

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-0135356

Owner: Triumph Foods, LLC
Address: 5302 Stockyards Expressway, St. Joseph, MO 64504

Continuing Authority: Same as above
Address: Same as above

Facility Name: Triumph Foods, LLC
Facility Address: 5302 Stockyards Expressway, St. Joseph, MO 64504

Legal Description: SW¼, SW¼, SW¼, Sec.30, T57N, R35W, Buchanan County
UTM Coordinates: X= 339056, Y= 4398397

Receiving Stream: Tributary to Missouri River, locally known as Brown's Branch
First Classified Stream and ID: Missouri River (P) (0226) (303d list)
USGS Basin & Sub-watershed No.: (10240011-0106)

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 stormwater only, meatpacking plant; SIC #2011
Receives stormwater from a settling basin that is chlorinated/de-chlorinated prior to discharge. Process wastewater and industrial sludge is captured and sent to a permitted facility for treatment.
Design Flow: 4.8 MGD
Actual Flow: Dependent on precipitation

This permit authorizes only stormwater 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.

July 1, 2016
Effective Date

Sara Parker Pauley, Director, Department of Natural Resources

June 30, 2018
Expiration Date

John Madras, Director, Water Protection Program

EFFLUENT PARAMETERS	UNITS	DAILY MAXIMUM	BENCHMARK	MONITORING REQUIREMENTS	
				MEASUREMENT FREQUENCY ^o	SAMPLE TYPE
OUTFALL #001 <i>Industrial Stormwater</i>					
TABLE A-1 FINAL EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS					
The permittee is authorized to discharge from outfall(s) with serial number(s) as specified in the application for this permit. The final effluent limitations shall become effective on July 1, 2016 and remain in effect until expiration of the permit. Such discharges shall be controlled, limited and monitored by the permittee as specified below:					
PHYSICAL					
Flow	MGD	*	-	once/quarter	24 hr. total estimate
Precipitation	Inches	*	-	once/quarter***	24 hr. total measured
CONVENTIONAL					
Biochemical Oxygen Demand ₅	mg/L	30	-	once/quarter	grab
Chlorine, Total Residual (Note A)	µg/L	17 (130ML)	-	once/quarter	grab
Oil & Grease	mg/L	15	-	once/quarter	grab
pH (Note B)	SU	6.5 to 9.0	-	once/quarter	grab
Settleable Solids	mL/L/hr	1.5	-	once/quarter	grab
Total Suspended Solids	mg/L	100	-	once/quarter	grab
NUTRIENTS					
Ammonia as N	mg/L	**	8	once/quarter	grab
Nitrogen, Total (TN)	mg/L	**	194	once/quarter	grab
Phosphorus, Total (TP)	mg/L	*	-	once/quarter	grab
OTHER					
Dissolved Oxygen (Minimum) (Note C)	mg/L	*	-	once/quarter	grab
Surfactants (Note D)	mg/L	**	0.5	once/quarter	grab
MONITORING REPORTS SHALL BE SUBMITTED <u>QUARTERLY</u> ; THE FIRST REPORT IS DUE <u>OCTOBER 28, 2016</u> . THERE SHALL BE NO DISCHARGE OF FLOATING SOLIDS OR VISIBLE FOAM IN OTHER THAN TRACE AMOUNTS.					

EFFLUENT PARAMETERS	UNITS	DAILY MAXIMUM LIMIT	SEASONAL GEOMETRIC MEAN LIMIT	MONITORING REQUIREMENTS	
				MEASUREMENT	SAMPLE
OUTFALL #001 <i>INDUSTRIAL STORMWATER</i>					
TABLE A-2 FINAL EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS					
The permittee is authorized to discharge from outfall(s) with serial number(s) as specified in the application for this permit. The final effluent limitations shall become effective on July 1, 2016 and remain in effect until expiration of the permit. Such discharges shall be controlled, limited and monitored by the permittee as specified below:					
BACTERIA					
E. coli (Note E)	#/100ml	1030	206	once/month	grab
MONITORING REPORTS SHALL BE SUBMITTED <u>QUARTERLY</u> ; THE FIRST REPORT IS DUE <u>OCTOBER 28, 2016</u> . SEASONAL GEOMETRIC MEAN REPORT IS DUE ON <u>NOVEMBER 28, 2016</u> . THERE SHALL BE NO DISCHARGE OF FLOATING SOLIDS OR VISIBLE FOAM IN OTHER THAN TRACE AMOUNTS.					

See Notes and Conditions on Page 4

MINIMUM QUARTERLY REPORTING REQUIREMENTS		
QUARTER	MONTHS	REPORT IS DUE
First	January, February, March	April 28 th
Second	April, May, June	July 28 th
Third	July, August, September	October 28 th
Fourth	October, November, December	January 28 th

- ∞ 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 discharge 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.
- * Monitoring requirement only.
- ** This parameter incorporates a Benchmark Value associated with Best Management Practices (BMPs). See Special Condition #12 for further information.
- *** Precipitation will be measured once per month on the same day/during the same rainfall event as other samples are taken.

Note A - This permit contains a Total Residual Chlorine (TRC) limit.

- (a) This effluent limit is below the minimum quantification level (ML) of the most common and practical EPA approved CLTRC methods. The Department has determined the current acceptable ML for total residual chlorine to be 130 µg/L when using the DPD Colorimetric Method #4500 – CL G. from Standard Methods for the Examination of Waters and Wastewater. The permittee will conduct analyses in accordance with this method, or equivalent, and report actual analytical values. Measured values greater than or equal to the minimum quantification level of 130 µg/L will be considered violations of the permit and values less than the minimum quantification level of 130 µg/L will be considered to be in compliance with the permit limitation. The minimum quantification level does not authorize the discharge of chlorine in excess of the effluent limits stated in the permit.
- (b) Disinfection is required year-round unless the permit specifically states that “Final limitations and monitoring requirements for *E. coli* are applicable only during the recreational season from April 1 through October 31.” If your permit does not require disinfection during the non-recreational months, do not chlorinate in those months.
- (c) Do not chemically de-chlorinate if it is not needed to meet the limits in your permit.
- (d) If no chlorine was used in a given sampling period, an actual analysis is not necessary. Simply report as “0 µg/L” TRC.

Note B The facility will report the minimum and maximum values. pH is not to be averaged.

Note C Dissolved Oxygen is a minimum value. The facility will state the minimum value for the report.

Note D Wash waters containing surfactants (detergent, cleaners, etc.) are not to be discharged in stormwater. Sampling required for assure compliance with permit conditions. See special condition 16 on page 7.

Note E - Final limitations and sampling requirements for *E. coli* are applicable only during the recreational season from April 1 through October 31. The Seasonal Average Limit for *E. coli* is to be expressed as a geometric mean. It will include a seasonal geometric average for the recreational months only. Report for the recreation season will be due November 28th of each year.

