

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-0135216

Owner: City of Moberly
Address: 101 West Reed Street, Moberly, MO 65270

Continuing Authority: Same as above
Address: Same as above

Facility Name: Omar N. Bradley Airport
Facility Address: 3600 Highway 63 North, Moberly, MO 65270

Legal Description: NE¹/₄, NW¹/₄, Sec. 24, T54N, R14W, Randolph County
UTM Coordinates: X= 548661, Y= 4368699

Receiving Stream: Unnamed tributary to Sugar Creek Lake
First Classified Stream and ID: Sugar Creek Lake (L1) (7166)
USGS Basin & Sub-watershed No.: 10280203-0204

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 - Industrial, Airport - SIC #4581
Stormwater runoff from airport that conducts uncovered vehicle and aircraft maintenance, washing, and/or fueling.
Design flow is dependent upon precipitation.
Actual flow is dependent upon precipitation.

This permit authorizes only wastewater discharges under the Missouri Clean Water Law and the National Pollutant Discharge Elimination System; it does not apply to other regulated areas. This permit may be appealed in accordance with Sections 640.013, 621.250, and 644.051.6 of the Law.

January 1, 2016
Effective Date

Sara Parker Pauley, Director, Department of Natural Resources

December 31, 2020
Expiration Date

John Madras, Director, Water Protection Program

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

EFFLUENT PARAMETER(S)***	UNITS	FINAL EFFLUENT LIMITATIONS			MONITORING REQUIREMENTS	
		DAILY MAXIMUM	WEEKLY AVERAGE	MONTHLY AVERAGE	MEASUREMENT FREQUENCY	SAMPLE TYPE
Flow	MGD	*	-	-	once/quarter****	24 hr. estimate
Biochemical Oxygen Demand ₅	mg/L	**	-	-	once/quarter****	grab
Chemical Oxygen Demand	mg/L	**	-	-	once/quarter****	grab
Total Suspended Solids	mg/L	70	-	-	once/quarter****	grab
pH – Units	SU	****	-	-	once/quarter****	grab
Ammonia as N	mg/L	**	-	-	once/quarter****	grab
Chloride	mg/L	*	-	-	once/quarter****	grab
Oil & Grease	mg/L	15	-	-	once/quarter****	grab
Benzene	µg/L	**	-	-	once/quarter****	grab
Ethylbenzene	µg/L	**	-	-	once/quarter****	grab
Toluene	µg/L	**	-	-	once/quarter****	grab
Xylene	µg/L	*	-	-	once/quarter****	grab
Precipitation	Inches	*	-	-	once/quarter****	total measured

MONITORING REPORTS SHALL BE SUBMITTED QUARTERLY; THE FIRST REPORT IS DUE APRIL 28, 2016. 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.
- ** Monitoring requirement only with a benchmark value. Please see Special Condition #11.
- *** 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. If a precipitation event does not occur within the reporting period, report as **no discharge**. The total amount of precipitation should be noted from the event from which the samples were collected.
- **** 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.
- ***** 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

B. STANDARD CONDITIONS

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

C. SPECIAL CONDITIONS

1. This permit establishes final ammonia limitations based on Missouri's current Water Quality Standard. On August 22, 2013, the U.S. Environmental Protection Agency (EPA) published a notice in the Federal Register announcing of the final national recommended ambient water quality criteria for protection of aquatic life from the effects of ammonia in freshwater. The EPA's guidance, Final Aquatic Life Ambient Water Quality Criteria for Ammonia – Fresh Water 2013, is not a rule, nor automatically part of a state's water quality standards. States must adopt new ammonia criteria consistent with EPA's published ammonia criteria into their water quality standards that protect the designated uses of the water bodies. The Department of Natural Resources has initiated stakeholder discussions on how to best incorporate these new criteria into the State's rules. A date for when this rule change will occur has not been determined. Also, refer to Section VI of this permit's factsheet for further information including estimated future effluent limits for this facility. It is recommended the permittee view the Department's 2013 EPA criteria Factsheet located at <http://dnr.mo.gov/pubs/pub2481.htm>.
2. This permit may be reopened and modified, or alternatively revoked and reissued, to:
 - (a) Comply with any applicable effluent standard or limitation issued or approved under Sections 301(b)(2)(C) and (D), 304(b)(2), and 307(a) (2) of the Clean Water Act, if the effluent standard or limitation so issued or approved:
 - (1) contains different conditions or is otherwise more stringent than any effluent limitation in the permit; or
 - (2) controls any pollutant not limited in the permit.
 - (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.

3. All outfalls must be clearly marked in the field.
4. Water Quality Standards
 - (a) To the extent required by law, discharges to waters of the state shall not cause a violation of water quality standards rule under 10 CSR 20-7.031, including both specific and general criteria.
 - (b) General Criteria. The following general water quality criteria shall be applicable to all waters of the state at all times including mixing zones. No water contaminant, by itself or in combination with other substances, shall prevent the waters of the state from meeting the following conditions:
 - (1) Waters shall be free from substances in sufficient amounts to cause the formation of putrescent, unsightly or harmful bottom deposits or prevent full maintenance of beneficial uses;
 - (2) Waters shall be free from oil, scum and floating debris in sufficient amounts to be unsightly or prevent full maintenance of beneficial uses;
 - (3) Waters shall be free from substances in sufficient amounts to cause unsightly color or turbidity, offensive odor or prevent full maintenance of beneficial uses;
 - (4) Waters shall be free from substances or conditions in sufficient amounts to result in toxicity to human, animal or aquatic life;
 - (5) There shall be no significant human health hazard from incidental contact with the water;
 - (6) There shall be no acute toxicity to livestock or wildlife watering;
 - (7) Waters shall be free from physical, chemical or hydrologic changes that would impair the natural biological community;
 - (8) Waters shall be free from used tires, car bodies, appliances, demolition debris, used vehicles or equipment and solid waste as defined in Missouri's Solid Waste Law, section 260.200, RSMo, except as the use of such materials is specifically permitted pursuant to section 260.200-260.247.

C. SPECIAL CONDITIONS (continued)

5. 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 by the Director in accordance with 40 CFR 122.44(f).
- (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.

6. Report as no-discharge when a discharge does not occur during the report period.

7. Reporting of Non-Detects:

- (a) An analysis conducted by the permittee or their contracted laboratory shall be conducted in such a way that the precision and accuracy of the analyzed result can be enumerated.
- (b) The permittee shall not report a sample result as "Non-Detect" without also reporting the detection limit of the test. Reporting as "Non Detect" without also including the detection limit will be considered failure to report, which is a violation of this permit.
- (c) The permittee shall provide the "Non-Detect" sample result using the less than sign and the minimum detection limit (e.g. <10).
- (d) Where the permit contains a Minimum Level (ML) and the permittee is granted authority in the permit to report zero in lieu of the < ML for a specified parameter (conventional, priority pollutants, metals, etc.), then zero (0) is to be reported for that parameter.
- (e) See Standard Conditions Part I, Section A, #4 regarding proper detection limits used for sample analysis.

8. It is a violation of the Missouri Clean Water Law to fail to pay fees associated with this permit (644.055 RSMo).

9. Any pesticide discharge from any point source shall comply with the requirements of Federal Insecticide, Fungicide and Rodenticide Act, as amended (7 U.S.C. 136 et. seq.) and the use of such pesticides shall be in a manner consistent with its label.

