

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

MISSOURI CLEAN WATER COMMISSION



MISSOURI STATE OPERATING PERMIT

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

Permit No. MO-0127442

Owner: FUJIFILM Manufacturing U.S.A. Inc.
Address: 921 Highway 246 South, Greenwood, SC 29643

Continuing Authority: same as above
Address: same as above

Facility Name: FUJIFILM Manufacturing U.S.A. Inc.
Facility Address: 20 West 14th Avenue, North Kansas City, MO 61446

Legal Description: see page two, Clay County
UTM Coordinates: see page two

Receiving Stream: Tributary to Missouri River
First Classified Stream and ID: Missouri River (P) (WBID# 0356), 303(d) List
USGS Basin & Sub-watershed No.: Buckeye Creek-Missouri River (10300101-0301)

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

FACILITY DESCRIPTION

See page two, a certified wastewater operator is not required.

This permit authorizes only wastewater discharges under the Missouri Clean Water Law and the National Pollutant Discharge Elimination System; it does not apply to other regulated areas. This permit may be appealed in accordance with Sections 640.013, 621.250, and 644.051.6 of the Law.

September 1, 2015
Effective Date

Sara Parker Pauley, Director, Department of Natural Resources

June 30, 2019
Expiration Date

John Madras, Director, Water Protection Program

FACILITY DESCRIPTION (CONTINUED)

OUTFALL #001 -- Chemical Manufacturing —SIC #2893 and NAICS #325910

Legal Description: SW ¼, NW ¼, Sec 23, T 50N, R 33W, Clay County

UTM Coordinates: X=363297, Y=4332887

Stormwater influenced by baghouse stack blowers, outfall is located on the southeast side of the building

Design Flow: 120,000 gallons per day

Actual Flow: dependent upon precipitation (last 5 years averaged 0.01518 MGD = 15,180 gallons daily when raining)

Receiving Stream: Tributary to Missouri River (U)

First Classified Stream and ID: Missouri River (P)(0356) 303(d) list

USGS Basin & Sub-watershed No.: 10300101-0301

OUTFALL #002- Chemical Manufacturing—SIC #2893 and NAICS #325910

Legal Description: SW ¼, NW ¼, Sec 23, T 50N, R 33W, Clay County

UTM Coordinates: X=363251, Y=4332940

Non-contact cooling water for three roll mills. The source is city water and is not recirculated. Outfall is located on the west side of the building.

Design Flow: 49,375 gallons

Actual Flow: 49,375 gallons

Receiving Stream: Unnamed Tributary to Missouri River (U)

First Classified Stream and ID: Missouri River (P)(356)(303d)

USGS Basin & Sub-watershed No.: 10300101-0301

OUTFALL #003 -- ELIMINATED (ROUTED TO #001)

Routed to #001 in December 2013

Legal Description: SW ¼, NW ¼, Sec 23, T 50N, R 33W, Clay County

UTM Coordinates: X = 363253, Y = 4332915

OUTFALL #004 – ELIMINATED (ROUTED TO #001)

Routed to #001 in December 2013

Legal Description: SW ¼, NW ¼, Sec 23, T 50N, R 33W, Clay County

UTM Coordinates: X = 363323, Y = 4332879

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

OUTFALL #001	TABLE A-1 FINAL EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS					
	The permittee is authorized to discharge from outfall(s) with serial number(s) as specified in the application for this permit. The final effluent limitations shall become effective on September 1, 2015 , and remain in effect until expiration of the permit. Such discharges shall be controlled, limited and monitored by the permittee as specified below:					
EFFLUENT PARAMETERS	UNITS	FINAL EFFLUENT LIMITATIONS			MONITORING REQUIREMENTS (NOTE 1 PAGE 2)	
		DAILY MAXIMUM	WEEKLY AVERAGE	MONTHLY AVERAGE	MEASUREMENT FREQUENCY	SAMPLE TYPE
Flow	MGD	*			once/quarter	24 hr estimate
Total Suspended Solids	mg/L	70			once/quarter	grab
Chemical Oxygen Demand	mg/L	90			once/quarter	grab
Oil & Grease	mg/L	10			once/quarter	grab
Precipitation (Note #1, Page 4)	inches	*			once/quarter	measured
2-butoxyethanol	µg/L	*			twice/year	grab
Cyclohexanone	µg/L	*			twice/year	grab
Mineral Spirits-odorless	µg/L	*			twice/year	grab
Naphthalene	µg/L	*			twice/year	grab
1,2,4-trimethylbenzene	µg/L	*			twice/year	grab
		DAILY MINIMUM		DAILY MAXIMUM		
pH	SU	6.5		9	once/quarter	grab
MONITORING REPORTS SHALL BE SUBMITTED <u>BI-ANNUALLY</u> ; THE FIRST REPORT IS DUE <u>JANUARY 28, 2016</u> .						

OUTFALL #002	TABLE A-2 FINAL EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS					
	The permittee is authorized to discharge from outfall(s) with serial number(s) as specified in the application for this permit. The final effluent limitations shall become effective on September 1, 2015 , and remain in effect until expiration of the permit. Such discharges shall be controlled, limited and monitored by the permittee as specified below:					
EFFLUENT PARAMETERS	UNITS	FINAL EFFLUENT LIMITATIONS			MONITORING REQUIREMENTS	
		DAILY MAXIMUM	WEEKLY AVERAGE	MONTHLY AVERAGE	MEASUREMENT FREQUENCY	SAMPLE TYPE
Flow	MGD	*		*	once/quarter	24 hr estimate
Temperature	°F	*		*	once/quarter	grab
		DAILY MINIMUM		DAILY MAXIMUM		
pH	SU	6.5		10	once/quarter	grab
MONITORING REPORTS SHALL BE SUBMITTED <u>BI-ANNUALLY</u> ; THE FIRST REPORT IS DUE <u>JANUARY 28, 2016</u> .						

* Monitoring requirement only.

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS (CONTINUED)

Note #1: All samples from Outfall #001 shall be collected from a discharge resulting from a precipitation event greater than 0.1 inches in magnitude and that occurs at least 72 hours from the previously measurable precipitation event. If a precipitation event does not occur within the reporting period, report as **no discharge**. Samples must be collected within the first three hours of the beginning of the discharge [40 CFR 122.21 (g)(7)(ii)]. The total amount of precipitation should be noted from the event from which the samples were collected.

QUARTERLY SAMPLING AND REPORTING SCHEDULE

Minimum Sampling Requirements			
Quarter	Months	Effluent Parameters	Report is Due
First	January, February, March	Sample at least once during any month of the quarter	July 28 th
Second	April, May, June	Sample at least once during any month of the quarter	
Third	July, August, September	Sample at least once during any month of the quarter	January 28 th
Fourth	October, November, December	Sample at least once during any month of the quarter	

BIANNUAL SAMPLING AND REPORTING SCHEDULE

Minimum Sampling Requirements			
Quarter	Months	Effluent Parameters	Report is Due
First Event	January, February, March, April, May, June	Sample at least once during any month	July 28 th
Second Event	July, August, September, October, November, December	Sample at least once during any month	January 28 th

B. STANDARD CONDITIONS

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

C. SPECIAL CONDITIONS

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

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

C. SPECIAL CONDITIONS (CONTINUED)

3. Water Quality Standards
 - a. To the extent required by law, discharges to waters of the state shall not cause a violation of water quality standards rule under 10 CSR 20-7.031, including both specific and general criteria.
 - b. General Criteria. The following general water quality criteria shall be applicable to all waters of the state at all times including mixing zones. No water contaminant, by itself or in combination with other substances, shall prevent the waters of the state from meeting the following conditions:
 - i. Waters shall be free from substances in sufficient amounts to cause the formation of putrescent, unsightly or harmful bottom deposits or prevent full maintenance of beneficial uses;
 - ii. Waters shall be free from oil, scum and floating debris in sufficient amounts to be unsightly or prevent full maintenance of beneficial uses;
 - iii. Waters shall be free from substances in sufficient amounts to cause unsightly color or turbidity, offensive odor or prevent full maintenance of beneficial uses;
 - iv. Waters shall be free from substances or conditions in sufficient amounts to result in toxicity to human, animal or aquatic life;
 - v. There shall be no significant human health hazard from incidental contact with the water;
 - vi. There shall be no acute toxicity to livestock or wildlife watering;
 - vii. Waters shall be free from physical, chemical or hydrologic changes that would impair the natural biological community;
 - viii. Waters shall be free from used tires, car bodies, appliances, demolition debris, used vehicles or equipment and solid waste as defined in Missouri's Solid Waste Law, section 260.200, RSMo, except as the use of such materials is specifically permitted pursuant to section 260.200-260.247.
4. Changes in Discharges of Toxic Substances: The permittee shall notify the Director as soon as it knows or has reason to believe:
 - a. That any activity has occurred or will occur which would result in the discharge of any toxic pollutant which is not limited in the permit, if that discharge will exceed the highest of the following "notification levels:"
 - i. One hundred micrograms per liter (100 µg/L);
 - ii. Two hundred micrograms per liter (200 µg/L) for acrolein and acrylonitrile; five hundred micrograms per liter (500 µg/L) for 2,5 dinitrophenol and for 2-methyl-4, 6-dinitrophenol; and one milligram per liter (1 mg/L) for antimony;
 - iii. Five (5) times the maximum concentration value reported for the pollutant in the permit application;
 - b. The level established by the Director in accordance with 40 CFR 122.44(f).
 - c. That they have begun or expect to begin to use or manufacture as an intermediate or final product or byproduct any toxic pollutant, which was not reported in the permit application.
5. Report as no-discharge when a discharge does not occur during the report period.
6. Reporting of Non-Detects
 - a. An analysis conducted by the permittee or their contracted laboratory shall be conducted in such a way that the precision and accuracy of the analyzed result can be enumerated.
 - b. The permittee shall not report a sample result as "Non-Detect" without also reporting the detection limit of the test. Reporting as "Non Detect" without also including the detection limit will be considered failure to report, which is a violation of this permit.
 - c. The permittee shall provide the "non-detect" sample result using the less than sign and the minimum detection limit (e.g. <10).
 - d. The permittee shall use one-half of the detection limit for the non-detect result when calculating and reporting monthly averages.
 - e. See Standard Conditions Part I, Section A, #4 regarding proper detection limits used for sample analysis.
7. It is a violation of the Missouri Clean Water Law to fail to pay fees associated with this permit (644.055 RSMo).
8. Any pesticide discharge from any point source shall comply with the requirements of Federal Insecticide, Fungicide and Rodenticide Act, as amended (7 U.S.C. 136 ET. SEQ.) and the use of such pesticides shall be in a manner consistent with its label.