B. STANDARD CONDITIONS

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

C. SPECIAL CONDITIONS

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

C. SPECIAL CONDITIONS (CONTINUED)

- (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.
- 5. Changes in Discharges of Toxic Substances

In addition to the reporting requirements under §122.41(1), all existing manufacturing, commercial, mining, and silvicultural dischargers must notify the Director as soon as they know or have reason to believe:

 - A. That an activity has occurred or will occur which would result in the discharge, on a routine or frequent basis, 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;
 - 3. Five hundred micrograms per liter (500 µg/L) for 2,4-dinitrophenol and for 2-methyl-4, 6-dinitrophenol;
 - 4. One milligram per liter (1 mg/L) for antimony;
 - 5. Five (5) times the maximum concentration value reported for the pollutant in the permit application in accordance with 40 CFR 122.21(g)(7); or
 - 6. The notification level established by the department in accordance with 40 CFR 122.44(f).
 - B. That any activity has occurred or will occur which would result in any discharge, on a non-routine or infrequent basis, of a toxic pollutant which is not limited in the permit, if that discharge will exceed the highest of the following "notification levels":
 - 1. Five hundred micrograms per liter (500 µg/l);
 - 2. One milligram per liter (1 mg/l) for antimony;
 - 3. Ten (10) times the maximum concentration value reported for that pollutant in the permit application in accordance with §122.21(g)(7).
 - 4. The level established by the Director in accordance with §122.44(f).
- 6. Report as no-discharge when a discharge does not occur during the report period.

C. SPECIAL CONDITIONS (CONTINUED)

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 report the "Non-Detect" result using the less than sign and the minimum detection limit (e.g. <10).
- (d) The permittee shall use one-half (1/2) of the detection limit for the non-detect result when calculating and reporting monthly averages.
- (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 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.

11. 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 precipitation 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. 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.

12. 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).

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 measureable progress towards achieving the benchmarks is a permit violation.

13. 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 stormwater 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. SPECIAL CONDITIONS (CONTINUED)

- (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 stormwater or provide other prescribed BMPs such as plastic lids and/or portable spill pans to prevent the commingling of stormwater 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 or benchmarks.
- (f) Ensure that adequate provisions are provided to prevent surface water intrusion into the storage basin, to divert stormwater runoff around the storage basin, and to protect embankments from erosion.
14. Before releasing water that has accumulated in secondary containment areas it must be examined for hydrocarbon odor and presence of a sheen. On-site remediation may take place prior to testing. 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 and the water must be tested prior to release to ensure compliance with water quality standards. 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. Permittee must ensure separation of wastewater and stormwater flows. No wastewater may enter stormwater flow under this permit. Discharging process wastewater, which includes, but is not limited to: water used to wash vehicles, water that has come in contact with contaminated equipment used in processing of meat, or water that comes into contact with contaminated shipping and receiving areas, requires a permit for the discharge of wastewater. Any stormwater that comes into contact with process wastewater is considered process wastewater and must be treated as such. Failure to dispose of process wastewater according to no discharge guidelines will constitute a violation of this permit. If stormwater drains are located near areas of production, shipping and receiving, or washing of any contaminated item, permittee must prevent the discharge of contaminated water into the stormwater drain through BMP measures. Continued discharge of wastewater into a storm drain is a violation of this stormwater-only permit.
- a. All water containing surfactants, cleaners, detergents, or foaming agents must be collected and handled in a “no discharge” manner. This stormwater permit does not authorize the discharge of these substances into waters of the state. Any wash water must be diverted away from storm drains and into the wastewater collection areas. Monitoring of surfactants will be continued to assure compliance with this permit condition.
 - b. Permittee must ensure organic materials such as blood, feces, or fats do not enter the stormwater collection system. This material can enter the stormwater stream in a number of ways. It is the facility’s responsibility to manage BMPs to protect numerical and narrative in-stream water quality criteria.

MISSOURI DEPARTMENT OF NATURAL RESOURCES
FACT SHEET
FOR THE PURPOSE OF RENEWAL
OF
MO-0135356
TRIUMPH FOODS

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 stormwater 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 for less.

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 (MSOP or operating permit) listed below. A factsheet is not an enforceable part of an operating permit.

Part I. FACILITY INFORMATION

Facility Type: Industrial
 Facility SIC Code(s): 2011
 Application Date: 08/09/2013
 Expiration Date: 02/05/2014
 Last Inspection: 08/15/2012 In Compliance

FACILITY DESCRIPTION:

Triumph Foods processes live animals into pork products for both domestic and international markets. Primary products are meat cuts and trimmings and by-products that include peptone, bone meal, grease, and pet food. Wastewater is captured and sent to St. Joseph WWTP (MO0023043), or another permitted facility, for disposal.

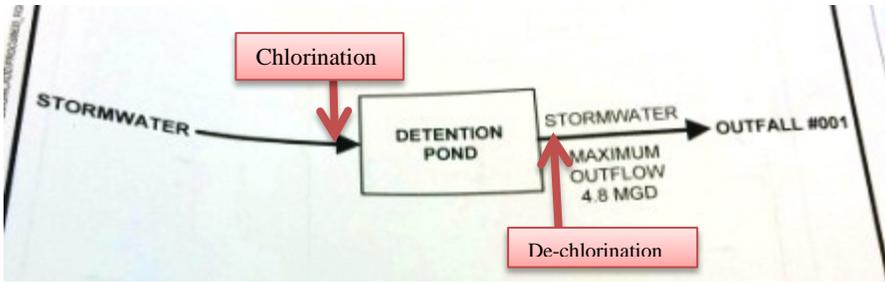
PERMITTED FEATURES TABLE:

OUTFALL	AVERAGE FLOW (MGD)	DESIGN FLOW (MGD)	TREATMENT LEVEL	EFFLUENT TYPE
#001	Dependent on precipitation	4.8	Advanced (Chlorination/de-chlorination), Primary (basin)	Industrial stormwater

FACILITY PERFORMANCE HISTORY & COMMENTS:

The electronic discharge monitoring reports were reviewed for the last five years. The facility has exceedances of BOD, TSS, and *E. coli*, along with other more infrequent exceedances of ammonia, oil and grease, pH, and chlorine. The facility was found to be in compliance after the last inspection in 08/15/2012. The last facility inspection noted locations where *E. coli* contamination was possibly entering the stormwater stream, and the facility was advised of these areas. The DMR reports also noted the detection of surfactants in the stormwater stream. A stormwater permit does not authorize the discharge of these substances into waters of the state.