10. The permittee shall implement a Stormwater 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 the department 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 stormwater. The BMPs at the facility should be designed to meet this value during rainfall event up to the 10 year, 24 hour rain event.
- b. The SWPPP must include a schedule for once per month site inspections and brief written reports. The inspection report must include weather information for the entire period since last inspection, as well as observations and evaluations 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 department 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 the department.

C. SPECIAL CONDITIONS (continued)

11. This permit stipulates pollutant benchmarks applicable to your discharge. The benchmarks do not constitute direct numeric effluent limitations; therefore, a benchmark exceedance alone is not a permit violation. Benchmark monitoring and visual inspections shall be used to determine the overall effectiveness of SWPPP and to assist you in knowing when additional corrective action may be necessary to protect water quality. If a sample exceeds a benchmark concentration you must review your SWPPP and your BMPs to determine what improvements or additional controls are needed to reduce that pollutant in your stormwater discharge(s).

<i>Outfall #001</i>	
Parameter	Benchmark
Biochemical Oxygen Demand ₅	30 mg/L
Chemical Oxygen Demand	120 mg/L
Ammonia as N	2.14 mg/L
Benzene	71 µg/L
Ethylbenzene	320 µg/L
Toluene	200,000 µg/L

Any time a benchmark exceedance occurs a Corrective Action Report (CAR) must be completed. A CAR is a document that records the efforts undertaken by the facility to improve BMPs to meet benchmarks in future samples. CARs must be retained with the SWPPP and available to the department upon request. If the efforts taken by the facility are not sufficient and subsequent exceedances of a benchmark occur, the facility must contact the department if a benchmark value cannot be achieved. Failure to take corrective action to address a benchmark exceedance and failure to make tangible progress towards achieving the benchmarks is a permit violation.

12. Permittee shall adhere to the following minimum Best Management Practices (BMPs):
- 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 BMPs 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.
13. 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.
14. Before releasing water that has accumulated in secondary containment areas it must be examined for hydrocarbon odor and presence of a sheen. If the presence of hydrocarbons is indicated, this water must be tested for Total Petroleum Hydrocarbons (TPH). The analytical method for testing TPH must comply with EPA approved testing methods listed in [40 CFR 136]. If the concentration for TPH exceeds 10mg/L, the water shall be taken to a WWTP for treatment.
15. 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.
16. If any deicing/anti-icing chemicals are to be used on site, the permittee must submit a request for modification of the State Operating Permit before any deicing/anti-icing chemicals can be used.

**MISSOURI DEPARTMENT OF NATURAL RESOURCES
FACT SHEET
FOR THE PURPOSE OF RENEWAL
OF
MO-0135216
OMAR N. BRADLEY AIRPORT**

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

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

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

This Factsheet is for an Industrial Facility.

Part I. Facility Information

Facility Type: Industrial, Airport
Facility SIC Code(s): 4581

Facility Description:

Stormwater runoff from airport that conducts uncovered vehicle and aircraft maintenance, washing, and/or fueling.

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

- No.

Application Date: 04/032013
Expiration Date: 08/28/2013
Last Inspection: 07/02/2013 In Compliance ; Non-Compliance

OUTFALL(S) TABLE:

OUTFALL	DESIGN FLOW (CFS)	TREATMENT LEVEL	EFFLUENT TYPE
001	Stormwater Dependent	Best Management Practices	Stormwater runoff from airport

Facility Performance History & Comments:

The most recent site-inspection to determine compliance with MSOP MO-01352016 was conducted on July 2, 2013. The facility was found to be in non-compliance during the time of the inspection and was issued a Notice of Violation (NOV) for the following reasons:

1. Failed to apply for renewal of the Missouri State Operating Permit (MSOP) at least one hundred and eighty (180) days before expiration of the Missouri State Operating Permit (MSOP) #MO-0135216 [Sections 644.051.9 and 644.076.1, RSMo, and 10 CSR 20-6.010(5)(C)].
2. In the 2nd Quarter 2012 and the 1st Quarter 2013, the facility failed to comply with the effluent limits contained in Part A of Missouri State Operating Permit (MSOP) #MO-0135216 [Sections 644.051.1(3) and 644.076.1, RSMo].

The Missouri Department of Natural Resources' Northeast Regional Office received the sample results from the 1st Quarter 2013 and the 2nd Quarter 2012 for the Omar N. Bradley Airport. It was noted that the effluent data from Outfall #001 for the 1st Quarter 2013 exceeded the effluent limitation parameters of pH. A pH concentration of 10.3 was reported, whereas MSOP #MO-0135216 requires the facility to maintain the pH between 6.5 and 9.0. The effluent data from Outfall #001 for the 2nd Quarter 2012 exceeded the effluent limitation parameters of Total Suspended Solids (TSS). A TSS concentration of 966 mg/L was reported, whereas MSOP #MO-0135216 sets forth a weekly average limit of 70 mg/L and a monthly average limit of 70mg/L. The facility must provide a written report by August 12, 2013, to the department which explains the cause(s) for the non-compliance and actions taken to correct the unsatisfactory feature and prevent a reoccurrence in the future.

The permittee responded appropriately to the NOV and was returned to compliance on August 7, 2013.

Comments: This previous permit was issued to replace the general stormwater permit #MO-R80F032. The facility discharges within two stream miles of a lake designated as a drinking water supply. This means that the facility does not qualify for the general permit. The facility conducts fueling and vehicle maintenance onsite. The maintenance and fueling are confined to the western side of the property near the hangars. The facility does not use any deicing/anti-icing chemicals at this time. Due to these two facts, the only outfall from the facility's activities is located at the northwestern side of the property. If the facility would like to start using deicing/anti-icing chemicals, they are to submit a request for modification of the permit at that time. The outfalls can be re-evaluated at that time.

Part II. Receiving Stream Information

Receiving Water Body's Water Quality

Neither the receiving stream nor the first classified water body are on the Missouri 303 (d) List of impaired water bodies nor have an associated Total Maximum Daily Load (TMDL) allocation. There are no indications of streams surveys for either water body in the Department's database.

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.

As per Missouri's Stormwater Regulations [10 CSR 20.6.200(6)(B)2.], the department shall establish effluent limits as necessary to protect waters of the state. Effluent limitations for stormwater are established using best professional judgment based on the category and designated uses of the receiving stream.

- Missouri or Mississippi River:
- Lake or Reservoir:
- Losing:
- Metropolitan No-Discharge:
- Special Stream:
- Subsurface Water:
- All Other Waters:

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 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)].

RECEIVING STREAM(S) TABLE:

OUTFALL	WATERBODY NAME	CLASS	WBID	DESIGNATED USES*	DISTANCE TO CLASSIFIED SEGMENT	12-DIGIT HUC**
#001	Unnamed tributary to Sugar Creek Lake	-	N/A	GEN	1.15 miles	10280203-0204
#001	Sugar Creek Lake	L1	7166	AQL, DWS, GEN, LWV, WBC-B		

* - Irrigation (IRR), Livestock & Wildlife Watering (LWW), Protection of Warm Water Aquatic Life and Human Health-Fish Consumption (AQL), Cool Water Fishery(CLF), Cold Water Fishery (CDF), Whole Body Contact Recreation (WBC), Secondary Contact Recreation (SCR), Drinking Water Supply (DWS), Industrial (IND), Groundwater (GRW). ** - Hydrologic Unit Code

RECEIVING STREAM(S) LOW-FLOW VALUES:

OUTFALL	RECEIVING STREAM (C, P)	LOW-FLOW VALUES (CFS)		
		1Q10	7Q10	30Q10
#001	Unnamed tributary to Sugar Creek Lake	0.0	0.0	0.0

MIXING CONSIDERATIONS

Mixing Zone: Not Allowed [10 CSR 20-7.031(5)(A)4.B.(I)(a)].

