

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

MISSOURI CLEAN WATER COMMISSION



MISSOURI STATE OPERATING PERMIT

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

Permit No. MO-0121266

Owner: Bartlett Country Elevators, LLC
Address: 4900 Main Street, Suite 1200, Kansas City, MO 64112

Continuing Authority: Same as above
Address: Same as above

Facility Name: Bartlett-Waverly Large Tank Containment
Facility Address: East River Road, Waverly, MO 64096

Legal Description: SW ¼, NE ¼, Sec. 14, T51N, R24W, Lafayette County
UTM Coordinates: X = 456104, Y = 4340697

Receiving Stream: Missouri River (P)
First Classified Stream and ID: Missouri River (P) (0356) 303(d) List
USGS Basin & Sub-watershed No.: (10300101-1104)

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 - Agrichemical SIC #5153 and #5191

Containment water from bulk fertilizer and bulk pesticide facilities such as those classified under SIC code 5191.
Design flow is 0.14 million gallons per day.
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 Sections 640.013, 621.250, and 644.051.6 of the Law.

May 1, 2015
Effective Date

Sara Parker Pauley, Director, Department of Natural Resources

March 31, 2019
Expiration Date

John Madras, Director, Water Protection Program

OUTFALL #001	TABLE A. FINAL EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS					
	The permittee is authorized to discharge from outfall(s) with serial number(s) as specified in the application for this permit. The final effluent limitations shall become effective on May 1, 2015 , and remain in effect until expiration of the permit. Such discharges shall be controlled, limited and monitored by the permittee as specified below:					
EFFLUENT PARAMETER(S)	UNITS	FINAL EFFLUENT LIMITATIONS			MONITORING REQUIREMENTS	
		DAILY MAXIMUM	WEEKLY AVERAGE	MONTHLY AVERAGE	MEASUREMENT FREQUENCY	SAMPLE TYPE
Discharge from secondary containment						
Flow	Gallons/day	*		*	Each discharge	24 hr. estimate
pH	SU	**		**	prior to each discharge	grab
Settable Solids	mg/L/hr	1.5		1.0	prior to each discharge	grab
Monitoring Requirements for Bulk Pesticides within the secondary containment Note 1, Pages 6 & 7						
Each bulk pesticide stored or handled within the last three years.	Note 1, Pages 6 & 7	Note 1, Pages 6 & 7		Note 1, Pages 6 & 7	prior to each discharge	grab
Conductivity	uhmos/om at 25°C	*		*	prior to each discharge	grab
Monitoring Requirements for Bulk Fertilizers within the secondary containment						
Ammonia as N	mg/L	1.5		1.0	prior to each discharge	grab
Nitrate + Nitrite as N	mg/L	10.0		10.0	prior to each discharge	grab
Total Phosphorus	mg/L	1.0		1.0	prior to each discharge	grab
MONITORING REPORTS SHALL BE SUBMITTED <u>ANNUALLY</u> ; THE FIRST REPORT IS DUE <u>OCTOBER 28, 2015</u> .						

* Monitoring requirement only.

** pH is measured in pH units and is not to be averaged. The pH is limited to the range of 6.5-9.0 pH units.

B. STANDARD CONDITIONS

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

C. SPECIAL CONDITIONS

1. This permit establishes final ammonia limitations based on Missouri’s current Water Quality Standard. On August 22, 2013, the U.S. Environmental Protection Agency (EPA) published a notice in the Federal Register announcing of the final national recommended ambient water quality criteria for protection of aquatic life from the effects of ammonia in freshwater. The EPA’s guidance, Final Aquatic Life Ambient Water Quality Criteria for Ammonia – Fresh Water 2013, is not a rule, nor automatically part of a state’s water quality standards. States must adopt new ammonia criteria consistent with EPA’s published ammonia criteria into their water quality standards that protect the designated uses of the water bodies. The Department of Natural Resources has initiated stakeholder discussions on how to best incorporate these new criteria into the State’s rules. A date for when this rule change will occur has not been determined. Also, refer to Section IV of this permit’s factsheet for further information including estimated future effluent limits for this facility. It is recommended the permittee view the Department’s 2013 EPA criteria Factsheet located at <http://dnr.mo.gov/pubs/pub2481.htm>
2. 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.

C. SPECIAL CONDITIONS (continued)

- (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.
 - (d) The permit as modified or reissued under this paragraph shall also contain any other requirements of the Clean Water Act then applicable.
3. All outfalls must be clearly marked in the field.
4. Water Quality Standards
- (a) To the extent required by law, discharges to waters of the state shall not cause a violation of water quality standards rule under 10 CSR 20-7.031, including both specific and general criteria.
 - (b) General Criteria. The following general water quality criteria shall be applicable to all waters of the state at all times including mixing zones. No water contaminant, by itself or in combination with other substances, shall prevent the waters of the state from meeting the following conditions:
 - (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
- (a) The permittee shall notify the Director as soon as it knows or has reason to believe:
 - (b) 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 by the Director in accordance with 40 CFR 122.44(f).
 - (c) That they have begun or expect to begin to use or manufacture as an intermediate or final product or byproduct any toxic pollutant, which was not reported in the permit application.
6. Report as no-discharge when a discharge does not occur during the report period.
7. Reporting of Non-Detects:
- (a) An analysis conducted by the permittee or their contracted laboratory shall be conducted in such a way that the precision and accuracy of the analyzed result can be enumerated.
 - (b) The permittee shall not report a sample result as "Non-Detect" without also reporting the detection limit of the test. Reporting as "Non Detect" without also including the detection limit will be considered failure to report, which is a violation of this permit.
 - (c) The permittee shall provide the "Non-Detect" sample result using the less than sign and the minimum detection limit (e.g. <10).
 - (d) Where the permit contains a Minimum Level (ML) and the permittee is granted authority in the permit to report zero in lieu of the < ML for a specified parameter (conventional, priority pollutants, metals, etc.), then zero (0) is to be reported for that parameter.
 - (e) See Standard Conditions Part I, Section A, #4 regarding proper detection limits used for sample analysis.

C. SPECIAL CONDITIONS (continued)

8. It is a violation of the Missouri Clean Water Law to fail to pay fees associated with this permit (644.055 RSMo).
9. Any pesticide discharge from any point source shall comply with the requirements of Federal Insecticide, Fungicide and Rodenticide Act, as amended (7 U.S.C. 136 et. seq.) and the use of such pesticides shall be in a manner consistent with its label.
10. All paint, solvents, petroleum products, petroleum waste products (except fuels), spray additives, and unsecured storage containers (such as drums, cans or cartons) shall be stored so that these materials are not exposed to stormwater. A secure container shall be deemed to be a container with a lid that has never been opened since it was originally sealed or a container that is designed in such a way as to prevent the contents from being exposed to stormwater.
11. Spill prevention, control, and/or management shall be provided to prevent any spills of pollutants from entering waters of the state. Any spills of bulk agrichemicals in any secondary containment area or operational containment area should be removed in such a manner as to prevent any release of agrichemicals to waters of the state in violation of any applicable law or the effluent limits specified herein. 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.
12. Good housekeeping practices shall be maintained on-site to keep solid waste from entry into waters of the state.
13. Release of a hazardous substance must be reported to the department in accordance with 10 CSR 24-3.010. A record of each reportable spill shall be retained with the inspection log and made available to the department upon request.
14. This permit authorizes the discharge of stormwater from secondary and operational containment areas to waters of the state.
15. This permit does not authorize:
 - (a) A discharge of water other than stormwater,
 - (b) The discharge of rinsate from fertilizer or pesticide application equipment or spray additives, or
 - (c) The discharge of stormwater from secondary or operational containment area for bulk agrichemicals where a spill of bulk agrichemicals has not been properly cleaned up prior to the precipitation event.
16. Definitions as set forth in 10 CSR 20-2.010.
15. All personnel involved in handling, mixing, or storage of agrichemicals shall be provided training by the owner in the proper methods of handling, mixing, and storage of agrichemicals. Proof of training may consist of documentation of dates of training, personnel attending, and subject matter. Documentation of training shall be kept on site and made available to staff of the Department for viewing upon request.
16. An individual shall be designated by the permittee as responsible for environmental matters. Once a month on workdays, staff of the permitted facility shall inspect the facility in general and all structures that function to prevent pollution of stormwater or to remove pollutants from stormwater to ensure that all Best Management Practices (BMP) are continually implemented and effective. Repairs to maintain effectiveness shall be made promptly. A log of such inspections shall be kept on-site and made available to staff of the Department for viewing upon request.
17. There shall be no open burning on-site of containers, cartons, and other trade wastes.
18. The result of every other year integrity testing shall be submitted for review with the discharge monitoring report (DMR).
19. The permittee shall keep pumping equipment on site at all times that is adequate for recovering lost product from the containment area in the event of a leak or failure of the tank.
20. This permit establishes final ammonia limitations based on Missouri's current Water Quality Standard. On August 22, 2013, the U.S. Environmental Protection Agency (EPA) published a notice in the Federal Register announcing of the final national recommended ambient water quality criteria for protection of aquatic life from the effects of ammonia in freshwater. The EPA's guidance, Final Aquatic Life Ambient Water Quality Criteria for Ammonia – Fresh Water 2013, is not a rule, nor automatically part of a state's water quality standards. States must adopt new ammonia criteria consistent with EPA's published ammonia criteria into their water quality standards that protect the designated uses of the water bodies. The Department of Natural Resources has initiated stakeholder discussions on how to best incorporate these new criteria into the State's rules. A date for when this rule change will occur has not been determined. It is recommended the permittee view the Department's 2013 EPA criteria Factsheet located at <http://dnr.mo.gov/pubs/pub2481.htm>.

