplier = 5.802 * 3.114 = 18.1 µg/L [CV: 0.6, 99th %ile]
Monthly Average: AML = LTA * AML multiplier = 5.802 * 1.552 = 9 µg/L [CV: 0.6, 95th %ile, n=4]

Previous permit limits were 19 µg/L daily maximum and monthly average based on water quality criteria prior to December 2019. However, this permit utilizes the steady state calculation for effluent limits therefore the values are lower. Additionally, the water quality criteria have changed from 19 to 18 µg/L in December 2019 and are the approved criteria therefore must be used.

Oil & Grease

15 mg/L daily maximum; 10 mg/L monthly average; new requirement using RPD. Oil and grease is considered a conventional pollutant. Oil and grease is a comprehensive test which measures for gasoline, diesel, crude oil, creosote, kerosene, heating oils, heavy fuel oils, lubricating oils, waxes, and some asphalt and pitch. The test can also detect some volatile organics such as benzene, toluene, ethylbenzene, or xylene, but these constituents are often lost during testing due to their boiling points. An RPD on this parameter found RP based on the petroleum products held by the tanks and appurtenances at this site. 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 limit this permit applies does not allow the facility to violate general criteria pursuant to 10 CSR 20-7.015(4) even if data provided are below the numeric limit. The effluent limits are appropriate based on the activities at the site and are established pursuant to 10 CSR 20-7.015(9)(I)1 utilizing best professional judgment and are protective of the receiving waterbody's uses. There are no technology limits established for this parameter therefore water quality limits are the most protective.
AQL Chronic: 10 mg/L per 10 CSR 20-7.031 Table A1
Set chronic standard equal to chronic WLA per TSD §5.4.2 (EPA/505/2-90-001); multiply by 1.5 to obtain acute limit.
10 mg/L * 1.5 = 15 mg/L

pH

6.5 to 9.0 SU – instantaneous grab sample. Water quality limits per 10 CSR 20-7.031(5)(E) are appropriate as WQBEL is more protective than the TBEL, and there is RP. This parameter must be measured within the 15-minute holding time. pH is a fundamental water quality indicator. Additionally, metals leachability and ammonia availability in wastewater is dependent on pH. Limitations in this permit will protect against aquatic organism toxicity, downstream water quality issues, human health hazard contact, and negative physical changes in accordance with the general criteria at 10 CSR 20-7.031(4) and the Clean Water Act's (CWA) goal of 100% fishable and swimmable rivers and streams. The effluent limits are appropriate based on the activities at the site and are continued from MOG670353 pursuant to 10 CSR 20-7.015(9)(I)1 utilizing best professional judgment and are protective of the receiving waterbody's uses. There are no technology limits established for this parameter therefore water quality limits are the most protective. Antibacksliding requirements pursuant to CWA 402(o) requires the previous WQBELs be continued because an allowed backsliding exception was not met nor was an antidegradation review completed.

Total Suspended Solids (TSS)

100 mg/L daily maximum and monthly average. The wastewater discharge was reviewed for compliance with general criteria; there is RP for a general criteria violation based on the daily flow of hydrostatic testing water which may cause scouring or erosion if controls are not implemented. The effluent limits are appropriate based on the activities at the site and are continued pursuant to 10 CSR 20-7.015(9)(I)1 utilizing best professional judgment. Antibacksliding requirements pursuant to CWA 402(o) requires the previous WQBELs be continued because an allowed backsliding exception was not met nor was an antidegradation review completed.

PETROLEUM CONSTITUENTS:

BTEX are common indicators of petroleum discharge and provide data for the lighter constituents of petroleum fractions. While O&G limits are provided above, O&G typically does not show lighter aliphatic or ringed hydrocarbons like benzene, therefore additional monitoring of these parameters is required.

Benzene

Previous permit limits were 0.005 mg/L daily maximum, and monthly average based strictly on the water quality criteria per 10 CSR 20-7.031 Table A. The effluent limits are appropriate based on the activities at the site and are continued from MOG670353 pursuant to 10 CSR 20-7.015(9)(I)1 utilizing best professional judgment and are protective of the receiving waterbody's uses. Antibacksliding requirements pursuant to CWA 402(o) requires the previous WQBELs be continued because an allowed backsliding exception was not met nor was an antidegradation review completed.

Ethylbenzene

Previous permit limits were 0.32 mg/L daily maximum, and monthly average based strictly on the water quality criteria per 10 CSR 20-7.031 Table A. The effluent limits are appropriate based on the activities at the site and are continued from MOG670353 pursuant to 10 CSR 20-7.015(9)(I)1 utilizing best professional judgment and are protective of the receiving waterbody's uses. Antibacksliding requirements pursuant to CWA 402(o) requires the previous WQBELs be continued because an allowed backsliding exception was not met nor was an antidegradation review completed.

Toluene
Previous permit limits were 1.0 mg/L daily maximum, and monthly average based strictly on the water quality criteria per 10 CSR 20-7.031 Table A. The effluent limits are appropriate based on the activities at the site and are continued from MOG670353 pursuant to 10 CSR 20-7.015(9)(I)1 utilizing best professional judgment and are protective of the receiving waterbody's uses. Antibacksliding requirements pursuant to CWA 402(o) requires the previous WQBELs be continued because an allowed backsliding exception was not met nor was an antidegradation review completed.