FACILITY FLOW DIAGRAM:



STORMWATER CHLORINATION/DE-CHLORINATION PROCESS:

There are chemical additions to the stormwater at two different locations. The Chlorinating chemical (Sodium Hypochlorite – 12.5%) is added to the beginning of the drain line at the entry manhole. Inside the stormwater pump house, the chlorine is pumped into a water line and uses an in-line mixer to mix the chlorine and water. Then the mixed solution is sent to the drain line. For De-chlorination, Sodium Bisulfite – 35% is added to the drain line prior to the Outfall valve in the manhole. Inside the stormwater pump house, the sodium bisulfite is pumped into a water line which uses an in-line mixer to mix the sodium bisulfite, and then the solution is sent into the drain line prior to the outfall. The pump operations are controlled through by a level sensor located in the last manhole. A signal is sent from the level sensor to the controller that will send a signal to the pumps to turn them on and off. The purpose of the chlorination process is to meet effluent limits for E. coli.

FACILITY MAP:



--- Blue arrows indicate stormwater flow

Part II. RECEIVING STREAM INFORMATION

RECEIVING WATER BODY’S WATER QUALITY:

The receiving water body, Tributary to Missouri River, locally known as “Brown’s Branch,” has no concurrent water quality data available. The Missouri River is the first classified water body for the Triumph Foods discharge. The Missouri River has an associated TMDL for chlordane and PCB that was promulgated 11/03/2006. This segment of the Missouri River is also on the 2010 303d list for *E. coli* contamination.

APPLICABLE DESIGNATIONS OF WATERS OF THE STATE:

✓ As per Missouri’s Effluent Regulations [10 CSR 20-7.015(1)(B)], the waters of the state are divided into the following seven categories. Each category lists effluent limitations for specific parameters, which are presented in each outfall’s Effluent Limitation Table and further discussed in the Derivation & Discussion of Limits section.

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

Classes [10 CSR 20-7.031(1)(F) 1. to 8.] of water bodies which may be found in the receiving streams table below are:

Lakes: L1 = drinking supply lakes; L2 = major reservoirs; L3 = other

Streams: P = permanent streams; P1 = standing water of P streams; C = may cease flow in droughts but maintains permanent pools; E = ephemeral; W = natural wetlands

✓ As per 10 CSR 20-7.031 Missouri Water Quality Standards, the department defines the Clean Water Commission’s 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 in the following receiving stream table in accordance with [10 CSR 20-7.031(1)(C)].

Uses which may be found in the following receiving streams table:

10 CSR 20-7.031(1)(C)1: Protection and propagation of fish, shellfish, and wildlife (formerly AQL; this permit uses AQL effluent limitations in 10 CSR 20-7.031 Table A for all habitat temperature designations unless otherwise specified)

WWH = Warm Water Habitat; CLH = Cool Water Habitat; CDH = Cold Water Habitat; EAH = Ephemeral Aquatic Habitat; MAH = Modified Aquatic Habitat; LAH = Limited Aquatic Habitat

10 CSR 20-7.031(1)(C)2: Recreation in and on the water

WBC = Whole Body Contact; WBC-A = public swimming; WBC-B = swimming

SCR = Secondary Contact Recreation (like fishing, wading, and boating)

10 CSR 20-7.031(1)(C)3. to 7: HHP (formerly HHF) = Human Health Protection (fish consumption); IRR = irrigation; LWP (formerly LWL) = Livestock and Wildlife Protection; DWS = Drinking Water Supply;

IND = industrial water supply

10 CSR 20-7.031(6): GRW = Groundwater

✓ As per Missouri’s stormwater regulations [10 CSR 20.6.200(6)(B)2.] and federal regulations [40 CFR 122.26(b)(14)], the department shall establish limits necessary to protect waters of the state. Effluent limitations or benchmarks for stormwater are established using best professional judgment based on the category, impairments, technology available, and designated uses of the receiving stream.

RECEIVING STREAMS TABLE:

OUTFALL	WATERBODY NAME	CLASS	WBID	DESIGNATED USES	DISTANCE TO CLASSIFIED SEGMENT	12-DIGIT HUC
#001	Tributary to Missouri River (Brown’s Branch)	n/a	n/a	GEN	0.7 miles	10240011-0103 Roy’s Branch-Missouri River
#001	Missouri River	P	0226	AQL, DWS, IND, IRR, LWW, SCR, WBC-B, HHP		

n/a = not applicable

WBID = Waterbody ID: Missouri Use Designation Dataset 8-20-13 MUDD V1.0 data can be found as an ArcGIS shapefile on MSDIS at [ftp://msdis.missouri.edu/pub/Inland_Water_Resources/MO_2014_WQS_Stream_Classifications_and_Use_shp.zip](http://msdis.missouri.edu/pub/Inland_Water_Resources/MO_2014_WQS_Stream_Classifications_and_Use_shp.zip)

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)].

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. DMR data is available for the last five years that was not previously available to the permit writer.
 - ✓ The Department determines that technical mistakes or mistaken interpretations of law were made in issuing the permit under section 402(a)(1)(b). Monthly average limits were applied to stormwater discharges in error.
 - ✓ The previous permit limits for outfall #001 were established in error, based on limits for industrial process wastewater, however, this facility has only stormwater outfalls. This renewal establishes limits and benchmarks appropriate for stormwater discharges. 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 receiving stream's uses to be maintained.

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.

BENCHMARKS:

When a permitted feature or outfall consists of only stormwater, a benchmark may be implemented at the discretion of the permit writer. Benchmarks require the facility to monitor, and if necessary, replace and update stormwater control measures. Benchmark concentrations are not effluent limitations. A benchmark is a technology-based threshold. A benchmark exceedance, therefore, is not a permit violation; however, failure to take corrective action is a violation of the permit. Benchmark monitoring data is used to determine the overall effectiveness of control measures and to assist the permittee in knowing when additional corrective actions may be necessary to comply with the technology based effluent limitations (TBEL).

Because of the fleeting nature of stormwater discharges, the department, under the direction of EPA guidance, has determined monthly averages are capricious measures of stormwater discharges. The *Technical Support Document for Water Quality Based Toxics Control* (EPA/505/2-90-001; 1991) Section 3.1 indicates most procedures within the document apply only to water quality based approaches, not end-of-pipe technology-based controls. Hence, stormwater outfalls will only contain a maximum daily limit (MDL), benchmark, or monitoring requirement determined by the site specific conditions including the receiving water's current quality. While inspection of the stormwater BMPs occur monthly, facilities with no compliance issues are usually expected to sample stormwater quarterly. This facility has a history of compliance issues, and therefore will sample monthly for most parameters.

Numeric benchmark values are based on other stormwater permits including the Environmental Protection Agency's (EPA's) *Multi-Sector General Permit for Stormwater Discharges Associated with Industrial Activity* (MSGP) or water quality standards. Because precipitation events are sudden and momentary, benchmarks based on state or federal standards or recommendations use the Criteria Maximum Concentration (CMC) value, or acute standard. The CMC is the estimate of the highest concentration of a material in surface water to which an aquatic community can be exposed briefly without resulting in an unacceptable effect. The CMC for aquatic life is intended to be protective of the vast majority of the aquatic communities in the United States.