D. SAMPLING REQUIREMENTS

1. Sampling requirements of discharges of stormwater from secondary and operational containment areas:
 - (a) Prior to discharge, the permittee shall collect a sample of each batch of water from any secondary containment area and operational containment area that is used for bulk agrichemical handling systems. If the containment area is constructed of concrete, the discharge samples shall be analyzed for the bulk agrichemicals stored or handled in the respective area within the last year prior to the discharge. If the containment area is an earthen storage structure constructed of soil, clays, or other permeable materials, the discharge samples shall be analyzed for the bulk agrichemicals stored or handled in the respective area within the last three years prior to the discharge. If the discharge sample results exceed the discharge limitations specified in the permit, a discharge is not authorized and to do so would be a violation.
 - (b) If the analysis of three consecutive samples taken at rain events separated by 72 hours of dry weather do not show contamination from a discontinued or no-longer-used product then the permittee is no longer required to test for that chemical if;
 - (1) if the secondary containment is concrete and the chemical has not been used at any time in the previous year, or
 - (2) if the containment is of soil, clays, or other permeable materials and the chemical has not been used in the previous three years.If use of the product is renewed, then the requirements for sampling are required.
 - (c) Captured water may be used for dilution of agrichemicals to be land applied without analysis provided. Such applications are otherwise lawful.
 - (d) During the off-season when the facility is no longer in operation, and provided that the secondary and operational containment areas have been properly cleaned, secured, and taken out of operation, then sampling requirements for discharges from these areas shall not be in effect. The facility shall keep a written log of all clean-up activities and the dates when operations start and cease. This log shall be maintained on-site and be available for review by the Department upon request.
2. Stormwater outfalls that are outside of secondary and operational containment areas have no sampling requirements.
3. The department may require groundwater monitoring for ammonia or other chemicals if leakage from primary or secondary containment occurs or is suspected to occur.
4. The department may request additional sampling and reporting as a result of illegal discharges, compliance issues, complaint investigations, or other such evidence of off-site contamination due to the use of agricultural chemicals. If such an action is needed, the Department will specify in writing any additional sampling requirements, including such information as location, extent, and parameters.
5. In the event that off-site agrichemicals or other pollutants, not associated with this permitted facility, are believed to contaminate stormwater discharges from the permitted site, then the facility can sample on-coming stormwater to determine if off-site contamination is contributing to levels found at the point of discharge of the permitted facility. If the facility believes such to be the case, this data can be submitted to the Department to be reviewed when determining if an effluent violation has occurred.
6. If any of the sampling results from outfalls show any violation of the permit discharge limitations, written notification shall be made to the Department within five days of notification of sampling results. The letter shall indicate the date(s) sampled, actual sample results, permit number, and shall include a statement concerning the revisions or modifications in management practices that are being implemented to address the violation of the limitations that occurred. Repeat monitoring of the outfall(s) for which the violation occurred shall occur at the next discharge.

E. SCHEDULE OF COMPLIANCE

1. The permittee shall obtain compliance with secondary containment requirements in 10 CSR 20-8.500 by the expiration date of this permit. If an engineering solution cannot be reached, the facility shall reduce the volume of fertilizer stored in the largest tank to meet the 125% secondary containment requirement with the existing infrastructure.
2. The permittee shall submit a report every 12 months from the date of issuance of the permit. The report shall include an overview of progress made in obtaining compliance, actions taken in the previous 12 months to obtain compliance, and an estimated date the facility achieve compliance. Reports shall be submitted to the Missouri Department of Natural Resources, Kansas City Regional Office, Lee's Summit, Missouri, 64086-4710 and to Missouri Department of Natural Resources, Water Protection Program P.O. Box 176, Jefferson City, Missouri 65102.

NOTE 1 - EFFLUENT LIMITATIONS FOR BULK PESTICIDES

For individual pesticides listed in the water-quality standards (10 CSR 20-7.031), the concentration at the monitoring point shall not exceed the most stringent of the aquatic-life protection, human health-fish consumption, drinking water supply criteria, or health advisory levels. If the quantification limit is higher than this value for individual pesticides, the quantification limit shall not be exceeded.

Other potentially toxic substances for which sufficient toxicity data are not available may not be released to classified waters of the state until safe levels are demonstrated through adequate bioassay studies [10 CSR 20-7.031(4)]. Other bulk pesticides not listed below and other potentially toxic substances for which safe levels are demonstrated through adequate bioassay studies may be released to waters of the state, provided that the concentration at the monitoring point shall not exceed the demonstrated safe levels.

<u>PESTICIDE</u>	<u>LIMIT</u>	<u>SOURCE</u>
Demeton	3 ppb	QL*
Endosulfan	0.5	QL*
Guthion	5	QL*
Malathion	5	QL*
Parathion	1	QL*
2,4-D	70	DWSC
2,4,5-TP	50	DWSC
Chlorpyrifos	5**	QL*
Alachlor	10**	DWSC
Atrazine	15**	DWSC
Carbofuran	40	DWSC
Dalapon	200	DWSC
Dibromochloropropane	5**	QL*
Dinoseb	35**	DWSC
Diquat	20	DWSC
Endothall	100	DWSC
Ethylene dibromide	5**	QL*
Oxamyl (vydate)	200	DWSC
Picloram	500	DWSC
Simazine	20**	DWSC
Endrin	0.5	QL*
Aldrin	0.5	QL*
Dieldrin	0.5	QL*
Heptachlor	0.5	QL*
Heptachlor Epoxide	0.5	QL*
Methoxychlor	2	QL*
Mirex	2	QL*
Toxaphene	5	QL*
Lindane	0.5	QL*
A,B,G-BHC	0.5	QL*
Chlordane	1	QL*
Ametryn	60	DWSC
Baygon	3	DWSC
Bentazon	20	DWSC
Bis-2-chloroisopropyl ether	300	DWSC
Bromacil	90	DWSC
Bromochloromethane	90	DWSC
Bromomethane	10	DWSC
Butylate	350	DWSC
Carbaryl	700	DWSC
Carboxin	700	DWSC

NOTE 1 - EFFLUENT LIMITATIONS FOR BULK PESTICIDES (continued)

<u>PESTICIDE</u>	<u>LIMIT</u>	<u>SOURCE</u>
Chloramben	100	DWSC
o-chlorotoluene	100	DWSC
p-chlorotoluene	100	DWSC
DCPA (dacthal)	4000	DWSC
Diazinon	0.6	DWSC
Dicamba	200	DWSC
Diisopropyl methylphosphonate	600	DWSC
Dimethyl methylphosphonate	100	DWSC
1,3-dinitrobenzene	1	DWSC
Diphenamid	200	DWSC
Diphenylamine	200	DWSC
Disulfoton	0.3	DWSC
1,4-dithiane	80	DWSC
Diuron	10	DWSC
Fenamiphos	2	DWSC
Fluometron	90	DWSC
Fluorotrichloromethane	2000	DWSC
Fonofos	10	DWSC
Hexazinone	200	DWSC
Maleic hydrazide	4000	DWSC
MCPA	10	DWSC
Methyl parathion	2	DWSC
Metolachlor	70	DWSC
Metribuzin	100	DWSC
Naphthalene	20	DWSC
Nitroguanidine	700	DWSC
p-nitrophenol	60	DWSC
Paraquat	30	DWSC
Pronamide	50	DWSC
Propachlor	90	DWSC
Propazine	10	DWSC
Propham	100	DWSC
2,4,5-T	70	DWSC
Tebuthiuron	500	DWSC
Terbacil	90	DWSC
Terbufos	0.9	DWSC
1,1,1,2-Tetrachloroethane	70	DWSC
1,2,3-trichloropropane	40	DWSC
Trifluralin	5	DWSC
Trinitroglycerol	5	DWSC
Trinitrotoluene	2	DWSC

* Quantification limit.

** Allowance made for 5:1 dilution ratio.

QL = Quantification limit, as per the Department's Environmental Services Program, 1991.

DWSC = Water Quality Standard for drinking water supply criteria, protection of surface water supplies and ground water (these are taken from federal MCLs).

