

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, 92<sup>nd</sup> Congress) as amended,

Permit No.	MO-0136824
Owner:	CNH Reman, LLC
Address:	2707 N. Farm Road 123, Springfield, MO 65803
Continuing Authority:	SRC Holdings Corporation
Address:	3140 East Division, Springfield, MO 65802
Facility Name:	CNH Reman, LLC
Facility Address:	2707 N. Farm Road 123, Springfield MO 65803
Legal Description:	SE <sup>1</sup> / <sub>4</sub> , SE <sup>1</sup> / <sub>4</sub> , Sec. 06, T29N, R22W, Greene County
UTM (X/Y):	467475 / 4122539
Receiving Stream:	Unnamed Tributary to Sinkhole (U)
First Classified Stream and ID:	Spring Branch (P) (01385)
USGS Basin & Sub-watershed No.:	(10290106-0404)

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

### **FACILITY DESCRIPTION**

Outfall #001 - Industrial Storm water - SIC #3174

The use or operation of this facility does not require a CERTIFIED OPERATOR.

Storm water discharge only.

Actual flow is dependent upon precipitation

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 Section 644.051.6 of the Law.

April 9, 2012

Effective Date

Handwritten signature of Sara Parker Pauley in black ink.

Sara Parker Pauley, Director, Department of Natural Resources

April 8, 2017

Expiration Date

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John Madras, Director, Water Protection Program

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS				PAGE NUMBER 2 of 5		
				PERMIT NUMBER MO-0136824		
The permittee is authorized to discharge from outfall(s) with serial number(s) as specified in the application for this permit. The final effluent limitations shall become effective upon issuance and remain in effect until expiration of the permit. Such discharges shall be controlled, limited and monitored by the permittee as specified below:						
OUTFALL NUMBER AND EFFLUENT PARAMETER(S)	UNITS	FINAL EFFLUENT LIMITATIONS			MONITORING REQUIREMENTS	
		DAILY MAXIMUM	WEEKLY AVERAGE	MONTHLY AVERAGE	MEASUREMENT FREQUENCY	SAMPLE TYPE
<u>Outfall #001</u> - Stormwater						
Flow	MGD	*		*	once/quarter**	24 hr. estimate
Total Settleable Solids	ml/L/Hr	1.0		0.5	once/quarter**	grab
pH – Units	SU	***		***	once/quarter**	grab
Chemical Oxygen Demand (COD)	mg/L	*		*	once/quarter**	grab
Oil & Grease	mg/L	15		10	once/quarter**	grab
Aluminum, Total Recoverable	mg/L	*		*	once/quarter**	grab
Iron, Total Recoverable	mg/L	*		*	once/quarter**	grab
Precipitation ****	inches	*		*	daily**	measured
MONITORING REPORTS SHALL BE SUBMITTED <b>QUARTERLY</b> ; THE FIRST REPORT IS DUE <b>July 28, 2012</b> . THERE SHALL BE NO DISCHARGE OF FLOATING SOLIDS OR VISIBLE FOAM IN OTHER THAN TRACE AMOUNTS..						
<b>B. STANDARD CONDITIONS</b>						
IN ADDITION TO SPECIFIED CONDITIONS STATED HEREIN, THIS PERMIT IS SUBJECT TO THE ATTACHED <u>Parts I</u> STANDARD CONDITIONS DATED <u>October 1, 1980 and August 15, 1994</u> , AND HEREBY INCORPORATED AS THOUGH FULLY SET FORTH HEREIN.						

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS (continued)

\* Monitoring requirement only.

\*\* **All samples 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. Sampling shall occur once per quarter in the periods of January through March, April through June, July through September, and October through December, please note that monitoring reports shall be submitted no later than the 28<sup>th</sup> day of the month following the monitoring period (April 28<sup>th</sup>, July 28<sup>th</sup>, October 28<sup>th</sup>, and January 28<sup>th</sup>, respectively). If a precipitation event does not occur within the reporting period, report as no discharge.** For tracking purposes samples taken anytime in the first quarter (January through March) will be recorded by the Department as though they were taken in March, samples taken anytime in the second quarter (April through June) will be recorded by the Department as though they were taken in June, samples taken anytime in the third quarter (July through September) will be recorded by the Department as though they were taken in September, and samples taken in the fourth quarter (October through December) will be recorded by the Department as though they were taken in December.

\*\*\* pH is measured in pH units and is not to be averaged. The pH for all facilities except lagoons is limited to the range of 6.5-9.0 pH units.

\*\*\*\* The total precipitation for the event sampled shall be reported.

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:
    - (1) contains different conditions or is otherwise more stringent than any effluent limitation in the permit; or
    - (2) controls any pollutant not limited in the permit.
  - (b) Incorporate new or modified effluent limitations or other conditions, if the result of a waste load allocation study, toxicity test or other information indicates changes are necessary to assure compliance with Missouri's Water Quality Standards.
  - (c) Incorporate new or modified effluent limitations or other conditions if, as the result of a watershed analysis, a Total Maximum Daily Load (TMDL) limitation is developed for the receiving waters which are currently included in Missouri's list of waters of the state not fully achieving the state's water quality standards, also called the 303(d) list.

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

2. All outfalls must be clearly marked in the field.
3. Permittee will cease discharge by connection to a facility with an area-wide management plan per 10 CSR 20-6.010(3)(B) within 90 days of notice of its availability.

4. Water Quality Standards

- (a) Discharges to waters of the state shall not cause a violation of water quality standards rule under 10 CSR 20-7.031, including both specific and general criteria.
- (b) General Criteria. The following general water quality criteria shall be applicable to all waters of the state at all times including mixing zones. No water contaminant, by itself or in combination with other substances, shall prevent the waters of the state from meeting the following conditions:
  - (1) Waters shall be free from substances in sufficient amounts to cause the formation of putrescent, unsightly or harmful bottom deposits or prevent full maintenance of beneficial uses;
  - (2) Waters shall be free from oil, scum and floating debris in sufficient amounts to be unsightly or prevent full maintenance of beneficial uses;
  - (3) Waters shall be free from substances in sufficient amounts to cause unsightly color or turbidity, offensive odor or prevent full maintenance of beneficial uses;
  - (4) Waters shall be free from substances or conditions in sufficient amounts to result in toxicity to human, animal or aquatic life;
  - (5) There shall be no significant human health hazard from incidental contact with the water;
  - (6) There shall be no acute toxicity to livestock or wildlife watering;
  - (7) Waters shall be free from physical, chemical or hydrologic changes that would impair the natural biological community;
  - (8) Waters shall be free from used tires, car bodies, appliances, demolition debris, used vehicles or equipment and solid waste as defined in Missouri's Solid Waste Law, section 260.200, RSMo, except as the use of such materials is specifically permitted pursuant to section 260.200-260.247.

5. 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":
  - (1) One hundred micrograms per liter (100 µg/L);
  - (2) 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;
  - (3) Five (5) times the maximum concentration value reported for the pollutant in the permit application;
  - (4) The level established in Part A of the permit by the Director.
- (b) That they have begun or expect to begin to use or manufacture as an intermediate or final product or byproduct any toxic pollutant, which was not reported in the permit application.

C. SPECIAL CONDITIONS

6. Report as no-discharge when a discharge does not occur during the report period.
7. It is a violation of the Missouri Clean Water Law to fail to pay fees associated with this permit (644.055 RSMo).
8. The permittee shall comply with any applicable requirements listed in 10 CSR 20-9, unless the facility has received written notification that the Department has approved a modification to the requirements. The monitoring frequencies contained in this permit shall not be construed by the permittee as a modification of the monitoring frequencies listed in 10 CSR 20-9. If a modification of the monitoring frequencies listed in 10 CSR 20-9 is needed, the permittee shall submit a written request to the department for review and, if deemed necessary, approval.
9. An Operation and Maintenance (O & M) manual shall be maintained by the permittee and made available to the operator. The O & M manual shall include key operating procedures and a brief summary of the operation of the facility.
9. This facility must develop and implement a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP must include an analysis of the Best Management Practices (BMPs). This analysis is a structured evaluation of BMPs that are reasonable and cost effective. The evaluation should include practices that are designed to be 1) non-degrading 2) less degrading, or 3) degrading water quality. The chosen BMP will be the most reasonable and cost effective while ensuring that the highest statutory and regulatory requirements are achieved and the highest quality water attainable for the facility is discharged. The analysis must demonstrate why "no discharge" or "no exposure" is not a feasible alternative at the facility. This structured analysis of BMPs serves as the Antidegradation review, fulfilling the requirements of 10 CSR 20-7.031(2).
10. The SWPPP must be prepared and implemented within 30 days of permit issuance. The SWPPP must be kept on-site and should not be sent to DNR unless specifically requested. 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:

Storm Water Management For Industrial Activities, Developing Pollution Prevention Plans and Best Management Activities, (Document number EPA 832-R-92-006) published by the United States Environmental Protection Agency (USEPA) in September 1992.