Xylene
Previous permit limits were 10.0 mg/L daily maximum, and monthly average based strictly on the water quality criteria per 10 CSR 20-7.031 Table A. The effluent limits are appropriate based on the activities at the site and are continued from MOG670353 pursuant to 10 CSR 20-7.015(9)(I)1 utilizing best professional judgment and are protective of the receiving waterbody's uses. Antibacksliding requirements pursuant to CWA 402(o) requires the previous WQBELs be continued because an allowed backsliding exception was not met nor was an antidegradation review completed.

PART V. ADMINISTRATIVE REQUIREMENTS

PUBLIC NOTICE
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 this Missouri State Operating Permit. The proposed determinations are tentative pending public comment. The department shall give public notice when a draft permit has been prepared for renewals and major modifications. Additionally, a public notice will be posted if a public hearing is to be held because of a significant degree of interest in or with concerns related to a draft permit. No public notice is required when a request for a permit modification or termination is denied; however, the requester and facility must be notified of the denial in writing. https://dnr.mo.gov/water/what-were-doing/public-notices The public comment period is the length of time not less than 30 days following the date of the public notice which interested persons may submit written comments about the proposed permit. For persons wishing to submit comments regarding this proposed operating permit, please refer to the Public Notice page located at the front of this draft operating permit which gives direction on how and where to submit appropriate comments. All comments must be in written form.

✓ The Public Notice period for this operating permit began September 26, 2025, and ended October 27, 2025. No comments were received.

DATE OF FACT SHEET: OCTOBER 28, 2025

COMPLETED BY:
PAM HACKLER, ENVIRONMENTAL SCIENTIST | OPERATING PERMITS SECTION - INDUSTRIAL UNIT
MISSOURI DEPARTMENT OF NATURAL RESOURCES |WATER PROTECTION PROGRAM
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STANDARD CONDITIONS FOR NPDES PERMITS
ISSUED BY
THE MISSOURI DEPARTMENT OF NATURAL RESOURCES
MISSOURI CLEAN WATER COMMISSION
REVISED
AUGUST 1, 2014

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

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

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

2. **Monitoring Requirements**.
   a. Records of monitoring information shall include:
      i. The date, exact place, and time of sampling or measurements;
      ii. The individual(s) who performed the sampling or measurements;
      iii. The date(s) analyses were performed;
      iv. The individual(s) who performed the analyses;
      v. The analytical techniques or methods used; and
      vi. The results of such analyses.
   b. If the permittee monitors any pollutant more frequently than required by the permit at the location specified in the permit using test procedures approved under 40 CFR Part 136, or another method required for an industry-specific waste stream under 40 CFR subchapters N or O, the results of such monitoring shall be included in the calculation and reported to the Department with the discharge monitoring report data (DMR) submitted to the Department pursuant to Section B, paragraph 7.

3. **Sample and Monitoring Calculations.** Calculations for all sample and monitoring results which require averaging of measurements shall utilize an arithmetic mean unless otherwise specified in the permit.

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

5. **Record Retention.** Except for records of monitoring information required by the permit related to the permittee's sewage sludge use and disposal activities, which shall be retained for a period of at least five (5) years (or longer as required by 40 CFR part 503), the permittee shall retain records of all monitoring information, including all calibration and maintenance records and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports required by the permit, and records of all data used to complete the application for the permit, for a period of at least three (3) years from the date of the sample, measurement, report or application. This period may be extended by request of the Department at any time.

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

Section B – Reporting Requirements

1. **Planned Changes.**
   a. The permittee shall give notice to the Department as soon as possible of any planned physical alterations or additions to the permitted facility when:
      i. The alteration or addition to a permitted facility may meet one of the criteria for determining whether a facility is a new source in 40 CFR 122.29(b); or
      ii. The alteration or addition could significantly change the nature or increase the quantity of pollutants discharged. This notification applies to pollutants which are subject neither to effluent limitations in the permit, nor to notification requirements under 40 CFR 122.42(a)(1);
      iii. The alteration or addition results in a significant change in the permittee's sludge use or disposal practices, and such alteration, addition, or change may justify the application of permit conditions that are different from or absent in the existing permit, including notification of additional use or disposal sites not reported during the permit application process or not reported pursuant to an approved land application plan;
      iv. Any facility expansions, production increases, or process modifications which will result in a new or substantially different discharge or sludge characteristics must be reported to the Department 60 days before the facility or process modification begins. Notification may be accomplished by application for a new permit. If the discharge does not violate effluent limitations specified in the permit, the facility is to submit a notice to the Department of the changed discharge at least 30 days before such changes. The Department may require a construction permit and/or permit modification as a result of the proposed changes at the facility.

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

b. The following shall be included as information which must be reported within 24 hours under this paragraph.
   i. Any unanticipated bypass which exceeds any effluent limitation in the permit.
   ii. Any upset which exceeds any effluent limitation in the permit.
   iii. Violation of a maximum daily discharge limitation for any of the pollutants listed by the Department in the permit required to be reported within 24 hours.

c. The Department may waive the written report on a case-by-case basis for reports under paragraph 2. b. of this section if the oral report has been received within 24 hours.