Missouri Department of Natural Resources
FACT SHEET
FOR THE PURPOSE OF RENEWAL
OF
MO-0121266
BARTLETT WAVERLY LARGE TANK CONTAINMENT

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

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

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

This Factsheet is for an Industrial Facility.

Part I – Facility Information

Facility Type: Industrial
Facility SIC Code(s): 5153, 5191

Facility Description:

Agrichemical facility. This permit covers the 70' diameter x 37' high tank used to store nitrous fertilizer. The tank was constructed in the mid 1960's with a storage capacity of 1,000,000 gallons. The facility installed a liner inside the original tank in 2004 with a storage capacity of approximately 900,000 gallons. The storage capacity of the secondary containment is approximately 525,000 gallons. Accumulated stormwater in the secondary containment is used in dilution or mixing of chemicals. The remainder of the facility is covered under MO-R240460 general permit.

Have any changes occurred at this facility or in the receiving water body that effects effluent limit derivation?

- No.

Application Date: 09/11/12
Expiration Date: 03/06/13
Last Inspection: 09/12/12 Non-Compliance

OUTFALL(S) TABLE:

OUTFALL	DESIGN FLOW (CFS)	TREATMENT LEVEL	EFFLUENT TYPE
#001	Varies	BMP	Stormwater

Facility Performance History & Comments:

This facility was last inspected on September 12, 2012 and was found to be in non-compliance for failure to keep a log of monthly stormwater inspections.

The tank was previously covered under the MO-R240460 general permit. The secondary containment for the tank does not meet the 125% minimum storage volume requirement in 10 CSR 20-8.500. Variances were granted in 1997 and 2004 for the secondary containment. The variances required the facility to apply for a site specific permit that included requirements for groundwater monitoring should a leak be suspected, the permittee have provisions for transferring liquids from the containment in the event of leak or failure, and required every other year integrity testing of the tank with the test results submitted with the discharge monitoring reports (DMR). Both times the variance was granted for a period not greater than a five years corresponding to the term of the site specific permit. The facility has complied with all the requirements of the previous variances.

Part II – Receiving Stream Information

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." Should this facility discharge, the receiving stream and/or 1st classified receiving stream's beneficial water uses to be maintained, are located in the Receiving Stream Table located below in accordance with [10 CSR 20-7.031(4)].

RECEIVING STREAM(S) TABLE: OUTFALL #001

WATERBODY NAME	CLASS	WBID	DESIGNATED USES*	DISTANCE TO CLASSIFIED SEGMENT	12-DIGIT HUC**
Missouri River	P	0356	AQL, DWS, IND, IRR, LW, SCR, WBC B	0.01	10300101-1104

* - 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), Groundwater (GRW). ** - Hydrologic Unit Code

Part III – Rationale and Derivation of Effluent Limitations & Permit Conditions

ALTERNATIVE EVALUATIONS FOR NEW FACILITIES:

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

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

ANTI-BACKSLIDING:

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

- All limits in this operating permit are at least as protective as those previously established; therefore, backsliding does not apply.

BIOSOLIDS & SEWAGE SLUDGE:

Biosolids are solid materials resulting from domestic wastewater treatment that meet federal and state criteria for beneficial uses (i.e. fertilizer). Sewage sludge is solids, semi-solids, or liquid residue generated during the treatment of domestic sewage in a treatment works; including but not limited to, domestic septage; scum or solids removed in primary, secondary, or advanced wastewater treatment process; and a material derived from sewage sludge. Sewage sludge does not include ash generated during the firing of sewage sludge in a sewage sludge incinerator or grit and screening generated during preliminary treatment of domestic sewage in a treatment works. Additional information regarding biosolids and sludge is located at the following web address: <http://extension.missouri.edu/main/DisplayCategory.aspx?C=74>, items WQ422 through WQ449.

Not applicable; This condition is not applicable for this facility.

COMPLIANCE AND ENFORCEMENT:

Enforcement is the action taken by the Water Protection Program (WPP) to bring an entity into compliance with the Missouri Clean Water Law, its implementing regulations, and/or any terms and conditions of an operating permit. The primary purpose of the enforcement activity in the WPP is to resolve violations and return the entity to compliance.

Not Applicable; The facility is not currently under Water Protection Program enforcement action.

REASONABLE POTENTIAL ANALYSIS (RPA):

Federal regulation [40 CFR Part 122.44(d)(1)(i)] requires effluent limitations for all pollutants that are or may be discharged at a level that will cause or have the reasonable potential to cause or contribute to an in-stream excursion above narrative or numeric water quality standard.

In accordance with [40 CFR Part 122.44(d)(iii)] if the permit writer determines that any give pollutant has the reasonable potential to cause, or contribute to an in-stream excursion above the WQS, the permit must contain effluent limits for that pollutant.

Not Applicable; A RPA was not conducted for this facility.

SCHEDULE OF COMPLIANCE (SOC):

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

Applicable; The time given for effluent limitations of this permit listed under Interim Effluent Limitation and Final Effluent Limitations were established in accordance with [10 CSR 20-7.031(10)]. The facility has been given a schedule of compliance to meet secondary containment requirements in 10 CSR 20-8.500. A variance has been granted through the expiration date of this permit. In addition to previous variance provisions, the facility is to attain compliance by the expiration date of this permit. The Department believes this timeframe provides adequate time to evaluate alternatives and modify the facility to comply with the secondary containment requirements. If an engineering solution cannot be reached, the facility shall reduce the volume of fertilizer stored in the largest tank to meet the 125% secondary containment requirement with the existing infrastructure.

STORMWATER POLLUTION PREVENTION PLAN (SWPPP):

In accordance with 40 CFR 122.44(k) *Best Management Practices (BMPs)* to control or abate the discharge of pollutants when: (1) Authorized under section 304(e) of the Clean Water Act (CWA) for the control of toxic pollutants and hazardous substances from ancillary industrial activities; (2) Authorized under section 402(p) of the CWA for the control of storm water discharges; (3) Numeric effluent limitations are infeasible; or (4) the practices are reasonably necessary to achieve effluent limitations and standards or to carry out the purposes and intent of the CWA.

In accordance with the EPA's *Developing Your Stormwater Pollution Prevention Plan, A Guide for Industrial Operators*, (Document number EPA 833-B-09-002) [published by the United States Environmental Protection Agency (USEPA) in February 2009], BMPs are measures or practices used to reduce the amount of pollution entering (regarding this operating permit) waters of the state. BMPs may take the form of a process, activity, or physical structure.

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

Not Applicable; At this time, the permittee is not required to develop and implement a SWPPP.

SPILL REPORTING:

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

VARIANCE:

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

Applicable; This permit contains a variance for the secondary containment for the storage tank as it does not meet the minimum 125% storage volume of the largest tank within the containment as required by 10 CSR 20-8.500. Variances were granted in 1997 and 2004 with provisions to be met by the permittee. The permittee has met all provisions of the previous variances. Another variance was granted by the Commission on January 7, 2015 for a period not to exceed the expiration date of this permit. In addition to previous variance provisions the permittee is to evaluate alternatives and modify the facility to comply with the secondary containment requirements by the expiration date of this permit.

WASTELOAD ALLOCATIONS (WLA) FOR LIMITS:

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

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

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

Where C = downstream concentration

Cs = upstream concentration

Qs = upstream flow

Ce = effluent concentration

Qe = 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.

Not Applicable; Wasteload allocations were not calculated.

WLA MODELING:

There are two general types of effluent limitations, technology-based effluent limits (TBELs) and water quality based effluent limits (WQBELs). If TBELs do not provide adequate protection for the receiving waters, then WQBEL must be used.

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.

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

Applicable; Missouri River is listed on the 2014 Missouri 303(d) List for E. coli.

– This facility is not considered to be a source of the above listed pollutant(s) or considered to contribute to the impairment of the Missouri River.

Part IV –2013 Water Quality Criteria for Ammonia

Upcoming changes to the Water Quality Standard for ammonia may require significant upgrades to wastewater treatment facilities.

On August 22, 2013, the U.S. Environmental Protection Agency (EPA) finalized new water quality criteria for ammonia, based on toxicity studies of mussels and gill breathing snails. Missouri's current ammonia criteria are based on toxicity testing of several species, but did not include data from mussels or gill breathing snails. Missouri is home to 69 of North America's mussel species, which are spread across the state. According to the Missouri Department of Conservation nearly two-thirds of the mussel species in Missouri are considered to be "of conservation concern". Nine species are listed as federally endangered, with an additional species currently proposed as endangered and another species proposed as threatened.

The adult forms of mussels that are seen in rivers, lakes, and streams are sensitive to pollutants because they are sedentary filter feeders. They vacuum up many pollutants with the food they bring in and cannot escape to new habitats, so they can accumulate toxins in their bodies and die. But very young mussels, called glochidia, are exceptionally sensitive to ammonia in water. As a result of a citizen suit, the EPA was compelled to conduct toxicity testing and develop ammonia water quality criteria that would be protective if young mussels may be present in a waterbody. These new criteria will apply to any discharge with ammonia levels that may pose a reasonable potential to violate the standards. Nearly all discharging domestic wastewater treatment facilities (cities, subdivisions, mobile home parks, etc.), as well as certain industrial and stormwater dischargers with ammonia in their effluent, will be affected by this change in the regulations.

