

**BEFORE THE
DEPARTMENT OF NATURAL RESOURCES
STATE OF MISSOURI**

IN THE MATTER OF:

MW RECYCLING, LLC,
an Ohio limited liability company and wholly
owned subsidiary of PSC Metals, Inc.,
doing business in the State of Missouri as
Shapiro Brothers a division of MW Recycling LLC
EPA ID # MOR000021907

No. 2013-WPCB-1190

SERVE:

Mr. Denzil Boss,
Vice President of Operations Services
MW Recycling LLC

ABATEMENT ORDER ON CONSENT

I. NOTICE TO RECIPIENTS OF ABATEMENT ORDERS

The issuance of this Abatement Order on Consent (AOC) number No. 2013-WPCB-1190 by the Missouri Department of Natural Resources is a formal administrative action by the State of Missouri, and is being issued because the Department believes that MW Recycling LLC, an Ohio limited liability company and wholly owned subsidiary of PSC Metals, Inc. that is doing business in the State of Missouri as "Shapiro Brothers a division of MW Recycling, LLC" (the Regulated Party), is in violation of the Missouri Clean Water Law (MCWL), Chapter 644, RSMo, and the Missouri Hazardous Waste Management Law (MHWML), Sections 260.350-260.430, RSMo, and their implementing regulations, as described below. This AOC is issued under the authorities of Sections 640.130, 640.131, 644.056, 644.079, 260.410, and 260.425, RSMo. Failure to comply with this AOC is, by itself, a violation of both the MCWL and MHWML. Litigation may occur without further notice if the Regulated Party fails to comply with any of the terms of this AOC.

II. FINDINGS OF FACT

- A. Shapiro Brothers, Inc., owned by Gregory E. Shapiro and David C. Shapiro (together, Shapiro), owned and operated the scrap metal recycling operation (Operation) located at North Ninth Street and Delmar Avenue, in Festus, Missouri that is the subject site of this AOC.
- B. The Operation is located at North Ninth Street and Delmar Avenue in Festus, Missouri. The approximately 9-acre Operation is located in the Northeast ¼, Northeast ¼, Section 6, Township 40 North, Range 6 East, Jefferson County, and continues to operate pursuant to Missouri State Operating Permit (MSOP) number MO-R60A146 (Permit). The Operation buys, sells, and processes scrap metal and deconstructs old railroad cars, automobiles, and miscellaneous metal parts for scrap metal. The Operation discharges stormwater through two (2) outfalls to the Tributary to Plattin Creek, which runs southward along the Operation's east property boundary.
- C. The Tributary to Plattin Creek is a water of the State as the term is defined by Section 644.016 (27), RSMo.
- D. On June 16, 2008, the Department issued the Permit to Shapiro. The Permit authorizes the discharge of stormwater runoff from the Operation to waters of the State pursuant to the conditions and requirements of the Permit. Under the terms of the Permit, no discharge from the Operation may violate the water quality standards rule contained in 10 CSR 20-7.031. The Permit requires the permittee to submit to the Department an annual report describing any unusual occurrences including spills, tank failures, overflows, ruptured piping, fish kills, firefighting activities, or other upsets that result in any loss of product during the previous operating year.
- E. On July 13, 2011, Department staff conducted a site investigation at the Operation in response to an environmental concern that was received on July 8, 2011, reporting that there was a discharge of water with an oily sheen from the Operation. During the site investigation, Department staff observed an oily sheen in the Tributary to Plattin Creek. Department staff determined that an unknown amount of oil leaked from a switch motor at the Operation and discharged to a storm sewer inlet at the Operation. Following discovery of the discharge, Shapiro constructed a sock filter basket to lower into the storm sewer manhole just downstream from the storm sewer inlet to prevent any further discharge of oil to the Tributary to Plattin Creek.
- F. On September 14, 2011, Department staff conducted a site investigation at the Operation in response to an environmental concern received on September 1, 2011, reporting that dust and sediment were leaving the Operation. During the site investigation, Department staff observed that the Operation did not have secondary containment structures for used oil containers. Department staff also observed that Shapiro had recently installed a wheel wash station at the Operation near the North Ninth Street entrance. Department staff observed that wash water from the wash station was directed to a 2,500 gallon self-contained underground holding tank. Shapiro staff explained that flocculent is added to the holding tank to allow solids to settle out, and the dewatered solids are transferred on a conveyor belt to an uncovered