3. **Anticipated Noncompliance**. The permittee shall give advance notice to the Department of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements. The notice shall be submitted to the Department 60 days prior to such changes or activity.

4. **Compliance Schedules.** Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of the permit shall be submitted no later than 14 days following each schedule date. The report shall provide an explanation for the instance of noncompliance and a proposed schedule or anticipated date, for achieving compliance with the compliance schedule requirement.

5. **Other Noncompliance.** The permittee shall report all instances of noncompliance not reported under paragraphs 2, 3, and 6 of this section, at the time monitoring reports are submitted. The reports shall contain the information listed in paragraph 2. a. of this section.

6. **Other Information**. Where the permittee becomes aware that it failed to submit any relevant facts in a permit application, or submitted incorrect information in a permit application or in any report to the Department, it shall promptly submit such facts or information.

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

Section C – Bypass/Upset Requirements

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

2. **Bypass Requirements.**
   a. Bypass not exceeding limitations. The permittee may allow any bypass to occur which does not cause effluent limitations to be exceeded, but only if it also is for essential maintenance to assure efficient operation. These bypasses are not subject to the provisions of paragraphs 2. b. and 2. c. of this section.
   b. Notice.
      i. Anticipated bypass. If the permittee knows in advance of the need for a bypass, it shall submit prior notice, if possible at least 10 days before the date of the bypass.
      ii. Unanticipated bypass. The permittee shall submit notice of an unanticipated bypass as required in Section B – Reporting Requirements, paragraph 5 (24-hour notice).
   c. Prohibition of bypass.
      i. Bypass is prohibited, and the Department may take enforcement action against a permittee for bypass, unless:
         1. Bypass was unavoidable to prevent loss of life, personal injury, or severe property damage;
         2. There were no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment downtime. This condition is not satisfied if adequate back-up equipment should have been installed in the exercise of reasonable engineering judgment to prevent a bypass which occurred during normal periods of equipment downtime or preventive maintenance; and
         3. The permittee submitted notices as required under paragraph 2. b. of this section.
      ii. The Department may approve an anticipated bypass, after considering its adverse effects, if the Department determines that it will meet the three (3) conditions listed above in paragraph 2. c. i. of this section.

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

Section D – Administrative Requirements

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

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

c. Any person may be assessed an administrative penalty by the EPA Director for violating section 301, 302, 306, 307, 308, 318 or 405 of this Act, or any permit condition or limitation implementing any of such sections in a permit issued under section 402 of this Act. Administrative penalties for Class I violations are not to exceed $10,000 per violation, with the maximum amount of any Class I penalty assessed not to exceed $25,000. Penalties for Class II violations are not to exceed $10,000 per day for each day during which the violation continues, with the maximum amount of any Class II penalty not to exceed $125,000.

d. It is unlawful for any person to cause or permit any discharge of water contaminants from any water contaminant or point source located in Missouri in violation of sections 644.006 to 644.141 of the Missouri Clean Water Law, or any standard, rule or regulation promulgated by the commission. In the event the commission or the director determines that any provision of sections 644.006 to 644.141 of the Missouri Clean Water Law or standard, rules, limitations or regulations promulgated pursuant thereto, or permits issued by, or any final abatement order, other order, or determination made by the commission or the director, or any filing requirement pursuant to sections 644.006 to 644.141 of the Missouri Clean Water Law or any other provision which this state is required to enforce pursuant to any federal water pollution control act, is being, was, or is in imminent danger of being violated, the commission or director may cause to have instituted a civil action in any court of competent jurisdiction for the injunctive relief to prevent any such violation or further violation or for the assessment of a penalty not to exceed $10,000 per day for each day, or part thereof, the violation occurred and continues to occur, or both, as the court deems proper. Any person who willfully or negligently commits any violation in this paragraph shall, upon conviction, be punished by a fine of not less than $2,500 nor more than $25,000 per day of violation, or by imprisonment for not more than one year, or both. Second and successive convictions for violation of the same provision of this paragraph by any person shall be punished by a fine of not more than $50,000 per day of violation, or by imprisonment for not more than two (2) years, or both.

2. **Duty to Reapply.**
   a. If the permittee wishes to continue an activity regulated by this permit after the expiration date of this permit, the permittee must apply for and obtain a new permit.
   b. A permittee with a currently effective site-specific permit shall submit an application for renewal at least 180 days before the expiration date of the existing permit, unless permission for a later date has been granted by the Department. (The Department shall not grant permission for applications to be submitted later than the expiration date of the existing permit.)
   c. A permittees with currently effective general permit shall submit an application for renewal at least 30 days before the existing permit expires, unless the permittee has been notified by the Department that an earlier application must be made. The Department may grant permission for a later submission date. (The Department shall not grant permission for applications to be submitted later than the expiration date of the existing permit.)

3. **Need to Halt or Reduce Activity Not a Defense.** It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.

4. **Duty to Mitigate.** The permittee shall take all reasonable steps to minimize or prevent any discharge or sludge use or disposal in violation of this permit which has a reasonable likelihood of adversely affecting human health or the environment.

