

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-0137375
Owner: M W Recycling, LLC
Address: P.O. Box 6548, Cleveland OH 44101
Continuing Authority: Same as above
Address: Same as above
Facility Name: Shapiro Brothers, A division of M W Recycling, LLC
Facility Address: Ninth and Delmar Festus MO 63028
Legal Description: NE¼, NE¼, Sec. 6, T40N, R6E, Jefferson County
UTM Coordinates: X=728451, Y= 4234516
Receiving Stream: Tributary to Plattin Creek (U)
First Classified Stream and ID: Plattin Creek (P) (1728)
USGS Basin & Sub-watershed No.: 07140101-0806

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 - SIC # 5093

Scrap Metal Recycling including the purchase and selling of aluminum cans, aluminum, wheels, copper, brass, stainless steel, breakage, coated wire, batteries, lead (clean), tin appliances, long iron, short iron, rail cars stored and scrapped and vehicles.

Storm water discharge only.
Actual flow is dependent upon rainfall.

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.

April 1, 2014
Effective Date

Sara Parker Pauley, Director, Department of Natural Resources

September 30, 2016
Expiration Date

John Madras, Director, Water Protection Program

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

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PERMIT NUMBER MO0137375

The permittee is authorized to discharge from outfall(s) with serial number(s) as specified in the application for this permit. The interim effluent limitations shall become effective upon issuance and remain in effect until **September 30, 2014**, from the day of issuance. Such discharges shall be controlled, limited and monitored by the permittee as specified below:

OUTFALL NUMBER AND EFFLUENT PARAMETER(S)	UNITS	INTERIM EFFLUENT LIMITATIONS			MONITORING REQUIREMENTS	
		DAILY MAXIMUM	WEEKLY AVERAGE	MONTHLY AVERAGE	MEASUREMENT FREQUENCY	SAMPLE TYPE
<u>Outfall 001</u>						
Flow	MGD	*			once/month	24 hr. estimate
Chemical Oxygen Demand	mg/L	*			once/month	grab
Total Suspended Solids	mg/L	*			once/month	grab
pH - Units	SU	***			once/month	grab
Oil & Grease	mg/L	*		*	once/month	grab
Arsenic, Total Recoverable	µg/L	*			once/month	grab
Aluminum, Total Recoverable	µg/L	*			once/month	grab
Cadmium, Total Recoverable	µg/L	*			once/month	grab
Chromium VI, Total Recoverable	µg/L	*			once/month	grab
Copper, Total Recoverable	µg/L	*			once/month	grab
Iron, Total Recoverable	µg/L	*			once/month	grab
Lead, Total Recoverable	µg/L	*			once/month	grab
Zinc, Total Recoverable	µg/L	*			once/month	grab
Precipitation	inches	*			once/day	record

MONITORING REPORTS SHALL BE SUBMITTED QUARTERLY; THE FIRST REPORT IS DUE JULY 28, 2014. THERE SHALL BE NO DISCHARGE OF FLOATING SOLIDS OR VISIBLE FOAM IN OTHER THAN TRACE AMOUNTS.

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

PAGE NUMBER 3 of 6

PERMIT NUMBER MO0137375

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 **October 1, 2014**, from the day of issuance and remain in effect until expiration of the permit. Such discharges shall be controlled, limited and monitored by the permittee as specified below:

OUTFALL NUMBER AND EFFLUENT PARAMETER(S)	UNITS	FINAL EFFLUENT LIMITATIONS			MONITORING REQUIREMENTS	
		DAILY MAXIMUM	WEEKLY AVERAGE	MONTHLY AVERAGE	MEASUREMENT FREQUENCY	SAMPLE TYPE
<u>Outfall 001</u>						
Flow	MGD	*			once/quarter**	24 hr. estimate
Chemical Oxygen Demand ₅	mg/L	120			once/quarter**	grab
Total Suspended Solids	mg/L	100			once/quarter**	grab
pH - Units	SU	***			once/quarter**	grab
Oil & Grease	mg/L	15		10	once/quarter**	grab
Arsenic, Total Recoverable	µg/L	20			once/quarter**	grab
Aluminum, Total Recoverable	µg/L	750			once/quarter**	grab
Cadmium, Total Recoverable	µg/L	7.4			once/quarter**	grab
Chromium VI, Total Recoverable	µg/L	15.2			once/quarter**	grab
Copper, Total Recoverable	µg/L	22.1			once/quarter**	grab
Iron, Total Recoverable	µg/L	1000			once/quarter**	grab
Lead, Total Recoverable	µg/L	151			once/quarter**	grab
Zinc, Total Recoverable	µg/L	181			once/quarter**	grab
Precipitation	inches	*			once/day	record

MONITORING REPORTS SHALL BE SUBMITTED QUARTERLY; THE FIRST REPORT IS DUE JANUARY 28, 2015. THERE SHALL BE NO DISCHARGE OF FLOATING SOLIDS OR VISIBLE FOAM IN OTHER THAN TRACE AMOUNTS.

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS (continued)

* Monitoring requirement only.

** All samples shall be collected from a discharge resulting from a precipitation event greater than 0.1 inches in magnitude and that occurs at least 72 hours from the previously measurable precipitation event. See table below for quarterly sampling:

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

*** 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 November 1, 2013, and hereby incorporated as though fully set forth herein.

C. SPECIAL CONDITIONS

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

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

2. All outfalls must be clearly marked in the field.
3. Changes in Discharges of Toxic Substances

The permittee shall notify the Director as soon as it knows or has reason to believe:

- (a) That any activity has occurred or will occur which would result in the discharge of any toxic pollutant which is not limited in the permit, if that discharge will exceed the highest of the following "notification levels:"
 - (1) One hundred micrograms per liter (100 µg/L);
 - (2) Two hundred micrograms per liter (200 µg/L) for acrolein and acrylonitrile; five hundred micrograms per liter (500 µg/L) for 2,5-dinitrophenol and for 2-methyl-4,6-dinitrophenol; and one milligram per liter (1 mg/L) for antimony;
 - (3) Five (5) times the maximum concentration value reported for the pollutant in the permit application;
 - (4) The level established in Part A of the permit by the Director.
 - (b) That they have begun or expect to begin to use or manufacture as an intermediate or final product or byproduct any toxic pollutant, which was not reported in the permit application.
4. Report as no-discharge when a discharge does not occur during the report period.
 5. 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;
 - (1) Waters shall be free from substances in sufficient amounts to cause unsightly color or turbidity, offensive odor or prevent full maintenance of beneficial uses;
 - (2) 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.

C. SPECIAL CONDITIONS (continued)

6. The permittee shall implement a Storm Water Pollution Prevention Plan (SWPPP). The SWPPP must be prepared and implemented upon permit issuance. The SWPPP must be kept on-site and should not be sent to DNR unless specifically requested. The SWPPP must be reviewed and updated, if needed, every five (5) years or as site conditions change. The permittee shall select, install, use, operate, and maintain the Best Management Practices prescribed in the SWPPP in accordance with the concepts and methods described in the following document:

Developing Your Stormwater Pollution Prevention Plan, A Guide for Industrial Operators, (Document number EPA 833-B-09-002) published by the United States Environmental Protection Agency (USEPA) in February 2009.

The SWPPP must include the following:

- (a) A listing of specific Best Management Practices (BMPs) and a narrative explaining how BMPs will be implemented to control and minimize the amount of potential contaminants that may enter storm water. Minimum BMPs are listed in SPECIAL CONDITIONS #7 below.
 - (b) The SWPPP must include a schedule for twice per month site inspections and brief written reports. The inspections must include observation and evaluation of BMP effectiveness. Deficiencies must be corrected within seven (7) days and the actions taken to correct the deficiencies shall be included with the written report, including photographs. Any corrective measure that necessitates major construction may also need a construction permit. Inspection reports must be kept on site with the SWPPP and maintained for a period of five (5) years. These must be made available to DNR personnel upon request.
 - (c) A provision for designating an individual to be responsible for environmental matters.
 - (d) A provision for providing training to all personnel involved in material handling and storage, and housekeeping of maintenance and cleaning areas. Proof of training shall be submitted on request of DNR.
7. Permittee shall adhere to the following minimum Best Management Practices:
- (a) Prevent the spillage or loss of fluids, oil, grease, fuel, etc. from vehicle maintenance, equipment cleaning, or warehouse activities and thereby prevent the contamination of storm water from these substances.
 - (b) Provide collection facilities and arrange for proper disposal of waste products including but not limited to petroleum waste products, and solvents.
 - (c) Store all paint, solvents, petroleum products and petroleum waste products (except fuels), and storage containers (such as drums, cans, or cartons) so that these materials are not exposed to storm water or provide other prescribed BMP's such as plastic lids and/or portable spill pans to prevent the commingling of storm water with container contents. Commingled water may not be discharged under this permit. Provide spill prevention control, and/or management sufficient to prevent any spills of these pollutants from entering waters of the state. Any containment system used to implement this requirement shall be constructed of materials compatible with the substances contained and shall also prevent the contamination of groundwater.
 - (d) Provide good housekeeping practices on the site to keep trash from entry into waters of the state.
 - (e) Provide sediment and erosion control sufficient to prevent or control sediment loss off of the property. This could include the use of straw bales, silt fences, or sediment basins, if needed, to comply with effluent limits.
8. The purpose of the SWPPP and the BMPs listed herein is the prevention of pollution of waters of the state. A deficiency of a BMP means it was not effective in preventing pollution [10 CSR 20-2.010(56)] of waters of the state, and corrective actions means the facility took steps to eliminate the deficiency.
9. Release of a hazardous substance must be reported to the Department in accordance with 10 CSR 24-3.010. A record of each reportable spill shall be retained with the SWPPP and made available to the Department upon request.

E. SCHEDULE OF COMPLIANCE

The facility shall attain compliance with final effluent limitations for all parameter(s) as soon as reasonably achievable or no later than **180 days** of the effective date of this permit.

1. Within 90 days of the effective date of this permit, the permittee shall report progress made in attaining compliance with the final effluent limits.
2. Within 180 days of the effective date of this permit, the permittee shall attain compliance with the final effluent limits, for all parameters.

Please submit progress reports to the Missouri Department of Natural Resources, St. Louis Regional Office, located at 7545 S. Lindbergh Blvd., Ste. 210 St. Louis MO 63125.

Missouri Department of Natural Resources
FACT SHEET
FOR THE PURPOSE OF NEW ISSUANCE
OF
SHAPIRO BROTHERS, INC., A DIVISION OF M W RECYCLING, LLC
MO-0137375

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: IND
Facility SIC Code(s): 5093

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

- NA, new facility.