When new water quality criteria are established by the EPA, states must adopt them into their regulations in order to keep their authorization to issue permits under the National Pollutant Discharge Elimination System (NPDES). States are required to review their water quality standards every three years, and if new criteria have been developed they must be adopted. States may be more protective than the Federal requirements, but not less protective. Missouri does not have the resources to conduct the studies necessary for developing new water quality standards, and therefore our standards mirror those developed by the EPA; however, we will utilize any available flexibility based on actual species of mussels that are native to Missouri and their sensitivity to ammonia.

Many treatment facilities in Missouri are currently scheduled to be upgraded to comply with the current water quality standards. But these new ammonia standards may require a different treatment technology than the one being considered by the permittee. It is important that permittees discuss any new and upcoming requirements with their consulting engineers to ensure that their treatment systems are capable of complying with the new requirements. The Department encourages permittees to construct treatment technologies that can attain effluent quality that supports the EPA ammonia criteria.

Ammonia toxicity varies by temperature and by pH of the water. Assuming a stable pH value, but taking into account winter and summer temperatures, Missouri includes two seasons of ammonia effluent limitations. Current effluent limitations in this permit are:

Summer – 3.6 mg/L daily maximum, 1.4 mg/L monthly average.

Winter – 7.5 mg/L daily maximum, 2.9 mg/L monthly average.

Under the new EPA criteria, where mussels of the family Unionidae are present or expected to be present, the estimated effluent limitations for a facility in a location such as this that discharges to a receiving stream with no mixing /the mixing consideration listed in Part IV of the Fact Sheet will be:

Summer – 1.7 mg/L daily maximum, 0.6 mg/L monthly average.

Winter – 5.6 mg/L daily maximum, 2.1 mg/L monthly average.

Actual effluent limits will depend in part on the actual performance of the facility.

Operating permits for facilities in Missouri must be written based on current statutes and regulations. Therefore permits will be written with the existing effluent limitations until the new standards are adopted. To aid permittees in decision making, an advisory will be added to permit Fact Sheets notifying permittees of the expected effluent limitations for ammonia. When setting schedules of compliance for ammonia effluent limitations, consideration will be given to facilities that have recently constructed upgraded facilities to meet the current ammonia limitations.

For more information on this topic feel free to contact the Missouri Department of Natural Resources, Water Protection Program, Water Pollution Control Branch, Operating Permits Section at (573) 751-1300.

Part V – Effluent Limits Determination

Outfall #001 – Main Facility Outfall

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

Effluent Limitations Table:

(The below table is an example table, please add and/or remove parameters as needed.)

PARAMETER	UNIT	BASIS FOR LIMITS	DAILY MAXIMUM	WEEKLY AVERAGE	MONTHLY AVERAGE	MODIFIED	PREVIOUS PERMIT LIMITATIONS
FLOW	gpd	1	*		*	No	
pH	SU	1	6.5-9.0		6.5-9.0	YES	6.0-9.0
SETTLABLE SOLIDS	ml/L/hr	9	1.5		1.0	No	
PESTICIDES	µg/L	1	*		*	No	
CONDUCTIVITY	umhos/Om at 25°C	9	*		*	No	
NITRATE PLUS NITRITE AS N	mg/L	1	10.0		10.0	No	
AMMONIA AS N	mg/L	1	1.5		1.0	No	
TOTAL PHOSPHORUS	mg/L	1	1.0		1.0	No	

* - Monitoring requirement only.

Basis for Limitations Codes:

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

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 not to be averaged. Effluent limitation range is 6.5 – 9.0 Standard pH Units (SU) per 10 CSR 20-7.031(4)(E) and is established to protect water quality standards in all receiving streams.

Settleable Solids. Effluent limits carried over from previous permit.

Pesticides. Monitoring for pesticides stored at the facility. Carried over from previous permit.

Conductivity. Monitoring required because elevated conductivity is an indicator of contaminants in water. Stormwater, before it contacts materials, has a very low conductivity.

Nitrate + Nitrite. Effluent limits are deemed protective of water quality standards and are carried over from previous permit.

Total Ammonia Nitrogen. Effluent limits are protective of water quality, and have been retained from previous permit. Calculating a wasteload allocation based on current policy would result in an increase in the limits. Federal Antidegradation Regulations [CWA §303(d)(4); CWA §402(c); 40 CFR Part 122.44(D)] prohibit renewal of a permit with less stringent limits than the previous permit. Review of records for the previous permit cycle indicates that the existing limits are achievable by the industry. Increasing ammonia limits would not provide any benefit to water quality or the industry. On August 22, 2013 EPA published revised aquatic life protection criteria for ammonia. Water quality standards will be revised to incorporate the new criteria in the future. This new criteria will be incorporated into this permit after adopted by the State.

Temperature. Monitoring requirement, no longer necessary to determine compliance.

Total Phosphorus. Effluent limits are deemed protective of water quality standards and are carried over from previous permit.

Part VI– Administrative Requirements

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

PERMIT SYNCHRONIZATION:

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

PUBLIC NOTICE:

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

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

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

- The Public Notice period for this operating permit was from March 13, 2015 to April 13, 2015. No responses were received.

DATE OF FACT SHEET: APRIL 16, 2015

COMPLETED BY:

**GREG CALDWELL, ENVIRONMENTAL SPECIALIST
MISSOURI DEPARTMENT OF NATURAL RESOURCES
WATER PROTECTION PROGRAM
OPERATING PERMITS SECTION - INDUSTRIAL UNIT
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STANDARD CONDITIONS FOR NPDES PERMITS
ISSUED BY
THE MISSOURI DEPARTMENT OF NATURAL RESOURCES
MISSOURI CLEAN WATER COMMISSION
REVISED
AUGUST 1, 2014

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

Part I – General Conditions

Section A – Sampling, Monitoring, and Recording

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

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

Section B – Reporting Requirements

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



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

Section C – Bypass/Upset Requirements

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

Section D – Administrative Requirements

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



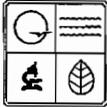
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- imposed in a pretreatment program approved under section 402(a)(3) or 402(b)(8) of the Act, is subject to criminal penalties of \$2,500 to \$25,000 per day of violation, or imprisonment of not more than one (1) year, or both. In the case of a second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



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

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



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

AP13240

FOR AGENCY USE ONLY	
CHECK NUMBER NO FEE required	
DATE RECEIVED 9/11/12	FEE SUBMITTED Ø

12

Note PLEASE READ THE ACCOMPANYING INSTRUCTIONS BEFORE COMPLETING THIS FORM.

1. This application is for:

- An operating permit and antidegradation review public notice
- A construction permit following an appropriate operating permit and antidegradation review public notice
- A construction permit and concurrent operating permit and antidegradation review public notice
- A construction permit (submitted before Aug. 30, 2008 or antidegradation review is not required)
- An operating permit for a new or unpermitted facility
- An operating permit renewal: permit # MO- 0121266 Construction Permit # _____
- An operating permit modification: permit # MO- _____ Expiration Date March 6, 2013

Reason: _____

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

2. FACILITY

NAME Bartlett Waverly Large Tank Containment		TELEPHONE WITH AREA CODE (660) 493-2294	
ADDRESS (PHYSICAL) East River Road		CITY Waverly	STATE MO
		ZIP CODE 64096	FAX (660) 493-2664

3. OWNER

NAME Bartlett Country Elevators, LLC		E-MAIL ADDRESS r.simmons@bartlett	TELEPHONE WITH AREA CODE (816) 714-3234
ADDRESS (MAILING) 4900 Main Street, Suite 1200		CITY Kansas City	STATE MO
		ZIP CODE 64112	FAX (815) 753-1775

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

4. CONTINUING AUTHORITY

NAME Same as above		TELEPHONE WITH AREA CODE	
ADDRESS (MAILING) Same as above		CITY	STATE
		ZIP CODE	FAX

5. OPERATOR

NAME Bartlett Country Elevators, LLC		CERTIFICATE NUMBER MO-0121266	TELEPHONE WITH AREA CODE (816) 714-3234
ADDRESS (MAILING) 4900 Main Street, Suite 1200		CITY Kansas City	STATE MO
		ZIP CODE 64112	FAX (816) 753-1775

6. FACILITY CONTACT

NAME Randall Miller		TITLE Operations Manager	TELEPHONE WITH AREA CODE (660) 493-2294
			FAX (660) 493-2664