C. SPECIAL CONDITIONS (CONTINUED)

9. The permittee shall implement a Stormwater Pollution Prevention Plan (SWPPP). The SWPPP must be prepared and implemented upon permit issuance. The SWPPP must be kept on-site and should not be sent to the department unless specifically requested. The SWPPP must be reviewed and updated, if needed, every five (5) years or as site conditions change. The permittee shall select, install, use, operate, and maintain the Best Management Practices prescribed in the SWPPP in accordance with the concepts and methods described in the following document: Developing Your Stormwater Pollution Prevention Plan, A Guide for Industrial Operators, (Document number EPA 833-B-09-002) published by the United States Environmental Protection Agency (USEPA) in February 2009.
- The SWPPP must include the following:
- a. A listing of specific Best Management Practices (BMPs) and a narrative explaining how BMPs will be implemented to control and minimize the amount of potential contaminants that may enter stormwater. The BMPs at the facility should be designed to meet this value during rainfall event up to the 10 year, 24 hour rain event.
 - b. The SWPPP must include a schedule for once per month site inspections and brief written reports. The inspection report must include precipitation information for the entire period since last inspection, as well as observations and evaluations of BMP effectiveness. Deficiencies must be corrected within seven (7) days and the actions taken to correct the deficiencies shall be included with the written report, including photographs. Inspection reports must be kept on site with the SWPPP and maintained for a period of five (5) years. These must be made available to department personnel upon request.
 - c. A provision for designating an individual to be responsible for environmental matters.
 - d. A provision for providing training to all personnel involved in material handling and storage, and housekeeping of maintenance and cleaning areas. Proof of training shall be submitted on request of the department.
 - e. The facility must examine and propose or provide corrective action to resolve any exceedance of COD from outfall #001. When an exceedance occurs, the facility must document what steps were taken to correct the exceedance. This documentation shall be kept with the SWPPP and be made available to the department upon request.
10. Permittee shall adhere to the following minimum Best Management Practices (BMPs):
- a. Prevent the spillage or loss of fluids, oil, grease, fuel, etc. from vehicle maintenance, equipment cleaning, or warehouse activities and thereby prevent the contamination of storm water from these substances.
 - b. Provide collection facilities and arrange for proper disposal of waste products including but not limited to petroleum waste products, and solvents.
 - c. Store all paint, solvents, petroleum products and petroleum waste products (except fuels), and storage containers (such as drums, cans, or cartons) so that these materials are not exposed to storm water or provide other prescribed BMPs such as plastic lids and/or portable spill pans to prevent the commingling of storm water 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.
 - d. Provide good housekeeping practices on the site to keep trash from entry into waters of the state.
 - e. Provide sediment and erosion control sufficient to prevent or control sediment loss off of the property. This could include the use of straw bales, silt fences, or sediment basins, if needed, to comply with effluent limits.
 - f. Ensure that adequate provisions are provided to prevent surface water intrusion into the storage basin, to divert stormwater runoff around the storage basin, and to protect embankments from erosion.
11. The purpose of the SWPPP and the BMPs listed herein is the prevention of pollution of waters of the state. A deficiency of a BMP means it was not effective in preventing pollution [10 CSR 20-2.010(56)] of waters of the state, and corrective actions means the facility took steps to eliminate the deficiency.
12. Before releasing water that has accumulated in secondary containment areas it must be examined for hydrocarbon odor and presence of a sheen. On-site remediation may take place prior to testing. If the presence of hydrocarbons is indicated, this water must be tested for Total Petroleum Hydrocarbons (TPH). The analytical method for testing TPH must comply with EPA approved testing methods listed in [40 CFR 136] and the water must be tested prior to release to ensure compliance with water quality standards. If the concentration for TPH exceeds 10mg/L, the water shall be taken to a WWTP for treatment.
13. Release of a hazardous substance must be reported to the department in accordance with 10 CSR 24-3.010. A record of each reportable spill shall be retained with the SWPPP and made available to the department upon request.

MISSOURI DEPARTMENT OF NATURAL RESOURCES
FACT SHEET
FOR THE PURPOSE OF RENEWAL
OF
MO-0127442
FUJIFILM MANUFACTURING U.S.A. INC.

The Federal Water Pollution Control Act (“Clean Water Act” Section 402 Public Law 92-500 as amended) established the National Pollution Discharge Elimination System (NPDES) permit program. This program regulates the discharge of pollutants from point sources into the waters of the United States, and the release of storm water from certain point sources. All such discharges are unlawful without a permit (Section 301 of the “Clean Water Act”). After a permit is obtained, a discharge not in compliance with all permit terms and conditions is unlawful. Missouri State Operating Permits (MSOPs) are issued by the Director of the Missouri Department of Natural Resources (Department) under an approved program, operating in accordance with federal and state laws (Federal “Clean Water Act” and “Missouri Clean Water Law” Section 644 as amended). MSOPs are issued for a period of five (5) years unless otherwise specified.

As per [40 CFR Part 124.8(a)] and [10 CSR 20-6.020(1)2.] a factsheet shall be prepared to give pertinent information regarding the applicable regulations, rationale for the development of effluent limitations and conditions, and the public participation process for the Missouri State Operating Permit (operating permit) listed below.

A factsheet is not an enforceable part of an operating permit. This factsheet is for an industrial facility.

Part I. FACILITY INFORMATION

Facility Type: Industrial
Facility SIC Code(s): 2893
Application Date: 01/10/2014
Expiration Date: 06/30/2014
Last Inspection: 12/07/2011—in compliance

FACILITY DESCRIPTION

FUJIFILM manufactures printing inks (screen, flexographic, letterpress, and inkjet). Most inks are ultraviolet curable (75%), some are solvent based (20%) and a few are water based (5%). The activities consist of dispensing liquids, milling pigment pastes (three roll mills), mixing the milled paste with remaining ingredients and packaging (gravity feed mostly). The process starts with blending raw materials (acrylates, solvents, resins and pigments) using an industrial mixer. The pasty concentrate is milled then remixed with additional raw ingredients. Batches are small in size averaging 150 gallons. Packaging is mostly manual and generally consists of one or five gallon containers with the occasional 30 or 55 gallon drum. An effluent limitation guideline does not apply to this facility. The blowers on the roof expel the by-product of the factory activities; predominantly organic solvent vapors including aromatic hydrocarbons, glycol ethers, ketones, alcohols and some amines. The particulates consist mostly of organic pigments including carbon black, diarylides, copper phthalocyanines, and melamine formaldehyde copolymer base fluorescents. The facility also uses titanium dioxide, silica dioxide, barium sulfate and acrylic, PVC and hydrocarbon resins. The airborne particulates are mostly captured by the facility’s three baghouses. The caustic detergent tub washing machine is also vented on the roof but the emission is just water vapor. Outfall #001 samples are taken from the spill control drain plug location. This captures the storm water that flows from the east and southeast side of the facility. Outfalls #003 and #004 were routed to #001 in December of 2013. Outfall #002 is non-contact once-through cooling water supplied by municipal drinking water.

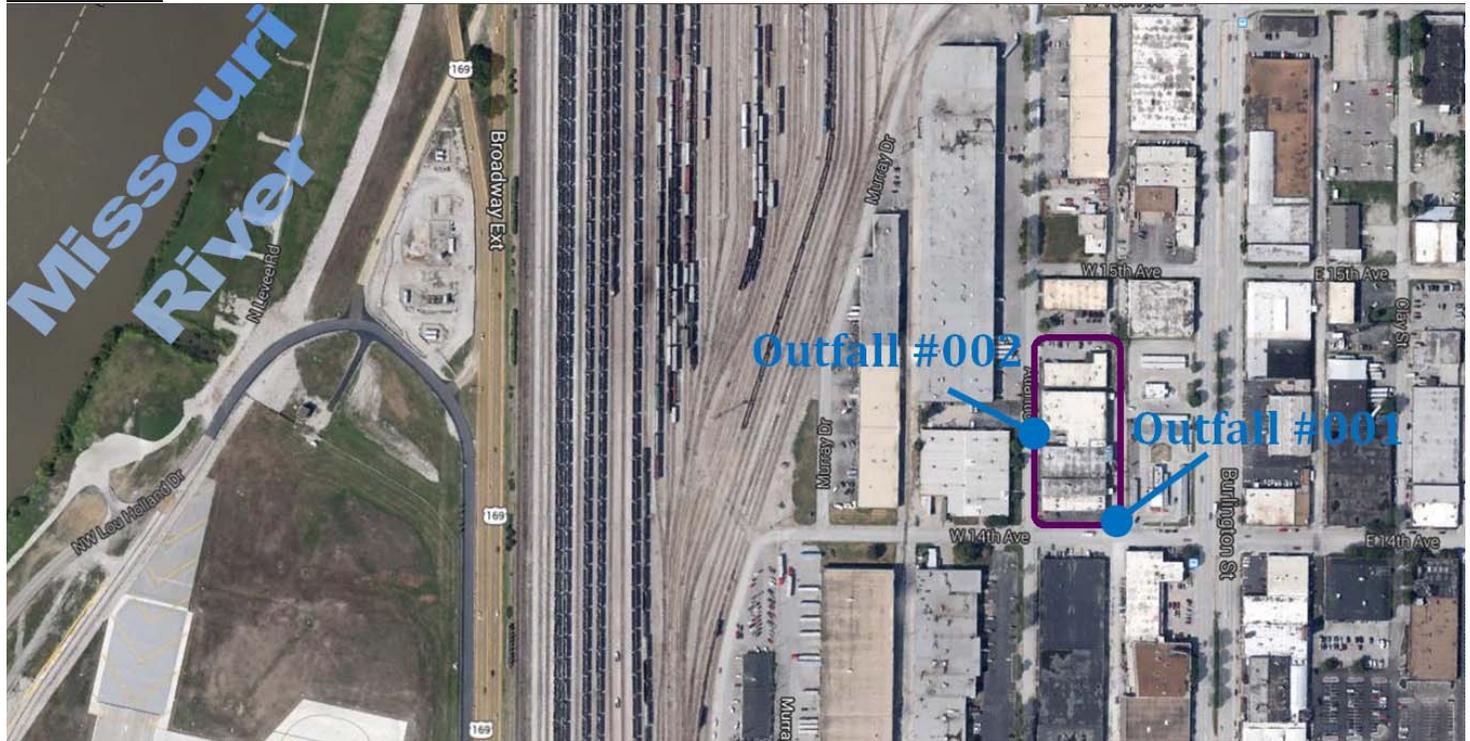
Additional information about this facility may be found at echo.epa.gov.