metal container next to the wheel wash station where they are stored until disposal. Department staff observed that stormwater from the uncovered solids container was directed through an underground drainage pipe, which discharged to the Tributary to Plattin Creek at the southeast corner of the Operation. Water analysis indicated that the discharge had a cadmium concentration of 30.9 micrograms/liter and a lead concentration of 2,110 micrograms/liter. Water analysis conducted on a water sample collected from the wash station indicated a cadmium concentration of 23.9 micrograms/liter and a lead concentration of 2,610 micrograms/liter. The acute criterion for cadmium (at the maximum hardness of 250+) is 11.6 micrograms/liter and for lead is 172 micrograms/liter. During the inspection, Department staff also state that Mr. Gregory Shapiro stated that he did not make a hazardous waste determination on street sweepings generated by the Operation's street sweeper and wheel wash solids generated at the Operation's wheel wash station.

- G. During a review of its file on the Operation conducted in conjunction with the inspection, Department staff observed that Shapiro had failed to submit to the Department annual operating reports for 2009 and 2010.
- H. On or about September 16, 2011, MW Recycling LLC, acquired substantially all of the assets of Shapiro, including the Operation, and the Operation is now operated by MW Recycling, LLC, which operates under the fictitious name "Shapiro Brothers a Division of MW Recycling LLC", which in turn is duly registered with the Missouri Secretary of State.
- I. Lead and cadmium are water contaminants as the term is defined in Section 644.016(24), RSMo.
- J. On November 22, 2011, the Department issued Notice of Violation (NOV) number SLR07382748 to Shapiro Brothers a Division of MW Recycling, LLC, for violations of the MHWML observed during the September 14, 2011, inspection.
- K. On November 23, 2011, the Department issued NOV number 2937 SL to Shapiro for alleged violations of the MCWL and the Permit that were documented by Department staff during the September 14, 2011, site investigation. In addition, the inspection report for the NOV noted that, as of that date, Shapiro had failed to submit an application to transfer the Permit to the new owner of the Operation, PSC Metals, Inc. The NOV required Shapiro to submit a response to the Department within fifteen (15) days of receipt of the NOV. MW Recycling responded on December 13, 2011, within fifteen (15) days of receipt.
- L. On December 6, 2011, the Department issued NOV number 2938 SL to Shapiro for exceeding the specific water quality criteria for lead and cadmium on September 14, 2011. The NOV required Shapiro to submit a response to the Department within fifteen (15) days of receipt of the NOV. MW Recycling responded on January 13, 2012, within fifteen (15) days of receipt.
- M. On December 19, 2011, the Department received correspondence from the Regulated Party, in response to NOV numbers 2937 SL and 2938 SL, which included a complete application to transfer ownership of the Permit from Shapiro to MW Recycling LLC.

The Regulated Party also transmitted a report intended to serve as the annual operating reports for 2009, 2010, and 2011. In the letter, the Regulated Party stated that the drainage pipe leading from the wheel wash collection basin had been removed, gutters from the main office building had been directed away from the wash station, a concrete pad had been installed north of the wash station to collect solids, a concrete swale had been installed north of the wash station to divert stormwater away from the area, and the wash station was currently being operated as a closed-loop system by which wheel wash water is reused and prevented from discharging.