OUTFALL(S) TABLE:

OUTFALL	DESIGN FLOW (CFS)	TREATMENT LEVEL	EFFLUENT TYPE	DISTANCE TO CLASSIFIED SEGMENT (MI)
001	dependent on rainfall	BMPs	Stormwater	2.1

Comments:

This facility was operating under general permit #MOR60A146, and had previous water pollution violations. It was referred to the Water Protection Program's Compliance and Enforcement Section on December 7, 2011 by the St. Louis Regional Office. On December 3, 2012, the Department received an application to renew MOR60A146, but due to violations of the Missouri Clean Water Law and its implementing regulations documented by Department staff, the Department returned the general permit renewal application, on January 25, 2013, and required the facility to apply for a site specific operating permit that would be better protective of the quality of waters of the state.

Part II – Receiving Stream Information

APPLICABLE DESIGNATIONS OF WATERS OF THE STATE:

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

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

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

MIXING CONSIDERATIONS

Mixing Zones and Zones of Initial Dilution are not allowed. All effluent from this facility is stormwater runoff. Permit limits and water quality standards must be met at the end of the pipe.

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

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 ;
New 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.

- New facility, backsliding does not apply.

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.

Applicable ;

The permittee/facility is currently under Water Protection Program enforcement action. The facility entered into Abatement Order on Consent number 2013-WPCB-1190 November 19, 2013 to resolve violations of the Missouri Clean Water Laws and Regulations.

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; Due to a compliance agreement requiring the permittee to quickly implement the SWPPP and come into compliance with water quality standards, a brief 180 day schedule of compliance is allowed for this facility. Due to ongoing enforcement actions, the facility has already been working to improve the discharge and does not need an extended schedule of compliance.

STORM WATER POLLUTION PREVENTION PLAN (SWPPP):

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

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

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

Applicable ;

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

VARIANCE:

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

Not Applicable ;

This operating permit is not drafted under premises of a petition for variance.

WASTELOAD ALLOCATIONS (WLA) FOR LIMITS:

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

Not Applicable ;

Wasteload allocations were not calculated.

WLA MODELING:

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.

Not Applicable ;

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

Part IV – Effluent Limits Determination

Outfall #001

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.

FINAL EFFLUENT LIMITATIONS TABLE:

PARAMETER	UNIT	DAILY MAXIMUM	WEEKLY AVERAGE	MONTHLY AVERAGE
Flow	MGD	*		
Chemical Oxygen Demand ₅	mg/L	120		
Total Suspended Solids	mg/L	100		
pH - Units	SU	6.5-9.0		
Oil & Grease	mg/L	15		10
Arsenic, Total Recoverable	µg/L	20		
Aluminum, Total Recoverable	µg/L	750		
Cadmium, Total Recoverable	µg/L	7.4		
Chromium VI, Total Recoverable	µg/L	15.2		
Copper, Total Recoverable	µg/L	22.1		
Iron, Total Recoverable	µg/L	1000		
Lead, Total Recoverable	µg/L	151		
Zinc, Total Recoverable	µg/L	181		
Precipitation	inches	*		

* - Monitoring requirement only

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.
- **Chemical Oxygen Demand, Total Suspended Solids.** Stormwater limits from the EPA MSGP, Subsector N1.
- **Total Suspended Solids** Stormwater limits from the EPA MSGP, Subsector N1.
- **pH.** 10 CSR 20-7.031 (4) (E).
- **Oil & Grease.** Conventional pollutant, effluent limitation for protection of aquatic life; 10 mg/L monthly average, 15 mg/L daily maximum.

- **Metals**

Effluent limitations for total recoverable metals were developed using methods and procedures outlined in the “Technical Support Document For Water Quality-based Toxic Controls” (EPA/505/2-90-001) and “The Metals Translator: Guidance for Calculating a Total Recoverable Permit Limit from a Dissolved Criterion” (EPA 823-B-96-007). General warm-water fishery criteria apply and a water hardness of 162 mg/L is used in the conversion below.

Due to the absence of contemporaneous effluent and in-stream data for total recoverable metals, dissolved metals, hardness, and total suspended solids with which to calculate metals translators, partitioning between the dissolved and absorbed phases was assumed to be minimal (Section 5.7.3, EPA/505/2-90-001). Freshwater criteria conversion factors for dissolved metals were used as the metals translator as recommended in guidance (Section 1.3, 1.5.3, and Table 1, EPA 823-B-96-007). If concurrent site-specific data for total recoverable metals, dissolved metals, hardness, and total suspended solids are provided to the Department, partitioning evaluations may be considered and site-specific translators developed.

METAL	CONVERSION FACTORS	
	ACUTE	CHRONIC
Arsenic	1.000	1.000
Aluminum	1.000	1.000
Cadmium	0.944	0.909
Chromium VI	0.982	0.962
Copper	0.960	0.960
Iron	1.000	1.000
Lead	0.721	0.721
Zinc	0.980	0.980

Conversion factors for Cd and Pb are hardness dependent. Values calculated using equation found in Section 1.3 of EPA 823-B-96-007 and hardness = 162 mg/L.

Metals criteria were taken from the EPA Multi-Sector General Permit for Subsector N1 – Scrap Recycling and Waste Recycling facilities (SIC) 5093:

- **Arsenic, Total Recoverable** Protection of Aquatic Life Acute Criteria=20 µg/L. Although the facility had run one test on its stormwater, Arsenic was detected with a concentration of 8.65 µg/L.

$$\text{Acute} = 20 / 1.0 = 20 \text{ } \mu\text{g/L}$$

- **Aluminum, Total Recoverable**. Protection of Aquatic Life Acute Criteria = 750 µg/L.

- **Cadmium, Total Recoverable** Protection of Acute Aquatic Life Acute Criteria=7.02 µg/L. Although the facility had run one test on its stormwater, Cadmium was detected with a concentration of 30.9 µg/L.

$$\text{Acute} = 7.02 / .944 = 7.4 \text{ } \mu\text{g/L}$$

- **Chromium VI, Total Recoverable** Protection of Acute Aquatic Life Acute Criteria=15 µg/L. Although the facility had run one test on its stormwater, Chromium was detected with a concentration of 22.2 µg/L. The test did not specify which Chromium it was. The Department will have the facility to monitor for Chromium VI.

$$\text{Acute} = 15 / 0.982 = 15.2 \text{ } \mu\text{g/L}$$

- **Copper, Total Recoverable**. Protection of Aquatic Life Acute Criteria = 21.2 µg/L.

$$\text{Acute} = 21.2 / 0.960 = 22.1 \text{ } \mu\text{g/L}$$

- **Iron, Total Recoverable.** Protection of Aquatic Life Chronic Criteria = 1000 µg/L.
Chronic = 1000/1.000 = 1000 µg/L
- **Lead, Total Recoverable.** Protection of Aquatic Life Acute Criteria = 109 µg/L.
Acute = 109/0.721 = 151 µg/L
- **Zinc, Total Recoverable.** Protection of Aquatic Life Acute Criteria = 177 µg/L.
Acute = 177/0.980 = 181 µg/L
- **Precipitation.** The facility only discharges during precipitation events, therefore, the amount of daily rainfall is needed to determine how often the facility discharges.

Part V – Administrative Requirements

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

PERMIT SYNCHRONIZATION:

The Department of Natural Resources is currently undergoing a synchronization process for operating permits. Permits are normally issued on a five-year term, but to achieve synchronization many permits will need to be issued for less than the full five years allowed by regulation. The intent is that all permits within a watershed will move through the Watershed Based Management (WBM) cycle together will all expiring 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. **Permit synchronization date is September 30, 2016.**

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 December 20, 2013 to January 20, 2014. No responses were received.

DATE OF FACT SHEET: AUGUST 30, 2013

COMPLETED BY:

Thabit. H. Hamoud, P.E, EE III
Missouri Department of Natural Resources
Water Protection Section
7545 S. Lindbergh, Suite 210, St. Louis, Missouri 63125
(314) 416-2453
thabit.hamoud@dnr.mo.gov



STANDARD CONDITIONS FOR NPDES PERMITS
ISSUED BY
THE MISSOURI DEPARTMENT OF NATURAL RESOURCES
MISSOURI CLEAN WATER COMMISSION
REVISED
NOVEMBER 1, 2013

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. **Twenty-Four Hour 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. **Sanitary Sewer Overflow Reporting.** The following requirements solely reflect reporting obligations, and reporting does not necessarily reflect noncompliance, which may depend on the circumstances of the incident reported.
- a. **Twenty-Four Hour (24-Hour) Reporting.** The permittee or owner shall report any incident in which wastewater escapes the collection system such that it reaches waters of the state or it may pose an imminent or substantial endangerment to the health or welfare of persons. 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 incident. A written submission shall also be provided within five (5) business days of the time the permittee or owner becomes aware of the incident. The Department may waive the written report on a case-by-case basis if the oral report has been received within 24 hours. The five (5) day reports may be provided via the current electronic method approved by the Department.
 - b. **Incidents Reported via Discharge Monitoring Reports (DMRs).** The permittee or owner shall report any event in which wastewater escapes the collection system, which does not enter waters of the state and is not expected to pose an imminent or substantial endangerment to the health or welfare of persons, which occur typically during wet weather events. Relevant information shall be provided with the permittee's or owner's DMRs.
4. **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.
5. **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.
6. **Other Noncompliance.** The permittee shall report all instances of noncompliance not reported under paragraphs 2, 3, 4, and 7 of this section, at the time monitoring reports are submitted. The reports shall contain the information listed in paragraph 2. a. of this section.
7. **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.
8. **Discharge Monitoring Reports.**
- a. Monitoring results shall be reported at the intervals specified in the permit.
 - b. Monitoring results must be reported to the Department via the current method approved by the Department, unless the permittee has been granted a waiver from using the method. If the permittee has been granted a waiver, the permittee must use forms provided by the Department.
 - c. Monitoring results shall be reported to the Department no later than the 28th day of the month following the end of the reporting period.