OUTFALLS TABLE

OUTFALL	DESIGN FLOW	TREATMENT LEVEL	EFFLUENT TYPE
#001	120,000 GPD 15,180 GPD (average) (0.0234 CFS)	settling, BMPs	industrial stormwater, dependent upon precipitation
#002	49,375 GPD (0.0763 CFS)	none	non-contact cooling water

BMP = best management practices

FACILITY MAP



FACILITY PERFORMANCE HISTORY & COMMENTS

In December of 2013, outfalls #003 and #004 were routed to outfall #001. During reconstruction, outfall #001 also received a concrete culvert box with a shut-off valve for a sample collection point. During the last permit cycle, the facility had ten instances of exceeding limits. Five for chemical oxygen demand (COD), four for pH, and one for total suspended solids. Six of the exceedences were from outfalls #003 and #004; the other four were from outfall #001 (none from outfall #002). Outfalls #003 and #004 are now routed through outfall #001. In February of 2012, outfall #003 had a COD of 264 mg/L. The main contaminant influence for outfall #001 is likely air emissions contacting roof stormwater drainage; the roof itself was replaced in 2008. The facility underwent a regional office inspection December 7, 2011. At the time, the facility was considered to be in compliance. The facility uses the Kansas City municipal water supply for cooling and process water purposes. Approximately 49,375 of the 50,000 gallons used per day are for cooling. The facility may discharge up to 120,000 gallons of stormwater runoff according to their application but averaged 15,180 gallons per day when it was raining. This value is completely dependent upon precipitation volume and duration. Floor drains proceed to the city’s sanitary sewer. Total toxic organic pollutants were sampled once the last permit cycle; this permit will refine and attempt to define any stormwater impacts from the air stacks contacting precipitation through specific parameter sampling.

Part II. RECEIVING STREAM INFORMATION

RECEIVING WATER BODY’S WATER QUALITY

The Missouri River is on the impaired waters list for *Escherichia coli*, and has total maximum daily loads associated with chlordane and PCBs. While the facility is not likely a contributor of the above pollutants, the facility does contribute to increased chemical oxygen demand and total suspended solids. The limits imposed in this permit are generally acceptable for this river. Uses of this river are for aquatic life, livestock watering, irrigation, drinking water, and recreational boating and similar contact uses.

APPLICABLE DESIGNATIONS OF WATERS OF THE STATE

As per Missouri’s Effluent Regulations [10 CSR 20-7.015], the waters of the state are divided into the below listed seven (7) categories. Each category lists effluent limitations for specific parameters, which are presented in each outfall’s Effluent Limitation Table and further discussed in the Derivation & Discussion of Limits section.

- Missouri or Mississippi River:
- Lake or Reservoir:
- Lossing:
- Metropolitan No-Discharge:
- Special Stream:
- Subsurface Water:
- All Other Waters:

As per Missouri’s Stormwater Regulations [10 CSR 20.6.200(6)(B)2.], the department shall establish effluent limits as necessary to protect waters of the state. Effluent limitations for stormwater are established using best professional judgment based on the category and designated uses of the receiving stream.

10 CSR 20-7.031 Missouri Water Quality Standards, the Department defines the Clean Water Commission water quality objectives in terms of “water uses to be maintained and the criteria to protect those uses.” The receiving stream and 1st classified receiving stream’s beneficial water uses to be maintained are located in the Receiving Stream Table located below in accordance with [10 CSR 20-7.031(3)].

RECEIVING STREAM TABLE

OUTFALL	WATERBODY NAME	CLASS	WBID	DESIGNATED USES	DISTANCE TO CLASSIFIED SEGMENT	12-DIGIT HUC
#001	Tributary to Missouri River	n/a	n/a	GEN	0.46 mi	Buckeye Creek-Missouri River 10300101-0301
	Missouri River	P	0356	AQL, DWS, IND, IRR, LWW, SCR, WBC-B		
#002	Tributary to Missouri River	n/a	n/a	GEN	0.42 mi	
	Missouri River	P	0356	AQL, DWS, IND, IRR, LWW, SCR, WBC-B		

AQL= Protection of Warm Water Aquatic Life and Human Health-Fish Consumption; C= Streams may cease flow in dry periods; CDF= Cold Water Fishery; CLF= Cool Water Fishery; DWS= Drinking Water Supply; E= Ephemeral stream; GEN= General; GRW = Groundwater; HUC= Hydrologic Unit Code; IND= Industrial; IRR=Irrigation; LWW= Livestock & Wildlife Watering; P= Permanent; SCR= Secondary Contact Recreation; W= Wetland; WBC= Whole Body Contact Recreation; WBID= Water Body Identification Number

MIXING CONSIDERATIONS

Mixing Zone: Not Allowed [10 CSR 20-7.031(5)(A)4.B.(I)(a)].

Zone of Initial Dilution: Not Allowed [10 CSR 20-7.031(5)(A)4.B.(I)(b)].

RECEIVING STREAM MONITORING REQUIREMENTS

No receiving water monitoring requirements recommended at this time.

Part III. RATIONALE AND DERIVATION OF EFFLUENT LIMITATIONS & PERMIT CONDITIONS

ALTERNATIVE EVALUATIONS FOR NEW FACILITIES

As per [10 CSR 20-7.015(4)(A)], discharges to losing streams shall be permitted only after other alternatives including land application, discharges to a gaining stream and connection to a regional wastewater treatment facility have been evaluated and determined to be unacceptable for environmental and/or economic reasons.

- ✓ Not Applicable; The facility does not discharge to a Losing Stream as defined by [10 CSR 20-2.010(36)] & [10 CSR 20-7.031(1)(N)], or is an existing facility.

ANTI-BACKSLIDING

A provision in the Federal Regulations [CWA §303(d)(4); CWA §402(c); 40 CFR Part 122.44(I)] that requires a reissued permit to be as stringent as the previous permit with some exceptions.

- ✓ Limitations in this operating permit for the reissuance of this permit conform to the anti-backsliding provisions of Section 402(o) of the Clean Water Act, and 40 CFR Part 122.44.
 - ✓ The Department determines technical mistakes or mistaken interpretations of law were made in issuing the permit under section 402(a)(1)(b).
 - ✓ The permittee was prompted to test for total toxic organics once within the last permit cycle. The data was sporadic and unaccommodating to determine what if any pollutants present within the roof blowers were transferred to stormwater. Much of TTO compounds are not expected to be present at the facility therefore the facility will only be required to sample for those chemicals identified by the applicant to possibly be present at the facility in sufficient amounts to influence roof top runoff stormwater contamination. Also, the facility will be required to sample for naphthalene which was found in the previous TTO query.
 - ✓ The facility will no longer need to report daily rainfall data. The facility will only need to report rainfall for the day of sample collection. This requirement was relaxed because daily rainfall data is easily available online.

ANTIDegradation

In accordance with Missouri's Water Quality Standard [10 CSR 20-7.031(2)], the Department is to document by means of Antidegradation Review that the use of a water body's available assimilative capacity is justified. Degradation is justified by documenting the socio-economic importance of a discharging activity after determining the necessity of the discharge.

✓ Renewal, no degradation proposed, and no further review necessary.

BIOSOLIDS & SEWAGE SLUDGE

Biosolids are solid materials resulting from domestic wastewater treatment that meet federal and state criteria for beneficial uses (i.e. fertilizer). Sewage sludge is solids, semi-solids, or liquid residue generated during the treatment of domestic sewage in a treatment works; including but not limited to, domestic septage; scum or solids removed in primary, secondary, or advanced wastewater treatment process; and a material derived from sewage sludge. Sewage sludge does not include ash generated during the firing of sewage sludge in a sewage sludge incinerator or grit and screening generated during preliminary treatment of domestic sewage in a treatment works. Additional information regarding biosolids and sludge is located at the following web address:

<http://extension.missouri.edu/main/DisplayCategory.aspx?C=74>, items WQ422 through WQ449.

✓ Not applicable; this condition is not applicable to the permittee for this facility.

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

INDUSTRIAL SLUDGE

Industrial sludge is solids, semi-solids, or liquid residue generated during the treatment of industrial 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 a material derived from industrial sludge.

✓ Not applicable. This condition is not applicable to the permittee for this facility.

REASONABLE POTENTIAL ANALYSIS (RPA)

Federal regulation [40 CFR Part 122.44(d)(1)(i)] requires effluent limitations for all pollutants that are or may be discharged at a level that will cause or have the reasonable potential to cause or contribute to an in-stream excursion above narrative or numeric water quality standard. In accordance with [40 CFR Part 122.44(d)(1)(iii)] if the permit writer determines that any give pollutant has the reasonable potential to cause, or contribute to an in-stream excursion above the WQS, the permit must contain effluent limits for that pollutant.

✓ Not applicable; a RPA was not conducted for this facility.

SCHEDULE OF COMPLIANCE (SOC)

A schedule of remedial measures included in a permit, including an enforceable sequence of interim requirements (actions, operations, or milestone events) leading to compliance with the Missouri Clean Water Law, its implementing regulations, and/or the terms and conditions of an operating permit.

✓ Not applicable. This permit does not contain a SOC.

SPILL REPORTING

Per 10 CSR 24-3.010, any emergency involving a hazardous substance must be reported to the department's 24 hour Environmental Emergency Response hotline at (573) 634-2436 at the earliest practicable moment after discovery. The department may require the submittal of a written report detailing measures taken to clean up a spill. These reporting requirements apply whether or not the spill results in chemicals or materials leaving the permitted property or reaching waters of the state. This requirement is in addition to the Noncompliance Reporting requirement found in Standard Conditions Part I.

STORM WATER POLLUTION PREVENTION PLAN (SWPPP)

In accordance with 40 CFR 122.44(k) *Best Management Practices (BMPs)* to control or abate the discharge of pollutants when: (1) Authorized under section 304(e) of the Clean Water Act (CWA) for the control of toxic pollutants and hazardous substances from ancillary industrial activities; (2) Authorized under section 402(p) of the CWA for the control of storm water discharges; (3) Numeric effluent limitations are infeasible; or (4) the practices are reasonably necessary to achieve effluent limitations and standards or to carry out the purposes and intent of the CWA. In accordance with the EPA's *Developing Your Stormwater Pollution Prevention Plan, A Guide for Industrial Operators*, (Document number EPA 833-B-09-002) [published by the United States Environmental Protection Agency (USEPA) in February 2009], BMPs are measures or practices used to reduce the amount of pollution entering (regarding this operating permit) waters of the state. BMPs may take the form of a process, activity, or physical structure. Additionally in accordance with the Storm Water Management, a SWPPP is a series of steps and activities to (1) identify sources of pollution or contamination, and (2) select and carry out actions which prevent or control the pollution of storm water discharges.

- ✓ Applicable. A SWPPP shall be developed and implemented for each site and shall incorporate required practices identified by the Department with jurisdiction, incorporate erosion control practices specific to site conditions, and provide for maintenance and adherence to the plan. A SWPPP may be similar to an SPCC plan but should be separate documents.

303(D) LIST

Section 303(d) of the federal Clean Water Act requires that each state identify waters that are not meeting water quality standards and for which adequate water pollution controls have not been required. Water quality standards protect such beneficial uses of water as whole body contact (such as swimming), maintaining fish and other aquatic life, and providing drinking water for people, livestock and wildlife. The 303(d) list helps state and federal agencies keep track of waters that are impaired but not addressed by normal water pollution control programs.