Zone of Initial Dilution: Not Allowed [10 CSR 20-7.031(5)(A)4.B.(I)(b)].

RECEIVING STREAM MONITORING REQUIREMENTS:

No receiving water monitoring requirements recommended at this time.

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

ALTERNATIVE EVALUATIONS FOR NEW FACILITIES:

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

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

ANTI-BACKSLIDING:

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

- Limitations in this operating permit for the reissuance of this permit conform to the anti-backsliding provisions of Section 402(o) of the Clean Water Act, and 40 CFR Part 122.44.

- Information is available which was not available at the time of permit issuance (other than revised regulations, guidance, or test methods) and which would have justified the application of a less stringent effluent limitation at the time of permit issuance.

- The Department determines that technical mistakes or mistaken interpretations of law were made in issuing the permit under section 402(a)(1)(b).

Some of the previous permit limits were established using best professional judgment by the previous permit writer. However, in accordance with current stormwater permitting practices and utilization of benchmark values, best professional judgment has been used to remove some of the effluent limitations set for maximum daily limits (MDL) and all of the average monthly limits (AML). Stormwater events are acute occurrences that result in the greatest concentrations of pollutants being discharged in the first part of the runoff. This first flush can best be represented by a grab sample within the first hours of runoff. Additionally, stormwater events are highly variable. Recording an AML is not representative of the nature of these discharges. Many of these parameters that require just a MDL monitoring only requirement will now have a benchmark value associated with that monitoring only requirement. The following pollutants no longer have effluent limitations, but will have associated benchmark values.

<i>Outfall #001</i>	
Parameter	Benchmark
Biochemical Oxygen Demand ₅	30 mg/L
Chemical Oxygen Demand	120 mg/L
Ammonia as N	2.14 mg/L
Benzene	71 µg/L
Ethylbenzene	320 µg/L
Toluene	200,000 µg/L

Additionally, the permit writer has used best professional judgment to remove monitoring for nitrate from the permit. This facility does not have reasonable potential to exceed water quality standards for nitrate. Additionally, any concern with nitrogen in the discharge will be detected in the total ammonia nitrogen monitoring.

There will be no changes to industrial activities onsite or the composition of the stormwater discharge as a result of this renewal. The benchmark concentrations and required corrective actions are protective of the applicable water quality standards.

ANTIDegradation:

In accordance with Missouri's Water Quality Standard [10 CSR 20-7.031(2)], the Department is to document by means of Antidegradation Review that the use of a water body's available assimilative capacity is justified. Degradation is justified by documenting the socio-economic importance of a discharging activity after determining the necessity of the discharge.

- Renewal no degradation proposed and no further review necessary.

BIOSOLIDS & SEWAGE SLUDGE:

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

Not applicable; This condition is not applicable to the permittee for this facility.

COMPLIANCE AND ENFORCEMENT:

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

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

REASONABLE POTENTIAL ANALYSIS (RPA):

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

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

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

INDUSTRIAL SLUDGE:

Industrial sludge is solids, semi-solids, or liquid residue generated during the treatment of industrial process wastewater in a treatment works; including but not limited to, scum or solids removed in primary, secondary, or advanced wastewater treatment process; scum and solids filtered from water supplies and backwashed; and a material derived from industrial sludge.

Not applicable; This condition is not applicable to the permittee for this facility.

SCHEDULE OF COMPLIANCE (SOC):

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

Not Applicable; This permit does not contain a SOC.

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.

SPILL REPORTING:

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

VARIANCE:

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

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.

A TMDL is a calculation of the maximum amount of a given pollutant that a body of water can absorb before its water quality is affected. If a water body is determined to be impaired as listed on the 303(d) list, then a watershed management plan will be developed that shall include the TMDL calculation

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

Part IV. 2013 Water Quality Criteria for Ammonia

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

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

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

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

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

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

Summer – monitoring only with a benchmark value of 2.14 mg/L.

Winter – monitoring only with a benchmark value of 2.14 mg/L.

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

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

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

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

Part V. Effluent Limits Determination

Outfall #001 – Main Facility Outfall

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

Due to the nature of the discharges from these outfalls being stormwater, only a maximum daily limit (MDL) or monitoring requirement will be implemented for many of the parameters listed below. Stormwater events are acute occurrences that result in the greatest concentrations of pollutants being discharged in the first part of the runoff. This first flush can best be represented by a grab sample within the first hours of runoff. Additionally, stormwater events are highly variable. Recording an average monthly limit (AML) is not representative of the nature of these discharges. Many of these parameters that require just a MDL monitoring only requirement will now have a benchmark value associated with that monitoring only requirement. These benchmark values will be listed under the individual discussion and derivation of each parameter containing such a value.

Benchmarks

Benchmark concentrations are **not** effluent limitations; benchmark exceedance, therefore, is not a permit violation. Benchmark monitoring data is used to determine the overall effectiveness of control measures and to assist the permittee in knowing when additional corrective action(s) may be necessary to comply with the technology based effluent limitations (TBEL). Failure to take corrective action is a violation of the permit. Benchmark exceedance alone is not a permit violation.

The benchmarks listed in the derivation discussion below have been determined to be feasible, affordable and protective of water quality. These benchmark values are consistent with other stormwater permits including the Environmental Protection Agency's (EPA's) *Multi-Sector General Permit For Stormwater Discharges Associated With Industrial Activity* (MSGP). The facility will be required to monitor for all these parameters and if the benchmarks are exceeded at all in the following permit cycle, then the permit writer will use best professional judgment to determine if effluent limitations will be necessary to protect water quality.