- N. On January 23, 2012, the Department received correspondence from the Regulated Party in response to NOV numbers 2937 SL and 2938 SL, stating that the Regulated Party planned to develop a Stormwater Pollution Prevention Plan (SWPPP) for the Operation.
- O. As a result of the above investigation, the Department incurred costs for staff time in the amount One Thousand One Hundred Seventy-One Dollars and Seventy Cents (\$1,171.70).
- P. On March 4, 2013, the Department received an application for a site-specific state operating permit, including Form A, Form 2F, a new SWPPP, and the applicable fee, from the Regulated Party.
- Q. Section 644.096, RSMo, creates a cause of action in favor of the State, or any of its political subdivisions or agencies, to recover actual damages, including all costs and expenses necessary to establish or collect any sums under Section 644.006 to 644.141, RSMo, and the costs and expenses of restoring any waters of the State to their condition as they existed before the violation, sustained by the State because of the violation.
- R. Section 644.076.1, RSMo, makes it unlawful 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, or to violate any standard, rule or regulation promulgated by the Clean Water Commission. It also establishes civil penalties of up to ten thousand dollars (\$10,000.00) per day per violation.
- S. Section 260.425, RSMo, makes its unlawful for any person to cause or permit any acts or hazardous waste management practices which violate sections 260.350 to 260.430 or any standard, rule or regulation thereunder, and establishes civil penalties of up to ten thousand dollars (\$10,000.00) per day for each day, or part thereof, the violation occurred and continues to occur, or both.

III. CONCLUSIONS OF LAW

The Department alleges that violations of the MCWL and MHWML and their implementing regulations have been committed at the Operation. The Regulated Party's participation in this AOC shall not constitute or be construed as an admission of liability or of the findings and determinations contained in this AOC. The allegations are as follows:

- A. Failed to submit complete, accurate, and timely annual operating reports for 2009, 2010, and 2011 as required by MSOP number MO-R60A146, in violation of Section 644.076.1, RSMo, and 10 CSR 20-7.015(9)(A)1.
- B. On September 14, 2011, failed to prevent a discharge from a location other than the permitted outfalls in violation of MSOP number MO-R60A146, Sections 644.051.2 and 644.076.1, RSMo, 10 CSR 20-6.010(1)(A) and (5)(A), and 10 CSR 20-6.200(1)(A).
- C. On July 13 and September 14, 2011, caused pollution of the Tributary to Platin Creek, waters of the State, or placed or caused or permitted to be placed a water contaminant in a location where it is reasonably certain to cause pollution of waters of the State, in violation of Sections 644.051.1(1) and 644.076.1, RSMo.
- D. On July 13 and September 14, 2011, discharged water contaminants into waters of the State which reduced the quality of such waters below the Water Quality Standards established by the Missouri Clean Water Commission, in violation of Sections 644.051.1(2) and 644.076.1, RSMo, and 10 CSR 20-7.031.
- E. Failed to determine if waste generated at the Operation was hazardous, in violation of 10 CSR 25-5.262(1), incorporating 40 CFR 262.11.

IV. AGREEMENT

- A. The Department and the Regulated Party desire to amicably resolve all claims that might be brought against the Regulated Party for the violations alleged in NOV numbers SLR07382748, 2937 SL, and 2938 SL, and in this AOC, without the Regulated Party admitting the validity or accuracy of such claims. The Department and the Regulated Party agree that this AOC resolves only the violations observed during the inspections referenced herein or specifically alleged herein, that the Department has alleged all of the violations that it in fact observed during those inspections, that this AOC shall not be construed as a waiver or a modification of any requirements of the MCWL, MHWML, and their implementing regulations or any other source of law, and that this AOC does not resolve any claims based on failure by the Regulated Party to meet the requirements of this AOC, or claims for past, present, or future violations of any statutes or regulations other than those specifically referenced herein. The Regulated Party was not the owner or operator at the time of any of the above-referenced alleged violations, and specifically denies actual involvement with the alleged violations referenced herein, but accepts responsibility for them to address the alleged violations for the purposes of this AOC only.
- B. The provisions of this AOC shall apply to and be binding upon the parties executing this AOC, their successors, assigns, agents, subsidiaries, affiliates, and lessees, including the officers, agents, servants, corporations, and any persons acting under, through, or for the parties. Any changes in ownership or corporate status, including but not limited to any transfer of assets or real or personal property, shall not affect the responsibilities of the Regulated Party under this AOC. If the Regulated Party sells or