5. **Proper Operation and Maintenance**. The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance also includes adequate laboratory controls and appropriate quality assurance procedures. This provision requires the operation of back-up or auxiliary facilities or similar systems which are installed by a permittee only when the operation is necessary to achieve compliance with the conditions of the permit.

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

7. **Permit Transfer.**
   a. Subject to 10 CSR 20-6.010, an operating permit may be transferred upon submission to the Department of an application to transfer signed by the existing owner and the new owner, unless prohibited by the terms of the permit. Until such time the permit is officially transferred, the original permittee remains responsible for complying with the terms and conditions of the existing permit.
   b. The Department may require modification or revocation and reissuance of the permit to change the name of the permittee and incorporate such other requirements as may be necessary under the Missouri Clean Water Law or the Federal Clean Water Act.
   c. The Department, within 30 days of receipt of the application, shall notify the new permittee of its intent to revoke or reissue or transfer the permit.

8. **Toxic Pollutants.** The permittee shall comply with effluent standards or prohibitions established under section 307(a) of the Federal Clean Water Act for toxic pollutants and with standards for sewage sludge use or disposal established under section 405(d) of the Federal Clean Water Act within the time provided in the regulations that establish these standards or prohibitions or standards for sewage sludge use or disposal, even if the permit has not yet been modified to incorporate the requirement.

9. **Property Rights.** This permit does not convey any property rights of any sort, or any exclusive privilege.

10. **Duty to Provide Information.** The permittee shall furnish to the Department, within a reasonable time, any information which the Department may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit or to determine compliance with this permit. The permittee shall also furnish to the Department upon request, copies of records required to be kept by this permit.

11. **Inspection and Entry.** The permittee shall allow the Department, or an authorized representative (including an authorized contractor acting as a representative of the Department), upon presentation of credentials and other documents as may be required by law, to:
    a. Enter upon the permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of the permit;
    b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
    c. Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and
    d. Sample or monitor at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by the Federal Clean Water Act or Missouri Clean Water Law, any substances or parameters at any location.

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

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

14. **Severability.** The provisions of the permit are severable, and if any provision of the permit, or the application of any provision of the permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of the permit, shall not be affected thereby.

MO0140996

AP 47804

received
07/28/2025

MISSOURI DEPARTMENT OF NATURAL RESOURCES
WATER PROTECTION PROGRAM

FORM A – APPLICATION FOR NONDOMESTIC PERMIT UNDER MISSOURI CLEAN WATER LAW

FOR AGENCY USE ONLY	
CHECK NUMBER	
DATE RECEIVED	FEE SUBMITTED
JETPAY CONFIRMATION NUMBER	

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

IF THE FACILITY IS ELIGIBLE FOR A NO EXPOSURE EXEMPTION:
Fill out the No Exposure Certification Form (MO 780-2828).
No Exposure exemptions are granted only to stormwater-only facilities.

1. REASON FOR APPLICATION:

- ☐ A. This facility, now in operation under Missouri State Operating Permit (permit) MO – _____, is submitting an application for renewal, and there is **no** proposed increase in design wastewater flow, and **no** new wastewater types are being added. No fee for renewal. Renewal applications for site-specific industrial permits are due no less than 180 days prior to expiration.
- ☐ B. This facility, now in operation under permit MO – _____, is submitting an application for renewal, and there **is** a proposed increase in design wastewater flow or a new wastewater type is being added. An antidegradation review may be required.
- ☐ C. This facility is submitting an application for a new permit (not a renewal). An antidegradation review may be required. A new permit fee is required. What is the expected date of the new discharge: _____
- ☑ D. This facility, now in operation under Missouri State Operating Permit (permit) MO – G670353, is requesting a modification to the permit. An antidegradation review may be required. A modification fee is required. Attach a document explaining the changes being requested.

2. FACILITY

NAME AS IT SHOULD APPEAR ON THE PERMIT			TELEPHONE NUMBER WITH AREA CODE
Jefferson City Products Terminal			(573) 636-4984
PHYSICAL ADDRESS	CITY		STATE
2116 Idlewood Drive	Jefferson City		MO
FACILITY CONTACT NAME	TITLE	ZIP	COUNTY
Brandon Nagel	Supervisor of Operations	65110	Cole
EMAIL ADDRESS			
Brandon.Nagel@p66.com			

3. OWNER

NAME			TELEPHONE NUMBER WITH AREA CODE
Phillips 66 Pipeline, LLC			(918) 977-5652
EMAIL ADDRESS			
Crystal.L.Love@p66.com			
MAILING ADDRESS	CITY	STATE	ZIP CODE
2311 CityWest Boulevard	Houston	TX	77042

OWNERSHIP TYPE ☑ PRIVATE ☐ PUBLIC ☐ FEDERAL ☐ STATE ☐ OTHER(EXPLAIN):

4. CONTINUING AUTHORITY

NAME			TELEPHONE NUMBER WITH AREA CODE
Same as above			
EMAIL ADDRESS			CHARTER NUMBER
MAILING ADDRESS	CITY	STATE	ZIP CODE

5. OPERATOR CERTIFICATION (UNCOMMON)

NAME	CERTIFICATE NUMBER	TELEPHONE NUMBER WITH AREA CODE	
MAILING ADDRESS	CITY	STATE	ZIP CODE
EMAIL ADDRESS			

6. LOCATION OF PERMITTED FEATURES (OUTFALLS)

Use Universal Transverse Mercator (UTM) Zone 15 North referenced to North American Datum 1983 (NAD83).
Use existing outfall numbers or letters for "#" column. If this is a new outfall, describe.