EFFLUENT LIMITATIONS TABLE:

PARAMETER	UNIT	Basis for Limits	DAILY MAXIMUM	WEEKLY AVERAGE	MONTHLY AVERAGE	MODIFIED	PREVIOUS PERMIT LIMITATIONS
FLOW	GPD	1	*		***	YES	*/*
BOD ₅	MG/L	6	**		***	YES	90/60
COD	MG/L	6	**		***	YES	120/90
TSS	MG/L	1, 6	70		***	YES	70/70
pH	SU	1, 6	6.5-9.0		***	YES	6.5-9.0
AMMONIA AS N	MG/L	6	**		***	YES	*/*
NITRATE AS N	MG/L	6	***		***	YES	*/*
CHLORIDE	MG/L	6	*		***	YES	*/*
OIL & GREASE (MG/L)	MG/L	1, 6	15		***	YES	15/10
BENZENE	MG/L	6	**		***	YES	*/*
ETHYLBENZENE	MG/L	6	**		***	YES	0.32/0.32
TOLUENE	MG/L	6	**		***	YES	*/*
XYLENE	MG/L	6	**		***	YES	*/*
PRECIPITATION	INCHES	6	*		***	YES	*/*

* - Monitoring requirement only

** - Monitoring with associated benchmark

*** - Parameter being removed from permit.

**** - Parameter not previously established in previous state operating permit.

Basis for Limitations Codes:

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

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.
- **Biochemical Oxygen Demand (BOD₅).** Effluent limitations have been removed from the permit and replaced with monitoring only. Due to the nature of the discharge being stormwater only, the permit writer has used best professional judgment to remove effluent limitations and implement a benchmark value associated with monitoring only for this parameter. A benchmark value of 30 mg/L has been established in this permit. The facility has proven that it can meet this benchmark value with DMR data ranging from 5-7 mg/L. This benchmark value is consistent with the EPA's MGSP.
- **Chemical Oxygen Demand (COD).** Effluent limitations have been removed from the permit and replaced with monitoring only. There is no water quality standard for COD; however, increased oxygen demand may impact instream water quality. COD is also a valuable indicator parameter. COD monitoring allows the permittee to identify increases in COD that may indicate materials/chemicals coming into contact with stormwater that cause an increase in oxygen demand. Increases in COD may indicate a need for maintenance or improvement of BMPs. Due to the nature of the discharge being stormwater only, the permit writer has used best professional judgment to remove effluent limitations and implement a benchmark value associated with monitoring only for this parameter. A benchmark value of 120 mg/L has been established in this permit. The facility has proven that it can meet this benchmark value with DMR data ranging from 14.6-37.7 mg/L. This benchmark value is consistent with the EPA's MGSP.
- **Total Suspended Solids (TSS).** The MDL effluent limitations have been retained from the previous permit. There is no water quality standard for TSS; however, sediment discharges can negatively impact aquatic life habitat. TSS is also a valuable indicator parameter. TSS monitoring allows the permittee to identify increases in TSS that may indicate uncontrolled materials leaving the site. This facility has exceeded the effluent limitations for this parameter and was issued a NOV associated with the most recent site inspection for exceeding TSS limits. Therefore, it is the permit writer's best professional judgment to continue requiring a MDL of 70 mg/L.
- **pH.** – 6.5-9.0 SU. Technology based effluent limitations of 6.0-9.0 SU [10 CSR 20-7.015] are not protective of the Water Quality Standard, which states that water contaminants shall not cause pH to be outside the range of 6.5-9.0 SU. No mixing zone is allowed due to the classification of the receiving stream, therefore the water quality standard must be met at the outfall.
- **Total Ammonia Nitrogen.** Effluent imitations have been removed from the permit and replaced with monitoring only. Due to the nature of the discharge being stormwater only, the permit writer has used best professional judgment to remove effluent limitations and implement a benchmark value associated with monitoring only for this parameter. A benchmark value of 2.14 mg/L has been established in this permit. The facility has proven that it can meet this benchmark value with all DMR data points reported at 0.3 mg/L. This benchmark value is consistent with the EPA's MGSP.
- **Nitrate as N.** Monitoring only requirements have been removed from the previous permit. This facility does not have reasonable potential to exceed water quality standards for nitrate. Additionally, any concern with nitrogen in the discharge will be detected in the total ammonia nitrogen monitoring. Therefore, it is the permit writer's best professional judgment to remove this parameter from the permit.
- **Chloride.** Monitoring only requirement for MDL has been retained from the previous permit. This facility may use salts for de-icing of the tarmac, runway or aircraft. This parameter will indicate if excess salts are discharging in the runoff. Therefore, it is the permit writer's best professional judgment to continue monitoring for this parameter.
- **Oil & Grease.** The MDL effluent limitations have been retained from the previous permit. Conventional pollutant, in accordance with 10 CSR 20-7.031 Table A effluent limitation for protection of aquatic life; 15 mg/L daily maximum.
- **Benzene.** Monitoring only requirement for MDL has been retained from the previous permit. Refueling of aircraft occurs at this site. Benzene is a component of petroleum products and is an indicator of fuel leaks, spills or runoff in the discharge. Therefore, it is the permit writer's best professional judgment to continue monitoring. Additionally, a benchmark has been established for this parameter at the water quality standard for human health protection – fish consumption, 71 µg/L.
- **Ethylbenzene.** Effluent imitations have been removed from the permit and replaced with monitoring only. Refueling of aircraft occurs at this site. Ethylbenzene is an indicator of fuel leaks, spills or runoff in the discharge. Therefore, it is the permit writer's best professional judgment to continue monitoring. Additionally, a benchmark has been established for this parameter at the water quality standard for human health protection – fish consumption, 320 µg/L. This decision is supported by the DMR data, with all data points submitted at 0.005 µg/L.

- **Toluene**. Monitoring only requirement for MDL has been retained from the previous permit. Refueling of aircraft occurs at this site. Toluene is a component of petroleum products and is an indicator of fuel leaks, spills or runoff in the discharge. Therefore, it is the permit writer’s best professional judgment to continue monitoring. Additionally, a benchmark has been established for this parameter at the water quality standard for human health protection – fish consumption, 200,000 µg/L.
- **Xylene**. Monitoring only requirement for MDL has been retained from the previous permit. Refueling of aircraft occurs at this site. Xylene is a component of petroleum products and is an indicator of fuel leaks, spills or runoff in the discharge. Therefore, it is the permit writer’s best professional judgment to continue monitoring. A benchmark has not been established for this parameter because there is no water quality standard for human health protection – fish consumption.
- **Precipitation**. Monitoring only requirement. Measuring the amount of rainfall during an event is necessary to ensure adequate stormwater management exists at the site. Knowing the amount of potential stormwater runoff can provide the permittee a better understanding of specific control measure that should be employed to ensure protection of water quality.
- **Minimum Sampling and Reporting Frequency Requirements.**

PARAMETER	SAMPLING FREQUENCY	REPORTING FREQUENCY
Flow	once/quarter	once/quarter
BOD ₅	once/quarter	once/quarter
COD	once/quarter	once/quarter
TSS	once/quarter	once/quarter
pH	once/quarter	once/quarter
Ammonia as N	once/quarter	once/quarter
Chloride	once/quarter	once/quarter
Oil & Grease	once/quarter	once/quarter
Benzene	once/quarter	once/quarter
Ethylbenzene	once/quarter	once/quarter
Toluene	once/quarter	once/quarter
Xylene	once/quarter	once/quarter
Precipitation	once/quarter	once/quarter

Sampling Frequency Justification: Sampling and Reporting Frequency was retained from previous permit. Due to the nature of the discharge being stormwater runoff, the permit writer has used best professional judgment to determine that the current sampling and reporting frequency provides adequate data to ensure compliance with water quality standards.

- **Sampling Type Justification Choose one delete the rest**
Due to the nature of the discharge being stormwater runoff, the permit writer has used best professional judgment to determine that grab samples provide representative sampling.