The SWPPP must include the following:

- (a) An assessment of all storm water discharges associated with vehicle maintenance (including vehicle rehabilitation, mechanical repairs, painting, fueling, and lubrication), equipment cleaning, and chemical deicing/anti-icing activities. This must include a list of potential contaminants and an annual estimate of amounts that will be used in the described activities.
  - (b) 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 storm water. Minimum BMPs are listed in SPECIAL CONDITIONS #8 below.
  - (c) The SWPPP must include a schedule for a bi-monthly site inspection and a brief written report. The inspections must include observation and evaluation of BMP effectiveness, deficiencies, and corrective measures that will be taken. Deficiencies must be corrected within seven days. Inspection reports must be kept on site with the SWPPP. These must be made available to DNR personnel upon request.
  - (d) A provision for designating an individual to be responsible for environmental matters.
  - (e) 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 DNR.
11. Permittee shall adhere to the following minimum Best Management Practices:
- (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 BMP's 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

C. SPECIAL CONDITIONS

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.
12. Containers of paint, paint solvents, automotive fluid and lubricants (oils, antifreeze, brake fluid, ATF) cleaning solvents, insecticides, herbicides, or pesticides shall not be exposed to storm water. For example, containers stored in a building or shed with a sound roof and sidewalls or under a secure waterproof tarp would not be exposed to storm water. Spill prevention, control, and/or management shall be provided sufficient to prevent any spills of these pollutants from entering a water 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.
13. All spills must be cleaned up within 24 hours. This may include the excavation and disposal of contaminated soils. The following spills must be **reported** to the department within 24 hours:
- (a) Any spill of fluids or chemicals that leaves the property of the facility;
  - (b) Any spill of fluids or chemicals outside of a secondary containment structure and greater than 25 gallons, whether or not it leaves the property.

The department may also require the submittal of a written report detailing measures taken to clean up the spill within 5 days of the spill. Such a report must include the type of material spilled, volume, date of spill, date clean-up completed, clean-up method, and final disposal method. If the spill occurs outside of normal business hours, or if the permit holder cannot reach regional office staff for any reason, the permit holder is instructed to report the spill to the department's 24 hour Environmental Emergency Response hotline at (573) 634-2436. Leaving a message on a department staff member voice-mail does not satisfy this reporting requirement. This requirement is in addition to the Noncompliance Reporting requirement found in Standard Conditions Part I.

14. Insecticides, pesticides and herbicides, if used, shall be applied according to manufacturer's directions. Discharges from these activities are not authorized.

**Missouri Department of Natural Resources  
Statement of Basis  
CNH Reman, LLC  
MSOP #: MO-0136824  
Greene County**

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

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

**Part I – Facility Information**

Facility Type: (IND)  
Farm Equipment Remanufacturing- SIC #3174

Facility Description: Industrial Stormwater

**OUTFALL(S) TABLE:**

OUTFALL	DESIGN FLOW (CFS)	TREATMENT LEVEL	EFFLUENT TYPE	DISTANCE TO CLASSIFIED SEGMENT (MI)
001	Varies; dependent on precipitation	Primary	Stormwater	2.28

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

This facility would normally be covered under the MO-R203 general permit but because of the close proximity of a sinkhole, coverage under the general permit does not apply so a site specific permit must be issued.

This is for a new storm water permit

Comments: None

This facility remanufactures agricultural equipment such as engines and transmissions.

This permit was originally placed on public notice on December 16, 2011, but was withdrawn under threat of objection by the U.S. EPA. EPA had concerns about changes that had been made in the language protecting Missouri's Narrative Water Quality Standards. The change had been made in an attempt to accommodate recent changes in Missouri's Statutes. EPA found the new language deficient. This permit is being placed back on to public notice, with the previous version of the Narrative Criteria protection

**Part II – Operator Certification Requirements**

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

Not Applicable ; This facility is not required to have a certified operator.

**Part III – Receiving Stream Information**

**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 [10 CSR 20-7.015(2)]:
- Lake or Reservoir [10 CSR 20-7.015(3)]:
- Losing [10 CSR 20-7.015(4)]:
- Metropolitan No-Discharge [10 CSR 20-7.015(5)]:
- Special Stream [10 CSR 20-7.015(6)]:
- Subsurface Water [10 CSR 20-7.015(7)]:
- All Other Waters [10 CSR 20-7.015(8)]:

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/or 1<sup>st</sup> 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(S) TABLE:**

WATERBODY NAME	CLASS	WBID	DESIGNATED USES*	8-DIGIT HUC	EDU**
Unnamed Tributary to Sinkhole	-	-	General Criteria	10290106	Ozark / Osage
Spring Branch	P	01385	General Criteria, AQL, LWW, WBC-B		

\* - Irrigation (IRR), Livestock & Wildlife Watering (LWW), Protection of Warm Water Aquatic Life and Human Health-Fish Consumption (AQL), Cool Water Fishery(CLF), Cold Water Fishery (CDF), Whole Body Contact Recreation (WBC), Secondary Contact Recreation (SCR), Drinking Water Supply (DWS), Industrial (IND).

\*\* - Ecological Drainage Unit

**RECEIVING STREAM(S) LOW-FLOW VALUES TABLE:**

RECEIVING STREAM (U, C, P)	LOW-FLOW VALUES (CFS)		
	1Q10	7Q10	30Q10
Unnamed Tributary to Sinkhole	0	0	0

**MIXING CONSIDERATIONS**

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

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

**Part IV – 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.

Applicable ;

This facility discharges storm water only to a losing stream, as defined by [10 CSR 20-2.010(36)] & [10 CSR 20-7.031(1)(N)]. Storm water is intermittent and dependent on precipitation. It is not feasible to discharge storm water from the site to the sanitary sewer.

**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.

- New facility, backsliding does not apply.

**AREA-WIDE WASTE TREATMENT MANAGEMENT & CONTINUING AUTHORITY:**

As per [10 CSR 20-6.010(8)(A)10.], when a Continuing Authority under paragraph 10 CSR 20-6.010(3)(B)1. or 2. is expected to be available for connection within the next five (5) years, any operating permit issued to a permittee under this paragraph, located within the service area of the paragraph (3)(B)1. or 2. facility, shall contain the following special condition... This language is contained in Special Condition #3 of this operating permit.

**ANTIDegradation:**

Policies which ensure protection of water quality for a particular water body where the water quality exceeds levels necessary to protect fish and wildlife propagation and recreation on and in the water. This also includes special protection of waters designated as outstanding natural resource waters. Antidegradation requirements are consistent with 40 CFR 131.12 that outlines methods used to assess activities that may impact the integrity of a water and protect existing uses. This policy may compel the state to maintain a level of water quality above those mandated by criteria.

Applicable ;

The facility can not be covered under the MO-R203 general permit, because the facility discharges to a sinkhole, therefore, the general permit is not applicable. The facility is about three 26.8 acres in size and a 'no exposure' option is not feasible. This facility must develop and implement a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP must include an analysis of the Best Management Practices (BMPs). This analysis is a structured evaluation of BMPs that are reasonable and cost effective. The evaluation should include practices that are designed to be 1) non-degrading 2) less degrading, or 3) degrading water quality. The chosen BMP will be the most reasonable and cost effective while ensuring that the highest statutory and regulatory requirements are achieved and the highest quality water attainable for the facility is discharged. The analysis must demonstrate why "no discharge" or "no exposure" is not a feasible alternative at the facility. This structured analysis of BMPs serves as the Antidegradation review, fulfilling the requirements of 10 CSR 20-7.031(2).

Please see **APPENDIX A – STORMWATER POLLUTION PREVENTION PLAN**

**Bio-solids, Sludge, & Sewage Sludge:**

Bio-solids are solid materials resulting from wastewater treatment that meet federal and state criteria for beneficial uses (i.e. fertilizer). Sludge is any solid, semi-solid, or liquid waste generated from a municipal, commercial, or industrial wastewater treatment plant, water supply treatment plant, or air pollution control facility or any other such waste having similar characteristics and effect. 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://dnr.mo.gov/env/wpp/pub/index.html>, 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.