7. ADDITIONAL FACILITY INFORMATION

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

001 SW 1/4 NE 1/4 Sec 14 T 51N R 24W LF County

UTM Coordinates Easting (X): +391250 Northing (Y): -09330305

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

002 1/4 1/4 Sec _____ T _____ R _____ County

UTM Coordinates Easting (X): _____ Northing (Y): _____

003 1/4 1/4 Sec _____ T _____ R _____ County

UTM Coordinates Easting (X): _____ Northing (Y): _____

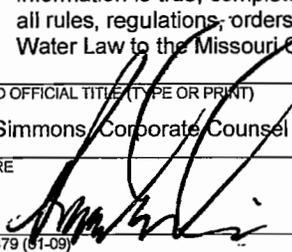
004 1/4 1/4 Sec _____ T _____ R _____ County

UTM Coordinates Easting (X): _____ Northing (Y): _____

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

001 – SIC 5153 and NAICS 424510 002 – SIC _____ and NAICS _____

003 – SIC _____ and NAICS _____ 004 – SIC _____ and NAICS _____

8. ADDITIONAL FORMS AND MAPS NECESSARY TO COMPLETE THIS APPLICATION (Complete all forms that are applicable.)			
A.	Is your facility a manufacturing, commercial, mining or silviculture waste treatment facility? If yes, complete Form C (unless storm water only, then complete U.S. Environmental Protection Agency Form 2F per Item C below).	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
B.	Is your facility considered a "Primary Industry" under EPA guidelines: If yes, complete Forms C and D.	YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>
C.	Is application for storm water discharges only? If yes, complete EPA Form 2F.	YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>
D.	Attach a map showing all outfalls and the receiving stream at 1" = 2,000' scale.		
E.	Is wastewater land applied? If yes, complete Form I.	YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>
F.	Is sludge, biosolids, ash or residuals generated, treated, stored or land applied? If yes, complete Form R.	YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>
9. DOWNSTREAM LANDOWNER(S) Attach additional sheets as necessary. See Instructions. (PLEASE SHOW LOCATION ON MAP. SEE 8.D ABOVE).			
NAME Bartlett Country Elevators, LLC			
ADDRESS 503 E. Thomas		CITY Waverly	STATE ZIP CODE MO 64096
10. I certify that I am familiar with the information contained in the application, that to the best of my knowledge and belief such information is true, complete and accurate, and if granted this permit, I agree to abide by the Missouri Clean Water Law and all rules, regulations, orders and decisions, subject to any legitimate appeal available to applicant under the Missouri Clean Water Law to the Missouri Clean Water Commission.			
NAME AND OFFICIAL TITLE (TYPE OR PRINT) Randy Simmons, Corporate Counsel		TELEPHONE WITH AREA CODE (816) 714-3234	
SIGNATURE 		DATE SIGNED 8/31/2012	

MO 780-1479 (8-1-09)

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

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

HAVE YOU INCLUDED:

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





MISSOURI DEPARTMENT OF NATURAL RESOURCES
 WATER PROTECTION PROGRAM, WATER POLLUTION BRANCH
FORM C – APPLICATION FOR DISCHARGE PERMIT –
MANUFACTURING, COMMERCIAL, MINING,
SILVICULTURE OPERATIONS, PROCESS & STORM WATER

FOR AGENCY USE ONLY	
CHECK NO.	
DATE RECEIVED	FEE SUBMITTED

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

1.00 NAME OF FACILITY
 Bartlett Waverly Large Tank Containment

1.10 THIS FACILITY IS NOW IN OPERATION UNDER MISSOURI OPERATING PERMIT NUMBER
 MO-021266

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

2.00 LIST THE STANDARD INDUSTRIAL CLASSIFICATION (SIC) CODES APPLICABLE TO YOUR FACILITY (FOUR DIGIT CODE)

A. FIRST 5153 B. SECOND 5191
 C. THIRD _____ D. FOURTH _____

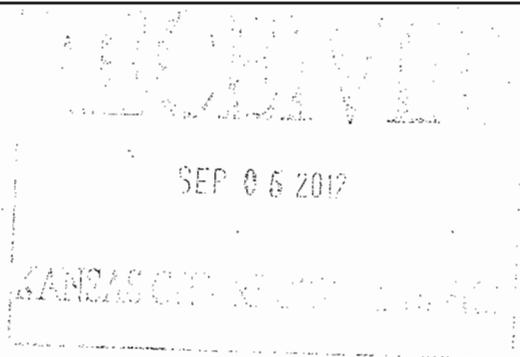
2.10 FOR EACH OUTFALL GIVE THE LEGAL DESCRIPTION.

OUTFALL NUMBER (LIST) SW 1/4 NE 1/4 SEC 14 T 51N R 24W Lafayette COUNTY

2.20 FOR EACH OUTFALL LIST THE NAME OF THE RECEIVING WATER

OUTFALL NUMBER (LIST)	RECEIVING WATER
001	Unnamed Tributary to the Missouri River

2.30 BRIEFLY DESCRIBE THE NATURE OF YOUR BUSINESS
 Agri-Chemical Business - Blending bulk pesticides & bulk fertilizers



2.40 CONTINUED

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

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

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

2.50 MAXIMUM PRODUCTION

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

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

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

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

C. IF YOU ANSWERED "YES" TO B. LIST THE QUANTITY THAT REPRESENTS AN ACTUAL MEASUREMENT OF YOUR MAXIMUM LEVEL OF PRODUCTION, EXPRESSED IN THE TERMS AND UNITS USED IN THE APPLICABLE EFFLUENT GUIDELINE AND INDICATE THE AFFECTED OUTFALLS.

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

2.60 IMPROVEMENTS

A. ARE YOU NOW REQUIRED BY ANY FEDERAL, STATE OR LOCAL AUTHORITY TO MEET, ANY IMPLEMENTATION SCHEDULE FOR THE CONSTRUCTION, UPGRADING OR OPERATION OF WASTEWATER TREATMENT EQUIPMENT OR PRACTICES OR ANY OTHER ENVIRONMENTAL PROGRAMS THAT MAY AFFECT THE DISCHARGES DESCRIBED IN THIS APPLICATION? THIS INCLUDES, BUT IS NOT LIMITED TO, PERMIT CONDITIONS, ADMINISTRATIVE OR ENFORCEMENT ORDERS, ENFORCEMENT COMPLIANCE SCHEDULE LETTERS, STIPULATIONS, COURT ORDERS AND GRANT OR LOAN CONDITIONS.

YES (COMPLETE THE FOLLOWING TABLE) NO (GO TO 3.00)

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

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

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

3.10 BIOLOGICAL TOXICITY TESTING DATA

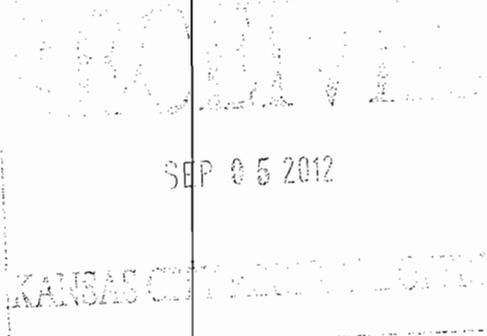
DO YOU HAVE ANY KNOWLEDGE OR REASON TO BELIEVE THAT ANY BIOLOGICAL TEST FOR ACUTE OR CHRONIC TOXICITY HAS BEEN MADE ON ANY OF YOUR DISCHARGES OR ON RECEIVING WATER IN RELATION TO YOUR DISCHARGE WITHIN THE LAST THREE YEARS?

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

3.20 CONTRACT ANALYSIS INFORMATION

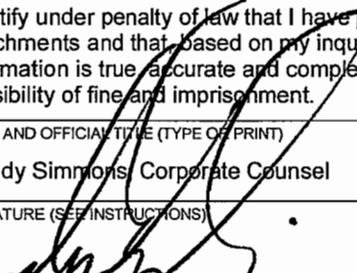
WERE ANY OF THE ANALYSES REPORTED PERFORMED BY A CONTRACT LABORATORY OR CONSULTING FIRM?