Part VI. Finding of Affordability

Pursuant to Section 644.145, RSMo, when issuing permits under this chapter that incorporate a new requirement for discharges from publicly owned combined or separate sanitary or storm sewer systems or publicly owned treatment works, or when enforcing provisions of this chapter or the Federal Water Pollution Control Act, 33 U.S.C. 1251 et seq., pertaining to any portion of a publicly owned combined or separate sanitary or storm sewer system or [publicly owned] treatment works, the Department of Natural Resources shall make a finding of affordability upon which to base such permits and decisions, to the extent allowable under this chapter and the Federal Water Pollution Control Act. Where permit modifications, permit renewals, or sewer extensions do not impose new requirements and/or do not require rate increases, the affordability finding may receive a less detailed review. Permits that do not include new requirements may be deemed affordable.

- The Department is required to determine “findings of affordability” because the permit applies to a **combined or separate sanitary sewer system for a publically-owned treatment works.**

Cost Analysis for Compliance - The Department has made a reasonable search for empirical data indicating the permit is affordable. The search consisted of a review of Department records that might contain economic data on the community, a review of information provided by the applicant as part of the application, and public comments received in response to public notices of this draft permit. If the empirical cost data was used by the permit writer, this data may consist of median household income, any other ongoing projects that the Department has knowledge, and other demographic financial information that the community provided as contemplated by Section 644. 145.3. See **Appendix – Cost Analysis for Compliance**

Part VII. Administrative Requirements

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

PERMIT SYNCHRONIZATION:

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

PUBLIC NOTICE:

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

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

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

- The Public Notice period for this operating permit began on November 21, 2014 and ended on December 22, 2014. No comments were received during the Public Notice period.

DATE OF FACT SHEET: AUGUST 21, 2014

COMPLETED BY:

**LOGAN COLE, ENVIRONMENTAL SPECIALIST
MISSOURI DEPARTMENT OF NATURAL RESOURCES
WATER PROTECTION PROGRAM
OPERATING PERMITS SECTION - INDUSTRIAL UNIT
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**Missouri Department of Natural Resources
Water Protection Program
Cost Analysis for Compliance
(In accordance with RSMo 644.145)**

**Omar N. Bradley Airport
City of Moberly
Missouri State Operating Permit #MO-0135216**

Section 644.145 RSMo requires the Department of Natural Resources (DNR) to make a “finding of affordability” when “issuing permits under” or “enforcing provisions of” state or federal clean water laws “pertaining to any portion of a combined or separate sanitary sewer system for publicly-owned treatment works.”

The Department is required to issue a permit with final effluent limits in accordance with 644.051.1.(1) RSMo, 644.051.1.(2) RSMo, and the Clean Water Act.

This cost analysis is based on data available to the Department as provided by the permittee and data obtained from readily available sources. A request for information was sent to the permittee, seeking data for input into this analysis prior to its development.

For the most accurate analysis, it is essential that the permittee provides the Department with current information about the City’s financial and socioeconomic situation.

Facility Description:

Facility Type: Industrial, Airport

Facility SIC Code(s): 4581

Stormwater runoff from airport that conducts uncovered vehicle and aircraft maintenance, washing, and/or fueling.

Flow evaluated:

All flows are dependent upon precipitation. Design flows were not assessed during permit review. Actual flows are highly variable.

Industrial Connections:

1 (stormwater)

Total Connections for this facility:

1

The flow from this facility is stormwater runoff. Process flows are not authorized for discharge under this permit.

New Permit Requirements or Requirements Now Being Enforced:

The permit requires compliance with new conditions for benchmark values and control of contaminated secondary containment water, which may require the permittee to change current operations to maintain stormwater controls in accordance with these new requirements. This could potentially require installation of technology to capture and control stormwater runoff or could require additional labor costs associated with updating documentation for stormwater control, such as the Stormwater Pollution Prevention Plant (SWPPP). Additionally, this may require increased sampling if stormwater that may enter the secondary containment around the fuel storage structure is found to be contaminated with petroleum products.

Anticipated Costs Associated with Complying with the New Requirements:

This cost analysis does not dictate that a permittee will upgrade their facility, or how they will comply with the new permit requirements.

Costs associated with land application:

The Department does not anticipate the need to install sophisticated land application systems for stormwater control measures or application of contaminated secondary containment water. A simple pump and traveling sprinkler would suffice for such an operation. The cost for installing a catchment basin or holding tank to store stormwater prior to land application depends on the sizing of that structure. Due to the highly variable costs associated with size and labor, the Department is unable to estimate costs for land application.

Cost associated with mechanical treatment:

There are a wide variety of technologies that qualify as best management practices (BMP’s) for the purposes of stormwater control. This can range from installing a flume and flow meter at the bottom of a drainage area to capturing all of the stormwater on site and treating that water with a reverse osmosis system. In accordance with EPA’s SWPPP guidance, BMP’s should be designed at minimum to control a 10 year, 24 hour rain event. This means that the sizing of a BMP depends on the area of drainage associated with a particular technology. With highly variable technologies and sizing of the technologies, the Department is unable to establish costs estimates for stormwater controls measures.

Cost associated with analytical testing for total petroleum hydrocarbon:

The permittee is now required to test for total petroleum hydrocarbon (TPH) in stormwater collected in the secondary containment around the fuel storage structure when the presence of a sheen or odor has been detected in that secondary containment prior to discharging that water. This may require additional costs for sampling and testing. According to Engineering Survey and Services in Columbia, MO, the cost for analyzing Oil & Grease ranges from \$40.00-\$70.00 and cost for analyzing BTEX (benzene, toluene, ethylbenzene and xylene) is \$220.00. The exact cost for TPH was not provided. Therefore, in an effort to consider the highest financial burden associated with new requirements and for the purposes of this analysis, the Department will assume the cost for TPH to be approximately \$220.00.

The Department will have to make an assumption regarding frequency of testing at \$220.00 per sample. The primary holding structure should not be leaking fuel into the secondary containment structure, so theoretically the frequency of testing should be very low to non-existent. However, the Department understands that leaks may occur and the permittee will repair those leaks appropriately. Therefore, the Department has decided to estimate that the facility will test for contamination twice each year, once in the spring and once in the fall. Therefore, the permittee will incur a \$440.00 per year cost burden with this permit renewal.

(1) A community’s financial capability and ability to raise or secure necessary funding;

The City of Moberly has developed a separate operating budget solely for the Omar Bradley Airport. According to the record of the 2013-2014 fiscal year budget and projected 2014-2015 fiscal year budget, the city operates at a zero profit margin with regards to the airport. It is expected that the projected revenue of \$1,563,261.99 will be balanced by the expenditures of the same amount. This budget does already account for analytical and testing fees expenses as well as additional professional services and other miscellaneous expenses. To be conservative, only the total cost of analytical and testing fees, other professional services and miscellaneous expenses (or revenue) will be considered in comparison to the estimated additional costs associated with this permit. Therefore, out of the projected \$16,100.99 of expenses, \$440.00 may need to be reallocated for sampling and analytical testing of contaminated secondary containment water. This translates to approximately 2.7% of the estimated miscellaneous expenses. Just for reference, the estimated costs associated with this permit translate to approximately 0.028% of the total expenditures (or revenue).

Although the costs associated with this permit renewal are minimal compared to the entire operating budget for this airport, the following exercise will be completed in an effort to maintain consistency with other cost analyses issued in the state. The following information that contributes to the final determination in this analysis may or may not be applicable and may or may not be known at this time.