Not Applicable ;

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

**FINDING OF AFFORDABILITY:**

Pursuant to Section 644.145, RSMo., the Department is required to determine whether a permit or decision is affordable and makes a finding of affordability for certain permitting and enforcement decisions. This requirement applies to discharges from combined or separate sanitary sewer systems or publically-owned treatment works.

Not Applicable;

The Department is not required to determine findings of affordability because the facility is not a **combined or separate sanitary sewer system for a publically-owned treatment works.**

**PRETREATMENT PROGRAM:**

The reduction of the amount of pollutants, the elimination of pollutants, or the alteration of the nature of pollutant properties in wastewater prior to or in lieu of discharging or otherwise introducing such pollutants into a Publicly Owned Treatment Works [40 CFR Part 403.3(q)].

Pretreatment programs are required at any POTW (or combination of POTW operated by the same authority) and/or municipality with a total design flow greater than 5.0 MGD and receiving industrial wastes that interfere with or pass through the treatment works or are otherwise subject to the pretreatment standards. Pretreatment programs can also be required at POTWs/municipals with a design flow less than 5.0 MGD if needed to prevent interference with operations or pass through.

Several special conditions pertaining to the permittee's pretreatment program may be included in the permit, and are as follows:

- Implementation and enforcement of the program,
- Annual pretreatment report submittal,
- Submittal of list of industrial users,
- Technical evaluation of need to establish local limitations, and
- Submittal of the results of the evaluation

Not Applicable .

The permittee, at this time, is not required to have a Pretreatment Program or does not have an approved pretreatment program.

**REASONABLE POTENTIAL ANALYSIS (RPA):**

Limitations must control all pollutants or pollutant parameters that are or may be discharged at a level which will cause, have reasonable potential to cause, or contribute to an excursion above the Missouri Water Quality Standards.

Not Applicable .

A RPA was not conducted for this facility.

**REMOVAL EFFICIENCY:**

Removal efficiency is a method by which the Federal Regulations define Secondary Treatment and Equivalent to Secondary Treatment, which applies to Biochemical Oxygen Demand 5-day (BOD<sub>5</sub>) and Total Suspended Solids (TSS) for Publicly Owned Treatment Works (POTWs). Please see the United States Environmental Protection Agency's (EPA) website for interpretation of percent removal requirements for National Pollutant Discharge Elimination System Permit Application Requirements for Publicly Owned Treatment Works and Other Treatment Works Treating Domestic Sewage @ [www.epa.gov/fedrgstr/EPA-WATER/1999/August/Day-04/w18866.htm](http://www.epa.gov/fedrgstr/EPA-WATER/1999/August/Day-04/w18866.htm)

Not Applicable .

This wastewater treatment facility is not a POTW. Influent monitoring is not being required to determine percent removal.

**SANITARY SEWER OVERFLOWS (SSOs), BYPASSES, INFLOW & INFILTRATION (I&I) – PREVENTION/REDUCTION:**

Sanitary Sewer Overflows (SSOs) are defined as an untreated or partially treated sewage release are considered bypassing under state regulation [10 CSR 20-2.010(11)] and should not be confused with the federal definition of bypass. SSO's have a variety of causes including blockages, line breaks, and sewer defects that allow excess storm water and ground water to (1) enter and overload the collection system, and (2) overload the treatment facility. Additionally, SSO's can be also be caused by lapses in sewer system operation and maintenance, inadequate sewer design and construction, power failures, and vandalism. SSOs also include overflows out of manholes and onto city streets, sidewalks, and other terrestrial locations.

Additionally, Missouri RSMo §644.026.1 mandates that the Department require proper maintenance and operation of treatment facilities and sewer systems and proper disposal of residual waste from all such facilities.

- Not applicable. This facility is not required to develop or implement a program for maintenance and repair of the collection system; however, it is a violation of Missouri State Environmental Laws and Regulations to allow untreated wastewater to discharge to waters of the state.

**SCHEDULE OF COMPLIANCE (SOC):**

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

Not Applicable .

This permit does not contain a SOC.

**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 *Storm Water Management for Industrial Activities: Developing Pollution Prevention Plans and Best Management Practices* [EPA 832-R-92-006] (Storm Water Management), BMPs are measures or practices used to reduce the amount of pollution entering (regarding this operating permit) waters of the state. BMPs may take the form of a process, activity, or physical structure.

Additionally in accordance with the Storm Water Management, a SWPPP is a series of steps and activities to (1) identify sources of pollution or contamination, and (2) select and carry out actions which prevent or control the pollution of storm water discharges.

Applicable .

A SWPPP shall be developed and implemented for each site and shall incorporate required practices identified by the Department with jurisdiction, incorporate erosion control practices specific to site conditions, and provide for maintenance and adherence to the plan.

**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 to total amount of pollutant that may be discharged into that stream without endangering its water quality.

Applicable ;

Wasteload allocations were calculated where applicable using water quality criteria or water quality model results and the dilution equation below:

$$C = \frac{(C_s \times Q_s) + (C_e \times Q_e)}{(Q_e + Q_s)} \quad (\text{EPA/505/2-90-001, Section 4.5.5})$$

Where C = downstream concentration  
C<sub>s</sub> = upstream concentration  
Q<sub>s</sub> = upstream flow  
C<sub>e</sub> = effluent concentration  
Q<sub>e</sub> = effluent flow

Chronic wasteload allocations were determined using applicable chronic water quality criteria (CCC: criteria continuous concentration) and stream volume of flow at the edge of the mixing zone (MZ). Acute wasteload allocations were determined using applicable water quality criteria (CMC: criteria maximum concentration) and stream volume of flow at the edge of the zone of initial dilution (ZID).

Water quality based maximum daily and average monthly effluent limitations were calculated using methods and procedures outlined in USEPA's "Technical Support Document For Water Quality-based Toxics Control" (EPA/505/2-90-001).

Number of Samples "n":

Additionally, in accordance with the TSD for water quality-based permitting, effluent quality is determined by the underlying distribution of daily values, which is determined by the Long Term Average (LTA) associated with a particular Wasteload Allocation (WLA) and by the Coefficient of Variation (CV) of the effluent concentrations. Increasing or decreasing the monitoring frequency does not affect this underlying distribution or treatment performance, which should be, at a minimum, be targeted to comply with the values dictated by the WLA. Therefore, it is recommended that the actual planned frequency of monitoring normally be used to determine the value of "n" for calculating the AML. However, in situations where monitoring frequency is once per month or less, a higher value for "n" must be assumed for AML derivation purposes. Thus, the statistical procedure being employed using an assumed number of samples is "n = 4" at a minimum. For Total Ammonia as Nitrogen, "n = 30" is used.

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

**WHOLE EFFLUENT TOXICITY (WET) TEST:**

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

Not Applicable ;

At this time, the permittee is not required to conduct WET test for this facility.

**40 CFR 122.41(m) - Bypasses:**

The federal Clean Water Act (CWA), Section 402 prohibits wastewater dischargers from “bypassing” untreated or partially treated sewage (wastewater) beyond the headworks. A bypass, which includes blending, is defined as an intentional diversion of waste streams from any portion of a treatment facility, [40 CFR 122.41(m)(1)(i)].

Additionally, Missouri regulation 10 CSR 20-2.010(11) defines a bypass as the diversion of wastewater from any portion of wastewater treatment facility or sewer system to waters of the state. Only under exceptional and specified limitations do the federal regulations allow for a facility to bypass some or all of the flow from its treatment process.

Bypasses are prohibited by the CWA unless a permittee can meet all of the criteria listed in 40 CFR

122.41(m)(4)(i)(A), (B), & (C). Any bypasses from this facility are subject to the reporting required in 40 CFR 122.41(l)(6) and per Missouri’s Standard Conditions I, Section B, part 2.b. Additionally, Anticipated Bypasses include bypasses from peak flow basins or similar.

- Not Applicable, this facility does not bypass.

**303(d) LIST & TOTAL MAXIMUM DAILY LOAD (TMDL):**

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

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

Not Applicable ;

This facility does not discharge to a 303(d) listed stream.

**Adjusted Design Flow:**

10 CSR 20-6.011(1)(B)1. provides for an Adjusted Design Flow when calculating permit fees on human sewage treatment facilities. If the average flow is sixty percent (60%) or less than the system’s design flow, the average flow may be substituted for the design flow when calculating the permit fee on human sewage treatment facilities. If the facility’s actual average flow is consistently 60% or less than the permitted design flow, the facility may qualify for a reduction in your fee when:

- The facility has a valid permit, or has applied for re-issuance, is in compliance with the terms, conditions and effluent limitations of the permit, and the facility has a good compliance history; and
- Flow is not expected to exceed 60% of design flow for the remaining term of the existing operating permit.