otherwise transfers the Operation, then the Regulated Party shall include as a condition of such sale or transfer a requirement that the buyer will assume the obligations of the Regulated Party under this AOC in writing. In such event, and if feasible, the Regulated Party shall provide thirty (30) days prior written notice of such assumption to the Department. If such prior notice is not feasible the Regulated Party shall provide notice to the Department within ten (10) days of the transfer.

- C. The Regulated Party, in compromise and satisfaction of the Department's claims relating to the above-referenced alleged violations, agree, without admitting liability or fault, to pay a civil penalty in the amount of Thirty Thousand Dollars (\$30,000.00), of which Ten Thousand Dollars (\$10,000.00) shall be suspended as described in Paragraph IV.D below. The up-front civil penalty in the amount of Twenty Thousand Dollars (\$20,000.00) shall be submitted in the form of a certified check or cashier's check made payable to "*Jefferson County Treasurer, as custodian of the Jefferson County School Fund.*" The up-front penalty is due and payable upon execution of this AOC by the Regulated Party. The check and signed copies of the AOC shall be delivered to:

Accounting Program
Missouri Department of Natural Resources
P.O. Box 477
Jefferson City, MO 65102-0176

- D. The suspended penalty described in paragraph IV.C of Ten Thousand Dollars (\$10,000.00) is suspended only upon the condition that the Regulated Party does not violate any terms of this AOC for a period of two (2) years from the execution of this AOC. Upon determination that the Regulated Party has failed to meet the terms of this AOC, including the required actions set forth in paragraphs IV.E through IV.L, the Department shall send a written demand for the suspended penalty to the Regulated Party. The Regulated Party shall have fifteen (15) days from receipt of the written demand to submit the suspended penalty in the manner described in paragraph IV.C.
- E. The Regulated Party agrees to pay the State's investigative costs in the amount One Thousand One Hundred Seventy-One Dollars and Seventy Cents (\$1,171.70) in the form of a certified check or cashier's check made payable to the "*State of Missouri.*" This amount represents all of the State costs associated with these NOV's. This check is due and payable upon execution of this AOC by the Regulated Party. The check shall be delivered to:

Accounting Program
Missouri Department of Natural Resources
P.O. Box 477
Jefferson City, MO 65102-0176

- F. Within sixty (60) days of receipt of the Department's comments on the SWPPP, the Regulated Party agrees to respond to and address all of the Department's comments on the SWPPP.

- G. Within sixty (60) days receipt of Department correspondence stating that the Department has no further comments on the submitted SWPPP, the Regulated Party agrees to implement the SWPPP at the Operation and initiate stormwater modifications consistent with the SWPPP. The Regulated Party agrees to update the SWPPP according to the operating permit requirements and maintain a current copy of the SWPPP onsite throughout the term of the operating permit.
- H. The Regulated Party agrees to sample the waste streams associated with the wheel wash station and the street sweepings until the Department has determined in writing that one of the following conditions are met:
- 1.) the waste streams are no longer generated; or
 - 2.) the Regulated Party paves the roadways used for truck and peddler traffic at the Operation to prevent materials from being tracked off the Operation's site.

In the event that the Regulated Party believes that it is no longer generating these waste streams from the wheel wash station and street sweepings, or paves the Operation as described in this Paragraph, then the Regulated Party shall submit a written report to the Department documenting the operational change or changes, in addition to a request to cease sampling of those waste streams. The Regulated Party shall continue sampling until they receive in writing from the Department a statement that sampling is no longer required. In no event shall the Regulated Party cease analysis and reporting requirements without first obtaining the written approval of the Department. The Regulated Party will retain records indicating costs of sampling and analysis and provide these records with a summary of the total costs to the Department upon receiving written approval from the Department that sampling is no longer required.