Current User Rates:	<u>None associated with airport budget</u>
Rate Capacity or Pay as You Go Option:	<u>None associated with airport budget</u>
Municipal Bond Rating (if applicable):	<u>AA+</u>
Bonding Capacity:	<u>Up to 20% (\$1,026,000.00 in federal grants, not necessarily associated with assistance in compliance with this permit.)</u>
<i>(General Obligation Bond capacity allowed by constitution: cities=up to 20% of taxable tangible property sewer districts or villages=up to 5% of taxable tangible property)</i>	
Current outstanding debt for Moberly:	<u>\$4,653.53 from 2013-2014 airport budget</u>
Amount within the current user rate used toward payments on outstanding debt related to the current wastewater infrastructure:	<u>None associated with airport budget</u>
Consideration of integrated planning to address the most significant needs of the municipality	<u>None associated with airport budget</u>
Other indicators:	<u>None associated with airport budget</u>

(2) Affordability of pollution control options for the individuals or households at or below the median household income level of the community;

The City of Moberly has developed a separate operating budget solely for the Omar Bradley Airport. For the purpose of this analysis, the Department will assume the estimated cost for additional analytical testing will be incorporated into the projected analytical and testing fees and miscellaneous expenditures. Please see item #1 above for additional considerations to the operating budget and assumptions being applied to this analysis. The following information that contributes to the final determination in this analysis may or may not be applicable and may or may not be known at this time.

A Current Costs

Current operating costs (exclude depreciation):	<u>\$1,563,261.99</u>
Current user rate:	<u>None associated with airport budget</u>

B-1 Estimated Costs for Additional Analytical Testing

Estimated capital cost of pollution control options	<u>None considered at this time</u>
Annual Cost of Operation and Maintenance:	<u>\$440.00</u>
Estimated Resulting User Cost per Household per Month:	<u>None associated with airport budget</u>
Estimated resulting user cost per household per month plus the amount within the current user rate used toward payments on outstanding debt:	<u>None associated with airport budget</u>
Median household income(MHI) ¹ :	<u>\$33,469</u>
Cost per household as a percent of median household income ² :	<u>1 one-hundredth of a percent (0.001%)</u>
Estimated cost per household per month plus the amount within the current user rate used toward payments on outstanding debt as a percent of median household income:	<u>None associated with airport budget</u>

B-2 Estimated Costs for Mechanical Plant Pollution Control Option

Not considered. Please see **Anticipated Costs Associated with Complying with the New Requirements** above for further explanation.

B-3 Estimated Costs for Land Application Pollution Control Options

Not considered. Please see **Anticipated Costs Associated with Complying with the New Requirements** above for further explanation.

(3) An evaluation of the overall costs and environmental benefits of the control technologies;

Proper stormwater management adequately controls pollutant discharge during storm events. Commercial airports can potentially have many pollutants that may impact aquatic life and stream habitat, such as solids/sediment, fuel, lubricants, other chemicals used in the operation and maintenance of aviation equipment and aircraft, de-icing chemicals, and road salts. Ensuring that these pollutants do not enter the stream unchecked is imperative for maintaining healthy stream habitats.

(4) Inclusion of ongoing costs of operating and maintaining the existing wastewater collection and treatment system, including payments on outstanding debts for wastewater collection and treatment systems when calculating projected rates:

The Department is currently unaware of any ongoing costs for outstanding debts on wastewater collection and treatment systems that would impact the financial capabilities of the permittee to comply with this permit. The operating budget provided by the city shows a debt of \$4,653.53 from the 2013-2014 fiscal year net revenue balance. The permittee is expected to continue with current operational and maintenance practices.

(5) An inclusion of ways to reduce economic impacts on distressed populations in the community, including but not limited to low and fixed income populations. This requirement includes but is not limited to:

- (a) Allowing adequate time in implementation schedules to mitigate potential adverse impacts on distressed populations resulting from the costs of the improvements and taking into consideration local community economic considerations.
- (b) Allowing for reasonable accommodations for regulated entities when inflexible standards and fines would impose a disproportionate financial hardship in light of the environmental benefits to be gained.

Socioeconomic Data^{3-5:}

Potentially Distressed Populations – City of Moberly	
Unemployment	6.6%
Adjusted Median Household Income (MHI)	\$33,469
Percent Change in MHI (1990-2012)	+56.3%
Percent Population Growth/Decline (1990-2012)	+9.3%
Change in Median Age in Years (1990-2012)	-0.1
Percent of Households in Poverty	21.1%
Percent of Households Relying on Food Stamps	21.3%

Opportunity for cost savings or cost avoidance:

The permittee may apply for State Revolving Fund (SRF) financial support in order to help fund a Capital Improvements Plan. Other loans and grants also exist for which the facility may be eligible. Contact information for the Department's Financial Assistance Center (FAC) and more information can be found on the Department's website at <http://dnr.mo.gov/env/wpp/srf/wastewater-assistance.htm>. However, this does not include strictly stormwater management. If the permittee is considering an integrated plan, they may qualify for some financial assistance.

Opportunity for changes to implementation/compliance schedule, new technology, site specific criteria, use attainability analysis:

The new conditions do not warrant a schedule of compliance.

(6) An assessment of other community investments and operating costs relating to environmental improvements and public health protection;

The community did not report any other investments relating to environmental improvements.

(7) An assessment of factors set forth in the United States Environmental Protection Agency's guidance, including but not limited to the "Combined Sewer Overflow Guidance for Financial Capability Assessment and Schedule Development" that may ease the cost burdens of implementing wet weather control plans, including but not limited to small system considerations, the attainability of water quality standards, and the development of wet weather standards; Secondary indicators for consideration:

Indicators	Strong (3 points)	Mid-Range (2 points)	Weak (1 point)	Score
Bond Rating Indicator	Above BBB or Baa	BBB or Baa	Below BBB or Baa	3
Overall Net Debt as a % of Full Market Property Value	Below 2%	2% - 5%	Above 5%	None associated with airport budget
Unemployment Rate	>1% below Missouri average of 6.6%	± 1% of Missouri average of 6.6%	>1% above Missouri average of 6.6%	2
Median Household Income	More than 25% above Missouri MHI (\$47,333)	± 25% of Missouri MHI (\$47,333)	More than 25% below Missouri MHI (\$47,333)	1
Percent of Households in Poverty*	>10% below Missouri average of 14.0%	± 10% of Missouri average of 14.0%	>10% above Missouri average of 14.0%	2
Percent of Households Relying on Food Stamps*	>5% below Missouri average of 11.4%	± 5% of Missouri average of 11.4%	>5% above Missouri average of 11.4%	1
Property Tax Revenues as a % of Full Market Property Value	Below 2%	2% - 4%	Above 4%	None associated with airport budget
Property Tax Collection Rate	Above 98%	94% - 98%	Below 94%	None associated with airport budget

Financial Capability (FCI) Indicators Average Score:

1.8

Additional Analytical Testing Costs Residential Indicator (RI, from Criteria #2 above): None associated with airport budget
In place of the above RI, the Department will use the percentage of cost for additional testing compared to the projected miscellaneous expenditures of 2.7%. (This is conservative when considering the estimated costs compared to the total budget, which is 0.028%)

* Financial Capability Indicators are specific to the State of Missouri

Financial Capability Matrix:

Financial Capability Indicators Score from above ↓	Residential Indicator (User cost as a % of MHI)		
	Low (Below 1%)	Mid-Range (Between 1.0% and 2.0%)	High (Above 2.0%)
Weak (below 1.5)	Medium Burden	High Burden	High Burden
Mid-Range (1.5 – 2.5)	Low Burden	Medium Burden	High Burden
Strong (above 2.5)	Low Burden	Medium Burden	High Burden

Estimated Financial Burden for Additional Analytical Costs: None associated with airport budget

The RI cannot be used because the city uses revenue from airport operations to pay for any necessary expenditure associated with those same operations. Therefore, the Department will make the following determination of burden based on the operating budget of the airport: Low Burden.