Not Applicable ;

Industrials do not qualify for Adjusted Design flows.

**Outfall #001 – Main Facility Outfall**

**EFFLUENT LIMITATIONS TABLE:**

PARAMETER	UNIT	BASIS FOR LIMITS	DAILY MAXIMUM	WEEKLY AVERAGE	MONTHLY AVERAGE	MODIFIED	PREVIOUS PERMIT LIMITATIONS
FLOW	MGD	1	*		*	N/A	N/A
TOTAL SETTLEABLE SOLIDS	MG/L	8	1.0		0.5	N/A	N/A
PH (S.U.)	SU	3	6.5-9.0		6.5-9.0	N/A	N/A
CHEMICAL OXYGEN DEMAND (COD)	MG/L	8	*		*	N/A	N/A
ALUMINUM, TOTAL RECOVERABLE	MG/L	8	*		*	N/A	N/A
IRON, TOTAL RECOVERABLE	MG/L	8	*		*	N/A	N/A
OIL & GREASE	MG/L	3, 8	15		10	N/A	N/A
RAINFALL	MG/L	8	*		*	N/A	N/A
MONITORING FREQUENCY	Please see Minimum Sampling and Reporting Frequency Requirements in the Derivation and Discussion Section below.						

**\* - Monitoring requirement only**

\*\*\* - # of colonies/100mL; the Monthly Average for E. coli is a geometric mean.

\*\*\*\* - Parameter not previously established in previous state operating permit.

N/A – Not applicable

S – Same as previous operating permit

**Basis for Limitations Codes:**

- |  |                                   |
|--|-----------------------------------|
| 1. State or Federal Regulation/Law       | 6. Antidegradation Policy         |
| 2. Water Quality Standard (includes RPA) | 7. Water Quality Model            |
| 3. Water Quality Based Effluent Limits   | 8. Best Professional Judgment     |
| 4. Lagoon Policy                         | 9. TMDL or Permit in lieu of TMDL |
| 5. Ammonia Policy                        | 10. WET test Policy               |
|  | 11. Dissolved Oxygen Policy       |

**OUTFALL #001 – 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.**

– pH is limited to the range of 6.5 – 9.0 pH units, as per [10 CSR 20-7.031(4)(E)]. pH is measured in pH units and is not to be averaged.

**Total Settleable Solids.** Discharges to losing streams in past permits have had Total Settleable Solid limits of 0.5 mL. The monthly average is 0.5 mL/L/hr and the daily maximum effluent limit is 1.0 mL/L/hr. The daily maximum is calculated by  $(0.5 \text{ AML})(\text{LTAc}/1.5524 \text{ AML})(3.114/\text{LTAc}) = 1.0 \text{ mg/L}$  daily maximum. This method is outlined in SWRO-WP17-01.

**Chemical Oxygen Demand.** Monitoring requirement only. Pollutant sources are stored outside that may cause oxygen demand in stormwater runoff.

**Aluminum, Total Recoverable.** Monitoring requirement only. To determine if reasonable potential exists to exceed the water quality standards. This heavy metal is commonly present at salvage yard operations.

**Iron, Total Recoverable.** Monitoring requirement only. To determine if reasonable potential exists to exceed the water quality standards. This heavy metal is commonly present at salvage yard operations.

**Oil & Grease.** Conventional pollutant, effluent limitation for protection of aquatic life; 10 mg/L monthly average, 15 mg/L daily maximum.

**Minimum Sampling and Reporting Frequency Requirements.**

PARAMETER	SAMPLING FREQUENCY	REPORTING FREQUENCY
FLOW	ONCE/QUARTER	QUARTERLY
TOTAL SETTABLE SOLIDS	ONCE/QUARTER	QUARTERLY
PH	ONCE/QUARTER	QUARTERLY
ALUMINUM, TOTAL RECOVERABLE	ONCE/QUARTER	QUARTERLY
IRON, TOTAL RECOVERABLE	ONCE/QUARTER	QUARTERLY
OIL AND GREASE	ONCE/QUARTER	QUARTERLY
RAINFALL	DAILY	QUARTERLY

**Sampling Frequency Justification:**

Quarterly sampling is appropriate because a Reasonable Potential Analysis will need to be conducted upon renewal to determine if effluent limits are appropriate for the monitoring only parameters.

**Sampling Type Justification**

Due to the discharge being storm water only, grab sample is more appropriate.

**Administrative Requirements**

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

**Date of Factsheet:** November 9, 2011

Chris Ray  
WP Permitting and Assistance Unit  
(417) 891-4300  
Chris.ray@dnr.mo.gov

**Appendix A – Antidegradation Analysis: STORMWATER POLLUTION PREVENTION PLAN**  
The SWPPP starts on the Next page



# **STORM WATER POLLUTION PREVENTION PLAN (SWPPP)**

**FOR:**

**CNH Reman LLC  
2707 N. Farm Road 123  
Springfield, Missouri**

**October 2011**

**Missouri Department of Natural Resources (MDNR)  
Division of Water Quality  
Operating Permit #MO-**

SWPPP Manager: Larry Dryer  
Title: Engineering Manager  
Telephone: (417) 893-2345

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Appendix C	Spill Contingency Plan
Appendix D	Specific Spill Response Procedures
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Appendix F	Employee Training Program Records
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## CERTIFICATION

I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gathered and evaluated the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.

Larry Dryer  
Name

Engineering Manager  
Title

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

## 1.0 INTRODUCTION

As part of the Clean Water Act, the U.S. Environmental Protection Agency (EPA) published final regulations in November 1990, which establish application requirements for storm water permits. Missouri implemented these requirements. The regulations require any facility utilizing outdoor storage areas located within 1,000 feet (ft) of a loosing stream to obtain a National Pollutant Discharge Elimination System (NPDES) permit. The permit also prohibits non-storm water discharges into the storm water system and is intended to authorize discharges composed entirely of storm water.

NPDES Operating Permit #MO- for Storm Water Discharges Associated with Industrial Activity was issued to the CNH Reman LLC facility located at 2707 North Farm Road 123 in Springfield, Missouri (the Site, Figure 1.0) on DATE. The permit requires the development and implementation of a Storm Water Pollution Prevention Plan (SWPPP) emphasizing storm water Best Management Practices (BMPs). All dischargers must prepare, retain onsite, and implement a SWPPP. This document represents a SWPPP as required by the Missouri Department Natural Resources (MDNR), Division of Water Quality for of the NPDES permit. The current NPDES permit is included as Appendix A. The SWPPP has two major objectives:

1. To help identify the potential sources of contaminants that October affect the quality of industrial storm water discharges.
2. To describe and ensure the implementation of practices to reduce contaminants in industrial storm water discharges.

The MDNR October request a copy of this SWPPP at any reasonable time, and October require additional measures to prevent and control pollution as needed.

CNH Reman LLC has prepared this SWPPP to conform to the federal guidelines. This SWPPP is to be retained on site and is intended to be a working document. As such, the SWPPP is to be updated as BMPs, state regulations and site conditions change.

### 1.1 SWPPP Committee

This section presents the individuals responsible for implementation of this SWPPP at the CNH Reman LLC. The name, title, phone number, and responsibilities of each individual are identified in Table 1-1.

**Table 1-1**  
**Storm Water Pollution Prevention Plan Committee<sup>1</sup>**  
**CNH Reman LLC**

<b>Name</b>	Larry Dryer
<b>Title</b>	Engineering Manager
<b>Office Phone</b>	(417) 893-2345
<b>Responsibilities</b>	Mr. Dryer is responsible for coordination of the SWPPP committee and is also responsible for developing, implementing, maintaining, and updating the SWPPP; reviewing environmental incidents; conducting a bi-monthly comprehensive inspection; and, evaluating effects of new construction and process/procedural changes on the SWPPP. Mr. Dryer is also responsible for coordinating incident response, cleanup, and notification procedures and establishing SWPPP training for personnel.
<b>Name</b>	Mussette Baird
<b>Title</b>	Safety Coordinator
<b>Office Phone</b>	(417) 893-2334 day/office; (417) 380-4135 evening/cell
<b>Responsibilities</b>	Ms. Baird is responsible for assisting the SWPPP Manager in developing, implementing, maintaining, and updating the SWPPP and evaluating effects of new construction and process/procedural changes on the SWPPP. Ms. Baird is responsible for the daily visual and bi-monthly visual/written inspections and reporting the findings of these inspections to Mr. Dryer. Ms. Baird is also responsible for assisting the SWPPP manager in conducting the SWPPP training.

<sup>1</sup>In the event of personnel turnover, the committee responsibilities will accompany the Personnel Title.