Section C – Bypass/Upset Requirements

1. **Definitions.**
 - a. *Bypass*: the intentional diversion of waste streams from any portion of a treatment facility.
 - b. *Severe Property Damage*: substantial physical damage to property, damage to the treatment facilities which causes them to become inoperable, or substantial and permanent loss of natural resources which can reasonably be expected to occur in the absence of a bypass. Severe property damage does not mean economic loss caused by delays in production.
 - c. *Upset*: an exceptional incident in which there is unintentional and temporary noncompliance with technology based permit effluent limitations because of factors beyond the reasonable control of the permittee. An upset does not include noncompliance to the extent caused by operational error, improperly designed treatment facilities, inadequate treatment facilities, lack of preventive maintenance, or careless or improper operation.
2. **Bypass Requirements.**
 - a. Bypass not exceeding limitations. The permittee may allow any bypass to occur which does not cause effluent limitations to be exceeded, but only if it also is for essential maintenance to assure efficient operation. These bypasses are not subject to the provisions of paragraphs 2. b. and 2. c. of this section.
 - b. Notice.
 - i. Anticipated bypass. If the permittee knows in advance of the need for a bypass, it shall submit prior notice, if possible at least 10 days before the date of the bypass.
 - ii. Unanticipated bypass. The permittee shall submit notice of an unanticipated bypass as required in Section B – Reporting Requirements, paragraph 5 (24-hour notice).
 - c. Prohibition of bypass.
 - i. Bypass is prohibited, and the Department may take enforcement action against a permittee for bypass, unless:
 1. Bypass was unavoidable to prevent loss of life, personal injury, or severe property damage;
 2. There were no feasible alternatives to the bypass, such as the use of auxiliary treatment facilities, retention of untreated wastes, or maintenance during normal periods of equipment downtime. This condition is not satisfied if adequate back-up equipment should have been installed in the exercise of reasonable engineering judgment to prevent a bypass which occurred during normal periods of equipment downtime or preventive maintenance; and
 3. The permittee submitted notices as required under paragraph 2. b. of this section.
 - ii. The Department may approve an anticipated bypass, after considering its adverse effects, if the Department determines that it will meet the three (3) conditions listed above in paragraph 2. c. i. of this section.
3. **Upset Requirements.**
 - a. Effect of an upset. An upset constitutes an affirmative defense to an action brought for noncompliance with such technology based permit effluent limitations if the requirements of paragraph 3. b. of this section are met. No determination made during administrative review of claims that noncompliance was caused by upset, and before an action for noncompliance, is final administrative action subject to judicial review.
 - b. Conditions necessary for a demonstration of upset. A permittee who wishes to establish the affirmative defense of upset shall demonstrate, through properly signed, contemporaneous operating logs, or other relevant evidence that:
 - i. An upset occurred and that the permittee can identify the cause(s) of the upset;
 - ii. The permitted facility was at the time being properly operated; and
 - iii. The permittee submitted notice of the upset as required in Section B – Reporting Requirements, paragraph 2. b. ii. (24-hour notice).
 - iv. The permittee complied with any remedial measures required under Section D – Administrative Requirements, paragraph 4.
 - c. Burden of proof. In any enforcement proceeding, the permittee seeking to establish the occurrence of an upset has the burden of proof.



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Section D – Administrative Requirements

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



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7. **Permit Transfer.**
 - a. Subject to 10 CSR 20-6.010, an operating permit may be transferred upon submission to the Department of an application to transfer signed by the existing owner and the new owner, unless prohibited by the terms of the permit. Until such time the permit is officially transferred, the original permittee remains responsible for complying with the terms and conditions of the existing permit.
 - b. The Department may require modification or revocation and reissuance of the permit to change the name of the permittee and incorporate such other requirements as may be necessary under the Missouri Clean Water Law or the Federal Clean Water Act.
 - c. The Department, within 30 days of receipt of the application, shall notify the new permittee of its intent to revoke or reissue or transfer the permit.
8. **Toxic Pollutants.** The permittee shall comply with effluent standards or prohibitions established under section 307(a) of the Federal Clean Water Act for toxic pollutants and with standards for sewage sludge use or disposal established under section 405(d) of the Federal Clean Water Act within the time provided in the regulations that establish these standards or prohibitions or standards for sewage sludge use or disposal, even if the permit has not yet been modified to incorporate the requirement.
9. **Property Rights.** This permit does not convey any property rights of any sort, or any exclusive privilege.
10. **Duty to Provide Information.** The permittee shall furnish to the Department, within a reasonable time, any information which the Department may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit or to determine compliance with this permit. The permittee shall also furnish to the Department upon request, copies of records required to be kept by this permit.
11. **Inspection and Entry.** The permittee shall allow the Department, or an authorized representative (including an authorized contractor acting as a representative of the Department), upon presentation of credentials and other documents as may be required by law, to:
 - a. Enter upon the permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of the permit;
 - b. Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - c. Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and
 - d. Sample or monitor at reasonable times, for the purposes of assuring permit compliance or as otherwise authorized by the Federal Clean Water Act or Missouri Clean Water Law, any substances or parameters at any location.
12. **Closure of Treatment Facilities.**
 - a. Persons who cease operation or plan to cease operation of waste, wastewater, and sludge handling and treatment facilities shall close the facilities in accordance with a closure plan approved by the Department.
 - b. Operating Permits under 10 CSR 20-6.010 or under 10 CSR 20-6.015 are required until all waste, wastewater, and sludges have been disposed of in accordance with the closure plan approved by the Department and any disturbed areas have been properly stabilized. Disturbed areas will be considered stabilized when perennial vegetation, pavement, or structures using permanent materials cover all areas that have been disturbed. Vegetative cover, if used, shall be at least 70% plant density over 100% of the disturbed area.
13. **Signatory Requirement.**
 - a. All permit applications, reports required by the permit, or information requested by the Department shall be signed and certified. (See 40 CFR 122.22 and 10 CSR 20-6.010)
 - b. The Federal Clean Water Act provides that any person who knowingly makes any false statement, representation, or certification in any record or other document submitted or required to be maintained under this permit, including monitoring reports or reports of compliance or non-compliance shall, upon conviction, be punished by a fine of not more than \$10,000 per violation, or by imprisonment for not more than six (6) months per violation, or by both.
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.

MO DEPT NATURAL RESOURCES
 St. Louis Regional Office
 Fee Received 3-4-13

AP 14843



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

FOR AGENCY USE ONLY	
CHECK NUMBER	
DATE RECEIVED	FEE SUBMITTED

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 Construction Permit # _____

An operating permit renewal: permit # MO- R60A146 Expiration Date May 29, 2013

An operating permit modification: permit # MO- Reason: _____

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

2. FACILITY

NAME Shapiro Brothers, a Division of M W Recycling, LLC		TELEPHONE WITH AREA CODE (636) 937-9185	
		FAX (636) 937-1939	
ADDRESS (PHYSICAL) Ninth and Delmar	CITY Festus	STATE MO	ZIP CODE 63028

3. OWNER

NAME M W Recycling, LLC		E-MAIL ADDRESS jking@pscmetals.co	TELEPHONE WITH AREA CODE (440) 753-5390	
			FAX (440) 753-5430	
ADDRESS (MAILING) P. O. Box 6548	CITY Cleveland	STATE OH	ZIP CODE 44101	

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

4. CONTINUING AUTHORITY RECEIVED

NAME Same As Owner		TELEPHONE WITH AREA CODE	
		FAX	
ADDRESS (MAILING)	CITY	STATE	ZIP CODE

5. OPERATOR

NAME Same As owner		CERTIFICATE NUMBER	TELEPHONE WITH AREA CODE	
			FAX	
ADDRESS (MAILING)	CITY	STATE	ZIP CODE	

6. FACILITY CONTACT

NAME Todd Katz		TITLE Yard Manager	TELEPHONE WITH AREA CODE (636) 937-9185	
			FAX (636) 937-1939	

7. ADDITIONAL FACILITY INFORMATION

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

001 1 1/4 NE 1/4 Sec 6 T 40N R 6E Jeffer County
 UTM Coordinates Easting (X): _____ Northing (Y): _____
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 5093 and NAICS _____ 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? YES NO
 If yes, complete Form C (unless storm water only, then complete U.S. Environmental Protection Agency Form 2F per Item C below).
- B. Is your facility considered a "Primary Industry" under EPA guidelines: YES NO
 If yes, complete Forms C and D.
- C. Is application for storm water discharges only? YES NO
 If yes, complete EPA Form 2F.
- 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 NO
- F. Is sludge, biosolids, ash or residuals generated, treated, stored or land applied? YES NO
 If yes, complete Form R.

9. DOWNSIDE/LANDOWNERS) Attach additional sheets as necessary. See instructions.
 (PLEASE SHOW LOCATION ON MAP. SEE 8.D ABOVE)

NAME Jefferson County Assessor			
ADDRESS 729 Maple Street	CITY Hillsboro	STATE MO	ZIP CODE 63050

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) Joseph D. King, Vice president, General Counsel	TELEPHONE WITH AREA CODE (440) 753-5390
SIGNATURE 	DATE SIGNED February 21, 2013

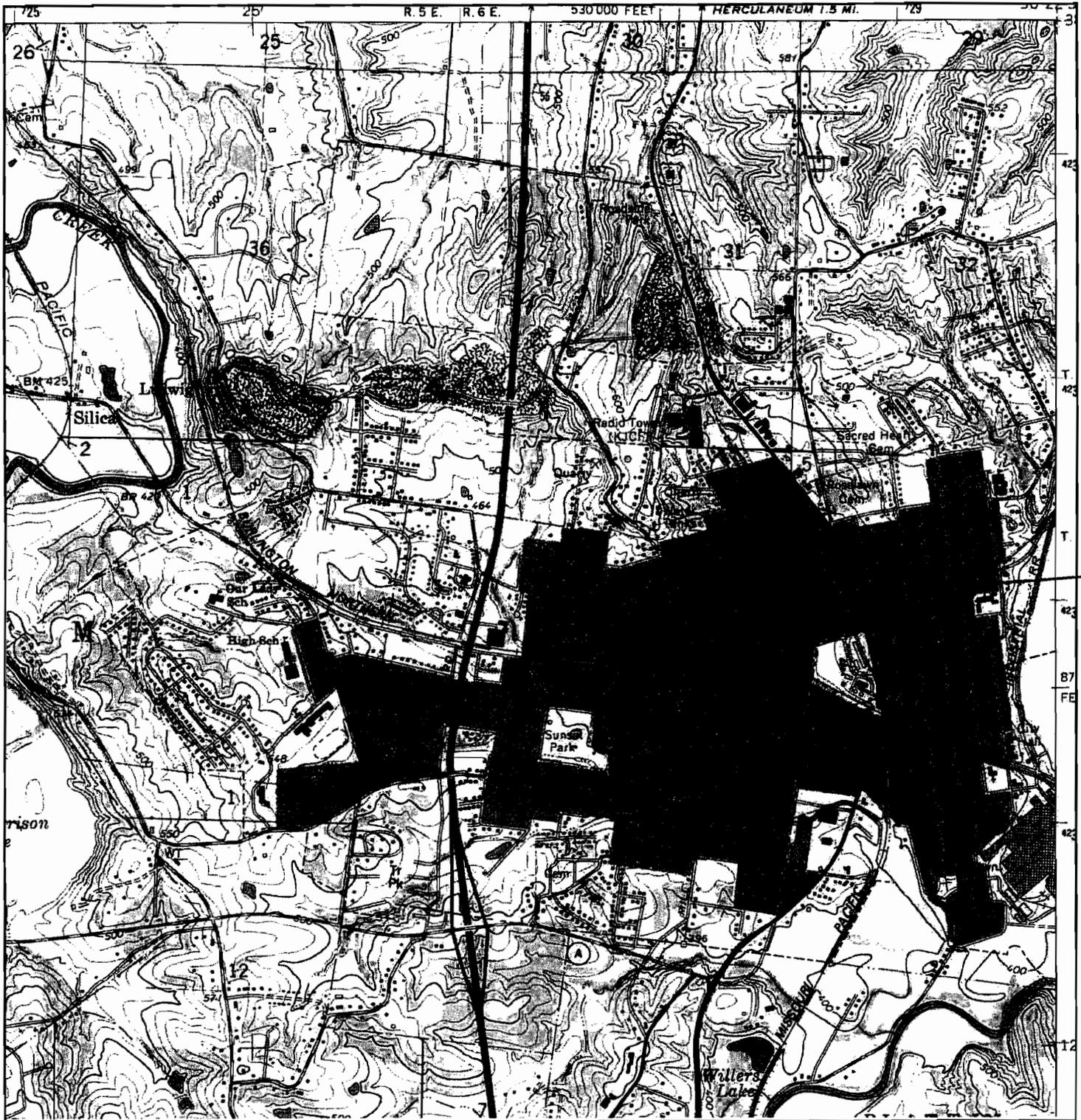
MO 780-1479 (01-09)