- ✓ Applicable; this facility has stormwater-only outfalls with benchmark constraints. The benchmarks listed in the derivation discussion have been determined to be feasible, affordable, and protective of water quality and aquatic life.

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.

GROUNDWATER MONITORING:

Groundwater is a water of the state according to 10 CSR 20-7.015(7) and 10 CSR 20-7.031(6) and must be protected accordingly.

✓ This facility is not required to monitor groundwater.

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.

✓ Permittee is not authorized to land apply industrial sludge. Sludge is removed by contract hauler to St. Joseph Waste Water Treatment Plant (MO-0023043) or other permitted facility.

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)(1)(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; an RPA was not conducted for this facility.

SCHEDULE OF COMPLIANCE (SOC):

A schedule of remedial measures included in a permit, including an enforceable sequence of interim requirements (actions, effluent limits, 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. SOCs are allowed under 40 CFR 122.47 providing certain conditions are met.

✓ Not applicable; this permit does not contain a SOC.

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. <http://dnr.mo.gov/env/esp/spillbill.htm>

STORMWATER POLLUTION PREVENTION PLAN (SWPPP):

In accordance with 40 CFR 122.44(k) *Best Management Practices (BMPs)* to control or abate the discharge of pollutants when: (1) Authorized under section 304(e) of the Clean Water Act (CWA) for the control of toxic pollutants and hazardous substances from ancillary industrial activities; (2) Authorized under section 402(p) of the CWA for the control of stormwater 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 Stormwater 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.

The purpose of a SWPPP is to comply with all applicable stormwater regulations by creating an adaptive management plan to control and mitigate pollution of stormwater runoff. Developing a SWPPP provides opportunities to employ appropriate BMPs to minimize the risk of pollutants being discharged with during storm events. The following paragraph outlines the general steps the permittee should take to determine which BMPs will work to achieve the benchmark values discussed in Part V above. This section is not intended to be all encompassing or restrict the use of any physical BMP or operational and maintenance procedure that will assist in pollution control. Additional steps or revisions to the SWPPP may be required to meet the requirements of the permit. Additional

information can be found in 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].

Areas which should be included in the SWPPP are identified in 40 CFR 122.26(b)(14). Once the potential sources of stormwater pollution have been identified, a plan should be formulated to best control the amount of pollutant being released and discharged by each activity or source. This should include, but is not limited to, minimizing exposure to stormwater, good housekeeping measures, proper facility and equipment maintenance, spill prevention and response, vehicle traffic control, and proper materials handling. Once a plan has been developed the facility will employ the control measures that have been determined to be adequate to achieve the benchmark values discussed above. The facility will conduct monitoring and inspections of the BMPs to ensure they are working properly and re-evaluate any BMP not achieving compliance with permitting requirements. For example, if sample results from an outfall show values of TSS above the benchmark value, the BMP being employed is deficient in controlling stormwater pollution. Corrective action should be taken to repair, improve, or replace the failing BMP. This internal evaluation is required at least once per month but should be continued more frequently if BMPs continue to fail. If failures do occur, continue this trial and error process until appropriate BMPs have been established.

If failures continue to occur and the permittee feels there are no practicable or cost-effective BMPs that will sufficiently reduce a pollutant concentration in the discharge to the benchmark values established in the permit, the permittee can submit a request to re-evaluate the benchmark values. This request needs to include 1) a detailed explanation of why the facility is unable to comply with the permit conditions and unable to establish BMPs to achieve the benchmark values; 2) financial data of the company and documentation of cost associated with BMPs for review and 3) the SWPPP, which should contain adequate documentation of BMPs employed, failed BMPs, corrective actions, and all other required information. This will allow the department to conduct a cost analysis on control measures and actions taken by the facility to determine cost-effectiveness of BMPs. The request shall be submitted in the form of an operating permit modification; the application is found at: <http://dnr.mo.gov/forms/index.html>.

- ✓ Applicable; a SWPPP shall be developed and implemented for each area 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.

303(d) LIST:

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. <http://dnr.mo.gov/env/wpp/waterquality/303d/303d.htm>

- ✓ Applicable; this segment of the Missouri River is listed on the 2010 Missouri 303(d) List for *E. coli*.
- ✓ This facility is considered to be a source of or has the potential to contribute to the above listed pollutant(s). When the implementation procedure is approved, the permit may be reopened and modified.

TOTAL MAXIMUM DAILY LOAD (TMDL):

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; hence, the purpose of a TMDL is to determine the pollutant loading a specific waterbody can assimilate without exceeding water quality standards. 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. <http://dnr.mo.gov/env/wpp/tmdl/>

- ✓ Applicable; the Missouri River is associated with the 2006 EPA Approved TMDL for chlordane and PCBs.
- ✓ This facility is not considered to be a source of the above listed pollutant(s) or considered to contribute to the impairment of the Missouri River.

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 WLA is the amount of pollutant each discharger is allowed 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:

- ✓ 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(4)], 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. This facility has stormwater outfalls only and does not handle large quantities of toxic substances.

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 water body. 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 temperature, Missouri includes two seasons of ammonia effluent limitations. Current limits and benchmarks in this permit are:

Summer – 8.0 mg/L daily maximum benchmark

Winter – 8.0 mg/L daily maximum benchmark

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.

Operating permits for facilities in Missouri must be written based on current statutes and regulations. Therefore permits will be written with the existing effluent limitations until the new standards are adopted. To aid permittees in decision making, an advisory

will be added to permit Fact Sheets notifying permittees of the expected effluent limitations for ammonia. When setting schedules of compliance for ammonia effluent limitations, consideration will be given to facilities that have recently constructed upgraded facilities to meet the current ammonia limitations. For more information on this topic feel free to contact the Missouri Department of Natural Resources, Water Protection Program, Water Pollution Control Branch, Operating Permits Section at (573) 751-1300.

Part V. EFFLUENT LIMITS DETERMINATION

OUTFALL #001 – INDUSTRIAL STORMWATER OUTFALL

Effluent limitations and benchmarks derived and established in the below 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.