- I. Pursuant to Paragraph IV.H, the Regulated Party agrees to conduct weekly sample collection of the wheel wash station waste, and analyze the samples as a composite sample for metals once a month. These samples shall be analyzed per the toxicity characteristic leaching procedure (method 1311 of the Environmental Protection Agency publication SW-846) for the following three (3) metals in 40 CFR 261.24: Cadmium, Chromium, and Lead. In the event that any of these samples exceed TCLP for Cadmium, Chromium, or Lead pursuant to such analysis, then the Regulated Party shall cause to be re-analyzed such samples per the toxicity characteristic leaching procedure (method 1311 of the Environmental Protection Agency publication SW-846) for the following seven (7) metals in 40 CFR 261.24: Arsenic, Barium, Cadmium, Chromium, Lead, Selenium, and Silver; results of such analysis shall be provided by the Regulated Party to the Department, which will determine an appropriate course of action. If, however, no such expanded testing for all seven metals is required, then after six (6) consecutive months of the sampling and analysis for Cadmium, Chromium, and Lead, the Regulated Party shall submit the results to the Department, and may request that the wheel wash station waste sampling collection frequency be modified from weekly to monthly and the metals analysis from monthly to biannually. Except as provided for in paragraphs IV.H and IV.I, the Regulated Party shall not modify the

frequency of the sampling or analyses until it has received written approval from the Department.

- J. Pursuant to paragraph IV.H, the Regulated Party agrees to conduct monthly sample collection of waste generated from street sweeping activities, and conduct biannual composite analysis for metals. Samples shall be analyzed per the toxicity characteristic leaching procedure (method 1311 of the Environmental Protection Agency publication SW-846) for the following three (3) metals in 40 CFR 261.24: Cadmium, Chromium, and Lead. In the event that any of those samples exceed TCLP for Cadmium, Chromium, or Lead, then the Regulated Party shall re-analyze that sample per the toxicity characteristic leaching procedure (method 1311 of the Environmental Protection Agency publication SW-846) for the following seven (7) metals in 40 CFR 261.24: Arsenic, Barium, Cadmium, Chromium, Lead, Selenium, and Silver; results of such analysis will be provided by the Regulated Party to the Department, which will determine an appropriate course of action. If, however, no such expanded analysis of all seven metals is required, then after twelve (12) consecutive months of such sampling and analysis of Cadmium, Chromium, and Lead, the Regulated Party shall submit the results to the Department, and may request that the street sweeping waste sampling collection frequency be modified from monthly to quarterly, and the metals analysis from biannually to annually. Except as provided for in paragraphs IV.H and IV.J, the Regulated Party shall not modify the frequency of the sampling or analysis until it has received written approval from the Department.
- K. Within three hundred sixty-five (365) days of the effective date of this AOC, the Regulated Party agrees to pay at least Forty-Five Thousand Dollars (\$45,000) towards the completion of at least one of the following initiatives:
- 1.) Repairing or causing to be repaired the culvert and roadway on 12th Street in Crystal City, Missouri, that is immediately east of the Operation's North Ninth Street entrance in such a manner that supports truck traffic up to 80,000 pounds;
 - 2.) Paving those areas of the Operation's site over which trucks that enter and leave the site customarily travel; or
 - 3.) Creating a new point of ingress and egress to the Operation that would minimize truck travel through the residential areas surrounding the Operation.

Upon completion of the initiative or initiatives, the Regulated Party shall submit to the Department written notification describing in detail the initiative or initiatives actually completed, and certifying the amount of funds the Regulated Party spent to complete it or them. Should the Regulated Party fail to complete the requirements of this Paragraph, it shall pay as an additional penalty Twenty Thousand Dollars (\$20,000) in the same manner as described in Paragraph IV.C. Payment of the specific penalty as described in this Paragraph does not excuse the Regulated Party from any other obligation it may have under the terms of this AOC.