## 2.0 ASSESSMENT OF POTENTIAL POLLUTION SOURCES

This section includes a discussion of industrial activities and potential sources including facility description and surface water flow, potential pollutants likely to be present in storm water discharges, significant materials on site, significant spills or leaks that have occurred, testing for non-storm water discharges, existing analytical data, and risk identification and assessment.

### 2.1 Facility Description and Surface Water Flow

The CNH Reman LLC facility is classified as a remanufacturing facility. The area around the facility is a mixture of industrial property and farmland. The 26.8-acre Site contains a main building, a storage building, and two pole barns. The main building at the Site is utilized as office space and for remanufacturing operations. The storage building and pole barns are utilized for storage.

One outfall is identified in the stormwater permit. Outfall #001 (exiting the Site to the north) receives storm water runoff from the eastern portion of the Site, traveling through the parking area north and east of the main building. Outfall #001 also receives storm water from the western portion of the Site, including parking areas west of the main building and areas surrounding the pole barns and storage building. Figure 1.0 is a location map showing the facility in relation to the local road system and the receiving water, a tributary to Spring Branch located approximately 1.23 miles east-northeast of the Site. A sinkhole is located in the northeast corner of the Site.

Figure 1.1 is a site diagram of the facility and includes the following information:

- Location of the storm water outfall and associated drainage basins;
- Existing structural control measures to reduce storm water pollutants;
- Location of property boundaries and buildings;
- Location of exposed significant materials; and,
- Locations of materials storage areas, materials handling / loading areas, and monitoring locations.

### 2.2 Potential Pollutants Likely To Be Present In Storm Water

This section describes an estimate of the direction of flow and the types of pollutants, which are likely to be present in the storm water discharges for each drainage area associated with industrial activity. Figure 1.1 is a close-up view of the buildings on the subject property showing material storage and interior drainage.

**2.2.1 Main Building/Chrysler Building:** Miscellaneous metal and pallets are stored outside the storage

sheds and the Chrysler Building. Surface runoff from this area flows to the outfall and could contain suspended solids and constituents associated with stored materials (see Table 2-1).

*Figure 1.0 – Site Location map*

*Figure 1.1 – Site Diagram*

### 2.3 Significant Materials Exposed to Storm Water / Material Inventory

This section describes the following: significant materials that have been treated, stored or disposed of in a manner to allow exposure to storm water from three years prior to permit application to the present; methods of on-site storage or disposal; materials management practices employed to minimize contact of these materials with storm water runoff; materials loading and access areas; location and description of structural and nonstructural controls to reduce pollutants in storm water runoff; and, a description of any treatment the storm water receives.

Metal racking components, metal process equipment and scrap pallets are stored in the southwest portion of the yard. No processes are performed outside the facility. Items to be stored outside are required to be free of any chemical or petroleum residue and are drained of any petroleum product if internal tanks exist.

Table 2-1 summarizes significant materials information.

**Table 2-1**  
**Materials Exposed to Storm Water**

### CNH Reman LLC

Based on site conditions, the significant materials that were exposed to storm water during the past three years and/or are currently exposed are indicated below.

Description of Exposed Significant Material	Quantity Exposed	Period of Exposure	Location	Method of Storage or Disposal	Description of Material Management Practice
Wooden Pallets	Varies	Long-term	Southeast of Storage Sheds	On asphalt	None
Metal Process Equipment	Varies	Short-term	Northwest of Storage Sheds	On asphalt	Must be free of residue or liquid to store outside
Metal Rack Parts	Varies	Long-term	Various locations around main building	On asphalt	None

**Table 2-2  
 List of Significant Spills and Leaks  
 CNH Reman LLC**

**There have not been any reportable spills or releases at this facility that would affect stormwater within the past three years.**

Date (month/day/year)	Spill or Leak (S/L)	Location (as indicated on site map)	Description				Response Procedure			
			Type of Material	Quantity	Source	Reason	Amount of Material Recovered	Material Exposed to Storm Water (Y/N)	Preventative Measures Taken	
None										

## **2.4 Significant Spills or Leaks**

Under CNH Reman management, no reportable spills or leaks of regulated toxic or hazardous substances that would have impacted storm water runoff have occurred at the facility from three years prior to permit application to the present (refer to Table 2-2). This facility is not subject to SARA Title III (Section 313) reporting requirements.

## **2.5 Testing for Non-Storm Water Discharges**

The non-storm water discharge testing inspection form follows as Form 2-1. Non-storm water discharges are not authorized by the permit.

## **2.6 Existing Sampling Data**

Storm water samples should be obtained quarterly as per permit #MO-. Results are entered into a discharged monitoring report. Examination reports must be maintained on site in the SWPPP.

## **2.7 Risk Identification and Assessment**

This section assesses the potential of various industrial activities to contribute pollutants to storm water discharges. The activities evaluated include: loading and unloading operations; outdoor storage activities; outdoor manufacturing or processing activities; significant dust or particulate generating processes; and on site waste disposal practices. Risk factors considered include the toxicity of chemicals; quantity of chemical used, produced, or discharged; the likelihood of contact with storm water; and history of significant leaks or spills of toxic or hazardous substances. BMPs to address these potential sources are found in Table 3-1.

### **2.7.1 Main Manufacturing Building**

This building is used for production, storage, and office space. The southern and western portions of the building house the main manufacturing locations for the rebuilding and painting of new and rebuilt agricultural drive train units. The northeastern portion of the building is dedicated to office space and the rest of the facility is used for storage.

Transportation of paints and petroleum products to and from work centers occurs via truck loading docks on the eastern and northern sides of the facility. The drums of material are kept clean and with closed tops. The pollution potential from loading and unloading these materials is minor, and is associated with the risk of employee mishandling of the material or accidentally dropping a drum. However, employee training helps to counter this risk. If a spill occurs during the loading or unloading operations, prompt spill cleanup will occur.

### **2.7.2 Storage Sheds and Outdoor Storage**

This area is the location for storage of unused equipment and warehouse racking. Equipment not stored in the pole barn must be free of chemical and petroleum residue as well as have all reservoir tanks completely drained. The potential for storm water contamination is moderate for iron (rust).

### **2.7.3 Used Oil Recycling & Special Solid Waste**

Used oil from this facility is recycled through Tulsa Oil and is stored within the facility. Special solid waste is disposed of through WCA Waste and is collected in a dumpster inside the facility. All other waste is collected in open top dumpsters that have closed lids when not in use.

### **3.0 STORM WATER MANAGEMENT**

This section presents information regarding storm water management controls appropriate for the facility, including a schedule for implementation. These measures have been included to minimize the potential for a release of significant amounts of pollutants to the receiving stream. The description of the storm water management controls includes sediment and erosion control, management of runoff by storm water diversion, good housekeeping, preventative maintenance, spill prevention and response, implementation of BMPs, visual site inspections, record keeping and reporting, and employee training.

#### **3.1 Sediment and Erosion Control**

The purpose of sediment and erosion control is to prevent the pollution of storm water via control of soil erosion. Locations where soil is exposed to water, wind, or ice could have soil erosion and sedimentation problems. Particular areas of concern include areas with such heavy activity that plants cannot grow, soil stockpiles, stream banks, steep slopes, construction areas, or areas where the soil is disturbed, denuded (stripped of plants), and subject to wind and water erosion.

The BMPs included in Table 3-1 contain practices to assist in storm water diversion.

#### **3.2 Management of Runoff by Storm Water Diversion**

Structures that divert stream flow October be used to channel storm water away from industrial areas and material storage areas, or to carry potentially polluted storm water to a treatment facility. Gutters, drains, sewers, dikes, curbs, graded pavement, and industrial drainage systems October be used for directing storm water flow.

The facility layout is designed such that storm water is diverted away from the building entrances, and the grading in the loading/unloading areas is sloped away from the docks.

The BMPs included in Table 3-1 contain practices to assist in storm water diversion.

### **3.3 Good Housekeeping**

Good housekeeping practices are designed to maintain a clean and orderly work environment. An effective first step in preventing storm water contamination at industrial sites involves using common sense to improve the facility's basic housekeeping methods. A clean and orderly work area can reduce the possibility of accidental spills caused by mishandling of chemicals and equipment, and reduce safety hazards to facility personnel. Well-maintained material and chemical storage areas will reduce the possibility of storm water contact with contaminants.

Specific good housekeeping practices are listed in Table 3-1.

### **3.4 Preventative Maintenance**

A preventative maintenance program involves inspection and maintenance of storm water management devices, proper maintenance of facility equipment and systems, and inspection and testing of facility equipment and systems. Formal inspections are discussed in Section 3.7. Informal inspections, such as checking equipment for leaks before and after use, will not be documented but will be utilized as part of the daily operations of the facility.