- ✓ Applicable. The Missouri River is listed on the 2006 Missouri 303(d) List for chlordane and polychlorinated biphenyls (PCBs) where a TMDL was developed, and the 2008, 2010, 2012, and 2014 303(d) list for *Escherichia coli* without an associated TMDL.
 - ✓ This facility is not considered to be a source of the above listed pollutants or considered to contribute to the impairment of the Missouri River.

TOTAL MAXIMUM DAILY LOAD (TMDL)

A TMDL is a calculation of the maximum amount of a given pollutant that a body of water can absorb before its water quality is affected. If a water body is determined to be impaired as listed on the 303(d) list, then a watershed management plan will be developed that shall include the TMDL calculation.

- ✓ Applicable. The Missouri River is associated with the 2006 EPA approved TMDL for chlordane and polychlorinated biphenyls (PCBs).
 - ✓ This facility is not considered to be a source of the above listed pollutant(s) or considered to contribute to the impairment of the Missouri River.

VARIANCE

As 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 shall be specified by the commission in its order. The variance may be extended by affirmative action of the commission. In no event shall the variance be granted for a period of time greater than is reasonably necessary for complying with the Missouri Clean Water Law §§644.006 to 644.141 or any standard, rule or regulation promulgated pursuant to Missouri Clean Water Law §§644.006 to 644.141.

- ✓ Not applicable. This operating permit is not drafted under premises of a petition for variance.

WASTELOAD ALLOCATIONS (WLA) FOR LIMITS

As per [10 CSR 20-2.010(78)], the amount of pollutant each discharger is allowed by the Department to release into a given stream after the Department has determined total amount of pollutant that may be discharged into that stream without endangering its water quality.

- ✓ Not applicable. Wasteload allocations were not calculated.

WLA MODELING

- ✓ Not applicable. A WLA study was either not submitted or determined not applicable by Department staff.

WATER QUALITY STANDARDS

Per [10 CSR 20-7.031(4)], general criteria shall be applicable to all waters of the state at all times including mixing zones. Additionally, [40 CFR 122.44(d)(1)] directs the Department to establish in each NPDES permit to include conditions to achieve water quality established under Section 303 of the Clean Water Act, including State narrative criteria for water quality.

WHOLE EFFLUENT TOXICITY (WET) TEST

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

- ✓ Not applicable; at this time, the permittee is not required to conduct WET test for this facility. This facility's discharge consists of non-contact cooling water and stormwater, the facility is not a major or subject to any federal effluent limitation guidelines.

Part IV. EFFLUENT LIMITS DETERMINATION

Outfall #001 → Stormwater Only

Effluent limitations derived and established in the below Effluent Limitations Table are based on current operations of the facility. Future permit action due to facility modification may contain new operating permit terms and conditions that supersede the terms and conditions, including effluent limitations, of this operating permit.

Due to the nature of the discharges from these outfalls being stormwater, only a maximum daily limit (MDL) or monitoring requirement will be implemented for many of the parameters listed below. Stormwater events are acute occurrences that result in the greatest concentrations of pollutants being discharged in the first part of the runoff. This first flush can best be represented by a grab sample within the first hours of runoff. Additionally, stormwater events are highly variable. Recording an average monthly limit (AML) is not representative of the nature of these discharges.

EFFLUENT LIMITATIONS TABLE (OUTFALL #001)

PARAMETER	UNIT	BASIS FOR LIMITS	DAILY MAXIMUM	WEEKLY AVERAGE	MONTHLY AVERAGE	MODIFIED	PREVIOUS PERMIT LIMITATIONS
1,2,4-trimethylbenzene	µg/L	9	*			≈	**
2-butoxyethanol	µg/L	9	*			≈	**
COD	mg/L	6	90			YES	120, 90
Cyclohexanone	µg/L	9	*			≈	**
Flow	MGD	1	*			NO	SAME
Mineral Spirits-odorless	µg/L	9	*			≈	**
Naphthalene	µg/L	9	*			≈	**
Oil & Grease	mg/L	1, 3	10			YES	15, 10
pH	SU	1, 3, 4	6.5-9			NO	SAME
Precipitation	inches	1, 2, 6	*			YES [♠]	♠
TSS	mg/L	1, 6	70			NO [♠]	70, 70

- * Monitoring requirement only
- ** Parameter not established in previous state operating permit
- ♠ Removed 70 Monthly Average (no change to limits)
- ≈ Parameter in place of Total Toxic Organic analysis
- ♠ The facility will only need to report one day of rainfall data; daily rainfall is unnecessary

Basis for Limitations Codes:

- | | | |
|--|-----------------------------------|--|
| 1. State or Federal Regulation/Law | 5. Water Quality Model | 9. Monitoring necessary to determine potential release and stream use depreciation |
| 2. Water Quality Standard (includes RPA) | 6. Best Professional Judgment | |
| 3. Water Quality Based Effluent Limits | 7. TMDL or Permit in lieu of TMDL | |
| 4. Antidegradation Review/Policy | 8. WET Test Policy | |

Outfall #001 – Derivation and Discussion of Limits

Chemical Oxygen Demand (COD)

Monitoring is included using the permit writer’s best professional judgment. There is no water quality standard for COD; however, increased oxygen demand may impact instream water quality. COD is also a valuable indicator parameter. COD monitoring allows the permittee to identify increases in COD that may indicate materials/chemicals coming into contact with stormwater that cause an increase in oxygen demand. Increases in COD may indicate a need for maintenance or improvement of BMPs. Previous permit limits were set at 120 mg/L for a daily maximum and 90 mg/L for a maximum monthly average. These limits will be adjusted to account for actual once per quarter sampling hence the monthly average will be applied to the daily maximum. Because the facility has only been sampling once per quarter, no schedule of compliance is allowed. The new limits are 90 mg/L for a maximum daily value.

Flow

In accordance with [40 CFR Part 122.44(i)(1)(ii)] the volume of effluent discharged from each outfall is needed to assure compliance with permitted effluent limitations. If the permittee is unable to obtain effluent flow, then it is the responsibility of the permittee to inform the Department, which may require the submittal of an operating permit modification.

Metals

In the application, the permittee did not indicate any metals were present. However, in a narrative supplied by the permittee, they indicated titanium and barium were used as mixtures. Previous testing of barium indicated no analytical detection. There are no water quality standards for titanium therefore no testing will be required.

Oil & Grease

Conventional pollutant, in accordance with 10 CSR 20-7.031 Table A effluent limitation for protection of aquatic life; 10 mg/L daily maximum. The previous permit provided 15 mg/L for a daily maximum. While the state regulation indicates it is a "chronic" effluent, because the facility discharges only stormwater, 10 mg/L is the daily maximum.

pH

6.5-9.0 SU. The water quality standard states water contaminants shall not cause pH to be outside the range of 6.5-9.0 SU. Limits are retained from the previous permit.

Naphthalene

During the last permit cycle, naphthalene was reported to have a value of 17 µg/L. This is very close to the Missouri health advisory level for drinking water (20 µg/L) which is a use to be maintained for the Missouri River. Because PAHs are a subset of TTOs (naphthalene is a polycyclic aromatic hydrocarbon), this portion of the TTO analysis is being kept. The facility will measure the compound biannually in 40 CFR 136 using Method 610 because the stormwater contacts air from the roof blowers; the method detection limit for this parameter is 1.8 µg/L. While the facility has stated they have baghouses associated with these air discharges, no determination has been made whether they are protective of water quality. This monitoring constituent is to help ascertain why elevated COD levels have been occurring in the stormwater effluent.

Precipitation

Monitoring only requirement; measuring the amount of precipitation [(10 CSR 20-6.200(2)(C)1.E(VI)] during an event is necessary to ensure adequate stormwater management exists at the site. Knowing the amount of potential stormwater runoff can provide the permittee a better understanding of specific control measures that should be employed to ensure protection of water quality. In the previous permit, the permittee was required to provide daily rainfall data. This is unnecessary for NPDES permitting as rainfall data is easily available on-line. The permittee will only need to report precipitation for any days the samples were collected.

Total Suspended Solids (TSS)

There is no water quality standard for TSS; however, sediment discharges can negatively impact aquatic life habitat. TSS is also a valuable indicator parameter. TSS monitoring allows the permittee to identify increases in TSS that may indicate uncontrolled materials leaving the site. Effluent limitations from the previous state operating permit have been reassessed and verified they are still protective of the receiving stream's water quality and beneficial uses. Effluent limitations have been retained from previous state operating permit; 70 mg/L for daily maximum. However, the facility was required to also report a monthly average during the last permit cycle. Monthly average reporting has been discontinued because of the fleeting nature of precipitation discharges, monthly limits should not have been applied.

Temperature

Due to the nature of the discharge being stormwater only, the permittee will not be required to monitor for this pollutant during stormwater flows from this outfall. The permit writer has used best professional judgment to determine the discharge will not cause an exceedance in temperature in the receiving stream during discharges of stormwater only. This is unchanged from the previous permit.

Total Toxic Organics (TTO)

The permittee was required to monitor once for TTO within the last permit cycle. A value of 151 µg/L was reported. TTO does not have a Missouri water quality standard or applicable (to this facility) federal regulation. Additional data is however needed because of the mixing of air from baghouse stacks with rainwater. However, TTO is too broad a category as it includes pesticides and other components not believed to be present in the processes at the facility. No pesticides are expected to be present within the facility except for label-applied consumer-use pest control. TTO is being replaced with compounds expected to be present at the facility as supplied to the department on a list dated 2/23/2015. This list contained 11 compounds but only four of the compounds had a standard method, hence those four will have monitoring. 1,2,4-trimethylbenzene, 2-butoxyethanol, cyclohexanone, and odorless mineral spirits are toxic organic compounds believed by the facility to be present in noteworthy amounts and with appropriate volatilities which may be present in the air emission stacks. These will be sampled for twice yearly during the next permit cycle to attempt to determine why elevated COD levels are present within the rooftop stormwater runoff.

MINIMUM SAMPLING AND REPORTING FREQUENCY REQUIREMENTS: OUTFALL #001

All samples from Outfall #001 shall be collected from a discharge resulting from a precipitation event greater than 0.1 inches in magnitude and that occurs at least 72 hours from the previously measurable precipitation event. If a precipitation event does not occur within the reporting period, report as no discharge. Samples must be collected within the first three hours of the beginning of the discharge [40 CFR 122.21 (g)(7)(ii)]. The total amount of precipitation should be noted from the day from which the samples were collected.

