Industrial Permitting

Heather Peters, Operating Permits Section
Industrial Permits Unit

- Power Plants
- Quarries/Mines
- Landfills/ Recycling
- Airports
- Agricultural Chemicals
- Pharmaceutical
- Laboratories
- Manufacturing
- Food Processing
- Land Application
- Concentrated Animal Feeding Operations
Site specific limits and conditions

- Template does not cover details of all sites
- Varied sites – Each unique
- Placeholders – Special Conditions
- Fact Sheets explain permit
- Public Notice for comments
- Respond to all comments
Continuing Authority (CA)

- Individuals
- Government (County, City, State, Federal)
- Business
  - Must match Secretary of State listing *exactly*
  - Will not issue without valid CA
  - Must have registered agent in Missouri
Anti-degradation / Anti-backsliding

- Clarity
  - Limits based on anti-deg / engineering designs
- Transparency
- History through permits
  - Cannot backslide on anti-degradation limits
  - Must note limits based on anti-deg
Industrial Effluent Guidelines

- Federal Regulations
- Industry Specific
- Technology-based limits
- May be tied to production at facility
- Limits must be incorporated into permit
Other considerations

- Groundwater protection
- Temperature
- General Criteria
- Underground Injection Control (UIC)
- WET Testing – when there is potential for effluent to cause toxicity in receiving waters
Lagoons/Basins

• No-discharge basin
• Emergency discharge only ("no-discharge")
• Discharging basins
• Stormwater or Wastewater
Stormwater

- Facility type / SIC code
- Benchmarks
- Stormwater Pollution Prevention Plan (SWPPP)
- EPA guidance document
- Site-specific
Nutrient Monitoring

- Hypoxia Task Force
  - Nutrient Sources identified
  - SIC codes and relevant nutrients
- Monitoring in future permits
  - Monthly or Quarterly
- Limits when appropriate
Oil/Water Separators

- Exempt from UST *if* regulated by CWA/Missouri Clean Water Law
- Included in the permit
- May or may not have limits, depending on location and usage
Domestic Waste

- Wasn’t included in most industrial permits
- Disposal now included in all permits
- If discharging, may include limits and conditions
Industrial Land Application

• Removed from Standard Conditions III
• Agriculture vs. Disposal/Land Treatment
  – Stormwater exemption
• Loading Rates
  – Hydraulic
  – Nutrient
  – Pollutant
Industrial Land App Practices

- Limiting Concentrations
  - 40 CFR 503 for metals
  - Everything else?
- Focus on land application practices
- Ensure agriculture only
- Must grow crops/pasture/hay
- Prevent industrial wastewater runoff
- May eliminate runoff sampling at fields
Fertilizer Exemption

- Fertilizer License/Permit issued by the Fertilizer Board
- Apply for permit exemption
- Include sampling
- Must provide reports as required by the Department - 10 CSR 20-6.015
Fertilizer Exemption

• A substance used to make soil more fertile
• Agricultural purposes
• Must be used to grow crops/pasture/hay
• Applied at agronomic rates
• Do not over-apply