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

A. NAME	B. ADDRESS	C. TELEPHONE (area code and number)	D. POLLUTANTS ANALYZED (list)
			

3.30 CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe the information is true, accurate and complete. I am aware there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

NAME AND OFFICIAL TITLE (TYPE OF PRINT) Randy Simmons, Corporate Counsel	TELEPHONE NUMBER WITH AREA CODE (816) 714-3234
SIGNATURE (SEE INSTRUCTIONS) 	DATE SIGNED 08/31/2012

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

FORM C
 TABLE 1 FOR 3.00 ITEM A AND B

INTAKE AND EFFLUENT CHARACTERISTICS

OUTFALL NO.
 001

1. POLLUTANT	2. EFFLUENT				D. NO. OF ANALYSES	3. UNITS (specify if blank)		4. INTAKE (optional)		B. NO. OF ANALYSES
	A. MAXIMUM DAILY VALUE		B. MAXIMUM 30 DAY VALUE (if available)			A. CONCENTRATION	B. MASS	A. LONG TERM AVRG. VALUE		
	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS				(1) CONCENTRATION	(2) MASS	
A. Biochemical Oxygen Demand (BOD)	NA									
B. Chemical Oxygen Demand (COD)	NA									
C. Total organic Carbon (TOC)	NA									
D. Total Suspended Solids (TSS)	NA									
E. Ammonia (as N)	NA									
F. Flow	VALUE NA		VALUE				VALUE			
G. Temperature (winter)	VALUE 75		VALUE				VALUE	°C		
H. Temperature (summer)	VALUE 103		VALUE				VALUE	°C		
I. pH	MINIMUM 7	MAXIMUM 7.5	MINIMUM	MAXIMUM				STANDARD UNITS		

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

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

WATER QUALITY CONTROL DISTRICT

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

MO 780-1514 (06-12)

SEP 05 2012

MO 780-1514 (06-12)

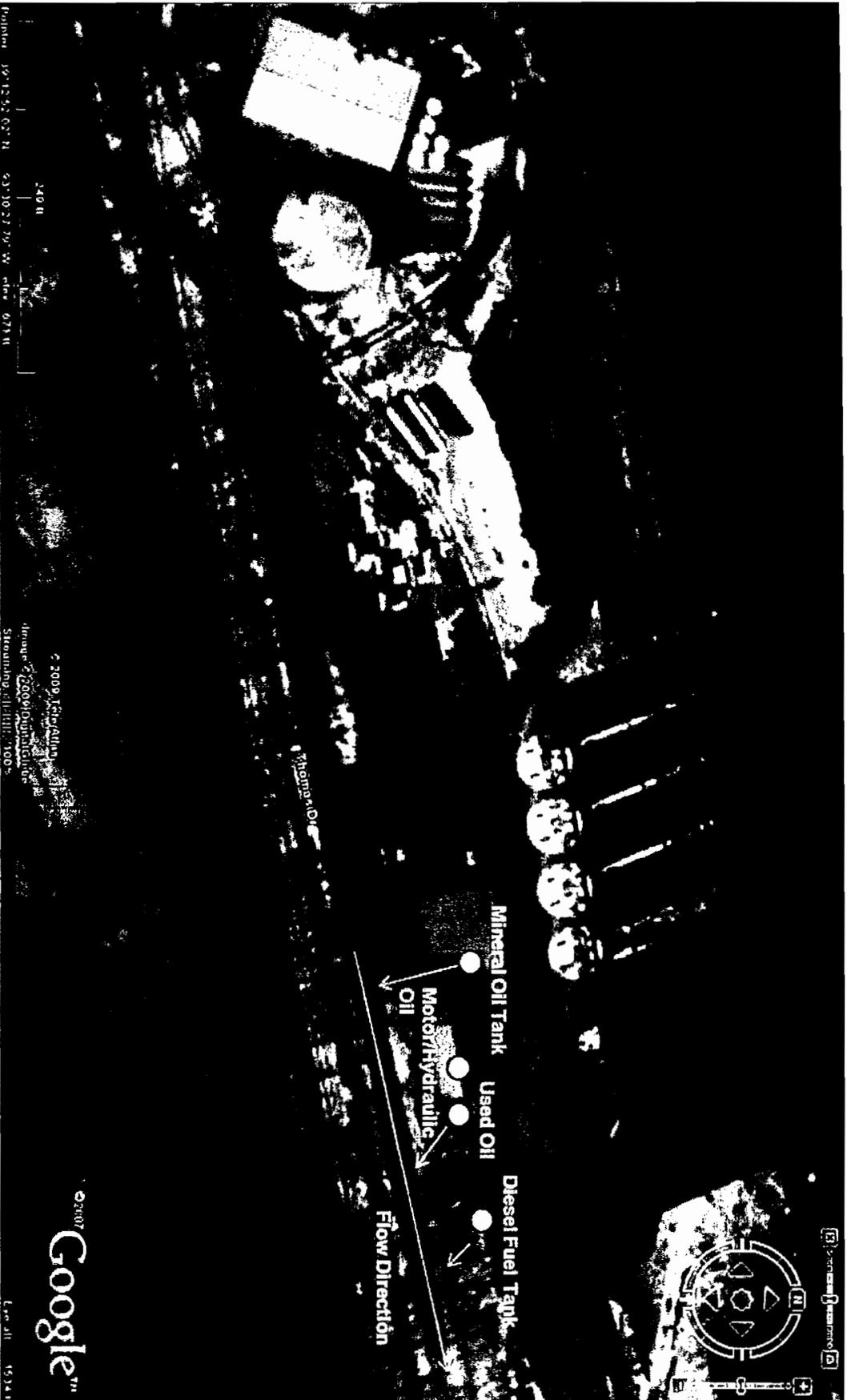
1. POLLUTANT AND CAS NUMBER (if available)	2. MARK "X"		3. EFFLUENT				4. UNITS		5. INTAKE (optional)			
	A. BELIEVED PRESENT	B. BELIEVED ABSENT	A. MAXIMUM DAILY VALUE		B. MAXIMUM 30 DAY VALUE		D. NO. OF ANALYSES	A. CONCENTRATION	B. MASS	A. LONG TERM AVRG. VALUE		B. NO. OF ANALYSES
			(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS				(1) CONCENTRATION	(2) MASS	
METALS, AND TOTAL PHENOLS												
1M. Antimony, Total (7440-36-9)		X										
2M. Beryllium, Total (7440-41-7)		X										
3M. Magnesium, Total (7439-95-4)		X										
4M. Molybdenum, Total (7439-98-7)		X										
5M. Tin, Total (7440-31-5)		X										
6M. Titanium, Total (7440-32-6)		X										
7M. Mercury, Total (7439-97-6)		X										
8M. Selenium, Total (7782-49-2)		X										
9M. Thallium, Total (7440-28-0)		X										
10M. Phenols, Total		X										
RADIOACTIVITY												
(1) Alpha Total		X										
(2) Beta Total		X										
(3) Radium Total		X										
(4) Radium 226 Total		X										

MOBILE ENVIRONMENTAL SERVICES, INC.

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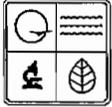
MOBILE ENVIRONMENTAL SERVICES, INC.

Figure 1 – Site Map



SEP 05 2012

KANSAS CITY WATER TREATMENT CENTER



MISSOURI DEPARTMENT OF NATURAL RESOURCES
 WATER PROTECTION PROGRAM, WATER POLLUTION BRANCH
FORM – APPLICATION FOR DISCHARGE PERMIT
PRIMARY INDUSTRIES

FOR AGENCY USE ONLY	
CHECK NO.	
DATE RECEIVED	FEE SUBMITTED

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

1.00 NAME OF FACILITY

Bartlett -Waverly Large Tank Containment

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

MO - 0121266

This form is to be filled out in addition to forms A and C "Application for Discharge Permit" for the Industries listed below.

INDUSTRY CATEGORY

- | | |
|-----------------------------------|---|
| Adhesives and sealants | Ore mining |
| Aluminum forming | Organic chemicals manufacturing |
| Auto and other laundries | Paint and ink formulation |
| Battery manufacturing | Pesticides |
| Coal mining | Petroleum refining |
| Coil coating | Pharmaceutical preparations |
| Copper forming | Photographic equipment and supplies |
| Electric and electronic compounds | Plastic and synthetic materials manufacturing |
| Electroplating | Plastic processing |
| Explosives manufacturing | Porcelain enameling |
| Foundries | Printing and publishing |
| Gum and wood chemicals | Pulp and paperboard mills |
| Inorganic chemicals manufacturing | Rubber processing |
| Iron and steel manufacturing | Soap and detergent manufacturing |
| Leather tanning and finishing | Steam electric power plants |
| Landfill | Textile mills |
| Mechanical products manufacturing | Timber products processing |
| Nonferrous metals manufacturing | |

SEP 05 2012

MISSOURI DEPARTMENT OF NATURAL RESOURCES

**APPLICATION FOR DISCHARGE PERMIT
FORM D – PRIMARY INDUSTRIES**

TABLE II	
NPDES # (IF ASSIGNED) MO-0121266	OUTFALL NUMBER 001

1.30 If you are a primary industry and this outfall contains process wastewater, refer to Table A in the instructions to determine which of the GC/MS fractions you must test for. Mark "X" in column 2-A for all such GC/MS fractions that apply to your industry and for ALL toxic metals, cyanides, and total phenols. Mark "X" in column 2-B for each pollutant you know or have reason to believe is present. Mark "X" in column 2-C for each pollutant you believe to be absent. If you mark either columns 2-A or 2-B for any pollutant, you must provide the results of at least one analysis for that pollutant. Note that there are seven pages to this part, please review each carefully. Complete one table (all seven pages) for each outfall. See instructions for additional details and requirements.