PARAMETER	SAMPLING FREQUENCY	REPORTING FREQUENCY
1,2,4-trimethylbenzene	twice yearly	twice yearly
2-butoxyethanol	twice yearly	twice yearly
COD	once/quarter	twice yearly
Cyclohexanone	twice yearly	twice yearly
Flow	once/quarter	twice yearly
Mineral Spirits-odorless	twice yearly	twice yearly
Naphthalene	twice yearly	twice yearly
Oil & Grease	once/quarter	twice yearly
pH	once/quarter	twice yearly
Precipitation	once/quarter	twice yearly
TSS	once/quarter	twice yearly

Outfall #002 → Main Facility Outfall, Non-Contact Cooling Water

Effluent limitations derived and established in the below Effluent Limitations Table are based on current operations of the facility. Future permit action due to facility modification may contain new operating permit terms and conditions that supersede the terms and conditions, including effluent limitations, of this operating permit.

EFFLUENT LIMITATIONS TABLE: OUTFALL #002

PARAMETER	UNIT	Basis for Limits	DAILY MAXIMUM	WEEKLY AVERAGE	MONTHLY AVERAGE	MODIFIED	PREVIOUS PERMIT LIMITATIONS
FLOW	GPD	1	*		*	NO	SAME
pH	SU	1, 3	6.5-10		n/a	NO	SAME
TEMPERATURE	MG/L	1, 2	*		*	NO	SAME

* - Monitoring requirement only

Basis for Limitations Codes:

- | | |
|--|-----------------------------------|
| 1. State or Federal Regulation/Law | 5. Water Quality Model |
| 2. Water Quality Standard (includes RPA) | 6. Best Professional Judgment |
| 3. Water Quality Based Effluent Limits | 7. TMDL or Permit in lieu of TMDL |
| 4. Antidegradation Review/Policy | 8. WET Test Policy |

Outfall #002 – Derivation and Discussion of Limits

Flow

In accordance with [40 CFR Part 122.44(i)(1)(ii)] the volume of effluent discharged from each outfall is needed to assure compliance with permitted effluent limitations. If the permittee is unable to obtain effluent flow, then it is the responsibility of the permittee to inform the Department, which may require the submittal of an operating permit modification.

pH

6.5 to 10.0 SU. State regulation 10 CSR 20-7.015(9)(I)(1) allows for a pH of 6 to 10.5 for uncontaminated cooling water effluent. In this case, the cooling water is municipal water and is supplied at an elevated pH according to a letter dated November 29, 2006 from the department to Mr. Craig Poggenpohl. This letter allowed the permit to establish effluent requirements for FUJIFILM’s cooling water which are expanded from the general water quality criteria. Within the previous permit, conditions were set at 6.5-10. Because the permittee is able to meet those more stringent limits from the previous permit [as opposed to 10 CSR 20-7.015(9)(I)(1)], and to conform to anti-backsliding rules [CWA §303(d)(4); CWA §402(c); 40 CFR Part 122.44(I)], the permit limits will remain 6.5 to 10.0 SU. pH is not to be averaged.

Temperature

In accordance with 10 CSR 20-7.031(5)(D), water contaminant sources shall not cause or contribute to stream temperature in excess of ninety degrees Fahrenheit (90 °F) or thirty-two and two-ninths degrees Celsius (32 2/9 °C). In order to reduce confusion and duplicative monitoring or reporting requirements, the permit will only require that temperature be monitored and reported in degrees Fahrenheit. It is not necessary to report in both Celsius and Fahrenheit.

MINIMUM SAMPLING AND REPORTING FREQUENCY REQUIREMENTS: OUTFALL #002

PARAMETER	SAMPLING FREQUENCY	REPORTING FREQUENCY
Flow	once/quarter	twice yearly
pH	once/quarter	twice yearly
Temperature	once/quarter	twice yearly

SAMPLING FREQUENCY JUSTIFICATION (OUTFALLS #001 & #002)

The sampling and reporting frequency was generally retained from previous permit. New toxic organic compounds of concern will be collected twice per year. The department, at a minimum, needs at least eight samples of a constituent of concern to make a valid judgment if a contaminant is present in sufficient amounts to cause pollution to waters of the state.

SAMPLING TYPE JUSTIFICATION (OUTFALLS #001 & #002)

Grab sampling is appropriate for stormwater discharges, pH, and temperature. For further information on sampling and testing methods see 10 CSR 20-7.015(9)(D)2.

Part V. ADMINISTRATIVE REQUIREMENTS

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

PERMIT SYNCHRONIZATION

The Department of Natural Resources is currently undergoing a synchronization process for operating permits. Permits are normally issued on a five-year term, but to achieve synchronization many permits will need to be issued for less than the full five years allowed by regulation. The intent is that all permits within a watershed will move through the Watershed Based Management (WBM) cycle together will all expire in the same fiscal year. This will allow further streamlining by placing multiple permits within a smaller geographic area on public notice simultaneously, thereby reducing repeated administrative efforts. This will also allow the department to explore a watershed based permitting effort at some point in the future. Renewal applications must continue to be submitted within 180 days of expiration, however, in instances where effluent data from the previous renewal is less than three years old, that data may be re-submitted to meet the requirements of the renewal application. If the permit provides a schedule of compliance for meeting new water quality based effluent limits beyond the expiration date of the permit, the time remaining in the schedule of compliance will be allotted in the renewed permit.

PUBLIC NOTICE

The Department shall give public notice that a draft permit has been prepared and its issuance is pending. Additionally, public notice will be issued if a public hearing is to be held because of a significant degree of interest in and water quality concerns related to a draft permit. No public notice is required when a request for a permit modification or termination is denied; however, the requester and permittee must be notified of the denial in writing.

The Department must issue public notice of a pending operating permit or of a new or reissued statewide general permit. The public comment period is the length of time not less than 30 days following the date of the public notice which interested persons may submit written comments about the proposed permit.

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

The Public Notice period for this operating permit was from April 3, 2015 to May 4, 2015. No responses were received.

DATE OF FACT SHEET: JULY 2015

COMPLETED BY

PAM HACKLER, ENVIRONMENTAL SCIENTIST
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07/15/2015 This permit includes one parameter which was not within the EPA's parameter reporting system; this caused a significant delay between the public notice period and final issuance date. Odorless Mineral Spirits was added to the EPA's system then also had to be entered into Missouri's system. 2-butoxyethanol had to be added to Missouri's system.



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.



STANDARD CONDITIONS FOR NPDES PERMITS
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- b. The following shall be included as information which must be reported within 24 hours under this paragraph.
 - i. Any unanticipated bypass which exceeds any effluent limitation in the permit.
 - ii. Any upset which exceeds any effluent limitation in the permit.
 - iii. Violation of a maximum daily discharge limitation for any of the pollutants listed by the Department in the permit required to be reported within 24 hours.
 - c. The Department may waive the written report on a case-by-case basis for reports under paragraph 2. b. of this section if the oral report has been received within 24 hours.
3. **Anticipated Noncompliance.** The permittee shall give advance notice to the Department of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements. The notice shall be submitted to the Department 60 days prior to such changes or activity.
 4. **Compliance Schedules.** Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of the permit shall be submitted no later than 14 days following each schedule date. The report shall provide an explanation for the instance of noncompliance and a proposed schedule or anticipated date, for achieving compliance with the compliance schedule requirement.
 5. **Other Noncompliance.** The permittee shall report all instances of noncompliance not reported under paragraphs 2, 3, and 6 of this section, at the time monitoring reports are submitted. The reports shall contain the information listed in paragraph 2. a. of this section.
 6. **Other Information.** Where the permittee becomes aware that it failed to submit any relevant facts in a permit application, or submitted incorrect information in a permit application or in any report to the Department, it shall promptly submit such facts or information.
 7. **Discharge Monitoring Reports.**
 - a. Monitoring results shall be reported at the intervals specified in the permit.
 - b. Monitoring results must be reported to the Department via the current method approved by the Department, unless the permittee has been granted a waiver from using the method. If the permittee has been granted a waiver, the permittee must use forms provided by the Department.
 - c. Monitoring results shall be reported to the Department no later than the 28th day of the month following the end of the reporting period.
- b. Notice.
 - i. Anticipated bypass. If the permittee knows in advance of the need for a bypass, it shall submit prior notice, if possible at least 10 days before the date of the bypass.
 - ii. Unanticipated bypass. The permittee shall submit notice of an unanticipated bypass as required in Section B – Reporting Requirements, paragraph 5 (24-hour notice).
 - c. Prohibition of bypass.
 - i. Bypass is prohibited, and the Department may take enforcement action against a permittee for bypass, unless:
 1. Bypass was unavoidable to prevent loss of life, personal injury, or severe property damage;
 2. There were no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment downtime. This condition is not satisfied if adequate back-up equipment should have been installed in the exercise of reasonable engineering judgment to prevent a bypass which occurred during normal periods of equipment downtime or preventive maintenance; and
 3. The permittee submitted notices as required under paragraph 2. b. of this section.
 - ii. The Department may approve an anticipated bypass, after considering its adverse effects, if the Department determines that it will meet the three (3) conditions listed above in paragraph 2. c. i. of this section.
3. **Upset Requirements.**
 - a. Effect of an upset. An upset constitutes an affirmative defense to an action brought for noncompliance with such technology based permit effluent limitations if the requirements of paragraph 3. b. of this section are met. No determination made during administrative review of claims that noncompliance was caused by upset, and before an action for noncompliance, is final administrative action subject to judicial review.
 - b. Conditions necessary for a demonstration of upset. A permittee who wishes to establish the affirmative defense of upset shall demonstrate, through properly signed, contemporaneous operating logs, or other relevant evidence that:
 - i. An upset occurred and that the permittee can identify the cause(s) of the upset;
 - ii. The permitted facility was at the time being properly operated; and
 - iii. The permittee submitted notice of the upset as required in Section B – Reporting Requirements, paragraph 2. b. ii. (24-hour notice).
 - iv. The permittee complied with any remedial measures required under Section D – Administrative Requirements, paragraph 4.
 - c. Burden of proof. In any enforcement proceeding, the permittee seeking to establish the occurrence of an upset has the burden of proof.

Section C – Bypass/Upset Requirements

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

Section D – Administrative Requirements

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



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

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



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

RECEIVED

AP17403



MISSOURI DEPARTMENT OF NATURAL RESOURCES
WATER PROTECTION PROGRAM, WATER POLLUTION CONTROL BRANCH
FORM A - APPLICATION FOR CONSTRUCTION OR OPERATING PERMIT
UNDER MISSOURI CLEAN WATER LAW

FOR AGENCY USE ONLY	
CHECK NUMBER	
DATE RECEIVED	FEE SUBMITTED
1-10-14	0

WATER PROTECTION PROGRAM

Note ▶ PLEASE READ THE ACCOMPANYING INSTRUCTIONS BEFORE COMPLETING THIS FORM.