PARAMETERS OUTFALLS #001	UNIT	BASIS	DAILY MAXIMUM LIMIT	BENCH- MARK	PREVIOUS PERMIT LIMITS	MINIMUM SAMPLING FREQUENCY	MINIMUM REPORTING FREQUENCY	SAMPLE TYPE
PHYSICAL								
FLOW	MGD	1	*	-	SAME	ONCE/QUARTER	ONCE/QUARTER	24 HR. ESTIMATE
PRECIPITATION	INCHES	6	*	-	SAME	ONCE/QUARTER	ONCE/QUARTER	24 HR. TOT
CONVENTIONAL								
BOD	MG/L	6,8	30	-	45/30	ONCE/QUARTER	ONCE/QUARTER	GRAB
CHLORINE, TOTAL RESIDUAL	µG/L	6	17 (130ML)	-	17/8	ONCE/QUARTER	ONCE/QUARTER	GRAB
OIL & GREASE	MG/L	1, 3	15	-	15, 10	ONCE/QUARTER	ONCE/QUARTER	GRAB
pH †	SU	1, 3,6	6.5 TO 9.0	-	SAME	ONCE/QUARTER	ONCE/QUARTER	GRAB
SETTLABLE SOLIDS	ML/L/HR	6	1.5	-	1, 0.5	ONCE/QUARTER	ONCE/QUARTER	GRAB
TSS	MG/L	6, 8	100	-	100/*	ONCE/QUARTER	ONCE/QUARTER	GRAB
NUTRIENTS								
AMMONIA	MG/L	6,8	**	8	8/4	ONCE/QUARTER	ONCE/QUARTER	GRAB
NITROGEN, TOTAL	MG/L	1,6,8	**	194	NEW	ONCE/QUARTER	ONCE/QUARTER	GRAB
PHOSPHORUS, TOTAL	MG/L	1	*	-	NEW	ONCE/QUARTER	ONCE/QUARTER	GRAB
OTHER								
DISSOLVED OXYGEN (MINIMUM)	MG/L	6	*	-	NEW	ONCE/QUARTER	ONCE/QUARTER	GRAB
SURFACTANTS	µG/L	3,6	**	0.5	*	ONCE/QUARTER	ONCE/QUARTER	GRAB
BACTERIA	UNIT	BASIS	DAILY MAXIMUM LIMIT	SEASONAL GEOMETRIC MEAN LIMIT	PREVIOUS PERMIT LIMITS	MINIMUM SAMPLING FREQUENCY	MINIMUM REPORTING FREQUENCY	SAMPLE TYPE
<i>E. COLI</i>	#/100ML	3,6,10	1030	206	1030/206	ONCE/MONTH	ONCE/QUARTER	GRAB

* - Monitoring requirement only

** - Monitoring with associated benchmark

† The facility will report the minimum and maximum pH values; pH is not to be averaged

NEW = Parameter not established in previous operating permit

Basis for Limitations Codes:

- | | | |
|--|-----------------------------------|--|
| 1. State or Federal Regulation/Law | 5. Water Quality Model | 9. Benchmark based on Missouri Water Quality Standards |
| 2. Water Quality Standard (includes RPA) | 6. Best Professional Judgment | 10. 303d designation |
| 3. Water Quality Based Effluent Limits | 7. TMDL or Permit in lieu of TMDL | |
| 4. Antidegradation Review/Policy | 8. Benchmark based on MSGP | |

DERIVATION AND DISCUSSION OF LIMITS:

PHYSICAL:

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. The facility will report the total flow in millions of gallons per day (MGD).

Precipitation

Monitoring only requirement; measuring the amount of precipitation [(10 CSR 20-6.200(2)(C)1.E(VI)] 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. The facility will provide the 24 hour accumulation value of precipitation from the day of sampling the other parameters. It is not necessary to report all days of precipitation during the month because of the readily available on-line data.

CONVENTIONAL:**Biochemical Oxygen Demand (BOD₅)**

Daily maximum limit set at 30 mg/L. The previous permit had a weekly average of 45 mg/L and a monthly average of 30 mg/L. Monthly and weekly averages will not be set in this permit as averages are not appropriate for stormwater discharges. It is in the best professional judgment of the permit writer that monthly averages were applied in error in the previous permit, and the weekly average requirement was erroneously based on limits for domestic wastewater. Due to the intermittent discharge associated with stormwater, monthly averages are not able to be reliably calculated for stormwater parameters. The permit writer has used best professional judgment to determine that due to the similarity in industrial activities listed under Subpart U, Subsector U2 of the MSGP, the value 30 mg/L will be implemented as a limit in this permit. This value falls within the range of values implemented in other permits that have similar industrial activities and the EPA's MSGP. Due to the frequent violations of the previous permit limits for this parameter, it is in the permit writer's best professional judgment that there is a high potential for this facility to violate Missouri's QWS; therefore, a limit will be set rather than a benchmark.

Chlorine, Total Residual (TRC)

Maximum Daily limit of 17µg/L. Previous permit had a maximum daily limit of 17µg/L and a monthly average limit of 8µg/L. The maximum daily limit is retained in this permit; however, average monthly limits will not be applied in this permit. Due to the intermittent discharge associated with stormwater, monthly averages are not able to be reliably calculated for stormwater parameters. Total residual chlorine effluent limits of 17 µg/L daily maximum are recommended if chlorine is used as a disinfectant.

Warm-water Protection of Aquatic Life CCC = 10 µg/L, CMC = 19 µg/L [10 CSR 20-7.031, Table A]. Background = 0 µg/L.

$$\text{Acute WLA: } C_e = ((10.08 + 0.0)19 - (0.0 * 0.0))/10.08 \quad C_e = 19 \mu\text{g/L}$$

$$\text{Chronic WLA: } C_e = ((10.08 + 0.0)10 - (0.0 * 0.0))/10.08 \quad C_e = 10 \mu\text{g/L}$$

$$\text{LTA}_a = 19 (0.321) = 6.1 \mu\text{g/L} \quad [\text{CV} = 0.6, 99^{\text{th}} \text{ Percentile}]$$

$$\text{LTA}_c = 10 (0.527) = 5.3 \mu\text{g/L} \quad [\text{CV} = 0.6, 99^{\text{th}} \text{ Percentile}]$$

Use most protective number of LTA_a or LTA_c.

$$\text{MDL} = 5.3 (3.11) = 16.5 \mu\text{g/L} \quad [\text{CV} = 0.6, 99^{\text{th}} \text{ Percentile}]$$

$$\text{AML} = 5.3 (1.55) = 8.2 \mu\text{g/L} \quad [\text{CV} = 0.6, 95^{\text{th}} \text{ Percentile, } n = 4]$$

Standard compliance language for TRC, including the minimum level (ML), is described in the permit.

Escherichia coli (E. coli)

A maximum daily limit of 1030cfu/100ml and a maximum seasonal geometric mean limit of 206 cfu per 100 mL –only during the recreational season (April 1 through October 31), to protect Whole Body Contact (B) designated use of the receiving stream. 10 CSR 20-7.031(5)(C) establishes these limits for industrial wastewater, and they will be applied to stormwater from this facility using the permit writer's BPJ, due to the Missouri River being on the 2010 303d list for *E.coli* contamination. The geometric mean is calculated by multiplying all of the data points and then taking the nth root of this product, where n = # of samples collected. For example: Five *E. coli* samples were collected with results of 1, 4, 5, 6, and 10 (#/100 mL). Geometric mean = 5th root of (1)(4)(5)(6)(10) = 5th root of 1,200 = 4.1 #/100 mL.