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

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

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

MAR - 4 2013



NO. 1
OUT. 11

<p>N ↑</p>	TARGET QUAD	SITE NAME: Shapiro Brothers, Inc.	CLIENT: PSC Industrial Outsourcing, LP
	NAME: FESTUS	ADDRESS: 9th / Delmar Street	CONTACT: Barbara Bruss
	MAP YEAR: 1982	Festus, MO 63028	INQUIRY#: 3054037.4
	PHOTOREVISED: 1964	LAT/LONG: 38.2297 / -90.39	RESEARCH DATE: 04/28/2011
	SERIES: 7.5		
	SCALE: 1:24000		

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Continued from the Front

IV. Narrative Description of Pollutant Sources

A. For each outfall, provide an estimate of the area (include units) of impervious surfaces (including paved areas and building roofs) drained to the outfall, and an estimate of the total surface area drained by the outfall.

Outfall Number	Area of Impervious Surface (provide units)	Total Area Drained (provide units)	Outfall Number	Area of Impervious Surface (provide units)	Total Area Drained (provide units)
1	No (1) acres of impervious area.	six (15) acres			

B. Provide a narrative description of significant materials that are currently or in the past three years have been treated, stored or disposed in a manner to allow exposure to storm water; method of treatment, storage, or disposal; past and present materials management practices employed to minimize contact by these materials with storm water runoff; materials loading and access areas, and the location, manner, and frequency in which pesticides, herbicides, soil conditioners, and fertilizers are applied.

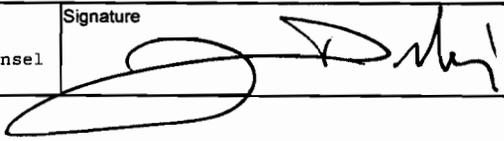
Scrap metal (ferrous and non-ferrous) is received by truck, rail and by walk in customers and it is stored in various storage piles as it is segregated by type of metals in preparation for recycling and reuse. Rail cars are staged, stored and scrapped and/or cut up for metals reclaim and reuse. Pesticides, soil conditioners, nor fertilizers are utilized in the area. Best Management practices include: good housekeeping and inspections, preventive equipment maintenance, spill prevention and response, sediment and erosion control, security, proper materials handling, spill prevention and employee training.

C. For each outfall, provide the location and a description of existing structural and nonstructural control measures to reduce pollutants in storm water runoff; and a description of the treatment the storm water receives, including the schedule and type of maintenance for control and treatment measures and the ultimate disposal of any solid or fluid wastes other than by discharge.

Outfall Number	Treatment	List Codes from Table 2F-1
1	Outfall No. 1 Southeast corner of property at Ninth. Street. Housekeeping inspections, preventive maintenance, visual inspections, spill prevention and response training, sediment and erosion control, facility security (patrols, lighting, access controls), standard operating procedures and employee training are utilized to maintain controls. Annual comprehensive site compliance evaluation are conducted as well as monthly visual inspections and quarterly visual examinations of storm water. All waste and trash is transported and disposed at approved sanitary landfills or reclamation facilities.	4-A

V. Nonstormwater Discharges

A. I certify under penalty of law that the outfall(s) covered by this application have been tested or evaluated for the presence of nonstormwater discharges, and that all nonstormwater discharged from these outfall(s) are identified in either an accompanying Form 2C or Form 2E application for the outfall.

Name and Official Title (type or print)	Signature	Date Signed
Joseph D. King, V.P. General Counsel		02/28/2013

B. Provide a description of the method used, the date of any testing, and the onsite drainage points that were directly observed during a test.

NA

VI. Significant Leaks or Spills

Provide existing information regarding the history of significant leaks or spills of toxic or hazardous pollutants at the facility in the last three years, including the approximate date and location of the spill or leak, and the type and amount of material released.

1. There was one unusual occurrence (such as spills, tank failures or overflow, ruptured piping, fish kills, fire-fighting activities, or other upsets which resulted in the loss of product). On May 3, 2012, the city of Festus fire department came to the site as a result of smoke generated by a small fire initiating in the facility's shredding operation. M W Recycling's employees had used a small amount of water and material movement to extinguish the small fire involving shredder fluff prior to the City of Festus arriving. The fire-fighting water used to extinguish the fire was maintained to the site and to the best of M W Recycling's knowledge, did not run off the site. No other occurrences occurred during 2012.

Continued from Page 2

VII. Discharge Information

A, B, C, & D: See instructions before proceeding. Complete one set of tables for each outfall. Annotate the outfall number in the space provided.
Table VII-A, VII-B, VII-C are included on separate sheets numbers VII-1 and VII-2.

E. Potential discharges not covered by analysis – is any toxic pollutant listed in table 2F-2, 2F-3, or 2F-4, a substance or a component of a substance which you currently use or manufacture as an intermediate or final product or byproduct?

 Yes (list all such pollutants below)

 No (go to Section IX)
VIII. 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 a receiving water in relation to your discharge within the last 3 years?

 Yes (list all such pollutants below)

 No (go to Section IX)
IX. Contract Analysis Information

Were any of the analyses reported in Item VII performed by a contract laboratory or consulting firm?

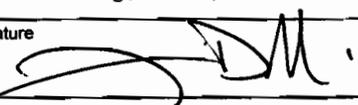
 Yes (list the name, address, and telephone number of, and pollutants analyzed by, each such laboratory or firm below)

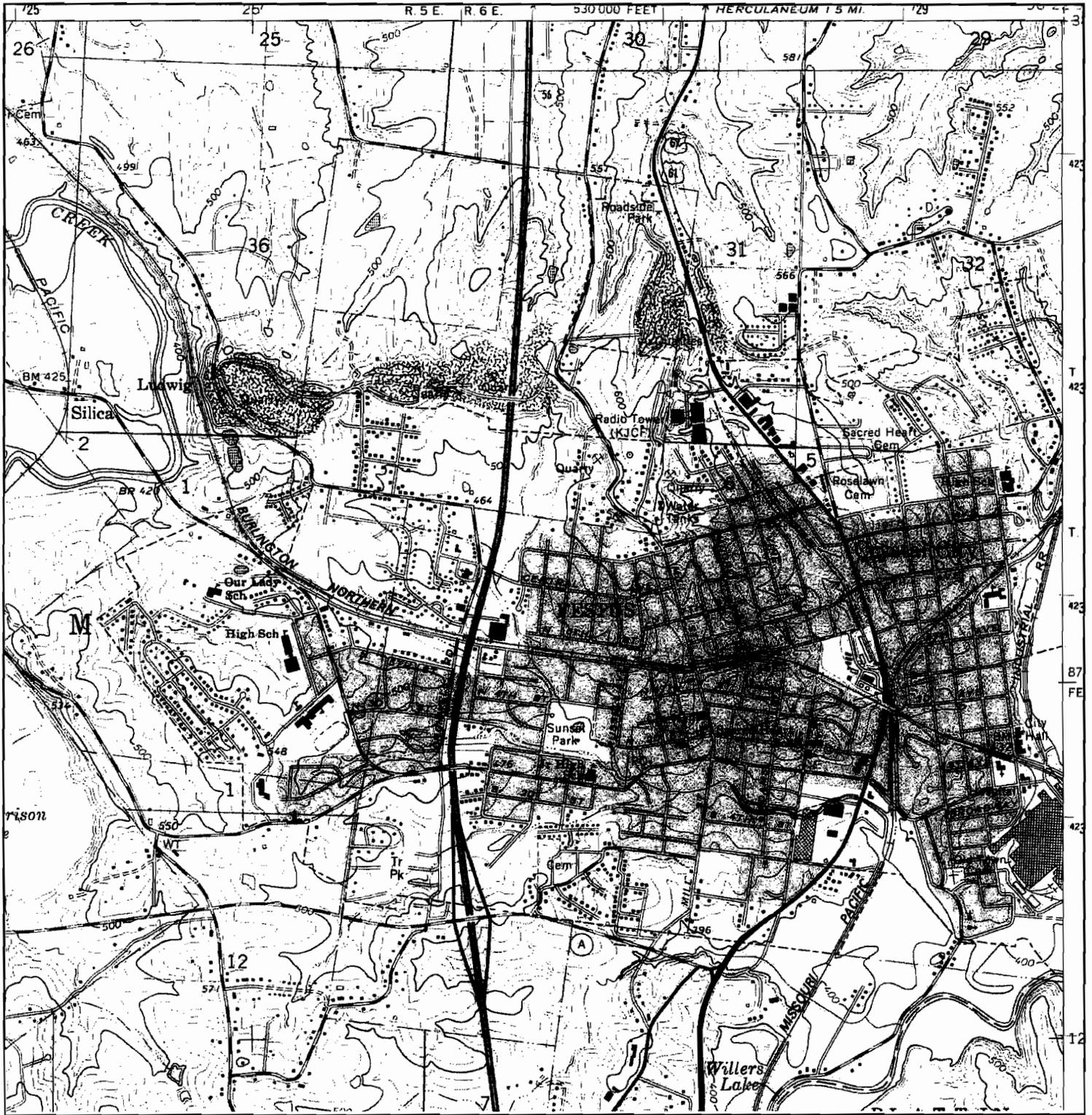
 No (go to Section X)