Specific preventative maintenance procedures are contained within the BMPs in Table 3-1.

### **3.5 Spill Prevention and Response**

The preparation of a well defined set of procedures for preventing spills, controlling spills if they occur and cleaning up spills once they occur will aid in the prevention of storm water contamination. Employee training and the adoption of operational procedures that reduce the risk of spills are the most effective methods of BMP application. However, if a spill occurs the SWPPP will be evaluated for effectiveness and changes will be implemented accordingly.

The Spill Contingency Plan can be found as Appendix C of this SWPPP. The facility has a certified Spill Prevention Control & Countermeasures (SPCC) Plan to ensure that adequate personnel trained in spill response and spill containment are available at the Site.

### 3.5.1 Potential Spill Areas and Their Drainage Points

The expected modes by which spills could occur at the facility are as follows:

- Tote/Drum failure or spill: 330-gallon totes or 55-gallon drums of engine oil, transaxle fluid, F-140 solvent, hydraulic oil, rust preventive, used oil and diesel fuel are stored in the northwestern and western portion of the main building. (See Figure 1.1)
  - Rate of flow: variable
  - Total quantity discharged: maximum of 330 gallons
  - Direction of flow: within the buildings or toward outfall #001.

### 3.5.2 Material Handling Procedures and Storage Requirements

Containers of oil based solvent, hydraulic oil, rust preventive, used oil, and diesel are stored in the western portion of the main building at the facility. Axle fluid is maintained within the room at the west end of the facility within a polymer tote. Two polymer totes of engine fluid are stored in the northwest corner of the facility. During loading and unloading of these products, BMPs (Table 3-1) will be followed. Inspections of this area are conducted in accordance with SPCC regulations.

### 3.5.3 Spill Response Plan

Mr. Larry Dryer is responsible for implementing the spill response plan.

Facility personnel will be properly instructed in the safe handling of drums and chemicals commonly used within the facility. The personnel operating the facility will be instructed regarding their job responsibilities and duties. Personnel are under the direct supervision of a foreman who is responsible for establishing daily performance and duty guidelines.

Specific spill response procedures are listed in Appendix D.

## 3.6 Implementation of BMPs

An implementation schedule of BMPs is listed on Table 3-3.

<b>Table 3-1</b>		
<b>Best Management Practices</b>		
<b>CNH Reman LLC</b>		
<b>LOADING / UNLOADING LIQUID MATERIALS</b>		
<b>Degrading</b>	<b>Less Degrading</b>	<b>Non-Degrading</b>
<input type="checkbox"/> No training for spill prevention and response	<input type="checkbox"/> Management is responsible for preventing and responding to spills	<input checked="" type="checkbox"/> All employees should be trained regarding spill prevention and response
To properly prevent and respond to spills, all employees should have accurate and updated training associated with this facility.		
<input type="checkbox"/> Loading areas are exposed to stormwater and good housekeeping in these areas are minimal	<input type="checkbox"/> Loading areas are exposed to stormwater and kept clean of spills and debris	<input checked="" type="checkbox"/> Prevent stormwater runoff from flowing into or across loading areas
Preventing stormwater from flowing into or across loading area and prevents the spread of possible contaminates.		
<input type="checkbox"/> Load and transport liquid materials regardless of weather	<input type="checkbox"/> Load and transport liquid materials in light rain only.	<input checked="" type="checkbox"/> Load and transport liquid materials in closed containers
Loading and transporting liquid materials in closed containers helps prevent the possible spread of contaminates from the loading/unloading areas and, in the case of an auto vehicle accident, along the roadway, ditch, stream, or other possible receiving area.		
<b>FLAMMABLE &amp; HAZARDOUS MATERIAL STORAGE</b>		
<b>Degrading</b>	<b>Less Degrading</b>	<b>Non-Degrading</b>
<input type="checkbox"/> Maximum exposure to rain and stormwater	<input type="checkbox"/> Storage of materials with limited exposure to rain and stormwater	<input checked="" type="checkbox"/> Prevent stormwater runoff from flowing into or across storage areas by providing areas with roof coverage and secondary containment
Preventing stormwater from flowing into or across loading area and prevents the spread of possible contaminates.		
<input type="checkbox"/> No designated storage areas for flammable and hazardous materials	<input type="checkbox"/> Designated storage areas for flammable and hazardous materials	<input checked="" type="checkbox"/> Restricted access to designated areas for flammable and hazardous material storage
Designating and restricting access to storage areas for flammable and hazardous materials is reasonable, cost effective and reduces potential risk.		

SEDIMENT & EROSION CONTROL		
Degrading	Less Degrading	Non-Degrading
<input type="checkbox"/>	<input type="checkbox"/> Identify areas that have a high potential for soil erosion	<input checked="" type="checkbox"/> Identify areas that have a high potential for soil erosion and implement preventative measures to stop potential erosion
All areas with asphalt except ponds, basins, natural vegetation are to be kept well established.		
GOOD HOUSEKEEPING		
Degrading	Less Degrading	Non-Degrading
<input type="checkbox"/> Clean floors monthly	<input type="checkbox"/> Clean floors weekly	<input checked="" type="checkbox"/> Maintain clean and dry floor and ground surfaces
Clean, Dry floors should be maintained as part of the employees regular work schedule.		
<input type="checkbox"/> No waste management practices	<input type="checkbox"/> Allow garbage, waste, and recycled materials to accumulate	<input checked="" type="checkbox"/> Regular removal and disposal of garbage, waste, and recycled materials
Garbage, waste, and recycled materials should be removed as part of the employees regular work schedule.		
<input type="checkbox"/> Label hazardous chemical containers	<input type="checkbox"/> Label all chemical containers and drums	<input checked="" type="checkbox"/> Label all chemical containers and drums, and designate chemical storage areas
Chemical containers should be labeled and placed in the property storage area upon arrival. Any worn labels should be replaced as needed.		
<input type="checkbox"/> Spread good housekeeping procedures, tips, and reminders by word of mouth	<input type="checkbox"/> Post updated good housekeeping procedures, tips, and reminders on bulletin boards	<input checked="" type="checkbox"/> Include good housekeeping practices in the facility's employee training program
Good house keeping practices would most effectively be discussed with the staff during the facility's employee training program.		
PREVENTATIVE MAINTENANCE		
Degrading	Less Degrading	Non-Degrading
<input type="checkbox"/> Sporadic inspection of ASTs, material storage areas, and flammable material/hazardous waste storage	<input type="checkbox"/> Regular inspection of ASTs, material storage areas, and flammable material/hazardous waste storage	<input checked="" type="checkbox"/> Regular inspection, cleaning, and upkeep of ASTs, material storage areas, and flammable material/hazardous waste storage
Regular inspection, cleaning, and upkeep of ASTs, material storage areas, and flammable material /hazardous waste storage is a form of preventative maintenance and good housekeeping.		

SPILL PREVENTION AND RESPONSE		
Degrading	Less Degrading	Non-Degrading
<input type="checkbox"/> Train management in spill cleanup	<input type="checkbox"/> Train employees in spill cleanup	<input checked="" type="checkbox"/> Hire a third-party vendor to clean spills
Dependant on the size, location, and type of spill, it is more cost effective to train facility employees to clean spills.		
<input type="checkbox"/> Identify closest location to purchase spill absorbent materials	<input type="checkbox"/> Storage of spill absorbent materials where readily accessible	<input checked="" type="checkbox"/> Storage of spill absorbent materials where readily accessible
Accessible spill kits allow trained employees to efficiently clean up spills and minimize risk of stormwater exposure.		

CNH Reman LLC  
 2707 N. Farm Road 123  
 Springfield, MO 65802  
 417-831-3131

**Table 3-2  
 Implementation of BMPs  
 CNH Reman LLC**

List all identified actual and potential storm water pollution sources, and describe existing management practices and proposed BMPs with implementation schedule

BMPs	Description of Action Required for Implementation	Implementation Schedule	Person Responsible for Action
Sediment and Erosion Control	BMPs in place		
Food Housekeeping	BMPs in place		
Preventative Maintenance	BMPs in place		
Oil Prevention and Response	BMPs in place		
Inspections	BMPs in place		
Employee Training	BMPs in place		

### 3.7 Visual Site Inspections (Daily Visual and Monthly Written)

Site inspections will be performed on a monthly basis on facility equipment and material handling areas for evidence of pollutants entering the drainage system. Daily visual and monthly written inspections will be completed of stored or contained materials that could potentially have an environmental impact on the property. The inspections will be recorded on a special form included in Appendix E.