Triumph Foods currently holds a permit for the discharge of stormwater. It is a violation of this permit to discharge wastewater of any sort. This includes all water which has come in contact with organic materials such as blood, feces, or fats from the shipping/receiving areas or slaughtering/rendering areas. The permittee must assure these organic materials do not enter the stormwater collection system and cause increases in *E.coli* and other parameters. This material can enter the stormwater stream in a number of ways. It is the facility's responsibility to manage BMPs to protect numerical and narrative in-stream water quality limits. If the permittee cannot assure the separation of wastewater and stormwater flows, they will be required to apply for a wastewater discharge permit rather than a stormwater permit.

Oil & Grease

Daily maximum limit of 15mg/L. In accordance with 10 CSR 20-7.031 Table A: *Criteria for Designated Uses*; 10 mg/L is the monthly average (chronic standard). The daily maximum limit was calculated using the *Technical Support Document for Water Quality-Based Toxics Control* (EPA/505/2-90-001). Section 5.4.2 indicates the waste load allocation can be set to the chronic standard. When the chronic standard is multiplied by 1.5, the daily maximum can be calculated. Hence, $10 * 1.5 = 15$ mg/L for the daily maximum. Due to exceedances of this parameter in the last permit cycle, a limit will be set rather than a benchmark.

Oxygen, Dissolved

Monitoring requirement only; monitoring for dissolved oxygen is included to determine whether reasonable potential exists to exceed water quality standards. This is a new parameter for this permit, and will be included due to the chlorination/de-chlorination process being used to disinfect stormwater.

pH

6.5 to 9.0 SU. 10 CSR 20-7.031(5)(E) states water contaminants shall not cause pH to be outside the range of 6.5 to 9.0 standard pH units.

Settleable Solids (SS)

Daily maximum limit of 1.5 mL/L/hr. This is a new parameter for this permit. There is no water quality standard for SS; however, sediment discharges can negatively impact aquatic life habitat. Increased settleable solids are known to interfere with multiple stages of the life cycle in many benthic organisms. For example, they can smother eggs and young or clog the crevasses that benthic organisms use for habitat. Settleable solids are also a valuable indicator parameter. Solids monitoring allows the permittee to identify increases in sediment and solids that may indicate uncontrolled materials leaving the site. Permit limits of 1.5 mL/L/hour daily maximum are typical and achievable at other similar facilities.

Total Suspended Solids (TSS)

Daily maximum limit of 100 mg/L. This limit is retained from the previous permit after re-evaluation. This permit applies only the Daily Maximum limit rather than a Daily and Monthly Average limit. It is in the permit writer's best professional judgment that monthly average limits were applied in error in the previous permit. Due to the intermittent flow nature of stormwater and quarterly sampling, a monthly average cannot be obtained reliably. A limit will be applied rather than a benchmark, due to the violations of this parameter in the previous permit cycle. It is in the permit writer's best professional judgment that there is no justification under anti-backsliding regulations to raise these limits. The permit writer has used best professional judgment to determine that due to the similarity in industrial activities listed under Subpart U, Subsector U2 of the MSGP, the value 100 mg/L will be continued as a limit in this permit. This value falls within the range of values implemented in other permits that have similar industrial activities and the EPA's MSGP. There is no water quality standard for TSS; however, sediment discharges can negatively impact aquatic life habitat. Increased suspended solids in runoff can lead to decreased available oxygen for aquatic life and an increase of surface water temperatures in a receiving stream. 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.

NUTRIENTS:

Ammonia, Total as Nitrogen

Monitoring with a benchmark set at a maximum of 8 mg/L daily. The previous permit had maximum daily limits of 8 mg/L and a monthly average limit of 4mg/L. Due to the acute nature of stormwater, it is in the permit writer's best professional judgment that the chronic monthly averages cannot be applied to stormwater discharges reliably, and therefore they will not be used in this permit. The permit writer was unable to make a determination as to the possibility of this facility exceeding water quality standards due to a limited number of data points. With further data collection, it will be clearer whether there is truly a potential to exceeding Missouri WQS. Because of the lack of data and the possibility of exceeding water quality standards, it is in the best professional judgment of the permit writer that a benchmark will be set for this parameter. The benchmark is set based on the federal effluent limit guidelines for high processing packinghouses limitations attainable by best practicable control technology currently available (40CFR 432.42) . If this is an effluent limitation considered practicable for effluent, it is feasible to achieve similar results with stormwater.

Nitrogen, Total N (TN)

Monitoring with a benchmark set at 194 mg/L. This is a new parameter for this permit. Per 10 CSR 20-7.015(9)(D)7, nutrient monitoring shall be instituted on a quarterly basis for facilities with a design flow greater than 0.1 MGD. It is in the best professional judgment of the permit writer that a benchmark also be placed for this parameter based on 40 CFR 432.63, applicable to meat cutting facilities, and the past uncontrolled discharge history of this facility.

Phosphorous, Total P (TN)

Monitoring only. It is in the permit writer's best professional judgment to apply the regulations for wastewater found at 10 CSR 20-7.015(9)(D)7 to this facility's stormwater, which requires that nutrient monitoring shall be instituted on a quarterly basis for facilities with a design flow greater than 0.1 MGD. This facility has a chronic problem with *E. coli* in their stormwater flows,

which indicates that animal feces are entering the stormwater stream. Animal feces and urine are known to contain high concentrations of phosphorus; therefore, monitoring for this parameter will be required.

OTHER:

Surfactants

Monitoring only; with a 0.5 mg/L benchmark. For the purposes of water quality protection and BMP monitoring, and following precedents set by other states including Florida and Puerto Rico, a 0.5 mg/L benchmark will be set for this parameter. DMR reports from the previous permit cycle show a detectable level of surfactants in the stormwater of this facility. Surfactants, also known as foaming agents, are widely used in commercial and domestic detergents and other cleaning products. One of the most commonly used surfactants is LAS (Linear Alkylbenzene Sulfonate). LAS is considered extremely toxic to aquatic life. LAS can be toxic to invertebrates and fish at levels ranging from 0.1 mg/L to 40 mg/L, dependent on a variety of factors, including: life stage, dissolved oxygen content, water hardness, and temperature (Abel 1974). LAS has been shown to cause gill damage, retardation of growth, alteration of feeding behavior, and inhibition of chemoreceptor organs in fish (Abel 1974 and Misra et al. 1985). The State of Missouri does not have water quality standards instituted for surfactants. However, surfactants can impair general criteria found in 10 CSR 20-7.031: "Waters shall be free from substances or conditions in sufficient amounts to result in toxicity to human, animal or aquatic life;" and, due to their ability to cause both a sheen and foam on the surface of the water, "Waters shall be free from oil, scum, and floating debris in sufficient amounts to be unsightly or prevent full maintenance of beneficial uses." General criteria are applicable to all waters of the State of Missouri at all times, including mixing zones. Many other states have water quality standards for surfactants; notably, Florida and Puerto Rico set their limits at 0.5 mg/L (State of Florida 2010 and EPA 2014). Internationally, the limits are much lower, with 0.001 mg/L being the accepted standard, effectively banning the substance from discharge (Renner 1997). It is in the permit writer's best professional judgment to set a benchmark on this parameter with a daily maximum of 0.5 mg/L. This is a level generally accepted to be acutely safe in natural waters for aquatic life (Abel 1974).