1. This application is for:
- An operating permit and antidegradation review public notice
 - A construction permit following an appropriate operating permit and antidegradation review public notice
 - A construction permit and concurrent operating permit and antidegradation review public notice
 - A construction permit (submitted before Aug. 30, 2008 or antidegradation review is not required)
 - An operating permit for a new or unpermitted facility
 - An operating permit renewal: permit # MO- 0127442
 - An operating permit modification: permit # MO-
- Construction Permit # _____
Expiration Date June 30, 2014
Reason: _____

1.1 Is the appropriate fee included with the application? (See instructions for appropriate fee) YES NO

2. FACILITY

NAME		TELEPHONE WITH AREA CODE	
FUJIFILM Manufacturing U.S.A., Inc.		(913) 573-3803	
ADDRESS (PHYSICAL)		FAX	
20 West 14th Avenue	CITY	STATE	ZIP CODE
	North Kansas City	MO.	64116

3. OWNER

NAME		E-MAIL ADDRESS		TELEPHONE WITH AREA CODE	
FUJIFILM Manufacturing U.S.A., Inc.				(864) 223-2888	
ADDRESS (MAILING)		FAX			
921 Highway 246 South	CITY	STATE	ZIP CODE		
	Greenwood	SC	29649		

3.1 Request review of draft permit prior to public notice? YES NO

4. CONTINUING AUTHORITY

NAME		TELEPHONE WITH AREA CODE	
FUJIFILM Manufacturing U.S.A., Inc.		(864) 223-2888	
ADDRESS (MAILING)		FAX	
921 Highway 246 South	CITY	STATE	ZIP CODE
	Greenwood	SC	29649

5. OPERATOR

NAME		CERTIFICATE NUMBER		TELEPHONE WITH AREA CODE	
Scott Holub		Not applicable		(913) 573-3851	
ADDRESS (MAILING)		FAX		(816) 842-4522	
20 West 14th Avenue	CITY	STATE	ZIP CODE		
	North Kansas City	MO.	64116		

6. FACILITY CONTACT

NAME		TITLE		TELEPHONE WITH AREA CODE	
Craig Poggenpohl		EHS Manager		(913) 573-3803	
				FAX (816) 842-4522	

7. ADDITIONAL FACILITY INFORMATION

7.1 Legal Description of Outfalls. (Attach additional sheets if necessary.)

001 SW 1/4 NW 1/4 Sec 23 T 50N R 33W Clay County
UTM Coordinates Easting (X): _____ Northing (Y): _____
For Universal Transverse Mercator (UTM), Zone 15 North referenced to North American Datum 1983 (NAD83)

002 SW 1/4 NW 1/4 Sec 23 T 50N R 33W Clay County
UTM Coordinates Easting (X): _____ Northing (Y): _____

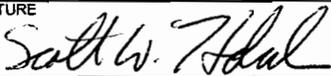
003 _____ 1/4 _____ 1/4 Sec _____ T _____ R _____ County
UTM Coordinates Easting (X): _____ Northing (Y): _____

004 _____ 1/4 _____ 1/4 Sec _____ T _____ R _____ County
UTM Coordinates Easting (X): _____ Northing (Y): _____

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

001 - SIC 2893 and NAICS 325910 002 - SIC 2893 and NAICS 325910
003 - SIC _____ and NAICS _____ 004 - SIC _____ and NAICS _____

KC
Clay

8. ADDITIONAL FORMS AND MAPS NECESSARY TO COMPLETE THIS APPLICATION (Complete all forms that are applicable.)			
A.	Is your facility a manufacturing, commercial, mining or silviculture waste treatment facility? If yes, complete Form C (unless storm water only, then complete U.S. Environmental Protection Agency Form 2F per Item C below).	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
B.	Is your facility considered a "Primary Industry" under EPA guidelines: If yes, complete Forms C and D.	YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>
C.	Is application for storm water discharges only? If yes, complete EPA Form 2F.	YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>
D.	Attach a map showing all outfalls and the receiving stream at 1" = 2,000' scale.		
E.	Is wastewater land applied? If yes, complete Form I.	YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>
F.	Is sludge, biosolids, ash or residuals generated, treated, stored or land applied? If yes, complete Form R.	YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>
9. DOWNSTREAM LANDOWNER(S) Attach additional sheets as necessary. See instructions. (PLEASE SHOW LOCATION ON MAP. SEE 8.D ABOVE).			
NAME Kansas City, Missouri, Missouri River			
ADDRESS Not applicable		CITY Kansas City	STATE ZIP CODE MO 64116
10. I certify that I am familiar with the information contained in the application, that to the best of my knowledge and belief such information is true, complete and accurate, and if granted this permit, I agree to abide by the Missouri Clean Water Law and all rules, regulations, orders and decisions, subject to any legitimate appeal available to applicant under the Missouri Clean Water Law to the Missouri Clean Water Commission.			
NAME AND OFFICIAL TITLE (TYPE OR PRINT) Scott Holub - Vice President of Manufacturing & Logistics		TELEPHONE WITH AREA CODE (913) 573-3851	
SIGNATURE 		DATE SIGNED 1/6/14	

MO 780-1479 (01-09)

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

Submittal of an incomplete application may result in the application being returned.

HAVE YOU INCLUDED:

- Appropriate Fees?
- Map at 1" = 2000' scale?
- Signature?
- Form C, if applicable?
- Form D, if applicable?
- Form 2F, if applicable?
- Form I (Irrigation), if applicable?
- Form R (Sludge), if applicable?

RECEIVED



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

JAN 10 2014

FOR AGENCY USE ONLY	
CHECK NO.	
DATE RECEIVED	FEE SUBMITTED

NOTE: DO NOT ATTEMPT TO COMPLETE THIS FORM BEFORE READING THE ACCOMPANYING INSTRUCTIONS

1.00 NAME OF FACILITY
FUJIFILM Manufacturing U.S.A., Inc.

1.10 THIS FACILITY IS NOW IN OPERATION UNDER MISSOURI OPERATING PERMIT NUMBER
MO0127442

1.20 LIST IS A NEW FACILITY AND WAS CONSTRUCTED UNDER MISSOURI CONSTRUCTION PERMIT NUMBER (COMPLETE ONLY IF THIS FACILITY DOES NOT HAVE AN OPERATING PERMIT).
Not applicable.

2.00 LIST THE STANDARD INDUSTRIAL CLASSIFICATION (SIC) CODES APPLICABLE TO YOUR FACILITY (FOUR DIGIT CODE)
A. FIRST 2893 B. SECOND _____
C. THIRD _____ D. FOURTH _____

2.10 FOR EACH OUTFALL GIVE THE LEGAL DESCRIPTION.
OUTFALL NUMBER (LIST) SW 1/4 NW 1/4 SEC 23 T 50N R 33W Clay COUNTY

2.20 FOR EACH OUTFALL LIST THE NAME OF THE RECEIVING WATER
OUTFALL NUMBER (LIST) RECEIVING WATER
Outfall# 001, Outfall# 002, Missouri River.
Note: Outfall# 003 and Outfall# 004 were rerouted to Outfall# 001 in December 2013 - see Section 2.60.

2.30 BRIEFLY DESCRIBE THE NATURE OF YOUR BUSINESS
Manufacturing printing inks including screen, flexographic, letterpress, and inkjet. Mostly ultraviolet curable acrylate base (75%), but some solvent based (20%), and water based (5%). The process starts with blending raw materials, including acrylates, solvents, resins and pigments together using an industrial mixer (typically 30-60 horsepower). This creates a pasty concentrate which is then milled using a three (3) roll mill or a bead mill. When the milling is complete, the final process is to add the remaining raw materials including additives, more acrylates, solvents etc. to the batch and mixing together. Packaging is mostly manual and primarily consists of 1 gallon and 5 gallon containers and occasional 30 and 55 gallon drums. This is a small batch operation with the average batch size being around 150 gallons.

2.40 CONTINUED

C. EXCEPT FOR STORM RUNOFF, LEAKS OR SPILLS, ARE ANY OF THE DISCHARGES DESCRIBED IN ITEMS A OR B INTERMITTENT OR SEASONAL?

YES (COMPLETE THE FOLLOWING TABLE) NO (GO TO SECTION 2.50)

1. OUTFALL NUMBER (list)	2. OPERATION(S) CONTRIBUTING FLOW (list)	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. LONG TERM AVERAGE	2. MAXIMUM DAILY	4. LONG TERM DAILY	3. MAXIMUM AVERAGE	

2.50 MAXIMUM PRODUCTION

A. DOES AN EFFLUENT GUIDELINE LIMITATION PROMULGATED BY EPA UNDER SECTION 304 OF THE CLEAN WATER ACT APPLY TO YOUR FACILITY?

YES (COMPLETE B.) NO (GO TO SECTION 2.60)

B. ARE THE LIMITATIONS IN THE APPLICABLE EFFLUENT GUIDELINES EXPRESSED IN TERMS OF PRODUCTION (OF OTHER MEASURE OF OPERATION)?

YES (COMPLETE c.) NO (GO TO SECTION 2.60)

C. IF YOU ANSWERED "YES" TO B. LIST THE QUANTITY THAT REPRESENTS 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.

1. MAXIMUM QUANTITY			2. AFFECTED OUTFALLS (list outfall numbers)
A. QUANTITY PER DAY	B. UNITS OF MEASURE	C. OPERATION, PRODUCT, MATERIAL, ETC. (specify)	

2.60 IMPROVEMENTS

A. ARE YOU NOW 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 THAT 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 3.00)

1. IDENTIFICATION OF CONDITION AGREEMENT, ETC.	2. AFFECTED OUTFALLS		3. BRIEF DESCRIPTION OF PROJECT	4. FINAL COMPLIANCE DATE	
				A. REQUIRED	B. PROJECTED
Permittee shall route all stormwater flow impacted by roof blowers' activities to the downspouts towards Outfall #001.		Outfall 001,003,004	Reroute all roof drain conduits to East parking lot and then modify Outfall #001 with a concrete culvert box and shut off valve and sample collection point.	March 1, 2014	January 1, 2014

B. OPTIONAL: YOU MAY ATTACH ADDITIONAL SHEETS DESCRIBING ANY ADDITIONAL WATER POLLUTION CONTROL PROGRAMS (OR OTHER ENVIRONMENTAL PROJECTS WHICH MAY AFFECT YOUR DISCHARGES) YOU NOW HAVE UNDER WAY OR WHICH YOU PLAN. INDICATE WHETHER EACH PROGRAM IS NOW UNDER WAY OR PLANNED, AND INDICATE YOUR ACTUAL OR PLANNED SCHEDULES FOR CONSTRUCTION.

MARK "X" IF DESCRIPTION OF ADDITIONAL CONTROL PROGRAMS IS ATTACHED.

3.10 BIOLOGICAL TOXICITY TESTING DATA

DO YOU HAVE ANY KNOWLEDGE OR REASON TO BELIEVE THAT ANY BIOLOGICAL TEST FOR ACUTE OR CHRONIC TOXICITY HAS BEEN MADE ON ANY OF YOUR DISCHARGES OR ON RECEIVING WATER IN RELATION TO YOUR DISCHARGE WITHIN THE LAST THREE YEARS?