### 3.8 Record Keeping and Reporting

A record keeping system is maintained for documenting incidents (such as spills, leaks, and other discharges), along with other information describing the quality and quantity of storm water discharges. Inspections and maintenance activities shall be documented and records of such activities will be incorporated into this plan. All inspection and maintenance records will be maintained for one year after the storm water permit expires. An annual operating report will be completed each year and kept on file at the facility.

Any spill or leak incident will be recorded in Table 2-3.

### 3.9 Employee Training

Employee training is an integral part of the successful implementation of this SWPPP. The training will inform personnel, at all levels of responsibility, on several main topics, including good housekeeping practices, spill prevention and response techniques, and proper material management practices.

The training of the appropriate employees will be completed as part of new employee orientation prior to beginning their work assignment. These employees include all personnel involved in materials loading / unloading, fueling, maintenance, and flammable or hazardous material handling. Annual training of employees will also be conducted to assure personnel maintain a working knowledge of the contents of this SWPPP. This annual training will also be utilized to solicit employee ideas for improvement of the overall pollution prevention program at the facility. In addition to the SWPPP training, SPILL CONTINGENCY PLAN training will occur annually.

Mr. Larry Dryer or an appropriate designee, who will retain documentation of attendance records (Appendix F), will conduct the training. Visitors, contractors, and temporary employees who perform work at the facility will receive training in basic safe work practices, pollution prevention, and the appropriate areas related to the type of work being performed.

Spill Prevention and Response Training will cover the following topics:

- Material handling procedures, material storage requirements, and safety measures associated with material handling and storage;
- Identifying potential spill areas and drainage routes;
- Implementing spill response procedures; and,
- Reporting spills to the appropriate management.

Good Housekeeping Training will cover the following topics:

- Specific BMPs in areas where the employees work;
- Proper storage of drums and other containers; and,
- Prompt removal and appropriate disposal of spilled material to prevent pollution of storm water runoff.

Materials Management Practices will cover the following topics:

- Proper organization of material storage areas;
- Proper labeling and segregation of all petroleum substances and hazardous substances stored, handled, or produced on site; and,
- Proper handling techniques for hazardous substances.

## **4.0 COMPREHENSIVE INSPECTIONS**

Comprehensive inspections of industrial activity areas will be conducted once a year. Records of inspections will be made and retained with the SWPPP for at least three years. These records will be made available to the MDNR upon request and will be summarized in the annual report.

Site inspections will be performed on any structures that function to prevent storm water pollution or to remove pollutants from storm water and of the facility, in general, to ensure that the SWPPP is continually implemented and effective. These inspections will be recorded on special forms Appendix G.

### **4.1 Inspection Items**

The annual inspection will verify the list of potential pollutant sources, identify the presence of actual pollution associated with these sources, verify the site diagram for the facility, and verify controls identified in the plan are accurate, up to date, and working. Spill response equipment will also be visually inspected.

### **4.2 Plan Revisions**

Within two weeks of the annual inspection, the SWPPP description of potential pollutant sources and pollution prevention measures shall be revised as appropriate. Implementation of changes to the plan shall occur within 12 weeks after the inspection.

### **4.3 Inspection Report (Annual)**

An inspection report will be made and retained as part of the SWPPP for at least three years. This report will summarize the scope of the inspection, major observations relating to implementation of the SWPPP, and actions taken to revise the SWPPP and implement the revisions. The report will also identify the personnel performing the inspection and the date of the inspection. Appendix G contains an inspection report outline.

**APPENDIX A**  
**FACILITY STORM WATER PERMIT**

**CNH Reman, LLC**  
**Springfield, Missouri**

**APPENDIX B**

**STORM WATER DISCHARGE MONITORING REPORT (SWDMR)**

**CNH Reman, LLC  
Springfield, Missouri**

**APPENDIX C**  
**SPILL CONTINGENCY PLAN**

**CNH Reman, LLC**  
**Springfield, Missouri**

## **Spill Contingency Plan**

### **C1.0 Notification Procedure**

In the event of an oil or fuel spill, facility personnel on duty are to take *immediate* action to comply with the detailed instructions on information to be reported, and phone numbers to be contacted included in this appendix. Applicable federal, state and local agencies phone numbers are provided on the Notification Phone List in this appendix.

The law requires immediate notification to the MDNR Division of Water Quality and the National Response Center (listed on the Notification Phone List) for spills that meet any of the following criteria:

- If the spill is estimated to be at least 50 gallons. For spills estimated to be greater than 1,000 gallons, the National Response Center must also be notified, or
- If the spill is hazardous or poses a threat to human health, or is detrimental to aquatic and terrestrial species of plants or animals, or
- If the spill threatens to or results in contamination of underground or surface water, or
- If the spill violates applicable water quality standards, or
- If the spill is sufficient to cause film sheen on, or discoloration of, the surface of the water or adjoining shorelines, or causes a sludge or emulsion to be deposited in harmful quantities into or upon waters of the United States or adjoining shorelines or roadside ditches.

### **C2.0 Spill Contingency Plan**

In the event of a release of fuel or oil-based product to the environment, the notification procedure is to be initiated and the following procedures should be used to contain or limit and cleanup the spill. Due to potential impact to the surrounding environment, immediate action to contain and clean up the release must be implemented.

All actions to limit the extent of the spill should be undertaken with care and judgment to avoid risk of injury to personnel and minimize impact on the environment. The objective of the response action is to minimize environmental damage and to contain the spill within the property boundaries of the facility.

The following criteria are to be used in assessing the appropriate response by personnel based on the type of spill:

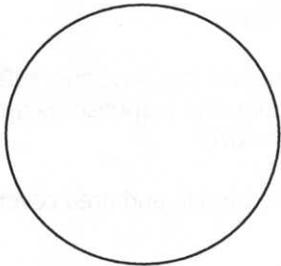
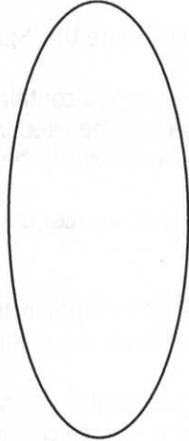
- Spills of any size consisting of fuel or other Class III combustible liquid can be responded to by site personnel. If possible, work upwind of the spill when applying absorbent materials or conducting other activities adjacent to the spill area. Motorized equipment can be used to assist construction of containment structures (trenches or diking) without restriction.
- Spills of oil or fuel which result (or could result, in the case of continuing leakage) in spill pools of more than 200 square feet (SF) are not to be responded to by site personnel due to the potential for flash fire. Advise home personnel and direct them to a safe location well away from the spill area and not downwind. Turn off any spark producing equipment in the downwind area from the spill. Advise any emergency personnel responding to the spill (fire department, Bass Pro Shops personnel, spill cleanup personnel, etc.) of the nature of the release and potential flash fire hazard.

- Spills of oil or fuel which result in spill pools of less than 200 SF can be responded to defensively by site personnel using appropriate caution. Observe the site wind direction indicator (flag or windsock), and work ONLY upwind of the spill area. If the spill cannot be approached from upwind due to buildings, walls, fences, etc., use the procedures above and DO NOT take defensive actions. Turn off any spark-producing equipment downwind of the spill. Do not use motorized equipment to construct containment structures unless it can be used entirely on the upwind side of the spill area.
- Spills of oil or fuel which result in spill pools of less than 25 SF, can be responded to by site personnel using appropriate caution. If possible, approach the spill area from the upwind side; however, the spill can be approached from other directions, if necessary. Use of motorized equipment to contain such a spill will normally not be necessary and is generally not advised. Shut off or move spark-producing equipment greater than 20 feet from the spill area.

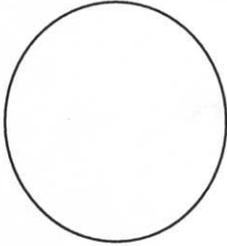
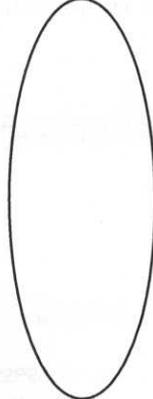
Personnel responding to a spill of any petroleum product should wear appropriate personal protective equipment, including impervious boots and gloves.