(8) An assessment of any other relevant local community economic condition.

The Department is not aware of any other relevant local economic conditions that would impact the permittee's ability to comply with this permit.

Conclusion and Finding

The Department is implementing new permit conditions that may require the permittee to adjust operations and maintenance of stormwater control measures and may require additional analytical sampling associated with secondary containment around the fuel storage structure. The Department identified the actions for which cost analysis for compliance is required under Section 644.145 RSMo.

The Department estimates the cost for analytical testing may cost \$440.00 per year. This will cost 2.7% of the expenditures associated with analytical and testing fees and other miscellaneous costs. This also translates to only 0.028% of the entire operating budget for the airport. The Department cannot estimate what BMP's or other control technologies that permittee may install to ensure compliance with benchmark values. The previous permit required effluent limitations for all of the parameters that now only have monitoring only requirements. According to the discharge monitoring reports, the facility was already meeting those effluent limitations. With this in mind, the Department can assume that proper management practices are already in place to adequately control pollutant runoff during storm events. Therefore, minimal costs should be incurred to comply with this permit renewal. Based on this analysis, the Department feels that the new requirements of this permit are affordable for the City of Moberly.

These new conditions do not warrant a compliance schedule. Under the CWA, a compliance schedule is an enforceable sequence of actions or operations leading to compliance with an effluent limitation. Since this permit does not contain new effluent limitations, a compliance schedule does not apply.

The Department considered eight (8) of the criteria presented in subsection 644.145.3 when evaluating the affordability of the relevant actions. Taking into consideration these criteria, this analysis examined whether the above referenced permit modifications affects the ability of an individual customer or household to pay a utility bill without undue hardship or unreasonable sacrifice in the essential lifestyle or spending patterns of the individual or household. As a result of reviewing the above criteria, the Department hereby finds that the action described above may result in a low burden with regard to the community's overall financial capability and a low financial impact for most individual customers/households.

References:

1. The Median Household Income was found using the American Community Survey by the U.S. Census Bureau
2. $(0.03/(33,469/12))100 = 0.001\%$ (analytical testing)
3. Unemployment data was obtained from Missouri Department of Economic Development (July 2014) – <http://www.missourieconomy.org/pdfs/urel1407.pdf>
4. Population trend data was obtained from online at: 2012 Census Bureau Population Data - http://factfinder2.census.gov/faces/tableservices/jsf/pages/productview.xhtml?_afpt=table, 2000 Census Bureau Population Data - <http://www.census.gov/popest/data/cities/totals/2009/tables/SUB-EST2009-04-29.xls>, 1990 Census Bureau Population Data - <http://www.census.gov/prod/cen1990/cp1/cp-1-27.pdf>
5. Poverty data – American Community Survey- <http://factfinder2.census.gov/faces/nav/jsf/pages/searchresults.xhtml?refresh=t>



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

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

Part I – General Conditions

Section A – Sampling, Monitoring, and Recording

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

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

Section B – Reporting Requirements

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



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

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

Section C – Bypass/Upset Requirements

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

Section D – Administrative Requirements

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



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

- 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.
7. **Permit Transfer.**
- a. Subject to 10 CSR 20-6.010, an operating permit may be transferred upon submission to the Department of an application to transfer signed by the existing owner and the new owner, unless prohibited by the terms of the permit. Until such time the permit is officially transferred, the original permittee remains responsible for complying with the terms and conditions of the existing permit.
- b. The Department may require modification or revocation and reissuance of the permit to change the name of the permittee and incorporate such other requirements as may be necessary under the Missouri Clean Water Law or the Federal Clean Water Act.
- c. The Department, within 30 days of receipt of the application, shall notify the new permittee of its intent to revoke or reissue or transfer the permit.
8. **Toxic Pollutants.** The permittee shall comply with effluent standards or prohibitions established under section 307(a) of the Federal Clean Water Act for toxic pollutants and with standards for sewage sludge use or disposal established under section 405(d) of the Federal Clean Water Act within the time provided in the regulations that establish these standards or prohibitions or standards for sewage sludge use or disposal, even if the permit has not yet been modified to incorporate the requirement.
9. **Property Rights.** This permit does not convey any property rights of any sort, or any exclusive privilege.

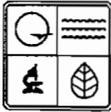


STANDARD CONDITIONS FOR NPDES PERMITS
ISSUED BY
THE MISSOURI DEPARTMENT OF NATURAL RESOURCES
MISSOURI CLEAN WATER COMMISSION
REVISED
AUGUST 1, 2014

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

Ch# 55443 Returned due to **RECEIVED** due @ time of Renewal

AP 15081 011201



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
4/9/13	\$ 88

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- 0135216 Expiration Date 8-28-2013
- An operating permit modification: permit # MO- Reason: _____

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

2. FACILITY

NAME	Department of Natural Resources Number 1000 Office	TELEPHONE WITH AREA CODE
Omar N. Bradley Airport	RECEIVED	(660) 263-4835
ADDRESS (PHYSICAL)	CITY	FAX (660) 269-8171
3600 Hwy 63 North	Moberly	STATE ZIP CODE
	APR - 3 2013	MO 65270

3. OWNER

NAME	US MAIL	E-MAIL ADDRESS	TELEPHONE WITH AREA CODE
City of Moberly	____ Email ____ FAX ____ UPS		(660) 263-4420
ADDRESS (MAILING)	Hand Delivery Fed Ex	CITY	FAX (660) 269-8171
101 West Reed Street		Moberly	STATE ZIP CODE
			MO 65270

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

4. CONTINUING AUTHORITY

NAME	TELEPHONE WITH AREA CODE
City of Moberly	(660) 263-4835
ADDRESS (MAILING)	FAX (660) 269-8171
101 West Reed Street	STATE ZIP CODE
	MO 65270

5. OPERATOR

NAME	CERTIFICATE NUMBER	TELEPHONE WITH AREA CODE
City of Moberly	N/A	(660) 263-4835
ADDRESS (MAILING)	CITY	FAX (660) 269-8171
101 West Reed Street	Moberly	STATE ZIP CODE
		MO 65270

6. FACILITY CONTACT

NAME	TITLE	TELEPHONE WITH AREA CODE
Tom Sanders	Dir of Comm. Dev/Public Works	(660) 263-4420
		FAX (660) 269-8171

7. ADDITIONAL FACILITY INFORMATION

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

001 NE 1/4 NW 1/4 Sec 24 T 54 R 14 Randolph 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 4581 and NAICS _____ 002 - SIC _____ and NAICS _____
 003 - SIC _____ and NAICS _____ 004 - SIC _____ and NAICS _____

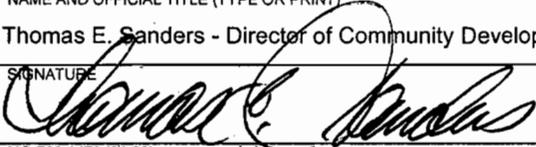
8. ADDITIONAL FORMS AND MAPS NECESSARY TO COMPLETE THIS APPLICATION
 (Complete all forms that are applicable.)