#	UTM Easting (X)	UTM Northing (Y)	Confirm NAD 83 Coordinate System	Sampling Location If Different from Outfall Location	Receiving (or Nearest Downgradient) Waterbody Name	Type of Discharge	Subject to an ELG*
001	568132	4266835	YES ☐ NO		Tributary to Renns Lake (U)	Wastewater ✔ Stormwater	YES ☐ NO ☑
002	568132	4266835	YES NO		Tributary to Renns Lake (U)	Wastewater Stormwater ✔	YES ☐ NO ☑
003	568102	4266552	YES NO		Tributary to Renns Lake (U)	Wastewater Stormwater ✔	YES ☐ NO ☑
			YES NO			Wastewater Stormwater	YES ☐ NO ☐
			YES NO			Wastewater Stormwater	YES ☐ NO ☐

Attach additional sheets if necessary. May use a separate table if desired.
Identify any outfalls which have been removed in previous permits, and why, if known (attach descriptions).
Include all subsurface discharges and underground injection systems.
*ELG stands for Effluent Limitation Guideline.

7. SIC AND NAICS CODES

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

Primary SIC 5171 and Primary NAICS 424710
SIC 4613 and NAICS _____
SIC _____ and NAICS _____
SIC _____ and NAICS _____

8. ADDITIONAL INFORMATION NECESSARY TO COMPLETE THIS APPLICATION (INSTRUCTIONS AT END OF FORM)

A. Is this permit for a manufacturing, commercial, mining, solid/hazardous waste or silviculture facility? YES ☑ NO ☐
Almost every facility needs Form C. 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 Form D.

C. Is wastewater, wastewater residuals, solids or sludge, land applied? YES ☐ NO ☑
If yes, submit a Land Application Management Plan (MO 780-2945)

D. Is the facility using a subsurface distribution system or well for industrial wastes and/or for domestic wastewater serving more than 20 people? YES ☐ NO ☑
If yes, complete Form UIC.

E. Has this facility applied for or received any permit or construction approval under the CWA, SDWA or any other environmental regulatory authority? If yes, list all applications, permits or approvals for this facility on a separate page. YES ☐ NO ☑

Is this facility a major water user? YES ☐ NO ☑

F. You must submit map (or maps) with sufficient detail and extending one mile beyond the property boundaries of the source. The map(s) must depict the facility and each of its intake and discharge structures; each of its hazardous waste treatment, storage, and/or disposal areas and/or each area where fluids from the facility are injected underground (UIC). The map(s) should also include wells, springs, surface water bodies, and/or drinking water wells listed in public records or otherwise known to the applicant occurring in the map(s) area. The map(s) should also identify all stormwater areas and the flow of stormwater (if applicable).

G. Does this facility accept, store, treat, handle, or otherwise manage any wastewater, wastewater residuals, solids or sludge generated at and/or accepted from another facility? YES ☐ NO ☑
If yes, describe in detail on additional page(s).

H. Is any wastewater or stormwater transferred off site for processing at another facility? This includes wastewater which is piped to another wastewater treatment system, such as a publicly owned treatment works. YES ☐ NO ☑
If yes, describe in detail on additional page(s).

I. Is there a new source of wastewater pursuant to 122.21(k) with this application? YES ☐ NO ☑
If yes, describe in detail on additional page(s).

9. INFORMATION ABOUT THE WASTEWATER

A. Complete a comprehensive wastewater line drawing (or drawings); include all production lines; describe any variation in treatment train or alternative flow paths. Include the volumes, both average and peak for each path. Include incoming water, all side processes, such as those enumerated below, and include any significant water lost to evaporation. Include the eventual disposal of any solid or fluid wastes other than by discharge. Identify any treatment changes that have occurred since the last application.

For stormwater, the line drawing should explain the flow direction and volume.

B. For any box marked yes, include additional information on a separate sheet.

Are there water treatment discharges such as from a reverse osmosis or softening system? YES ☐ NO ☑

Is there washout (i.e., truck wash, or implement wash) or cleanout (i.e., cement mixer or railcar)? YES ☐ NO ☑

Are there steam condensate relief valve sources or pipes present? YES ☐ NO ☑

Are there any other processes occurring at this facility which have not been permitted in the past? YES ☐ NO ☑

C. What is the source of the water (waterbody name or drinking water system name) if any is used. List all sources, including alternate sources.

_____

Is incoming water treated prior to use by the facility? YES ☐ NO ☑
If yes, these treatment processes must also be described completely and included in 9.A.

Is cooling water used in the operations at this facility? YES ☐ NO ☑

Is cooling water withdrawn from a surface water body? YES ☐ NO ☐ N/A ☑

Is the cooling water intake subject to 40 CFR 122.21(r) application requirements? YES ☐ NO ☐ N/A ☑

D. Domestic wastewater.

Is domestic wastewater piped to an off-site wastewater treatment facility? YES ☑ NO ☐

Is domestic wastewater discharged? If yes, outfall #_____ YES ☐ NO ☑

Is domestic wastewater managed by using an onsite subsurface distribution system? YES ☐ NO ☑

Include DHSS permit number _____

If more than 20 persons use the restrooms in any one day, that is considered UIC, complete Form UIC.