- L. Contingent upon compliance with this AOC, the Department agrees to not bring or cause to be brought any civil or criminal action against the Regulated Party or Shapiro

for penalties arising out of the above-referenced alleged violations of the MCWL, the MHWML, and their implementing regulations. However, this AOC does not constitute a waiver or a modification of any requirements of the MCWL, the MHWML, or their implementing regulations. Compliance with the terms of this AOC shall not relieve the Regulated Party of liability for, or preclude the Department from initiating, a judicial enforcement action to recover civil penalties for any other, including future, violations of the MCWL and MHWML or their implementing regulations, or of this AOC, or to seek injunctive relief, pursuant to Chapters 644 and 260, RSMo.

M. Immediately upon becoming aware that a deadline or milestone as set forth in this AOC will not be completed by the required deadline, the Regulated Party shall notify the Department by telephone or electronic mail and at a minimum:

- 1.) identify the deadline that will not be achieved;
- 2.) identify the reason for failing to achieve the deadline; and
- 3) propose a new deadline that can be achieved.

Within five (5) days of so notifying the Department, the Regulated Party shall submit to the Department for review and approval an official written request containing the same basic provisions of IV.M.1,2, and 3 that is signed by an appropriate officer or agent. The Department may grant an extension if it deems appropriate. Failure to submit a written notice to the Department may constitute a waiver of the Regulated Party's right to request an extension and may be grounds for the Department to deny the Regulated Party an extension.

N. In addition to any suspended penalty referenced in Paragraphs IV.C and D, should the Regulated Party fail to meet the terms of this AOC, the Regulated Party may be subject at the Department's discretion to stipulated penalties for each discrete violation of this AOC in the following amounts:

<u>Days of Violation</u>	<u>Amount of Penalty</u>
1 to 30 days	\$250.00 per violation per day
31 to 90 days	\$500.00 per violation per day
91 days and above	\$1,000.00 per violation per day

Stipulated penalties shall accrue and, upon demand from the Department, be paid in the form of a certified or cashier's check made payable to "*Jefferson County Treasurer, as custodian of the Jefferson County School Fund.*" Any such stipulated penalty shall be paid within thirty (30) days of demand by the Department and shall be delivered to:

Accounting Program
Missouri Department of Natural Resources
P.O. Box 477
Jefferson City, MO 65102-0176

P. No portion of any penalty paid pursuant to this AOC may be used to reduce the

Regulated Party's federal or state tax obligation.

- Q. Nothing in this AOC excuses the Regulated Party from future non-compliance with the laws of the State of Missouri, nor requires the Department or the State of Missouri to forego pursuing by any legal means any action to address noncompliance with the laws of the State of Missouri. The terms stated herein constitute the entire and exclusive agreement of the parties. There are no other obligations of the parties, be they express or implied, oral or written, with respect to the matters addressed by this AOC. The terms of this AOC supersede all previous memoranda or understanding, notes, conversations, and agreements, express or implied. This AOC may not be modified orally.
- R. By signing this AOC, all signatories assert that they have read and understand the terms of this AOC, that they have had the opportunity to consult with counsel, and that they have the authority to sign this AOC on behalf of their respective parties.
- S. The effective date of the AOC shall be the date the Department signs the AOC. The Department shall send a fully executed copy of this AOC to the Regulated Party for their records.
- T. The Regulated Party shall comply with the MCWL and MHWML, their implementing regulations, and Chapters 260 and 644, RSMo, and its implementing regulations at all times in the future.
- U. PSC Metals, Inc., the parent of MW Recycling LLC, is a guarantor of the performance of MW Recycling LLC's obligations herein.

V. RIGHT OF APPEAL

By signing this AOC, the Regulated Party consents to its terms and waives any right to appeal, seek judicial review, or otherwise challenge the terms and conditions of this AOC, pursuant to Sections 260.410, 621.250, 640.010, 640.013, 644.056.3, and 644.079.2, RSMo, 10 CSR 20- 1.020, 10 CSR 20-3.010, 10 CSR 20-6.020(5), 10 CSR 25-2.020, and Chapters 260, 536, 640, and 644, RSMo, the Missouri Constitution, or any other source of law. This AOC will become final and fully enforceable, as provided in Sections 260.425 and 644.076, RSMo upon the date the Department signs it.