- 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. DOWNSTREAM LANDOWNER(S) Attach additional sheets as necessary. See Instructions.
 (PLEASE SHOW LOCATION ON MAP. SEE 8.D ABOVE.)

NAME Robert and Myra Burks			
ADDRESS 2704 Pebble Creek Court	CITY Columbia	STATE MO	ZIP CODE 65201

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) Thomas E. Sanders - Director of Community Development/Public Works	TELEPHONE WITH AREA CODE (660) 263-4420
SIGNATURE 	DATE SIGNED 3-27-2013

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?

RECEIVED

APR - 9 2013



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

FOR AGENCY USE ONLY	
CHECK NO.	
DATE RECEIVED	FEE SUBMITTED

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

1.00 NAME OF FACILITY
Omar N. Bradley Airport

1.10 THIS FACILITY IS NOW IN OPERATION UNDER MISSOURI OPERATING PERMIT NUMBER
MO-135216

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

2.00 LIST THE STANDARD INDUSTRIAL CLASSIFICATION (SIC) CODES APPLICABLE TO YOUR FACILITY (FOUR DIGIT CODE)
A. FIRST 4581 B. SECOND _____
C. THIRD _____ D. FOURTH _____

2.10 FOR EACH OUTFALL GIVE THE LEGAL DESCRIPTION.
OUTFALL NUMBER (LIST) NE 1/4 NW 1/4 SEC 24 T 54 R 14 Randolph COUNTY

OUTFALL NUMBER (LIST)	RECEIVING WATER
001	unnamed tributary to Sugar Creek Lake

2.30 BRIEFLY DESCRIBE THE NATURE OF YOUR BUSINESS
Regional Airport

Missouri Department of Natural Resources
Water Pollution Branch
RECEIVED
APR - 3 2013
U.S. MAIL
Email FAX
Hand Delivery POST

2.40 CONTINUED

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

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

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

2.50 MAXIMUM PRODUCTION

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

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

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

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

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

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

2.60 IMPROVEMENTS

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

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

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

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

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

3.10 BIOLOGICAL TOXICITY TESTING DATA

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

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

3.20 CONTRACT ANALYSIS INFORMATION

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

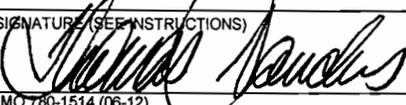
YES (LIST THE NAME, ADDRESS AND TELEPHONE NUMBER OF AND POLLUTANTS ANALYZED BY EACH SUCH LABORATORY OR FIRM BELOW.) NO (GO TO 3.30)

A. NAME	B. ADDRESS	C. TELEPHONE (area code and number)	D. POLLUTANTS ANALYZED (list)
Engineering Survey & Services	1113 Fay Street Columbia MO 65201	573-449-2646	BOD, TSS, COD, NH3, NO3, C1,O&G, BTEX

APR - 3 2013

3.30 CERTIFICATION

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

NAME AND OFFICIAL TITLE (TYPE OR PRINT) Thomas E. Sanders Director of Community Development/Public Works	TELEPHONE NUMBER WITH AREA CODE (660) 263-4420
SIGNATURE (SEE INSTRUCTIONS) 	DATE SIGNED 03/27/2013

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

FORM C
 TABLE 1 FOR 3.00 ITEM A AND B

INTAKE AND EFFLUENT CHARACTERISTICS										OUTFALL NO. 001
-------------------------------------	--	--	--	--	--	--	--	--	--	--------------------

1. POLLUTANT	2. EFFLUENT						3. UNITS (specify if blank)			4. INTAKE (optional)		
	A. MAXIMUM DAILY VALUE		B. MAXIMUM 30 DAY VALUE (if available)		C. LONG TERM AVRG. VALUE (if available)		D. NO. OF ANALYSES	A. CONCENTRATION	B. MASS	A. LONG TERM AVRG. VALUE		B. NO. OF ANALYSES
	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS				(1) CONCENTRATION	(2) MASS	
A. Biochemical Oxygen Demand (BOD)	<6				<6		3	mg/l				
B. Chemical Oxygen Demand (COD)	37.7				27.3		3	mg/l				
C. Total organic Carbon (TOC)												
D. Total Suspended Solids (TSS)	944				245		3	mg/l				
E. Ammonia (as N)	0.3				<0.3		3	mg/l				
F. Flow	VALUE 0.6922				VALUE 0.267		3	mgd		VALUE		
G. Temperature (winter)	VALUE				VALUE					VALUE		
H. Temperature (summer)	VALUE				VALUE					VALUE		
I. pH	MINIMUM 8.1	MAXIMUM 9.5			MINIMUM	MAXIMUM	3	STANDARD UNITS				

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

1. POLLUTANT AND CAS NUMBER (if available)	2. MARK "X"		3. EFFLUENT				4. UNITS			5. INTAKE (optional)				
	A. BELIEVED PRESENT	B. BELIEVED ABSENT	A. MAXIMUM DAILY VALUE		B. MAXIMUM 30 DAY VALUE (if available)		C. LONG TERM AVRG. VALUE (if available)		D. NO. OF ANALYSES	A. CONCENTRATION	B. MASS	A. LONG TERM AVRG. VALUE		B. NO. OF ANALYSES
			(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS				(1) CONCENTRATION	(2) MASS	
A. Bromide (24959-67-9)		X												
B. Chlorine Total Residual		X												
C. Color		X												
D. Fecal Coliform		X												
E. Fluoride (16984-48-8)		X												
F. Nitrate-Nitrate (as N)	X							0.81	3	mg/l				

1. POLLUTANT AND CAS NUMBER (if available)	2. MARK "X"		3. EFFLUENT						4. UNITS		5. INTAKE (optional)		B. NO. OF ANALYSES
	A. BELIEVED PRESENT	B. BELIEVED ABSENT	A. MAXIMUM DAILY VALUE		B. MAXIMUM 30 DAY VALUE (if available)		C. LONG TERM AVRG. VALUE (if available)		A. CONCENTRATION	B. MASS	A. LONG TERM AVRG. VALUE (1) CONCENTRATION	(2) MASS	
			(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS					
G. Nitrogen Total Organic (as N)													
H. Oil and Grease			<1.0				<1.0			3	mg/l		
I. Phosphorus (as P) Total (7723-14-0)													
J. Sulfate (as SO ₄) (14808-79-8)													
K. Sulfide (as S)													
L. Sulfite (as SO ₃) (14265-45-3)													
M. Surfactants													
N. Aluminum Total (7429-90-5)													
O. Barium Total (7440-39-3)													
P. Boron Total (7440-42-8)													
Q. Cobalt Total (7440-48-4)													
R. Iron Total (7439-89-6)													
S. Magnesium Total (7439-95-4)													
T. Molybdenum Total (7439-98-7)													
U. Manganese Total (7439-96-6)													
V. Tin Total (7440-31-5)													
W. Titanium Total (7440-32-6)													

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