1. POLLUTANT AND CAS NUMBER (if available)	2. MARK "X"			3. EFFLUENT				4. UNITS		5. INTAKE (optional)			
	A. TEST-ING REQUIRED	B. BELIEVED PRESENT	C. BELIEVED ABSENT	A. MAXIMUM DAILY VALUE		B. MAXIMUM 30 DAY VALUE (if available)		C. LONG TERM AVRG. VALUE (if available)		D. NO. OF ANALYSES	A. LONG TERM AVRG. VALUE	B. NO OF ANALYSES	
				(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS			(1) CONCENTRATION	(2) MASS
METALS, AND TOTAL PHENOLS													
1M. Antimony, Total (7440-36-9)			<input checked="" type="checkbox"/>										
2M. Beryllium, Total (7440-41-7)		—	<input checked="" type="checkbox"/>										
3M. Magnesium Total (7439-95-4)		—	<input checked="" type="checkbox"/>										
4M. Molybdenum Total (7439-98-7)		—	<input checked="" type="checkbox"/>										
5M. Tin Total (7440-31-6)			<input checked="" type="checkbox"/>										
6M. Titanium Total (7440-32-6)			<input checked="" type="checkbox"/>										
7M. Mercury, Total (7439-97-6)			<input checked="" type="checkbox"/>										
8M. Selenium, Total (7782-49-2)			<input checked="" type="checkbox"/>										
9M. Thallium, Total (7440-28-0)		—	<input checked="" type="checkbox"/>										
10M. Phenols, Total		—	<input checked="" type="checkbox"/>										
DIOXIN													
2,3,7,8 – Tetra – chlorodibenzo-P-dioxin (1764-01-6)		—	<input checked="" type="checkbox"/>										

DESCRIBE RESULTS

MOBILE ENVIRONMENTAL SERVICES

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MOBILE ENVIRONMENTAL SERVICES

CONTINUED FROM PAGE 3

1. POLLUTANT AND CAS NUMBER (if available)	2. MARK "X"			3. EFFLUENT						4. UNITS			5. INTAKE (optional)		
	A. TESTING REQUIRED	B. BELIEVED PRESENT	C. BELIEVED ABSENT	A. MAXIMUM DAILY VALUE		B. MAXIMUM 30 DAY VALUE (if available)		C. LONG TERM AVRG. VALUE (if available)		D. NO. OF ANALYSES	A. CONCENTRATION	B. MASS	A. LONG TERM AVRG. VALUE		B. NO OF ANALYSES
				(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS				(1) CONCENTRATION	(2) MASS	
GC/MS FRACTION - VOLATILE COMPOUNDS															
1V. Acrolein (107-02-8)	-	I	L												
2V. Acrylonitrile (107-13-1)	-	I	✓												
3V. Benzene (71-43-2)	-	II	✓												
4V. Bis (Chloromethyl) Ether (542-88-1)	-	□	✓												
5V. Bromoform (75-25-2)	-	□	✓												
6V. Carbon Tetrachloride (56-23-5)	-	II	✓												
7V. Chlorobenzene (108-90-7)	-	L	✓												
8V. Chlorodibromomethane (124-48-1)	-	□	✓												
9V. Chloroethane (75-00-3)	-	□	✓												
10V. 2-Chloroethylvinyl Ether (110-75-8)	-	II	✓												
11V. Chloroform (67-66-3)	-	II	✓												
12V. Dichlorobromomethane (75-27-4)	-	□	✓												
13V. Dichlorodifluoromethane (75-71-8)	-	□	✓												
14V. 1,1 - Dichloroethane (75-34-3)	-	I	✓												
15V. 1,2 - Dichloroethane (107-06-2)	-	□	✓												
16V. 1,1 - Dichloroethylene (75-35-4)	-	II	✓												
17V. 1,2 - Dichloropropane (78-87-5)	-	□	✓												
18V. 1,2 - Dichloropropylene (542-75-6)	-	□	✓												
19V. Ethylbenzene (100-41-4)	-	□	✓												
20V. Methyl Bromide (74-83-9)	-	II	✓												
21V. Methyl Chloride (74-87-3)	-	□	✓												

ANALYSIS RECEIVED 09/07/02

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NPDES # (IF ASSIGNED) OUTFALL NUMBER

CONTINUED FROM THE FRONT 2. MARK "X"

1. POLLUTANT AND CAS NUMBER (if available)	A. TESTING REQUIRED	B. BELIEVED PRESENT	C. BELIEVED ABSENT	3. EFFLUENT			4. UNITS		5. INTAKE (optional)				
				A. MAXIMUM DAILY VALUE		B. MAXIMUM 30 DAY VALUE (if available)		D. NO. OF ANALYSES	A. CONCEN- TRATION	B. MASS	A. LONG TERM AVRG. VALUE		B. NO OF ANALYSES
				(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS				(1) CONCENTRATION	(2) MASS	
GC/MS FRACTION – VOLATILE COMPOUNDS (continued)													
22V. Methylene Chloride (75-09-2)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>										
23V. 1,1,2,2 – Tetra- chloroethane (79-34-5)	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>										
24V. Tetrachloroethylene (127-18-4)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>										
25V. Toluene (108-88-3)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>										
26V. 1,2 – Trans Dichloroethylene (156-60-5)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>										
27V. 1,1,1 – Tri – chloroethane (71-55-6)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>										
28V. 1,1,2 – Tri- chloroethane (79-00-5)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>										
29V. Trichloro – ethylene (79-01-6)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>										
30V. Trichloro – fluoromethane (75-69-4)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>										
31V. Vinyl Chloride (75-01-4)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>										
GC/MS FRACTION – ACID COMPOUNDS													
1A. 2 – Chlorophenol (95-57-8)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>										
2A. 2,4 – Dichloro – phenol (120-83-2)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>										
3A. 2,4 – Dimethyl – phenol (105-67-9)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>										
4A. 4,6 – Dinitro - O- Cresol (534-52-1)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>										
5A. 2,4 – Dinitro – phenol (51-28-5)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>										
6A. 2-Nitrophenol (88-75-5)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>										
7A. 4-Nitrophenol (100-02-7)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>										
8A. P – Chloro – M Cresol (59-50-7)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>										
9A. Pentachloro – phenol (87-86-5)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>										
10A. Phenol (108-952)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>										
11A. 2,4,6 – Trichloro- phenol (88-06-2)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>										

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CONTINUED FROM THE FRONT

1. POLLUTANT AND CAS NUMBER (if available)	2. MARK "X"			3. EFFLUENT				4. UNITS			5. INTAKE (optional)				
	A. TESTING REQUIRED	B. BELIEVED PRESENT	C. BELIEVED ABSENT	A. MAXIMUM DAILY VALUE		B. MAXIMUM 30 DAY VALUE (if available)		C. LONG TERM AVRG. VALUE (if available)		D. NO. OF ANALYSES	A. CONCEN- TRATION	B. MASS	A. LONG TERM AVRG. VALUE		B. NO OF ANALYSES
				(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS				(1) CONCENTRATION	(2) MASS	
GC/MS FRACTION - BASE/NEUTRAL COMPOUNDS															
1B. Acenaphthene (83-32-9)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>												
2B. Acenaphthylene (208-96-8)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>												
3B. Anthracene (120-12-7)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>												
4B. Benzidine (92-87-5)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>												
5B. Benzo (a) Anthracene (56-55-3)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>												
6B. Benzo (a) Pyrene (50-32-8)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>												
7B. 3,4 - Benzofluoranthene (205-99-2)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>												
8B. Benzo (ghi) Perylene (191-24-2)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>												
9B. Benzo (k) Fluoranthene (207-08-9)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>												
10B. Bis (2-Chloroethoxy) Methane (111-91-1)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>												
11B. Bis (2-Chloroethyl) Ether (111-44-4)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>												
12B. Bis (2-Chloroisopropyl) Ether (38638-32-9)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>												
13B. Bis (2-Ethylhexyl) Phthalate (117-81-7)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>												
14B. 4-Bromophenyl Phenyl Ether (101-55-3)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>												
15B. Butyl Benzyl Phthalate (85-68-7)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>												
16B. 2-Chloronaphthalene (91-58-7)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>												
17B. 4-Chlorophenyl Phenyl Ether (7005-72-3)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>												
18B. Chrysene (218-01-8)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>												
19B. Dibenzo (a,h) Anthracene (53-70-3)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>												
20B. 1,2-Dichlorobenzene (95-50-1)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>												
21B. 1,3-Dichlorobenzene (541-73-1)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>												

ANALYSIS REPORT

CONTINUED FROM THE PAGE 5

NPDES # (IF ASSIGNED)