YES (IDENTIFY THE TEST(S) AND DESCRIBE THEIR PURPOSES BELOW.) NO (GO TO 3.20)

3.20 CONTRACT ANALYSIS INFORMATION

WERE ANY OF THE ANALYSES REPORTED PERFORMED BY A CONTRACT LABORATORY OR CONSULTING FIRM?

YES (LIST THE NAME, ADDRESS AND TELEPHONE NUMBER OF AND POLLUTANTS ANALYZED BY EACH SUCH LABORATORY OR FIRM BELOW.) NO (GO TO 3.30)

A. NAME	B. ADDRESS	C. TELEPHONE (area code and number)	D. POLLUTANTS ANALYZED (list)
Pace Analytical Services, Inc.	9608 Loiret Blvd., Lenexa, KS. 66219	913.599.5665	COD, TSS, O&G, pH
SCS Aquaterra	7311 West 130th St., Suite 100, Overland Park, KS. 66213	913.681.0030	Temperature, pH

3.30 CERTIFICATION

I CERTIFY UNDER PENALTY OF LAW THAT I HAVE PERSONALLY EXAMINED AND AM FAMILIAR WITH THE INFORMATION SUBMITTED IN THIS APPLICATION AND ALL ATTACHMENTS AND THAT, BASED ON MY INQUIRY OF THOSE INDIVIDUALS IMMEDIATELY RESPONSIBLE FOR OBTAINING THE INFORMATION, I BELIEVE THAT THE INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT.

NAME AND OFFICIAL TITLE (TYPE OR PRINT)

Scott Holub - Vice President of Manufacturing & Logistics

TELEPHONE NUMBER WITH AREA CODE

(913) 573-3851

SIGNATURE (SEE INSTRUCTIONS)

Scott W. Holub

DATE SIGNED

1/6/14

PLEASE PRINT OR TYPE. You may report some or all of this information on separate sheet
(Use the same format) instead of completing these pages.
SEE INSTRUCTIONS

FORM C
TABLE 1 FOR 3.00 ITEM A AND B

INTAKE AND EFFLUENT CHARACTERISTICS												OUTFALL NO. Outfall #001			
PART A - You must provide the results of at least one analysis for every pollutant in this table. Complete one table for each outfall. See instructions for additional details.															
1. POLLUTANT	A. MAXIMUM DAILY VALUE		B. MAXIMUM 30 DAY VALUE (if available)		C. LONG TERM AVRG. VALUE (if available)		D. NO. OF ANALYSES	3. UNITS (specify, if blank)			4. INTAKE (optional)				
	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS		A. CONCEN- TRATION	B. MASS	A. LONG TERM AVRG. VALUE (1) CONCENTRATION	(2) MASS	B. NO. OF ANALYSES			
A. Biochemical Oxygen Demand (BOD)	NA							NA							
B. Chemical Oxygen Demand (COD)	20.8							mg/L							
C. Total organic Carbon (TOC)	to be determi							mg/L							
D. Total Suspended Solids (TSS)	<5.0							mg/L							
E. Ammonia (as N)	to be determi							mg/L							
F. Flow	VALUE 0.0046		VALUE		VALUE			MGD		VALUE					
G. Temperature (winter)	VALUE NA		VALUE		VALUE			°C		VALUE					
H. Temperature (summer)	VALUE NA		VALUE		VALUE			°C		VALUE					
I. pH	MINIMUM 8.45	MAXIMUM	MINIMUM	MAXIMUM				STANDARD UNITS							
PART B - Mark "X" in column 2A for each pollutant you know or have reason to believe is present. Mark "X" in column 2B for each pollutant you believe to be absent. If you mark column 2A for any pollutant, you must provide the results for at least one analysis for that pollutant. Complete one table for each outfall. See the instructions for additional details and requirements.															
1. POLLUTANT AND CAS NUMBER (if available)	2. MARK "X"		3. EFFLUENT				4. UNITS				5. INTAKE (optional)				
	A. BELIEVED PRESENT	B. BELIEVED ABSENT	A. MAXIMUM DAILY VALUE (1) CONCENTRATION	(2) MASS	B. MAXIMUM 30 DAY VALUE (if available)	(1) CONCENTRATION	(2) MASS	C. LONG TERM AVRG. VALUE (if available)	(1) CONCENTRATION	(2) MASS	A. CONCEN- TRATION	B. MASS	A. LONG TERM AVRG. VALUE (1) CONCENTRATION	(2) MASS	B. NO. OF ANALYSES
CONVENTIONAL AND NONCONVENTIONAL POLLUTANTS															
A. Bromide (24959-67-9)		X													
B. Chlorine, Total Residual		X													
C. Color		X													
D. Fecal Coliform		X													
E. Fluoride (16984-48-8)		X													
F. Nitrate - Nitrate (as N)		X													

1. POLLUTANT AND CAS NUMBER (if available)	2. MARK "X"		3. EFFLUENT						4. UNITS		5. INTAKE (optional)			
	A. BELIEVED PRESENT	B. BELIEVED ABSENT	A. MAXIMUM DAILY VALUE		B. MAXIMUM 30 DAY VALUE (if available)		C. LONG TERM AVRG. VALUE (if available)		D. NO. OF ANALYSES	A. CONCENTRATION	B. MASS	A. LONG TERM AVRG. VALUE		B. NO. OF ANALYSES
			(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS				(1) CONCENTRATION	(2) MASS	
G. Nitrogen, Total Organic (as N)		X												
H. Oil and Grease		X												
I. Phosphorus (as P), Total (7723-14-0)		X												
J. Sulfate (as SO ⁴) (14808-79-8)		X												
K. Sulfide (as S)		X												
L. Sulfite (as SO ³) (14265-45-3)		X												
M. Surfactants		X												
N. Aluminum, Total (7429-90-5)		X												
O. Barium, Total (7440-39-3)		X												
P. Boron, Total (7440-42-8)		X												
Q. Cobalt, Total (7440-48-4)		X												
R. Iron, Total (7439-89-6)		X												
S. Magnesium, Total (7439-95-4)		X												
T. Molybdenum, Total (7439-98-7)		X												
U. Manganese, Total (7439-96-5)		X												
V. Tin, Total (7440-31-5)		X												
W. Titanium, Total (7440-32-6)		X												

1. POLLUTANT AND CAS NUMBER (if available)	2. MARK "X"		3. EFFLUENT						4. UNITS		5. INTAKE (optional)		B. NO. OF ANALYSES
	A. BELIEVED PRESENT	B. BELIEVED ABSENT	A. MAXIMUM DAILY VALUE		B. MAXIMUM 30 DAY VALUE		C. LONG TERM AVRG. VALUE		A. CONCENTRATION	B. MASS	A. LONG TERM AVRG. VALUE		
			(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(if available)	(1) CONCENTRATION			(2) MASS	(1) CONCENTRATION	
METALS, AND TOTAL PHENOLS													
1M. Antimony, Total (7440-36-9)	X												
2M. Arsenic, Total (7440-38-2)	X												
3M. Beryllium, Total (7440-41-7)	X												
4M. Cadmium, Total (7440-43-9)	X												
5M. Chromium III (16065-83-1)	X												
6M. Chromium VI (18540-29-9)	X												
7M. Copper, Total (7440-50-8)	X												
8M. Lead, Total (7439-92-1)	X												
9M. Mercury, Total (7439-97-6)	X												
10M. Nickel, Total (7440-02-0)	X												
11M. Selenium, Total (7782-49-2)	X												
12M. Silver, Total (7440-22-4)	X												
13M. Thallium, Total (7440-28-0)	X												
14M. Zinc, Total (7440-66-6)	X												
15M. Cyanide, Amenable to Chlorination	X												
16M. Phenols, Total	X												
RADIOACTIVITY													
(1) Alpha Total	X												
(2) Beta Total	X												
(3) Radium Total	X												
(4) Radium 226 Total	X												

PLEASE PRINT OR TYPE. You may report some or all of this information on separate sheet
(Use the same format) instead of completing these pages.
SEE INSTRUCTIONS

FORM C
TABLE 1 FOR 3.00 ITEM A AND B

INTAKE AND EFFLUENT CHARACTERISTICS										OUTFALL NO. Outfall #002
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PART A – You must provide the results of at least one analysis for every pollutant in this table. Complete one table for each outfall. See instructions for additional details.

1. POLLUTANT	2. EFFLUENT				3. UNITS (specify if blank)				4. INTAKE (optional)			
	A. MAXIMUM DAILY VALUE		B. MAXIMUM 30 DAY VALUE (if available)		C. LONG TERM AVRG. VALUE (if available)		D. NO. OF ANALYSES	A. CONCENTRATION	B. MASS	A. LONG TERM AVRG. VALUE		B. NO. OF ANALYSES
	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS				(1) CONCENTRATION	(2) MASS	
A. Biochemical Oxygen Demand (BOD)	NA							NA				
B. Chemical Oxygen Demand (COD)	<10.0							mg/L				
C. Total organic Carbon (TOC)	2.1							mg/L				
D. Total Suspended Solids (TSS)	11.0							mg/L				
E. Ammonia (as N)	<0.10							mg/L				
F. Flow	VALUE 0.05							MGD				
G. Temperature (winter)	VALUE 20.89							°C				
H. Temperature (summer)	VALUE NA							°C				
I. pH	MINIMUM 9.46	MAXIMUM						STANDARD UNITS				