10. ENGINEERING CERTIFICATION

For new or upgraded systems which have not previously received a construction permit, an engineering certification is required. If any portion of the treatment facility is or was upgraded or changed (e.g., added dechlorination; added solids press; removed filtration) then a certification is required. Submit the engineering certification as an attachment to this form. Please also include any revised designs (see Form C). Identify all changes on the line drawing, per Item 9.A.
Changes have occurred to the treatment system at this facility (attach description). YES ☐ NO ☑

11. ELECTRONIC DISCHARGE MONITORING REPORT (eDMR) SUBMISSION SYSTEM

Per the National Pollutant Discharge Elimination System (NPDES) Electronic Reporting rule (40 CFR Part 127), 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 boxes must be checked in order for this application to be considered complete. Please visit the department's eDMR system for information on how to register through the Missouri Gateway for Environmental Management (MoGEM) online portal.

☐ I will register an account online to participate in eDMR through MoGEM before any reporting is due, in compliance with the NPDES Electronic Reporting rule.

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

☐ I have submitted a written request for a waiver from electronic reporting. See the instructions section of this form for further information
regarding waivers (this is uncommon).

☐ The permit I am applying for does not require the submission of discharge monitoring reports (this is uncommon).

12. 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:

Select "Water Protection Program" as the payment, select "WP13" for annual fees, select "WP03" for new site-specific permits, select "WP08" for a modification, select "WP12" for UIC permits.

Checks may be mailed to: Department of Natural Resources, Water Protection Program Fees, P.O. Box 176, Jefferson City, MO 65102-0176.

A fee is not charged for renewal applications, but all annual fees and new permit fees must be paid before a permit will be processed.

13. SIGNATURE

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
Brad Dooley, Manager, Area Operations	(918) 977-6742
SIGNATURE	DATE SIGNED
	7-28-2025

OPTIONAL QUESTIONS

1. Have you ever served on active duty in the Armed Forces of the United States and separated from such service under conditions other than dishonorable?	YES ☐ NO ☑
2. Would you like to receive information and assistance regarding veterans benefits and services?	YES ☐ NO ☑
3. May the agency share your contact information with the Missouri Veterans Commission to provide such information?	YES ☐ NO ☑

MO 780-1479 (05-25)

MISSOURI DEPARTMENT OF NATURAL RESOURCES
WATER PROTECTION PROGRAM, WATER POLLUTION CONTROL BRANCH

FORM C – APPLICATION FOR DISCHARGE PERMIT – MANUFACTURING, COMMERCIAL, MINING, SILVICULTURE OPERATIONS, AND STORMWATER

GENERAL INFORMATION (PLEASE SEE INSTRUCTIONS)

1.0 NAME OF FACILITY

Jefferson City Products Terminal

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

MO-G670353

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

Not a new facility

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.

Finished Product Tank Farm

FLOWS, TYPE, AND FREQUENCY

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

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

1. OUTFALL NO.	2. OPERATION(S) CONTRIBUTING FLOW; INCLUDE ALL PROCESSES AND SUB PROCESSES AT EACH OUTFALL	3. AVERAGE FLOW AND (MAXIMUM FLOW), INCLUDE UNITS.	4. TREATMENT DESCRIPTION	5. TREATMENT CODES FROM TABLE A
001	Hydrostatic testing of new tanks and pipelines.	1.152 mgd	BMPs	NA
	Also hydrostatic testing for occassional repairs to			
	tanks.			
002	Stormwater from tank farm	2.050 mgd	BMPs	NA
003	Stormwater from tank farm and runoff from facility	1.066 mgd	BMPs	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	
001	Occassional (rare) hydrostatic testing			1.152 mgd				5-10 days
	of tanks and pipelines.							(depends on
								size of tank)

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.

Occassional solid removal when necessary. Not foreseeable for the permitting period.

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)
Visual observations of any oil or sheen is made prior to		001, 002, 003	NA-BMPs
discharges. No pollutants discharged.			*Table C not required per the activities at the facility.

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)*

4.0 STORMWATER

4.1
Do you have industrial stormwater discharges from the site? If so, attach a site map outlining drainage areas served by each outfall. Indicate the following attributes within each drainage area: pavement or other impervious surfaces; buildings; outdoor storage areas; material loading and unloading areas; outdoor industrial activities; structural stormwater control measures; hazardous waste treatment, storage, and disposal units; and wells or springs in the area.

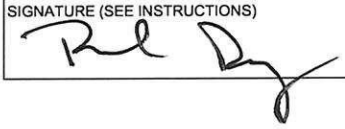
OUTFALL NUMBER	TOTAL AREA DRAINED (PROVIDE UNITS)	TYPES OF SURFACES (VEGETATED, STONE , PAVED, ETC)	BEST MANAGEMENT PRACTICES EMPLOYED; INCLUDE STRUCTURAL BMPS AND TREATMENT DESIGN FLOW FOR BMPS DESCRIBE HOW FLOW IS MEASURED
002	17.3 acres	Buildings, tanks, roadways	Prior to discharging stormwater from tank containments, visual inspections are
			performed and documented. Release of stormwater is only allowed if no oil or
			grease is present. Flow is measured using the rational equation.
003	9.0 acres	Same as above	Same as above

4.2 STORMWATER FLOWS
Provide the date of sampling with the flows, and how the flows were estimated.
Flows were calculated using the rational equation.