The following guidelines can help in estimating spill sizes:

For 200 SF spills:

 <p>16 feet in diameter</p>	 <p>10 feet wide, 20 feet long</p>	 <p>5 feet wide, 40 feet long</p>
--	---	---

For 25 SF spills:

 <p>5 feet in diameter</p>	 <p>3 feet wide, 8 feet long</p>	 <p>2 feet wide, 12 feet long</p>
---	---	--

## **C2.1 Spill Response Procedures - Facility Personnel:**

These procedures should be followed:

- (1) Upon observing a spill, immediately initiate this Spill Contingency Plan;
- (2) Take prompt emergency remedial action to contain the spill without risking personnel safety. (See Section C2.0 for spill size criteria to be used in assessing the level of response by facility personnel.) Emergency response equipment to be used is listed below;
- (3) Identify and verify the character, exact source, amount of spilled material, and area covered by released material at the facility;
- (4) Assess the possible direct and indirect hazards including fire or explosion, to human health or the environment that October result from the release;
- (5) The Christian County Emergency Coordinator will be notified at (417) 581-2426 of any reportable spill and the appropriate response procedures initiated according to the situation;
- (6) The Fire Department is to be notified and is to stand by for all spill situations where the possibility of fire ignition exists;
- (7) If necessary, the Facility Manager is to contact outside contractors for support;
- (8) In the event of spills, the Facility Manager is to send personnel trained in spill control to the site to contain and cleanup any spills, and;
- (9) The Facility Manager will follow up on all reportable spills with a written report submitted to the EPA Region VII and the Missouri Department of Natural Resources.

## **B3.0 Spill Control Procedures**

An oil or fuel spill incident could occur at the facility from the following situations:

- Fuel line rupture
- Storage tank rupture
- Spill during tank truck loading or offloading operations

See Section C2.0 for spill size criteria to be used in assessing the level of response by facility personnel. Should a spill incident occur, facility personnel will immediately implement the reporting procedures set forth in this document and the following spill control measures:

- (1) Turn off pump or pumps if applicable.
- (2) Ensure that spilled oil is contained as outlined in Section C4.0, Countermeasure Procedures.
- (3) Pump spilled oil/fuel into a recovery oil/fuel tank. If the spill volume is greater than the recovery oil/fuel tank, call a qualified contractor to pump spilled material into a tank truck for delivery to an approved treatment and disposal facility.

#### C4.0 Countermeasure Procedures

Countermeasure procedures are designed to contain and cleanup effects of a spill that could impact receiving water bodies. Incident-specific considerations and precautions must be implemented during each spill incident to adequately protect human health and the environment. See Section C2.0 for spill size criteria to be used in assessing the level of response by facility personnel.

For all spills that reach a surface waterway and any spills that result in significant degree of soil contamination, the Terminal Manager is to be contacted to provide emergency response services and consultation.

The facility's countermeasure procedures are outlined below:

- **Containment:** Containment activities are to be initiated as soon as possible to prevent spreading of the spilled material. Containment techniques include, but are not limited to:
  - Trenching – Dig a trench around the area to collect the spill so that it can be safely removed. If time allows, line the trench with plastic or similar material.
  - Diking – Dike the spill with dirt, sandbags or other absorbent materials that will contain the spill, using shovels, front-end loader or other available resources.
  - Booms and Absorbents – Use large quantities of absorbent materials, including dirt, sand, vermiculite, clay, absorbents, etc., to soak up and contain the spill by direct application.
  
- **Removal:** Once the spill is contained, any oil/fuel is to be removed. Removal techniques include, but are not limited to:
  - Pumps
  - Absorbent materials such as pads, pillows, booms, oil-dry, cat litter, etc.
  - Skimmers
  
- **Disposal:** This includes recycling of any recovered oil/fuel, disposing of abatement materials used to contain or remove the spilled material, and excavating contaminated soil. Disposal techniques include, but are not limited to:
  - Recycling
  - Disposal at an appropriate facility
  - Land farming

#### C5.0 Emergency Response Equipment Location

The following table identifies the type and location of the emergency response equipment, including personal protective equipment, available at the facility:

Equipment	Locations
Floor Dry	At process test
Absorbent Sock	stands and west
Shovel	storage area

## EMERGENCY NOTIFICATION PHONE LIST

This list should be copied and posted near each telephone location.

CONTACT LIST	RESPONSIBLE ROLE	PHONE NUMBER
<b>CONTACTS</b>		
Larry Dryer, Engineering Manager	Notification of response agencies; Spill reporting	(417) 893-2345 day/office (417) 453-4179 evening/cell
Tom Hilmes, General Manager		(417) 893-2207 day/office (417) 343-9479 evening /cell
Musette Baird, Safety Coordinator		(417) 893-2334 day/office (417) 380-4135 evening /cell
<b>GOVERNMENTAL CONTACTS</b>		
National Response Center	Incident reporting (if required)	1 (800) 424-8802
Federal On-Scene Coordinator (EPA Region VII)	Incident reporting; Spill response assistance	(913) 281-0991 or (913) 551-7000
State Emergency Response Commission (SERC)	Incident reporting	1 (800) 780-1014
Missouri Department of Natural Resources (MDNR)	Incident reporting; Spill response assistance	(573) 634-2436
Fire Department / Police Department	Traffic and crowd control; Evacuation assistance	911
<b>EMERGENCY RESPONSE CONTRACTORS:</b>		
Environmental Works	Spill response and clean up resources	(417) 890-9500 (office) (877) 827-9500 (24-hour)
<b>OTHER CONTACTS</b>		
National Weather Service (Springfield, MO)	Weather reports	(417) 869-4491
Local Radio KTTS 94.7 FM – Springfield KXUS 97.3 FM - Springfield KSMU 91.1 FM - Springfield	Public information	(417) 865-6614 (417) 890-5555 (417) 836-5878
Missouri One-Call	Utility location	1 (800) 344-7483
Cox North Hospital 1423 N. Jefferson Avenue Springfield, MO 65802	Medical assistance	(417) 269-3000 General (417) 269-3393 Emergency Dept.
Cox South Hospital 3801 S. National Avenue Springfield, MO 65807		(417) 269-6000 General (417) 269-4083 Emergency Dept.

**APPENDIX D**

**SPECIFIC SPILL RESPONSE PROCEDURES**

**CNH Reman, LLC  
Springfield, Missouri**

**APPENDIX E**

**VISUAL INSPECTION REPORT  
(Monthly)**

**CNH Reman, LLC  
Springfield, Missouri**



**VISUAL INSPECTION REPORT**  
**CNH Reman, LLC**  
**Springfield, Missouri**

**Note: Keep the completed report with the SWPPP Plan.**

Facility Name: CNH Reman, LLC

Inspector Name: \_\_\_\_\_

Inspector Signature: \_\_\_\_\_

Date: \_\_\_\_\_

Weather Conditions: \_\_\_\_\_

For the applicable drainage areas, are any of the following observed?

**West Yard**

Yes	No	NA	
			Excess trash or debris in ditches
			Evidence of recent spills or leaks of any shipped material
			Evidence of recent spills or leaks associated with drum use
			Evidence of recent spills or leaks from equipment (forklifts, tractors, etc.)

**Loading Docks and Parking Lots**

Yes	No	NA	
			Excess trash or debris in ditches
			Evidence of recent spills or leaks of any shipped material
			Evidence of recent spills or leaks associated with drum use
			Evidence of recent spills or leaks from equipment (forklifts, tractors, etc.)

Specific Observations/Comments

STATE TRAINING  
FINANCE RECORDS

**APPENDIX F**

**EMPLOYEE TRAINING PROGRAM RECORDS**

**CNH Reman, LLC  
Springfield, Missouri**





**Comprehensive Inspection Report  
CNH Reman, LLC  
Springfield, Missouri**

Circle yes or no to the appropriate question and fill in the requested information.

**Yes    No**    Is the description of the potential pollution sources in this SWPPP current?

If no then list current potential pollution sources: \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**Yes    No**    Are any pollutants entering the drainage system via the above potential pollution sources?

If yes then list pollutant, pollution source, and possible action necessary to prevent this discharge.

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**Yes    No**    Is the site map in the SWPPP accurate?

If no then list necessary changes. \_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

**Comprehensive Inspection Report  
CNH Reman, LLC  
Springfield, Missouri**

Circle yes or no to the appropriate question and fill in the requested information.

**Yes No** Are controls to reduce pollutants identified in the SWPPP being implemented?

If no then identify deficiencies. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**Yes No** Do the controls implemented to reduce pollutants appear to be adequate?

If no then identify modification necessary. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**Yes No** Does the spill kit at each designated area contain the proper equipment?

If no then identify the equipment missing. \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Additional Observations/Comments

<p>I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.</p>	
<b>A. Name and Official Title (type or print)</b>	<b>B. Area Code and Telephone Number</b>
<b>C. Signature</b>	<b>D. Date Signed</b>