A. Name	B. Address	C. Area Code & Phone No.	D. Pollutants Analyzed

X. Certification

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

A. Name & Official Title (Type Or Print) Joseph D. King, V.P., General Counsel	B. Area Code and Phone No. (440) 753-5390
C. Signature 	D. Date Signed 02/28/2012



<p>N ↑</p>	TARGET QUAD	SITE NAME: Shapiro Brothers, Inc.	CLIENT: PSC Industrial Outsourcing, LP
	NAME: FESTUS	ADDRESS: 9th / Delmar Street	CONTACT: Barbara Bruss
	MAP YEAR: 1982	Festus, MO 63028	INQUIRY#: 3054037.4
	PHOTOREVISED: 1964	LAT/LONG: 38.2297 / -90.39	RESEARCH DATE: 04/28/2011
	SERIES: 7.5		MAR - 1 2013
	SCALE: 1:24000		

III. SITE DRAINAGE MAP

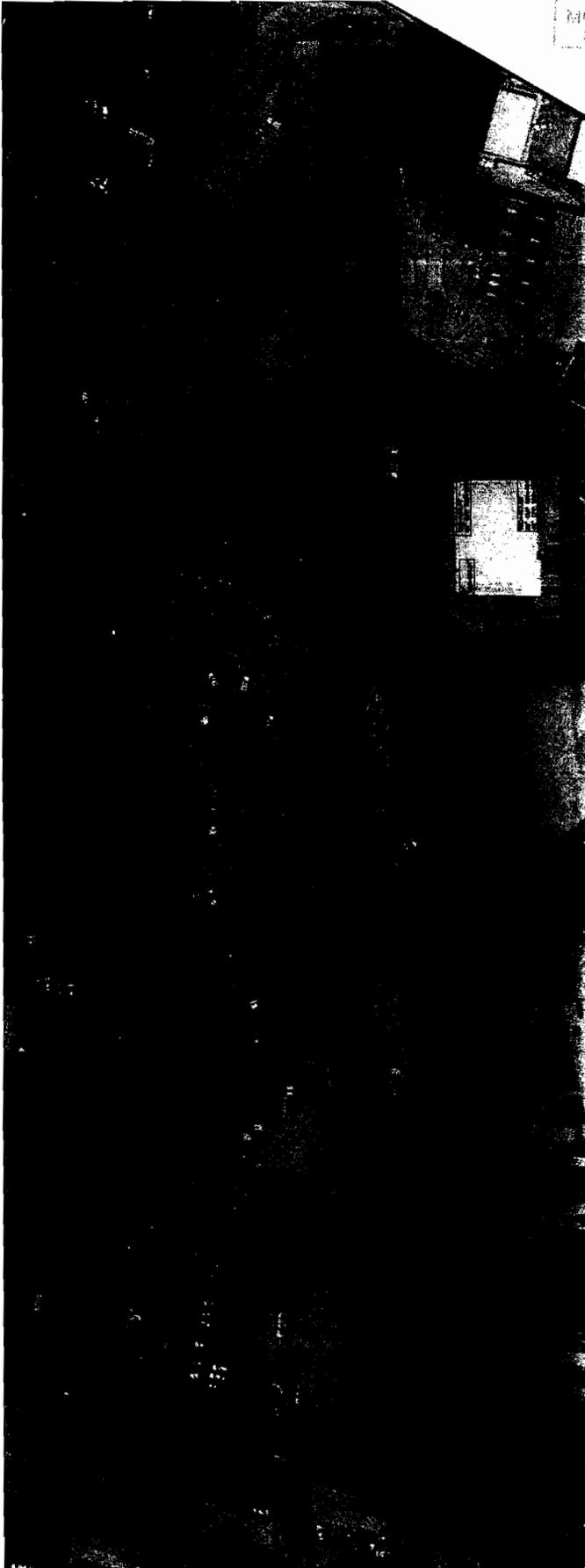
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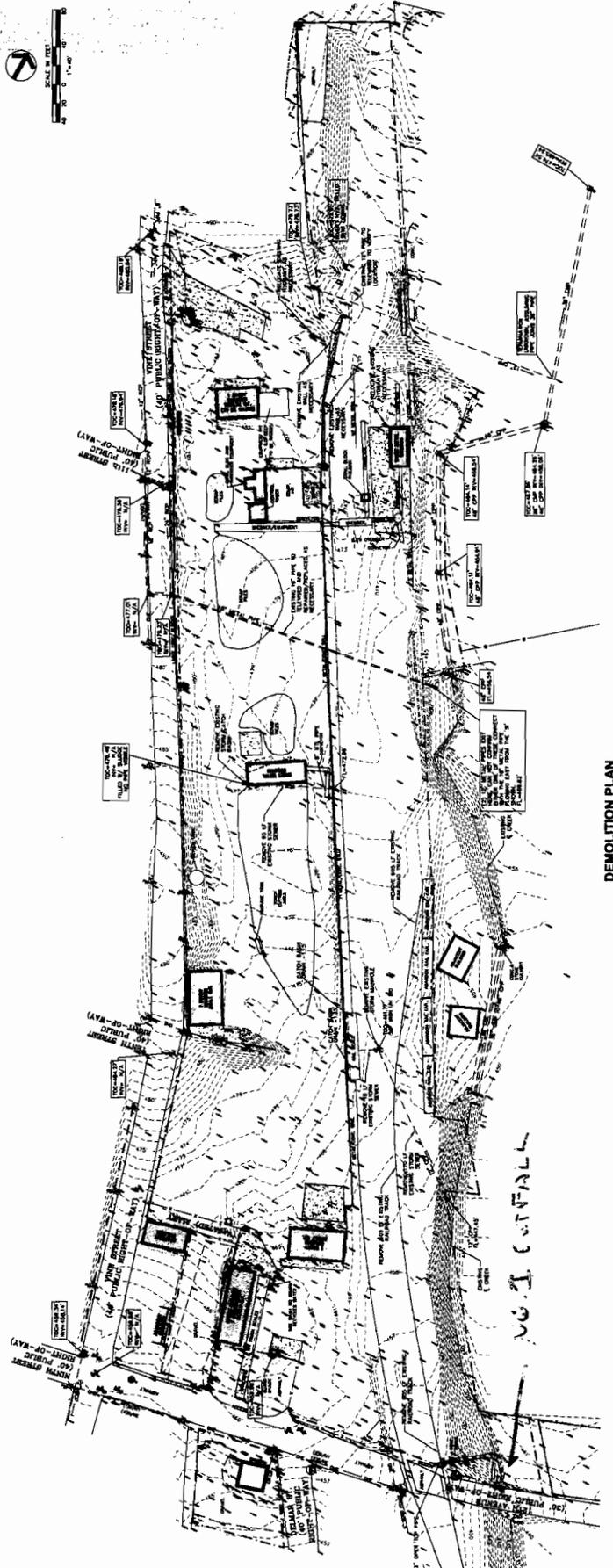
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EXISTING CONDITIONS DEMOLITION PLAN
PSC METALS INC
FESTUS, MISSOURI
C0100



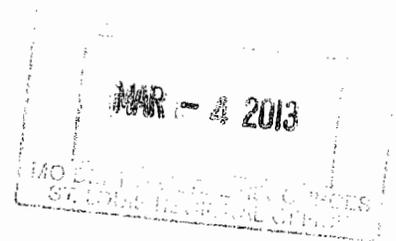
EXISTING CONDITIONS PLAN
SCALE: 1"=40'



DEMOLITION PLAN
SCALE: 1"=40'

NO. 1 CUTFALL

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M W Recycling, LLC

Festus, MO

STORM WATER POLLUTION PREVENTION PLAN (SWPPP)

Issued: November 2012

EXECUTIVE SUMMARY

As part of the environmental management efforts of M W Recycling, LLC, this plan has been developed to prevent or minimize storm water pollution resulting from activities at its facility located at Ninth and Delmar in Festus, Missouri. The plan is intended to ensure the facility's compliance with the State of Missouri State Operating Permit. The permit provides authorization to discharge Storm water associated with industrial activity from motor vehicle salvage yards, and auto/truck recycling operations, and includes facilities operating within SIC code 5093.

Recommendations include the following:

1. Complete non-storm water certification (Chapter 4).
2. Continue training program to inform employees of pollution prevention measures (Chapter 6).
3. Specific recommended procedures to further minimize the possibility of storm water pollution (Chapter 7).
4. Analytical Monitoring of outfalls for listed parameters once per year for every year of the permit (Chapter 8) and report results to State.
5. Perform quarterly and annual visual inspections of specific areas (Chapter 11).

The plan is to be maintained on the site in the office of the Health, Safety, Environmental and Transportation Advisor and a copy will be in the office of the General Manager. Submittal to MDNR is not required unless requested. The plan should be reviewed by M W Recycling, LLC, yearly and updated, if required. General Permit No. R60A146 was issued for the Festus facility. **The Permit is effective through May 29, 2013.** The plan and all accompanying records shall be retained for 3 years after permit expiration.

AUTHORIZED FACILITY REPRESENTATIVE CERTIFICATION

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

Signed _____
Name Mark Pfeiffer
Title HSET Advisor
Company M W Recycling, LLC
Date _____

Signed _____
Name Todd Katz
Title Yard Manager
Company M W Recycling, LLC
Date _____

LIST OF ABBREVIATIONS

BMP	Best Management Practices
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulations
CMP	Corrugated Metal Pipe
COD	Chemical Oxygen Demand
CTI	Consolidated Technologies, Inc.
DWPC	Division of Water Pollution Control
EPA	Environmental Protection Agency
MSP	Multi-Sector Permit
NOI	Notice of Intent
NPDES	National Pollutant Discharge Elimination System
SARA	Superfund Amendments and Reauthorization Act
SIC	Standard Industrial Classification
SWPPP	Storm Water Pollution Prevention Plan
TDEC	Tennessee Department of Environment and Conservation
TSS	Total Suspended Solids

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CHAPTER 1
Introduction

1.0 INTRODUCTION

M W Recycling, LLC has prepared this SWPPP for its facility located at Ninth and Delmar in Festus, Missouri. Pursuant to the Clean Water Act, the United States Environmental Protection Agency (EPA) regulates storm water sources by the issuance of Storm Water Multi-Sector General Permits (MSP) for Industrial Activities. This State of Missouri permit is issued under the final United States National Pollution Discharge Elimination System (NPDES) permit as outlined in Title 40 of the CFR, Part 122.26(b)(14).