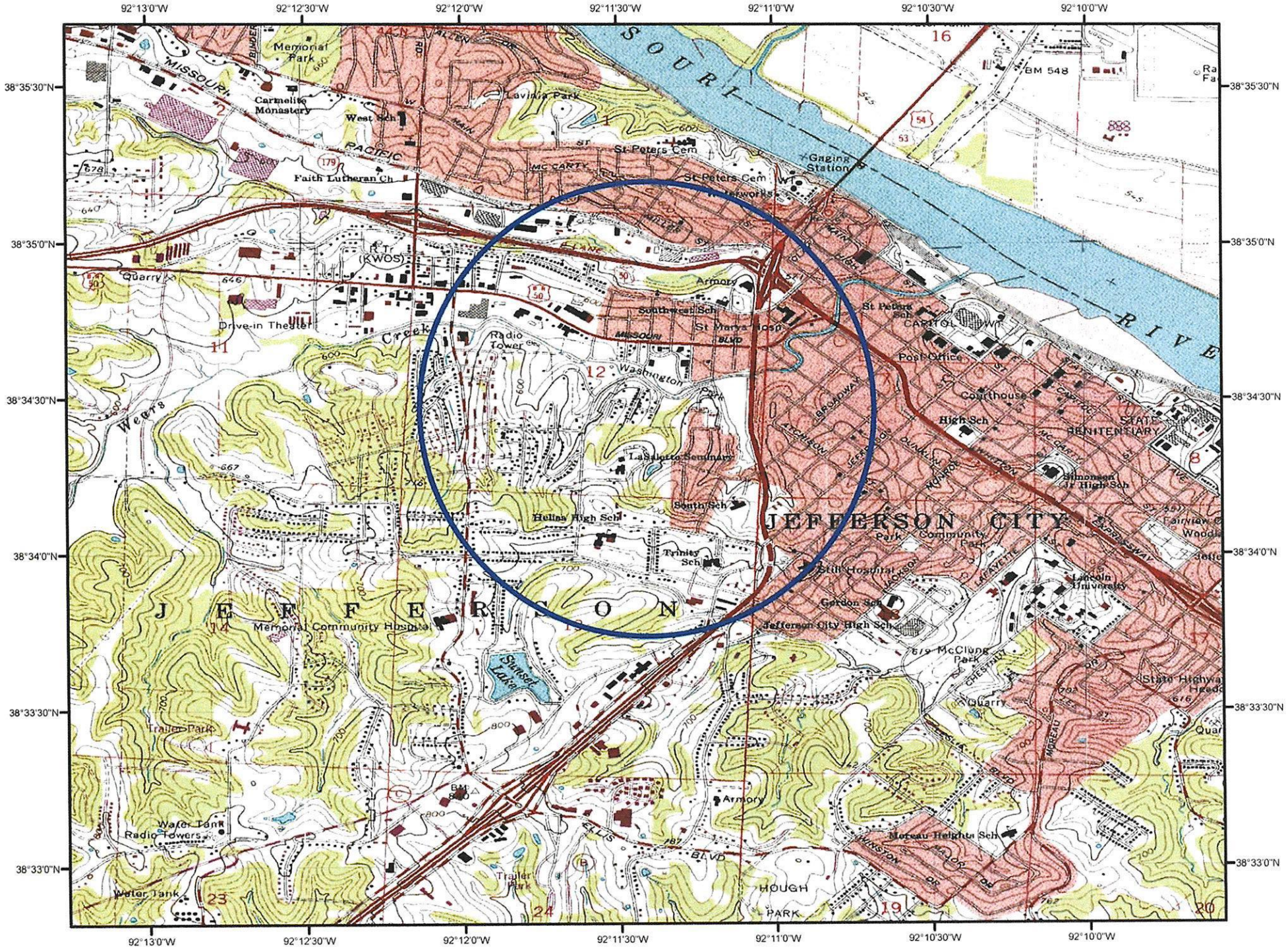
SIGNATORY REQUIREMENTS

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
Brad Dooley, Manager, Area Operations	918-977-6742
SIGNATURE (SEE INSTRUCTIONS)	DATE SIGNED
	7-28-2025


