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JUN 12 2015

WATER PROTECTION PROGRAM



Boehringer
Ingelheim

Missouri Department of Natural Resources
P.O. Box 176
Jefferson City, Missouri 65102-0176

Boehringer Ingelheim
Vetmedica, Inc.

RE: NPDES Operating Permits Section/Permit Comments
Draft Master General Permit No: **MO-R23A000**

June 8, 2015

Dear Madam/Sirs:

Boehringer Ingelheim Vetmedica, Inc. (BIVI) has reviewed the referenced draft Master General Permit MO-R23A000 for chemical manufacturing which was located at <http://dnr.mo.gov/env/wpp/permits/permit-pn.htm>.

R. Bruce Bowers
Sr. Engineer—Environmental
Telephone: (816) 236-8259
Cell: (913) 827-2846
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Of concern to BIVI are the sampling provisions related to the 40 CFR Part 122 constituents. Specifically, the old general permit language specified that Part 122 constituents would be sampled *“only for chemicals which are currently or have been stored or disposed of outside in the last three years in open or un-secured containers, loaded or unloaded, or treated and exposed to stormwater”*. The new permit does not have this qualifying language. Furthermore, the new draft permit appears to specify that the Part 122 constituent’s that are *“used”* or *“utilized”* at the facility must be sampled annually even if not exposed or potentially exposed to stormwater. Is this the intent of the permit language?

2621 North Belt Highway
St. Joseph, Missouri 64506-2002
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BIVI takes great care to ensure that all chemicals used at the facility are not exposed to stormwater during delivery, receipt, storage, use or disposal. Except for those Part 122 chemicals that are present in gasoline or diesel fuels (that are stored in ANSI approved tanks with appropriate secondary containment) and are managed under 40 CFR Part 112, all other Part 122 chemicals that are used in the facility are stored and used within state-of-the-art warehouses and laboratories and are not exposed to stormwater.

In addition, personnel that are responsible for managing and handling any Part 122 chemicals that could potentially impact stormwater receive annual training through BIVI’s Learning One Source (LOS) online training platform. The stormwater training addresses Best Management Practices (BMP’s) that include periodic and frequent inspections, good housekeeping practices and a preventative maintenance program.



BIVI does conduct research and development (R&D) activities at their campus in St. Joseph in Buildings R and D where Part 122 chemicals can be used. These buildings are state-of-the-art pharmaceutical R&D facilities and are designed with appropriate measures to address good storage and spill containment.

Management of waste hazardous chemicals at BIVI is also conducted in strict accordance subtitle C and D of the Resource Conservation and Recovery Act (RCRA). Waste is managed prior to disposal at a state-of-the-art waste management building on the campus. The building is equipped with secondary containment, a fire suppression system and emergency communications.

In addition, BIVI maintains an in-house Emergency Response Team (ERT) that that is fully capable of responding to chemical releases that may occur at the facility. The ERT receives annual OSHA refresher training and conducts periodic building-by-building risk assessments to assess and evaluate spill and release hazards so that more efficient responses can occur.

In summary, BIVI takes every practical measure possible to ensure that Part 122 chemicals are not exposed to stormwater during any phase of delivery, storage, usage or disposal. BIVI also has concern related to the significant increase in analytical cost for the Part 122 chemicals that may have to be analyzed resulting from the new permit language. BIVI is requesting that the draft permit language be revised to not require sampling of Part 122 constituents if they are not stored or exposed to stormwater. If you should have any questions related to these comments. Please don't hesitate to contact me at (913) 827-2846.

Sincerely,

BOEHRINGER INGELHEIM VETMEDICA, INC.

A handwritten signature in black ink, appearing to read "R. Bruce Bowers", written over a horizontal line.

R. Bruce Bowers

Sr. Engineer—Environmental