The State of Missouri Department of Natural Resources (MDNR) is responsible for implementing the NPDES General Permit through the Missouri MSP. A copy of the MSP requirements contained in Missouri Clean Water Law Chapter 644 R.S. Mo. (as amended) is contained in Appendix A. A copy of the NOI to discharge storm water associated with an industrial activity is included in Appendix B.

1.1 Objective

The objective of this SWPPP is to identify potential pollutants or uncontrolled discharges and to provide the structural and/or management practices necessary to minimize the possibility of introducing pollutants into the waters of the State as a result of activities at PSC Metals' facility at Ninth and Delmar in Festus, Missouri. This plan is designed to satisfy the requirements of the MSP requirements contained in the Missouri Clean Water Law Chapter 644 R.S. Mo. (as amended), and the Missouri State Operating Permit.

1.2 Methodology

Conclusions and recommendations contained in this plan are based on information gathered during site visits; discussions with operations, engineering, and management personnel; and drawings and data provided by M W Recycling, LLC.

1.3 General Plan Requirements

The plan is to be maintained on the site or at a nearby office. Submittal of the plan to MDNR is not required unless requested. Internal facility inspections by qualified personnel should be conducted at specified intervals, and inspection records should be kept with this plan. Employee training is required at least. **The current permit remains effective until May 29, 2013.** All permit-related records shall be retained for 3 years after permit expiration.

CHAPTER 2
Pollution Prevention Committee

POLLUTION PREVENTION COMMITTEE

2.0 POLLUTION PREVENTION COMMITTEE

The SWPPP team will assist the Yard Manager, Todd Katz, in implementing the plan. As shown in Table 2.1, the individuals on this team have varying responsibilities for storm water pollution prevention.

TABLE 2.1		
Pollution Prevention Committee		
Team Member	Job Title	Responsibility
Todd Katz or Supervisor?	On-Site Supervisor	Team Leader, Implementing BMPs, Assist in Recordkeeping, Report Submittal, and Training Employees, Backup for Annual Site Compliance Evaluations and Certifications
Todd Katz	Yard Manager	Assist in Implementing BMPs and Site Inspections
Mark Pfeiffer	HSET Advisor	Recordkeeping and Report Submittal, Site Inspections, Training Employees, Conducting Annual Site Compliance Evaluation
Steve Forystek	Director, HSET	Backup for Annual Site Compliance Evaluation and Certifications

CHAPTER 3
Description of Facility

3.0 DESCRIPTION OF FACILITY

3.1 General

M W Recycling operates a facility located at Ninth and Delmar Street in Festus, Missouri. The Festus facility is bordered to the West by Vine Street and to the East by a tributary to Platin Creek, to the North by a shopping center, and to the south by Ninth Street. The limits of industrial activity encompass an area of 10 acres. The facility was purchased by M W Recycling, LLC in 2011 and employs approximately 20 people.

The site location map is shown on Figure 3.1. The facility is engaged in scrap metal recycling and is in Standard Industrial Code (SIC) 5093.

3.2 Materials and Processes

The scrap materials handled at this site are:

- Ferrous Metals
- Non-ferrous Metals

Processing equipment includes the following:

- Cranes
- Bobcats or Skid Steers
- Forklifts
- Front Loaders
- Appliance and Automobile Shredder
- Stationary Shear

Material handling and flow are described below:

1. Raw material (ferrous and non-ferrous metal) is received by truck, rail, and by walk-in customers and dumped into storage piles on the yard and in the warehouse. The materials are then moved by Skid steers, Loaders, or forklifts to the proper processing equipment. The process is dependent upon the commodity but includes cutting and sizing.
2. Finished goods are accumulated in drums, boxes, bales, bins, or storage piles and then sold. Waste products are collected and reloaded into trucks for proper disposal.
3. Most material storage for these operations is housed outside or in the warehouse. All waste and trash disposal is transported to approved sanitary landfills.

3.3 Site Drainage

The water from the entire site will discharge into a tributary to Plattin Creek. The lone outfall identified at the site is at the southwest corner of the site closest to 12th Street. A discharge structure was created to collect and convey stormwater collected offsite to the tributary to Plattin Creek. The permit requires making the outfall with permanent signage to ensure samples are taken at the right location.

Site Map 3.2 shows the drainage for the Festus site.

CHAPTER 4
Non-Storm Water Discharge

NON-STORM WATER DISCHARGE

4.0 NON-STORM WATER DISCHARGE

EPA has four methods for testing for non-storm water discharge:

1. Visual inspection.
2. Plant schematic review.
3. Smoke tests.
4. Dye tests.

4.1 Festus Facility Certification

The storm water outfalls of M W Recycling, LLC located at Ninth and Delmar in Festus, Missouri were visually inspected on _____.

Certification for Non-Storm Water Discharge

The outfalls leaving the plant are clearly visible. The outfalls were visually checked for non-storm water discharge on _____. After several days of dry weather, the outfall was dry. M W Recycling, LLC located at Ninth and Delmar in Festus, Missouri, does not have any non-storm water discharges.

Todd Katz
Facility Manager

Date

CHAPTER 5
Spill History

5.0 SPILL HISTORY

EPA defines "significant spills" to include releases within a 24-hour period of hazardous substances in excess of reportable quantities under Section 311 of the Clean Water Act (CWA) and Section 102 of The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). Reportable quantities are set amounts of substances in pounds, gallons, or other units and are listed in 40 CFR Part 117 and 40 CFR Part 302.

Significant spills also include a discharge of oil in harmful quantities, defined as any discharge which:

1. Violates applicable water quality standards, or
2. Causes a film or sheen upon or discoloration of the surface of the water or adjoining shorelines, or
3. Causes a sludge or emulsion to be deposited beneath the surface of the water or upon adjoining shorelines.

Oil includes any petroleum product or other type of oil, whether of synthetic, animal, or vegetable origin. It also includes oily scum or sludge and mixtures of oil and other wastes. A discharge is defined as any spilling, leaking, pumping, pouring, emitting, emptying, dumping, or washing of materials into the environment.

Spills of hazardous substances or oil which meet any of these criteria must be reported to the National Response Center (800/424-8802) and DWPC.

The M W Recycling facility located at Ninth and Delmar, Festus, Missouri has had no significant spills or leaks in the last 3 years. If a spill or leak occurs, it should be documented in Table 5.1.

CHAPTER 6
Best Management Practices

6.0 BEST MANAGEMENT PRACTICES

6.1 General

BMPs include good housekeeping, preventive maintenance, visual inspections, spill prevention and response, sediment and erosion control, security, proper materials handling, spill prevention, and employee training.

6.2 Good Housekeeping

Good housekeeping practices will ensure a clean and orderly work environment. They can be implemented by initiating good material storage practices, maintaining up-to-date materials inventory, identifying and labeling storage containers, scheduling routine cleanup operations, maintaining well organized work areas, and training employees about good housekeeping practices.

6.3 Preventive Maintenance

Preventive maintenance programs involve maintenance of storm water management devices and routine inspections of facility operations to detect faulty equipment. Equipment, tanks, drums, containers, etc., should be checked on a weekly basis for signs of deterioration that could result in discharges of pollutants to surface water. Records of all preventive maintenance and any necessary repairs should be kept with this plan. Please refer to Appendix I for the most current preventative maintenance schedule.

6.4 Visual Inspections

Procedures for visual inspections in compliance with MSP regulations are described in Chapter 11. Frequent visual inspections help to ensure that all facets of the plan are in place and properly functioning. Records of the inspections should be maintained with this report. The records should indicate who performed the inspection, what areas were inspected, what problems were found, and what actions were taken.

6.5 Sediment and Erosion Control

A sediment and erosion control program will identify areas of vegetation stress and areas that present a potential for significant soil erosion so that appropriate measures can be taken.

6.6 Security

A security system helps prevent an accidental or intentional release of materials to storm water runoff or a loss of material inventory as a result of vandalism, theft, sabotage, or other improper uses of facility property. Routine patrol, lighting, and access control are possible measures to include in the security program. Signs, guard houses, and visitor clearance requirements are often used to control site access.

6.7 Outside Storage

Storage of any raw materials, by-products, finished products, containers, or wastes in areas exposed to rain and/or runoff can create the potential for storm water pollution.

Storm water can be contaminated by spills or leaks or by substances which wash off containers or materials.

The best way to avoid this is to prevent storm water or rain from coming into contact with the materials by:

1. Storing the materials indoors.
2. Covering the area with a roof.
3. Covering the material with a temporary covering made of polyethylene, polyurethane, polypropylene, or Hypalon.
4. Enclosing the area or building a berm around it.

6.8 Spill Prevention and Response Procedures

Spill prevention and response programs should be developed for all areas with a high potential for spills. A spill prevention plan includes the installation of leak detection devices, good housekeeping, visual inspections, and reduction of on-site waste by recycling and reuse. A spill response plan includes a spill response team; identification of safety measures; a procedure for notification of appropriate authorities; and spill containment, diversion, isolation, and cleanup practices.

6.9 Loading and Unloading Materials

Materials spilled, leaked, or lost during loading/unloading may collect in the soil or other surfaces and be carried away during rainfall or cleaning. Loading/unloading activities that can contaminate storm water include the transfer of bags, boxes, drums, or other containers by forklift, trucks, or other material handling equipment.

Covering loading and unloading areas, such as building overhangs at loading docks, can reduce exposure of materials, vehicles, and equipment to rain. Runoff flowing across loading/unloading areas can wash contaminants into storm drains. This can be minimized by grading, berming, or curbing the area. Also, roof downspouts should be positioned so storm water is directed away from loading sites, preferably to a grassy or vegetated area. Vehicles and equipment used for loading/unloading, as well as other vehicles parked on-site, should be regularly checked for leaks and repaired promptly.