ABC Preschool
Sunoco
Drag to enter Street View
Boss Breezy Collections
Lehmen Automotive
Jefferson City Terminal
Phillips 66 Pipeline
Outfall 001/002
Stormwater Basin
Storage Solutions
Environmental Engineering
Outfall 003
Bluebird Dr
Google Earth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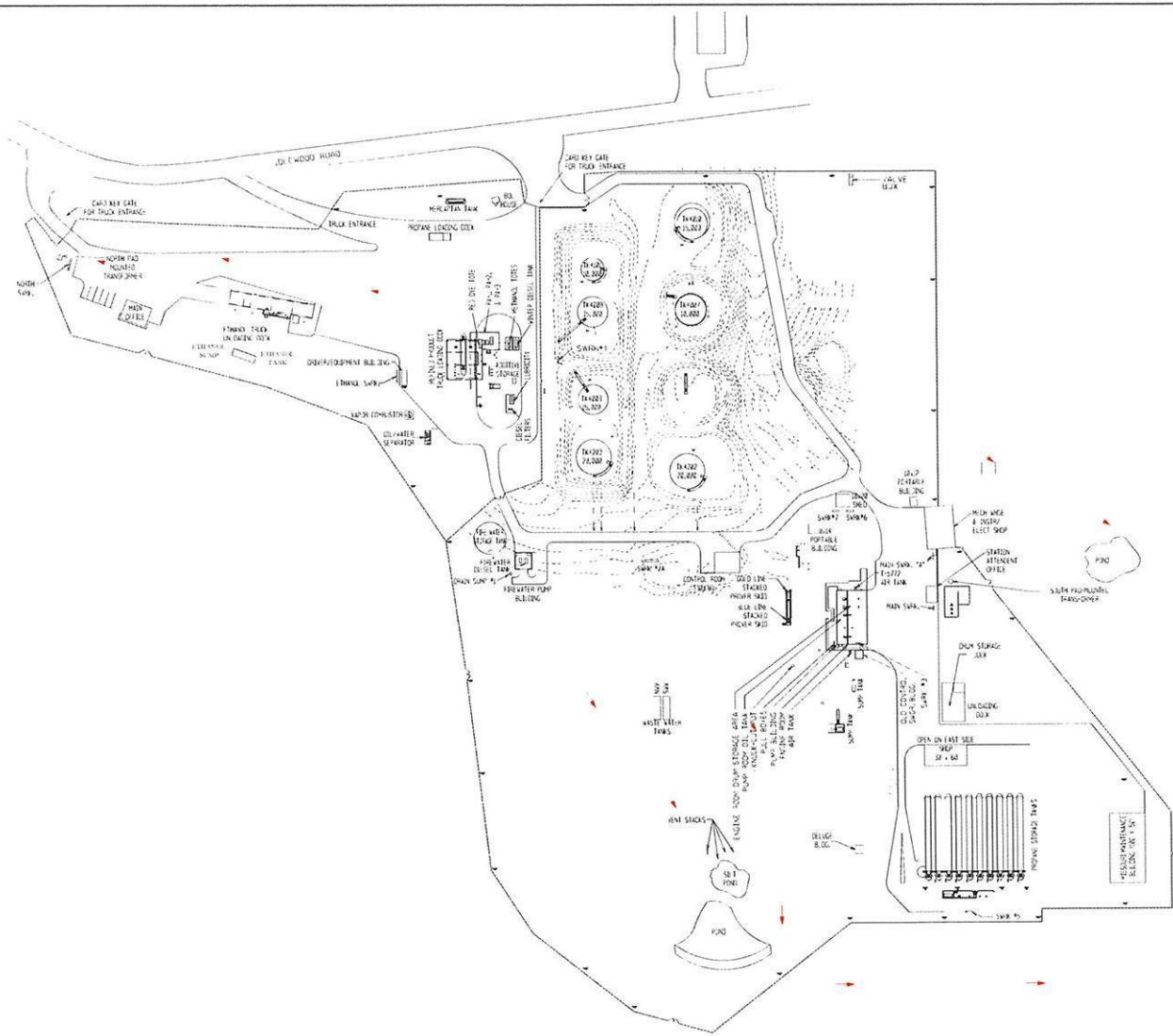
92°12'30"W
92°12'0"W
92°11'30"W
92°11'0"W
92°10'30"W
92°10'0"W
38°35'30"N
38°35'0"N
38°34'30"N
38°34'0"N
38°33'30"N
38°33'0"N
MISSOURI RIVE
Memorial Park
Carmelite Monastery
West Sch
Lavinia Park
St Peters Cem
Gaging Station
BM 548
Faith Lutheran Ch
Quarry
Drive-in Theater
Armory
Southwest Sch
St Marys Hosp
Radio Tower
Washington Park
Post Office
Courthouse
High Sch
STATE PENITENTIARY
Lafayette Sch
Simonsen Jr High Sch
South Sch
Helias High Sch
JEFFERSON CITY
Community Park
Trinity Sch
Still Hospital
Lincoln University
Garden Sch
Jefferson City High Sch
McClung Park
JEFFERSON
Memorial Community Hospital
Sunset Lake
Trailer Park
Water Tank
Radio Towers
Moreau Heights Sch
HOUGH PARK



NO.	REVISION	BY	DATE
1	REV. PER PHA WALKDOWN	CHK'D	APP'D
		DUKE	6/10
2	UPDATED NEW LOGO	SS	5/15
		APP'D	

PHILLIPS 66 PIPELINE LLC

FOR BIDS	
FOR PERMIT	
FOR CONST	
DRAWN	JBA
CHECKED	
APP'D	

JEFFERSON CITY TERMINAL

DRAINAGE PLOT PLAN

COLE COUNTY, MISSOURI

SCALE: 1"=80'

PROJECT NO.

FILE NAME / DRAWING NUMBER: JEFF-EV-0004