Triumph Foods currently holds a permit for the discharge of stormwater. This permit does not allow the discharge of wastewater of any sort. Waters used for cleaning (those that contain production wastes and/or surfactants) are not allowed to be discharged under this permit. If the facility cannot separate its wastewater and stormwater flows (see special condition #16 in the permit), it will be required to apply for a wastewater discharge permit. It is in the permit writer's best professional judgment to continue monitoring with a 0.5mg/L benchmark on this parameter to assure the facility is separating wastewater and stormwater flows.

Sources

Abel, P.D. 1974. "Toxicity of synthetic detergents to fish and aquatic invertebrates". *Journal of fish Biology* (6): 279-298.

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Florida Department of Environmental Protection. 2010. "Surface Water Quality Standards". <http://www.dep.state.fl.us/legal/Rules/shared/62-302/62-302.pdf>. Accessed 09/28/2015.

Misra, Virendra; Hazari lal, Geeta Chawla; and P.N. Viswanathan. 1985. "Pathomorphological changes in gills of fish fingerlings (*Cirrhina mrigala*) by linear alkyl benzene sulfonate". *Ecotoxicology and Environmental Safety* 10(3): 308-308.

Renner, Rebecca. 1997. "European Bans on Surfactant Trigger Transatlantic Debate". *Environ. Sci. Technol.* 31(7): 316A-320A.

Part VI. SAMPLING AND REPORTING REQUIREMENTS:

ELECTRONIC DISCHARGE MONITORING REPORTING:

Due to new federal regulations, all facilities must begin submitting their discharge monitoring reports electronically, called the eDMR system. To begin the process, please visit <http://dnr.mo.gov/env/wpp/edmr.htm>. This process is expected to save time, lessen paperwork, and reduce operating costs for both the facilities and the water protection program. Additional information may also be found at <http://dnr.mo.gov/pubs/pub2474.pdf>.

SAMPLING FREQUENCY JUSTIFICATION:

Sampling and reporting frequency is largely retained from the last permit. Although testing is quarterly, BMP management should be monthly, per the SWPPP. If the facility wishes to collect additional data on the effectiveness of their BMPs, they may sample and report more frequently than quarterly. Monthly testing will be required for *E. coli* during the recreational season, to allow for a calculation of a seasonal geometric mean.

SAMPLING TYPE JUSTIFICATION:

Sampling type was continued from the previous permit. The sampling types are representative of the discharges, and are protective of water quality. Grab samples are appropriate for stormwater.

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. <http://dnr.mo.gov/env/wpp/cpp/docs/watershed-based-management.pdf>. 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. *This permit will become synchronized by expiring end of 2nd quarter, 2018.*

PUBLIC NOTICE:

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

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

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

- The Public Notice period for this operating permit was from (01/08/2016) to (02/08/2016). No responses were received.

Permit writer edited the permit table A-2 for clarity 02/17/2016. There were no substantial permit alterations made; limits and requirements are not changed.

DATE OF FACT SHEET: 10/21/2015, UPDATED 02/17/2016

COMPLETED BY:

AMBERLY SCHULZ, ENVIRONMENTAL SPECIALIST
MISSOURI DEPARTMENT OF NATURAL RESOURCES
WATER PROTECTION PROGRAM
OPERATING PERMITS SECTION - INDUSTRIAL UNIT
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STANDARD CONDITIONS FOR NPDES PERMITS
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THE MISSOURI DEPARTMENT OF NATURAL RESOURCES
MISSOURI CLEAN WATER COMMISSION
REVISED
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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;
 - iii. The alteration or addition results in a significant change in the permittee's sludge use or disposal practices, and such alteration, addition, or change may justify the application of permit conditions that are different from or absent in the existing permit, including notification of additional use or disposal sites not reported during the permit application process or not reported pursuant to an approved land application plan;
 - iv. Any facility expansions, production increases, or process modifications which will result in a new or substantially different discharge or sludge characteristics must be reported to the Department 60 days before the facility or process modification begins. Notification may be accomplished by application for a new permit. If the discharge does not violate effluent limitations specified in the permit, the facility is to submit a notice to the Department of the changed discharge at least 30 days before such changes. The Department may require a construction permit and/or permit modification as a result of the proposed changes at the facility.
2. **Non-compliance Reporting.**
 - a. The permittee shall report any noncompliance which may endanger health or the environment. Relevant information shall be provided orally or via the current electronic method approved by the Department, within 24 hours from the time the permittee becomes aware of the circumstances, and shall be reported to the appropriate Regional Office during normal business hours or the Environmental Emergency Response hotline at 573-634-2436 outside of normal business hours. A written submission shall also be provided within five (5) business days of the time the permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the period of noncompliance, including exact dates and times, and if the noncompliance has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent reoccurrence of the noncompliance.