6.10 Traditional Storm Water Management Practices

Following is a list of traditional controls for controlling storm water exposure and runoff:

Berm	Drip Pan	Secondary Containment
Canopy	Grit Chamber	Silt Fence
Catch Basin	Guard	Sump
Cisterns	Gutter	Tank
Container	Infiltration Device	Trench
Cover	Manhole	Valve
Ground Cover	Overhang	Water Reuse
Culvert	Pipe	Weir
Curb	Pump	
Ditch	Retention Basin	
Door Skirt	Roof	

6.11 Employee Training

Employee training should be conducted at least once per year on the dates scheduled by the Pollution Prevention Team. The training should inform personnel of the components and goals of the SWPPP. Employee training programs should cover such topics as spill prevention and response, good housekeeping, and material management practices. The goals of the training program are to teach personnel at all levels of responsibility the components and goals of the SWPPP and to create overall sensitivity to storm water pollution prevention concerns. A general training outline is contained in Appendix C. Records of training should also be kept with this appendix.

CHAPTER 7
Recommended BMPs

7.0 RECOMMENDED BMPS

7.1 Material Receipt and Unloading

Trucks deliver ferrous and non-ferrous metals to the site. These metals are dumped in piles on the yard and in the warehouse.

Potential Pollutants - Residual oil or other contaminants on the scrap material may pollute the storm water if they contact precipitation or runoff.

BMP - Inbound materials are inspected by trained employees to identify materials that could pose a threat to human health or to the environment. Any oil-containing or oil-covered items are removed and disposed of properly before the remaining materials are processed.

7.2 Scrap Processing

Equipment used for scrap processing includes Front-end loaders, Skid Steers, and forklifts move the materials to the processing equipment (the shredder, and the shear), and into storage bins, piles, trucks headed outbound, or the warehouse.

Potential Pollutants - Oils and grease from the equipment and scrap material may pollute storm water if precipitation or runoff contacts the contaminant.

BMP - Practicable containment systems, such as a concrete pad with berms, should be provided under the hydraulic system of any new stationary scrap processing equipment exposed to storm water. Drip pans or equivalent measures should be placed under any leaking piece of stationary equipment until the leak is repaired. Where all parts of the hydraulic system are not visible to the operator, an alarm and/or pump shutoff system should be installed and maintained on all outside equipment with hydraulic reservoirs exceeding 150 gallons in order to prevent draining the tank contents if a line breaks. As an alternative, such equipment may have a secondary containment system capable of containing the contents of the hydraulic reservoir plus rainfall from a 24-hour, 10-year storm event.

7.3 Scrap Storage

The material is stored in various areas, depending on the type. Most material storage is on paved areas.

Potential Pollutants - Residual oils on the scrap material may contaminate storm water if they contact precipitation or runoff.

BMP - The metals are properly stored in bins prior to shipment. Handling and transport procedures for all product and waste are followed. These procedures include spill prevention and control, employee training, and preventive maintenance measures for equipment and facility. The vegetated swale facilitates settling and filtering of pollutants.

7.4 Waste Material

Waste material resulting from the processing is stored in concrete bins.

Potential Pollutants - Residual oils on the waste material may contaminate storm water.

BMP - The waste material is collected and reloaded into trucks for proper disposal. All waste is disposed of at an approved sanitary landfill. The storage areas are paved to prevent contamination from entering the ground surface. The vegetated swale facilitates settling and filtering of pollutants.

7.5 Containers and Dumpsters

Trash is dumped into a covered dumpster located near the trash discharge point of the processing equipment. Drums, containers, and pallets are located throughout the plant. All drums and containers are properly labeled to indicate chemical or hazardous material content.

Potential Pollutants - Open containers can collect storm water, which can be polluted by the contents and leak onto the ground. Trash, debris, pollutants, and residual oils on containers can wash into storm water.

BMP - All open containers should be moved indoors or covered. The site will be checked for open containers during quarterly inspections (Chapter 11). Dumpsters should remain covered.

7.6 Preventive Maintenance for Site

Scrap metal, waste material, various containers, and equipment are used or stored throughout the site as described in this chapter.

Potential Pollutants - These items or materials can come in contact with and pollute storm water.

BMP - The following BMPs have been implemented in all areas where storm water pollution is a concern:

1. Sweep accessible paved areas, as needed, on a regular basis.
2. Do not flush paved areas with water, except that small amounts of water may be sprayed for dust control. Fuel oil will never be applied for dust control.
3. Post notices to prohibit the dumping of materials into storm drains.
4. Contain and repair all significant leaks and spills as soon as practicable.
5. Use dry cleanup methods, where appropriate, on all significant leaks and spills. An adequate supply of absorbent material is maintained, and used absorbent material is swept up and properly disposed.
6. Store all open containers and all drums containing liquids, including oil and lubricants, indoors; in a bermed or curbed outdoor area; in overpack containers or spill pallets; or in similar containment devices.

7.7 Preventive Maintenance Measures for Equipment

Vehicles and scrap processing equipment are used in every aspect of the recycling process. The vehicles and equipment are regularly tested and inspected for any fluid leaks, malfunctioning parts, parts (such as gaskets) in need of replacement, and worn or corroded equipment. Maintenance and lubrication are conducted indoors, when practical. Please refer to Appendix I for the most current preventative maintenance schedule.

Potential Pollutants - This equipment can become worn or malfunction and may leak pollutants onto the ground.

BMP – M W Recycling's preventive inspection and testing program involves regular weekly inspections and maintenance of major equipment and vehicles used or stored outside. The program includes:

1. Service checklists and maintenance logs for each major piece of equipment.
2. Employee education and instruction materials.
3. Review of manufacturer-recommended frequency of parts replacement and maintenance activities.
4. Frequent cleaning of major processing equipment or systems used or stored outside to remove accumulated oil and grease that may be exposed to storm water (except where needed for proper operation of the equipment) or that may hide equipment trouble spots.
5. Scheduled maintenance of vehicles and major equipment in a covered, curbed, or bermed area.
6. Use of drip pans under equipment and vehicles during maintenance to capture leaks. Use of dry cleanup methods for leaks and spills.

7.8 Sediment and Erosion Control

Areas of the facility that are not paved can have the potential for erosion and suspended solids loading.

Potential Pollutants - Erosion can cause silt, sand, and rock to be carried away by storm water.

BMP - The facility has grassed and vegetative buffer areas which are properly maintained and has installed silt fence where vegetation is impractical.

7.9 Employee Training

The employees at the Festus facility are critical to the prevention of storm water contamination.

Potential Pollutants - Uninformed employees could inadvertently contaminate the storm water by spilling or pouring oils or other pollutants on the ground or down the catch basins.

BMP – M W Recycling has a training program for employees.

1. The employee training program addresses those conditions that cause pollution, effective use of the BMPs presented in this plan, and proper scrap inspection handling and storage procedures. Appropriate training is provided for:

- a. Truck drivers.
 - b. Scale operators.
 - c. Supervisors.
 - d. Operating personnel.
2. A supplier notification program has been developed to inform the major suppliers of the following:
- a. Types of material not accepted at this facility.
 - b. Conditions for the acceptance of certain types of material.
3. Since the Festus facility became an M W Recycling operation in 2011, all new employees have undergone training concerning proper operating practices to avoid conditions which cause pollution; the effective use of BMPs; and proper scrap handling, inspection, and storage procedures.
4. Additionally, these items along with housekeeping, cleanup, etc., are discussed in the monthly safety meetings held at the plant.

7.10 Recommended Controls

A summary of recommendations for storm water pollution prevention for the M W Recycling facility in Festus, Missouri, is presented in Table 7.1. Spaces for scheduled completion dates and actual completion dates are provided.

TABLE 7.1			
Recommendations and Implementation Schedule			
Section No.	Recommended Action	Scheduled Date	Actual Date
Various	Continue established good housekeeping, preventive maintenance, and training programs.		
7.2	Provide containment or alarm for hydraulic systems of stationary scrap processing equipment exposed to stormwater (shear).		
7.5	Cover or move open containers indoors		
7.8	Closely monitor the condition of the silt fence at the southeast corner of the facility.		
7.9	Improve condition and prevent blockage or damage of existing outfalls to allow for proper discharge, collection, and monitoring of stormwater. Also, use signage to identify outfalls		

CHAPTER 8
Monitoring Program

8.0 MONITORING PROGRAM

8.1 General

Monitoring requirements for MSP compliance are described below. Analytical monitoring and laboratory analysis are in addition to the visual examination of storm water quality discussed in Chapter 11.

1. **In accordance with the current permit, the storm water outfall does not need to be monitored unless specifically requested by MDNR.**
2. If requested, samples shall be collected from a qualifying rainfall event of more than 0.1 inch at least 72 hours after any previous rainfall.
3. A minimum of one grab sample shall be taken during the first 30 minutes of the discharge.
4. The following information shall be provided:
 - a. Date
 - b. Duration of the rainfall event (in hours)
 - c. Rainfall measured or estimated (in inches)
 - d. Duration between rainfall event monitored and the end of the previous rainfall event
 - e. Estimated total volume of discharge (in gallons)

8.2 Minimum Sampling Parameters (if requested by MDNR)

Samples shall be analyzed for the parameters requested by MDNR. Sampling is not required by the current permit.

8.3 Monitoring Procedures (if requested by MDNR)

Samples shall be taken at the outfalls located as shown on Figures 3.3 and 3.4. To take the grab sample, the sampler will use a glass jar (plastic jars will absorb some of the oil and grease and distort the test). The laboratory which is to perform the test should be contacted for any special instructions and procedures for preserving and shipping the samples.

Testing procedures for storm water samples shall be according to standard EPA-approved analysis methods. Appendix D presents an in-house form for summarizing the storm water sampling data. Copies of all monitoring reports should also be kept with this appendix.

CHAPTER 9
Requirements Under SARA Title III Section 313

REQUIREMENTS UNDER SARA TITLE III SECTION 313

9.0 REQUIREMENTS UNDER SARA TITLE III SECTION 313

9.1 General

A Section 313 "water priority chemical" is a chemical or chemical category which:

1. Is listed in 40 CFR 372.65 Section 313 of Title III of the Superfund Amendments and Reauthorization Act (SARA) of 1986, also entitled the Emergency Planning and Community Right-to-Know Act of 1986;
2. Is present at or above threshold levels at a facility subject to SARA Title III Section 313 reporting requirements;
3. Is listed in Appendix D of 40 CFR 122 on Table II (organic priority pollutants), Table III (certain metals, cyanide, and phenols), or Table V (certain toxic pollutants and hazardous substances);
4. Is listed as a hazardous substance pursuant to Section 311(b)(2)(A) of CWA at 40 CFR 116.4; or
5. Is a pollutant for which EPA has published acute or chronic toxicity criteria.

Section 313 water priority chemicals are listed in the table provided in Appendix E.

9.2 Applicability

As stated in 40 CFR 372.22, facilities must meet all of the following requirements to be covered under SARA Title III Section 313:

1. Ten or more full-time employees.
2. SIC Codes 20 through 39.
3. Manufacture or use a toxic chemical in excess of applicable threshold quantity of that chemical.