OUTFALL NUMBER

1. POLLUTANT AND CAS NUMBER (if available)	2. MARK "X"			3. EFFLUENT				4. UNITS		5. INTAKE (optional)	
	A. TESTING REQUIRED	B. BELIEVED PRESENT	C. BELIEVED ABSENT	A. MAXIMUM DAILY VALUE		B. MAXIMUM 30 DAY VALUE (if available)		C. LONG TERM AVRG. VALUE (if available)		A. LONG TERM VALUE CONCENTRATION	B. NO OF ANALYSES
				(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS		
GC/MS FRACTION - BASE/NEUTRAL COMPOUNDS (continued)											
22B. 1, 4-Dichlorobenzene (106-46-7)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>								
23B. 3, 3'-Dichlorobenzidine (91-94-1)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>								
24B. Diethyl Phthalate (84-66-2)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>								
25B. Dimethyl Phthalate (131-11-3)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>								
26B. Di-N-butyl Phthalate (84-74-2)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>								
27B. 2,4-Dinitrotoluene (121-14-2)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>								
28B. 2,6-Dinitrotoluene (606-20-2)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>								
29B. Di-N-Octyl Phthalate (117-84-0)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>								
30B. 1,2-Diphenylhydrazine (as Azobenzene) (122-66-7)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>								
31B. Fluoranthene (206-44-0)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>								
32B. Fluorene (86-73-7)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>								
33B. Hexachlorobenzene (87-68-3)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>								
34B. Hexachlorobutadiene (87-68-3)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>								
35B. Hexachlorocyclopentadiene (77-47-4)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>								
36B. Hexachloroethane (67-72-1)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>								
37B. Indeno (1,2,3-c-d) Pyrene (193-39-5)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>								
38B. Isophorone (78-59-1)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>								
39B. Naphthalene (91-20-3)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>								
40B. Nitrobenzene (98-95-3)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>								
41B. N-Nitrosodimethylamine (62-75-9)	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>								

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CONTINUED FROM THE FRONT

1. POLLUTANT AND GAS NUMBER (if available)	2. MARK "X"			3. EFFLUENT						4. UNITS		5. INTAKE (optional)		
	A. TESTING REQUIRED	B. BELIEVED PRESENT	C. BELIEVED ABSENT	A. MAXIMUM DAILY VALUE		B. MAXIMUM 30 DAY VALUE (if available)		C. LONG TERM AVRG. VALUE (if available)		D. NO. OF ANALYSES	A. CONCEN- TRATION	B. MASS	A. LONG TERM AVRG. VALUE	B. NO. OF ANALYSES
				(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS					
GC/MS FRACTION - BASE/NEUTRAL COMPOUNDS (continued)														
42B. N-Nitroso N-Propylamine (621-64-7)		<input type="checkbox"/>	<input checked="" type="checkbox"/>											
43B. N-Nitrosodiphenylamine (86-30-6)		<input type="checkbox"/>	<input checked="" type="checkbox"/>											
44B. Phenanthrene (85-01-8)		<input type="checkbox"/>	<input checked="" type="checkbox"/>											
45B. Pyrene (129-00-0)		<input type="checkbox"/>	<input checked="" type="checkbox"/>											
46B. 1,2,4-Trichlorobenzene (120-82-1)		<input type="checkbox"/>	<input checked="" type="checkbox"/>											
GC/MS FRACTION - PESTICIDES														
1P. Aldrin (309-00-2)		<input type="checkbox"/>	<input checked="" type="checkbox"/>											
2P. α-BHC (319-84-6)		<input type="checkbox"/>	<input checked="" type="checkbox"/>											
3P. β-BHC (319-84-6)		<input type="checkbox"/>	<input checked="" type="checkbox"/>											
4P. γ-BHC (68-89-9)		<input type="checkbox"/>	<input checked="" type="checkbox"/>											
5P. δ-BHC (319-86-8)		<input type="checkbox"/>	<input checked="" type="checkbox"/>											
6P. Chlordane (57-74-9)		<input type="checkbox"/>	<input checked="" type="checkbox"/>											
7P. 4,4'-DDT (50-29-3)		<input type="checkbox"/>	<input checked="" type="checkbox"/>											
8P. 4,4'-DDE (72-55-9)		<input type="checkbox"/>	<input checked="" type="checkbox"/>											
9P. 4,4'-DDD (72-54-8)		<input type="checkbox"/>	<input checked="" type="checkbox"/>											
10P. Dieldrin (60-57-1)		<input type="checkbox"/>	<input checked="" type="checkbox"/>											
11P. α-Endosulfan (115-29-7)		<input type="checkbox"/>	<input checked="" type="checkbox"/>											
12P. β-Endosulfan (115-29-7)		<input type="checkbox"/>	<input checked="" type="checkbox"/>											
13P. Endosulfan Sulfate (1031-07-8)		<input type="checkbox"/>	<input checked="" type="checkbox"/>											
14P. Endrin (72-20-8)		<input type="checkbox"/>	<input checked="" type="checkbox"/>											
15P. Endrin Aldehyde (7421-93-4)		<input type="checkbox"/>	<input checked="" type="checkbox"/>											
16P. Heptachlor (76-44-8)		<input type="checkbox"/>	<input checked="" type="checkbox"/>											

SEP 05 2017

LABORATORY REPORT

2.00 POTENTIAL DISCHARGES NOT COVERED BY ANALYSIS

A. IS ANY POLLUTANT LISTED IN ITEM 1.30 A SUBSTANCE OR A COMPONENT OF A SUBSTANCE WHICH YOU DO OR EXPECT THAT YOU WILL OVER THE NEXT FIVE YEARS USE OR MANUFACTURE AS AN INTERMEDIATE OR FINAL PRODUCT OR BYPRODUCT?

YES (LIST ALL SUCH POLLUTANTS BELOW) NO (GO TO B)

B. ARE YOUR OPERATIONS SUCH THAT YOUR RAW MATERIALS, PROCESSES OR PRODUCTS CAN REASONABLE BE EXPECTED TO VARY SO THAT YOUR DISCHARGES OF POLLUTANTS MAY DURING THE NEXT FIVE YEARS EXCEED TWO TIMES THE MAXIMUM VALUES REPORTED IN ITEM 1.30?

YES (COMPLETE C BELOW) NO (GO TO SECTION 3.00)

C. IF YOU ANSWERED "YES" TO ITEM B, EXPLAIN BELOW AND DESCRIBE IN DETAIL THE SOURCES AND EXPECTED LEVELS OF SUCH POLLUTANTS THAT YOU ANTICIPATE WILL BE DISCHARGED FROM EACH OUTFALL OVER THE NEXT FIVE YEARS, TO THE BEST OF YOUR ABILITY AT THIS TIME. CONTINUE ON ADDITIONAL SHEETS IF YOU NEED MORE SPACE.

3.00 CONTRACT ANALYSIS INFORMATION

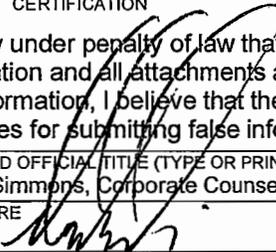
WERE ANY OF THE ANALYSES REPORTED IN 1.30 PERFORMED BY A CONTRACT LABORATORY OR CONSULTING FIRM?

YES (LIST THE NAME, ADDRESS, AND TELEPHONE NUMBER OF, AND ANALYZED BY, EACH SUCH LABORATORY OR FIRM BELOW)
 NO (GO TO SECTION 4.00)

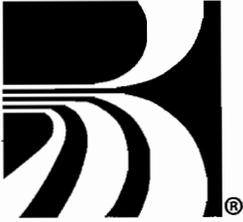
A. NAME	B. ADDRESS	C. TELEPHONE NUMBER WITH AREA CODE	D. POLLUTANTS ANALYZED (list)
			SEP 05 2012

4.00 CERTIFICATION

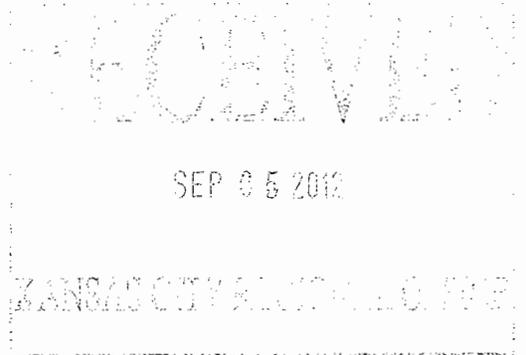
I certify under penalty of law that I have personally examined and am familiar with the information submitted in this application and all attachments and that, based on my inquiry of those individuals immediately responsible for obtaining the information, I believe that the information is true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

NAME AND OFFICIAL TITLE (TYPE OR PRINT) Randy Simmons, Corporate Counsel	TELEPHONE NUMBER WITH AREA CODE (816) 714-3234
SIGNATURE 	DATE SIGNED 08/31/2012

BARTLETT AND COMPANY



4900 Main Street, Suite 1200
Kansas City, Missouri 64112-2807
816-753-6300



August 31, 2012

Missouri Department of Natural Resources
Water Protection Program
P.O. Box 176
Jefferson City, MO 65102

RE: MO-0121266 Renewal

Dear Sir or Madam:

Enclosed please find forms A, C & D to renew permit MO-121266. If you require any additional information, please contact me directly. You can reach at (816) 714-3234 or by email at: r.simmons@bartlett-grain.com.

Very truly yours,

A handwritten signature in black ink, appearing to read 'Randy Simmons'. Below the signature, the name 'Randy Simmons' is printed in a standard font.

Randy Simmons

Enclosure