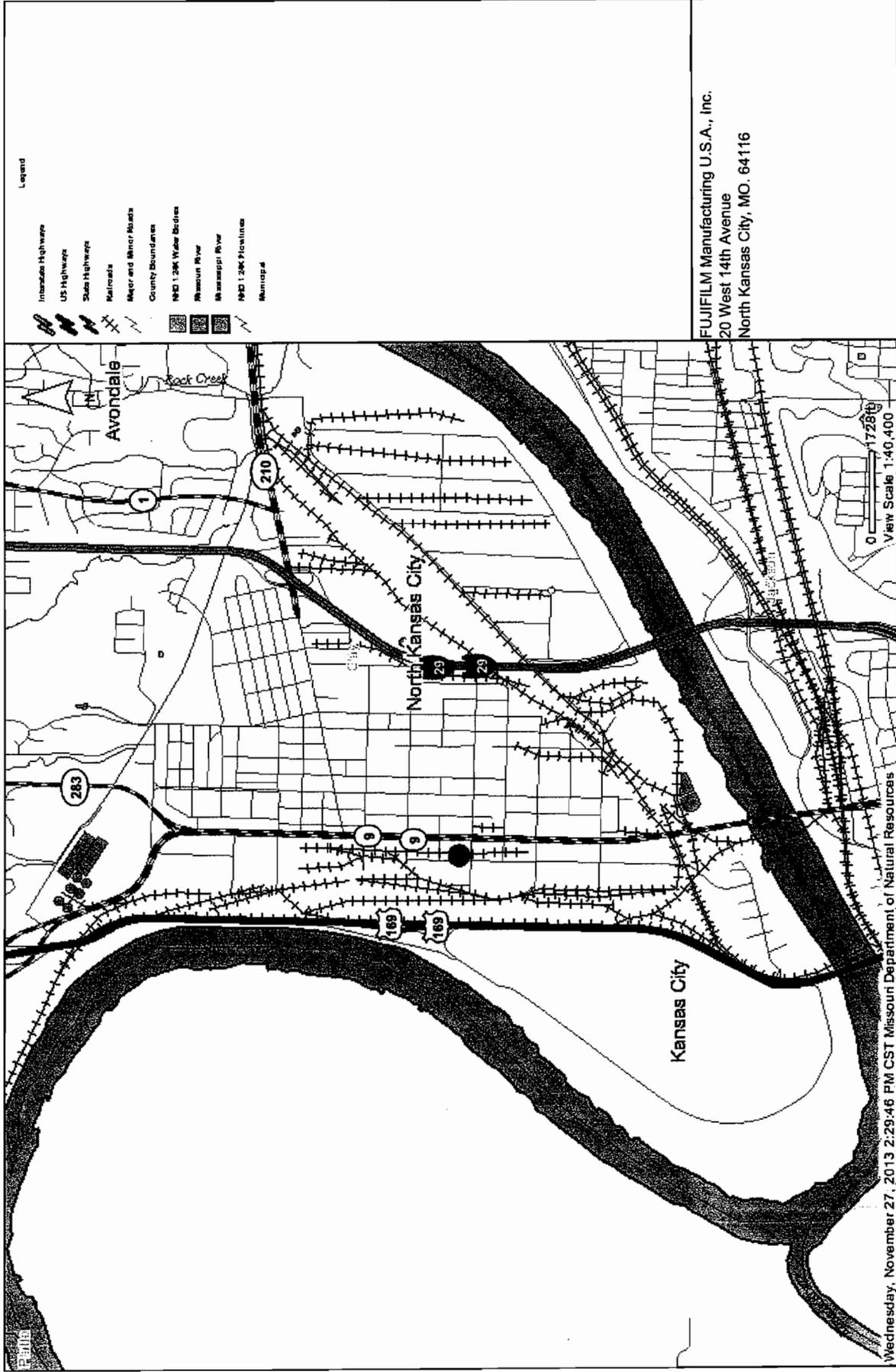
PART B – Mark "X" in column 2A for each pollutant you know or have reason to believe is present. Mark "X" in column 2B for each pollutant you believe to be absent. If you mark column 2A for any pollutant, you must provide the results for at least one analysis for that pollutant. Complete one table for each outfall. See the instructions for additional details and requirements.

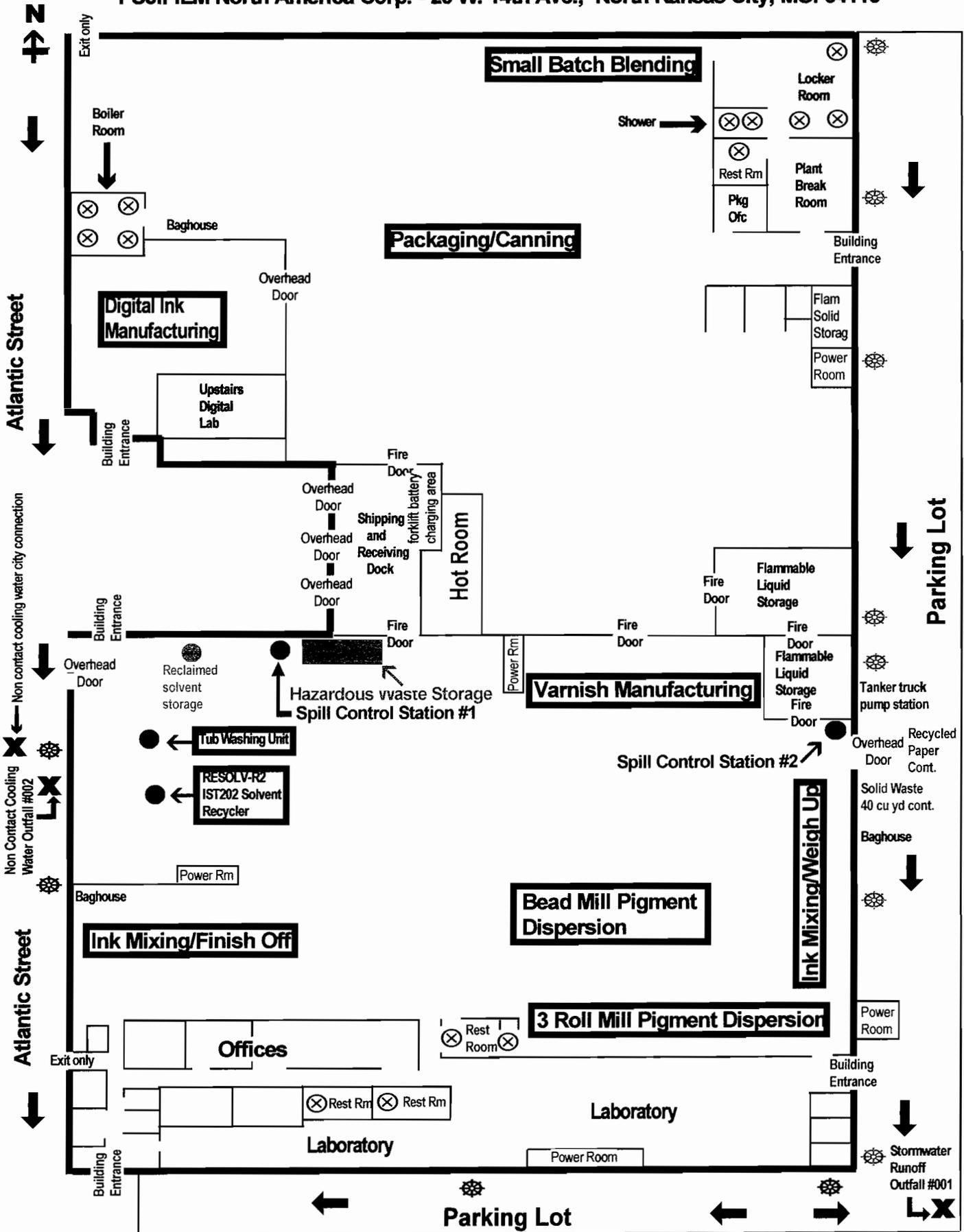
1. POLLUTANT AND CAS NUMBER (if available)	2. MARK "X"		3. EFFLUENT				4. UNITS				5. INTAKE (optional)	
	A. BELIEVED PRESENT	B. BELIEVED ABSENT	A. MAXIMUM DAILY VALUE	B. MAXIMUM 30 DAY VALUE (if available)	C. LONG TERM AVRG. VALUE (if available)	D. NO. OF ANALYSES	A. CONCENTRATION	B. MASS	A. LONG TERM AVRG. VALUE	B. NO. OF ANALYSES		
			(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS		
CONVENTIONAL AND NONCONVENTIONAL POLLUTANTS												
A. Bromide (24859-67-9)		X										
B. Chlorine, Total Residual		X										
C. Color		X										
D. Fecal Coliform		X										
E. Fluoride (16984-48-8)		X										
F. Nitrate - Nitrate (as N)		X										

1. POLLUTANT AND CAS NUMBER (if available)	2. MARK "X"		3. EFFLUENT						4. UNITS		5. INTAKE (optional)		B. NO. OF ANALYSES	
	A. BELIEVED PRESENT	B. BELIEVED ABSENT	A. MAXIMUM DAILY VALUE		B. MAXIMUM 30 DAY VALUE (if available)		C. LONG TERM AVRG. VALUE (if available)		A. CONCEN- TRATION	B. MASS	A. LONG TERM AVRG. VALUE			
			(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS			(1) CONCENTRATION	(2) MASS		
G. Nitrogen, Total Organic (as N)		X												
H. Oil and Grease		X												
I. Phosphorus (as P), Total (7723-14-0)		X												
J. Sulfate (as SO ₄) (14808-79-8)		X												
K. Sulfide (as S)		X												
L. Sulfite (as SO ₃) (14265-45-3)		X												
M. Surfactants		X												
N. Aluminum, Total (7429-90-5)		X												
O. Barium, Total (7440-39-3)		X												
P. Boron, Total (7440-42-8)		X												
Q. Cobalt, Total (7440-48-4)		X												
R. Iron, Total (7439-89-6)		X												
S. Magnesium, Total (7439-95-4)		X												
T. Molybdenum, Total (7439-98-7)		X												
U. Manganese, Total (7439-96-5)		X												
V. Tin, Total (7440-31-5)		X												
W. Titanium, Total (7440-32-6)		X												

1. POLLUTANT AND CAS NUMBER (if available)	2. MARK "X"		3. EFFLUENT						4. UNITS		5. INTAKE (optional)		
	A. BELIEVED PRESENT	B. BELIEVED ABSENT	A. MAXIMUM DAILY VALUE		B. MAXIMUM 30 DAY VALUE		C. LONG TERM AVRG. VALUE		A. CONCENTRATION	B. MASS	A. LONG TERM AVRG. VALUE		B. NO. OF ANALYSES
			(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS			(1) CONCENTRATION	(2) MASS	
METALS, AND TOTAL PHENOLS													
1M. Antimony, Total (7440-36-9)		X											
2M. Arsenic, Total (7440-38-2)		X											
3M. Beryllium, Total (7440-41-7)		X											
4M. Cadmium, Total (7440-43-9)		X											
5M. Chromium III (16065-83-1)		X											
6M. Chromium VI (18540-29-9)		X											
7M. Copper, Total (7440-50-8)		X											
8M. Lead, Total (7439-92-1)		X											
9M. Mercury, Total (7439-97-6)		X											
10M. Nickel, Total (7440-02-0)		X											
11M. Selenium, Total (7782-49-2)		X											
12M. Silver, Total (7440-22-4)		X											
13M. Thallium, Total (7440-28-0)		X											
14M. Zinc, Total (7440-66-6)		X											
15M. Cyanide, Amenable to Chlorination		X											
16M. Phenols, Total		X											
RADIOACTIVITY													
(1) Alpha Total		X											
(2) Beta Total		X											
(3) Radium Total		X											
(4) Radium 226 Total		X											

FUJIFILM Manufacturing U.S.A., Inc.





Legend:

- Storm Water Direction Flow
- X Municipal Storm Sewer Drains
- ☼ Active Roof Downspouts
- ☼ Inactive Roof Downspouts
- ⊗ Floor Drains
- ☼ Hazardous Waste Sources

Scale: 1 inch = 28 feet

14th Avenue

MDNR Form C - 2.40 A - Line Drawing of Water Flow