Although M W Recycling meets the first requirement, it does not meet the second and third criteria. **At this time, M W Recycling is not subject to the requirements of this chapter. This information is presented in case it is needed in the future.**

9.3 Requirements

Facilities which are subject to reporting requirements under SARA Title III Section 313 are required to provide, as a minimum, overhead coverings and drainage control structures to prevent or minimize exposure of the chemicals to storm water and wind. Liquid chemicals shall be stored in properly designed and constructed containers or tanks. Secondary containment should be provided. Inspections should be conducted at specified intervals to examine for leaks, wind blowing, corrosion, support or foundation failure, or other forms of deterioration or non-containment. Appropriate security systems are required to prevent accidental or intentional entry which could cause a discharge. Employees shall have additional training (minimum once per year) regarding storage and handling of water priority chemicals. The training should also include matters of pollution control laws and regulations.

9.4 Reporting of Releases

Releases of regulated hazardous substances to the environment in excess of reportable quantity thresholds and discharges of oil in harmful quantities must be reported immediately to the National Response Center (800/424-8802) and local water pollution and solid/hazardous waste agencies having jurisdiction. The reportable quantity thresholds for releases of hazardous substances within a 24-hour period are contained in 40 CFR Part 117 and 40 CFR Part 302.

CHAPTER 10
Inventory of Exposed Materials

INVENTORY OF EXPOSED MATERIALS

10.0 INVENTORY OF EXPOSED MATERIALS

The permit requires a general inventory of significant materials handled at the facility which may potentially be exposed to storm water. Significant materials (to the extent known by the permittee) that have been handled, treated, stored, or disposed in a manner to allow exposure to storm water include the following:

1. Types of Scrap
 - a. Ferrous metals
 - b. Non-ferrous metals

2. Scrap Processing Equipment
 - a. Skid Steers
 - b. Forklifts
 - c. Front loaders
 - d. Shear
 - e. Shredder
 - f. Trucks and Trailers

3. Other Materials
 - a. Diesel storage tank
 - b. Trash dumpsters
 - c. Wood pallets
 - d. 55-gallon steel drums

Table 10.1 will be updated as the materials exposed to storm water change.

CHAPTER 11
Visual Inspections

11.0 VISUAL INSPECTIONS

Requirements for visual inspections in compliance with current MSP regulations are discussed in this chapter. Three types of inspections are stipulated:

1. Comprehensive annual site compliance evaluation.
2. Monthly visual inspections of site.
3. Quarterly visual examinations of storm water quality.

Specifically, the areas involved in the following should be inspected:

1. Scrap processing equipment.
2. Scrap material unloading and loading.
3. Scrap handling.
4. Scrap storage.
5. Sediment and erosion BMPs.
6. Outdoor vehicle and equipment maintenance.
7. Vehicle and equipment fueling.
8. Storm water ditches and pond.
9. Other areas where scrap is generated, stored, received, treated, or disposed of which are exposed to storm water runoff or precipitation.

11.1 Annual Site Compliance Report

On or before October 28th of each year, the facility is to send a report to the Regional MDNR Office a report containing the following information:

1. Detail any unusual occurrences, such as spills, tank failures or overflows, ruptured piping, fish kills, fire-fighting activities, or other upsets which resulted in any loss of product. Product includes, but not limited to: fuels, oils, other fluids, and paints.
2. Measures Detail any remedial work undertaken at the site.
3. The report must also indicate if nothing unusual occurred.

Copies of the annual site compliance report must be maintained in Appendix F and submitted to the Regional MDNR office at the address below:

Regional Director
Missouri Department of Natural Resources
St. Louis Regional Office
7545 South Lindbergh Blvd., Suite 210
Saint Louis, MO 63125

11.2 Monthly Visual Inspection of Site

Monthly visual inspections must be conducted to determine the status of the ground surfaces and outfall. All areas exposed to precipitation shall be visually inspected for evidence of, or the potential for, pollutants entering the storm water drainage system.

A form for recording inspection results is contained in Appendix G. Documentation of the inspection shall be retained with the SWPPP.

CHAPTER 12
Modifications to Storm Water Pollution Prevention Plan

MODIFICATIONS TO STORM WATER POLLUTION PREVENTION PLAN

12.0 MODIFICATIONS TO STORM WATER POLLUTION PREVENTION PLAN

The SWPPP shall be modified as required by the Director of the Missouri DNR. The plan should also be modified as required based on changes in the process which impact pollution exposure or information gathered during the in-house inspections and reviews or for changes in responsible facility personnel. Record of the changes must be documented on the Revisions Record located on page iii of this document.

APPENDIX A
Copy of Missouri MSP Permit

APPENDIX B
Notice of Intent

APPENDIX C
General Training Outline

APPENDIX D
Reserved

APPENDIX E
Section 313 Water Priority Chemicals

APPENDIX F
Annual Site Compliance Reports

APPENDIX G
Monthly Visual Site Inspection

MONTHLY VISUAL SITE INSPECTION FORM

Date: _____ Quarter: _____

Time: _____ Facility: _____

Inspector: _____

Signature _____

Areas to be Inspected:

1. Scrap processing equipment.
 2. Scrap material unloading and loading.
 3. Scrap handling.
 4. Scrap storage.
 5. Sediment and erosion BMPs.
 6. Outdoor vehicle and equipment maintenance.
 7. Vehicle and equipment fueling.
 8. Other areas where scrap is generated, stored, received, or disposed of which are exposed to storm water runoff or precipitation.
-

- | | | |
|-----|----|--|
| Yes | No | Do facility grounds show signs of poor housekeeping (cluttered walkways, unswept floors, uncovered materials, etc.)? |
| Yes | No | Are storage areas disorderly or cluttered? |
| Yes | No | Are there spots, pools, puddles, or other traces of oil or other chemicals on the ground? |
| Yes | No | Is there discoloration, residue, or corrosion on the roof or around vents or pipes that ventilate work areas? |
| Yes | No | Is there discoloration, residue, or other stains on the grounds around the site? |
| Yes | No | Do you see any leaking equipment, pipes, process and material handling equipment, drums, dumpsters, or other problems? |
| Yes | No | Do storage containers show signs of corrosion or leaks? |
| Yes | No | Any discolored water standing in low areas? |
| Yes | No | Any evidence of recently spilled materials, either solid or liquid? |
| Yes | No | Are there open containers, stacked drums, or other indications of poor storage procedures? |
| Yes | No | Are any drums unlabeled or not sealed properly? |
| Yes | No | Any signs of dead grass or other distressed vegetation? |
| Yes | No | Does equipment stored outside show corrosion or residue that could wash into storm water? |
| Yes | No | Are trash and debris found at the facility? |
| Yes | No | Are tanks, hoses, curbs, roofs, or containment structures in poor condition? |
| Yes | No | Are stored or in-use chemicals subject to unauthorized use? |
| Yes | No | Is any erosion evident? |
| Yes | No | Are there any incidents of non-compliance? |
| Yes | No | Is any spill response equipment unavailable, difficult to access, or operating incorrectly? |

Outfall(s)

- Yes No Is any non-storm water being discharged?
- Yes No Visible flow? Estimate flow rate or quantity of flowing water _____
(if yes, complete the following; if no, go to "Standing Water Present?")
- Yes No Color of water? _____
- Yes No Odor?
- Yes No Murky?
- Yes No Floating objects?
- Yes No Scum?
- Yes No Suds?
- Yes No Oily sheen?
- Yes No Sludge present?
- Yes No Stains on conveyance?
- Yes No Plant life absent or distressed?
- Yes No Standing water present? Estimate flow rate or quantity of standing water _____
(if yes, complete the following; if no, go to "Corrective Actions Needed")
- Yes No Color of water? _____
- Yes No Odor?
- Yes No Murky?
- Yes No Floating objects?
- Yes No Scum?
- Yes No Suds?
- Yes No Oily sheen?
- Yes No Sludge present?
- Yes No Stains on conveyance?
- Yes No Plant life absent or distressed?

(Keep an organized record of the inspections on file as part of this plan.
Revise the plan as needed.)

Corrective Actions Needed: (see table below) _____

Follow-Up Inspection Date: _____



— PSC METALS, INC. —

RECEIVED

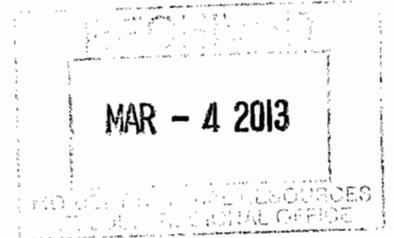
MAR 11 2013

WATER PROTECTION PROGRAM

VIA CERTIFIED MAIL

February 28, 2013

Regional Director
Missouri Department of Natural Resources
St. Louis Regional Office Water Protection Program Director
7545 South Lindbergh Blvd., Suite 210
Saint Louis, MO 63125



Re: M W Recycling LLC Permit Renewal
Renewal Application Permit No. MOR60A146

Dear MDNR:

As requested in a letter dated January 25, 2013 from John Madras, Director Water protection program enclosed please find a completed:

Form A – Application for Construction or Operating permit Under Missouri Clean Water Act
Renewal Application for an Individual Site Specific Permit for the above facility.

Form 2F Application for permit to Discharge Storm Water Discharges Associated with Industrial Activity.

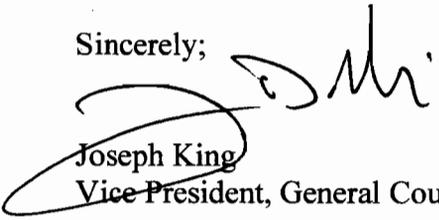
Also, enclosed is a check in the amount of \$1,350.00 for the Industrial Storm water renewal fee and a Storm Water Pollution Prevention Plan (SWPPP) as requested.

Please note that M W Recycling is working with MDNR's Water Division in Jefferson City to design significant changes at the facility.

Those changes are expected to be implemented during 2013. Specifically, additional concrete paving to reduce track out and the installation of a storm water collection, retention and treatment system. M W Recycling is working closely with MDNR regarding its design and permitting for the installation of any new equipment.

Today's submittal is being completed to ensure the timeliness of the renewal process as described in the above-referenced permit. If you have any questions regarding this submittal, please contact Steve Forystek at (440) 753-5351.

Sincerely;



Joseph King

Vice President, General Counsel

Enc.

Cc: Steve Forystek, M W Recycling
Stu Block, M W Recycling
Todd Katz, M W Recycling