VI. CORRESPONDENCE AND DOCUMENTATION

Correspondence or documentation with regard to conditions outlined in this AOC shall be directed to:

Ms. Corinne Rosania
Compliance and Enforcement Section
Water Protection Program
Missouri Department of Natural Resources
P.O. Box 176
Jefferson City, MO 65102-0176

AND

Mr. Evan Bryant
Compliance and Enforcement Section
Hazardous Waste Program
Missouri Department of Natural Resources
P.O. Box 176
Jefferson City, MO 65102-0176

FOR PSC METALS AND MW RECYCLING

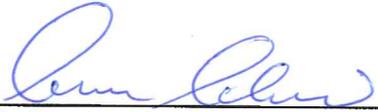
Mr. Douglas Cohen
Brown Rudnick
185 Asylum St 38th floor
Hartford, CT 06103

AND

General Counsel
MW Recycling LLC, and
PSC Metals, Inc.
5875 Landerbrook Drive, Suite 200
Mayfield Heights, OH 44124

Agreed to and So Ordered this 19th day of November, 2013:

DEPARTMENT OF NATURAL RESOURCES

By:  FOR LTA
Ms. Leanne Tippet Mosby, Director
Division of Environmental Quality

Agreed to this 14th day of November, 2013:

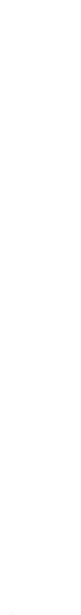
MW RECYCLING LLC

By: 
Mr. Denzil Boss
Vice President for Operations Services

Agreed to this 14th day of November, 2013:

PSC METALS, INC.

Guarantor of MW Recycling's Obligations:

By: 
Mr. Denzil Boss
Vice President for Operations Services

Copies of the foregoing have been delivered by certified mail to:

Mr. Denzil Boss
MW Recycling LLC, and
PSC Metals, Inc.
5875 Landerbrook Drive, Suite 200
Mayfield Heights, OH 44124

Ms. Diane Huffman, Chief
NPDES and Facilities Management Branch
Water, Wetlands, and Pesticides Division
U.S. Environmental Protection Agency, Region VII
11201 Renner Blvd.
Lenexa, KS 66219

Mr. Chris Wieberg, Chief Operating Permits Section
Water Protection Program
Department of Natural Resources
P.O. Box 176
Jefferson City, MO 65102-0176

Ms. Janet Pointer, Accounting Specialist
Accounting Program
Department of Natural Resources
P.O. Box 477
Jefferson City, MO 65102-0176

Ms. Dorothy Franklin
Saint Louis Regional Office
7545 S. Lindbergh, Suite 210
St. Louis, MO 63125

Dr. Samuel M. Hunter, Chair
Missouri Clean Water Commission
P.O. Box 984
216 Tanner Street
Sikeston, MO 63801

Mr. John Cowherd, Commissioner
Missouri Clean Water Commission
1303 Deer Lane
Mount Vernon, MO 65712

Mr. Buddy Bennett, Commissioner
Missouri Clean Water Commission
7361 Summer Azure Lane
Higginsville, MO 64037

Ms. Wallis Warren, Commissioner
Missouri Clean Water Commission
2671 Jefferiesburg Road
Beaufort, MO 63013

Mr. Ben A. "Todd" Parnell, III, Vice-Chair
Missouri Clean Water Commission
Drury University
900 N. Benton
Springfield, MO 65802

Mr. Samuel D. Leake, Commissioner
Missouri Clean Water Commission
41690 Harrison Trail
Perry, MO 63462

Mr. Dennis Wood, Commissioner
Missouri Clean Water Commission
P.O. Box 112
284 Lillian Lane
Kimberling City, MO 65686