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

Section C – Bypass/Upset Requirements

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

Section D – Administrative Requirements

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



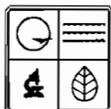
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- imposed in a pretreatment program approved under section 402(a)(3) or 402(b)(8) of the Act, is subject to criminal penalties of \$2,500 to \$25,000 per day of violation, or imprisonment of not more than one (1) year, or both. In the case of a second or subsequent conviction for a negligent violation, a person shall be subject to criminal penalties of not more than \$50,000 per day of violation, or by imprisonment of not more than two (2) years, or both. Any person who knowingly violates such sections, or such conditions or limitations is subject to criminal penalties of \$5,000 to \$50,000 per day of violation, or imprisonment for not more than three (3) years, or both. In the case of a second or subsequent conviction for a knowing violation, a person shall be subject to criminal penalties of not more than \$100,000 per day of violation, or imprisonment of not more than six (6) years, or both. Any person who knowingly violates section 301, 302, 303, 306, 307, 308, 318 or 405 of the Act, or any permit condition or limitation implementing any of such sections in a permit issued under section 402 of the Act, and who knows at that time that he thereby places another person in imminent danger of death or serious bodily injury, shall, upon conviction, be subject to a fine of not more than \$250,000 or imprisonment of not more than 15 years, or both. In the case of a second or subsequent conviction for a knowing endangerment violation, a person shall be subject to a fine of not more than \$500,000 or by imprisonment of not more than 30 years, or both. An organization, as defined in section 309(c)(3)(B)(iii) of the CWA, shall, upon conviction of violating the imminent danger provision, be subject to a fine of not more than \$1,000,000 and can be fined up to \$2,000,000 for second or subsequent convictions.
- c. Any person may be assessed an administrative penalty by the EPA Director for violating section 301, 302, 306, 307, 308, 318 or 405 of this Act, or any permit condition or limitation implementing any of such sections in a permit issued under section 402 of this Act. Administrative penalties for Class I violations are not to exceed \$10,000 per violation, with the maximum amount of any Class I penalty assessed not to exceed \$25,000. Penalties for Class II violations are not to exceed \$10,000 per day for each day during which the violation continues, with the maximum amount of any Class II penalty not to exceed \$125,000.
- d. It is unlawful for any person to cause or permit any discharge of water contaminants from any water contaminant or point source located in Missouri in violation of sections 644.006 to 644.141 of the Missouri Clean Water Law, or any standard, rule or regulation promulgated by the commission. In the event the commission or the director determines that any provision of sections 644.006 to 644.141 of the Missouri Clean Water Law or standard, rules, limitations or regulations promulgated pursuant thereto, or permits issued by, or any final abatement order, other order, or determination made by the commission or the director, or any filing requirement pursuant to sections 644.006 to 644.141 of the Missouri Clean Water Law or any other provision which this state is required to enforce pursuant to any federal water pollution control act, is being, was, or is in imminent danger of being violated, the commission or director may cause to have instituted a civil action in any court of competent jurisdiction for the injunctive relief to prevent any such violation or further violation or for the assessment of a penalty not to exceed \$10,000 per day for each day, or part thereof, the violation occurred and continues to occur, or both, as the court deems proper. Any person who willfully or negligently commits any violation in this paragraph shall, upon conviction, be punished by a fine of not less than \$2,500 nor more than \$25,000 per day of violation, or by imprisonment for not more than one year, or both. Second and successive convictions for violation of the same provision of this paragraph by any person shall be punished by a fine of not more than \$50,000 per day of violation, or by imprisonment for not more than two (2) years, or both.
2. **Duty to Reapply.**
- a. If the permittee wishes to continue an activity regulated by this permit after the expiration date of this permit, the permittee must apply for and obtain a new permit.
- b. A permittee with a currently effective site-specific permit shall submit an application for renewal at least 180 days before the expiration date of the existing permit, unless permission for a later date has been granted by the Department. (The Department shall not grant permission for applications to be submitted later than the expiration date of the existing permit.)
- c. A 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.



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



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

AUG 19 2011

AP 10163 C11959
FOR AGENCY USE ONLY
 CHECK NUMBER
 DATE RECEIVED 8/19/13 FEE SUBMITTED ESB

Note

PLEASE READ THE ACCOMPANYING INSTRUCTIONS BEFORE COMPLETING THIS FORM.

1. This application is for:
- An operating permit and antidegradation review public notice
 - A construction permit following an appropriate operating permit and antidegradation review public notice
 - A construction permit and concurrent operating permit and antidegradation review public notice
 - A construction permit (submitted before Aug. 30, 2008 or antidegradation review is not required)
 - An operating permit for a new or unpermitted facility
 - An operating permit renewal: permit # MO- 0135356 Construction Permit # 1 Expiration Date 02/05/2014
 - 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 Triumph Foods, LLC		TELEPHONE WITH AREA CODE (816) 396-2700	
ADDRESS (PHYSICAL) 5302 Stockyards Expressway		CITY St. Joseph	FAX
		STATE MO	ZIP CODE 64504

3. OWNER

NAME Triumph Foods, LLC		E-MAIL ADDRESS mcampbell@triumph	TELEPHONE WITH AREA CODE (816) 396-9882	
ADDRESS (MAILING) 5302 Stockyards Expressway		CITY St. Joseph	FAX	
		STATE MO	ZIP CODE 64504	

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

4. CONTINUING AUTHORITY

NAME Triumph Foods, LLC		TELEPHONE WITH AREA CODE (816) 396-2700		
ADDRESS (MAILING) 5302 Stockyards Expressway		CITY St. Joseph	FAX	
		STATE MO	ZIP CODE 64504	

5. OPERATOR

NAME N/A		CERTIFICATE NUMBER	TELEPHONE WITH AREA CODE	
ADDRESS (MAILING)		CITY	FAX	
		STATE	ZIP CODE	

6. FACILITY CONTACT

NAME Paul Gomes		TITLE Senior Safety and Environmental Mgr	TELEPHONE WITH AREA CODE (816) 396-2825	
			FAX	

7. ADDITIONAL FACILITY INFORMATION

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

001 SW ¼ SW ¼ Sec 30 T 57N R 35W Buch County
 UTM Coordinates Easting (X): +3943130 Northing (Y): -09452400
 For Universal Transverse Mercator (UTM), Zone 15 North referenced to North American Datum 1983 (NAD83)

002 ¼ ¼ Sec T R County
 UTM Coordinates Easting (X): Northing (Y):

003 ¼ ¼ Sec T R County
 UTM Coordinates Easting (X): Northing (Y):

004 ¼ ¼ 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 2011 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.)

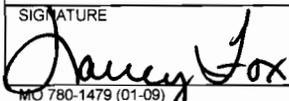
A.	Is your facility a manufacturing, commercial, mining or silviculture waste treatment facility? If yes, complete Form C (unless storm water only, then complete U.S. Environmental Protection Agency Form 2F per Item C below).	YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>
B.	Is your facility considered a "Primary Industry" under EPA guidelines: If yes, complete Forms C and D.	YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>
C.	Is application for storm water discharges only? If yes, complete EPA Form 2F.	YES <input checked="" type="checkbox"/>	NO <input type="checkbox"/>
D.	Attach a map showing all outfalls and the receiving stream at 1" = 2,000' scale.		
E.	Is wastewater land applied? If yes, complete Form I.	YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>
F.	Is sludge, biosolids, ash or residuals generated, treated, stored or land applied? If yes, complete Form R.	YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>

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

NAME N/A			
ADDRESS	CITY	STATE	ZIP CODE

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) Nancy Fox, Vice President of Human Resources	TELEPHONE WITH AREA CODE (806) 396-2800
---	--

SIGNATURE 	DATE SIGNED 8/2/13
--	-----------------------

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?

**INSTRUCTIONS FOR COMPLETING FORM A
APPLICATION FOR CONSTRUCTION OR OPERATING PERMIT**

1. Check which option is applicable. **Do not check more than one item.** Construction and operating permit refer to permits issued by the Department of Natural Resources' Water Protection Program, Water Pollution Control Branch. Effective Sept. 1, 2008, a facility will be required to use **MISSOURI'S ANTI-DEGRADATION RULE AND IMPLEMENTATION PROCEDURE**. For more information, this document can be reviewed at www.dnr.mo.gov/env/wpp/docs/aip-cwc-appr-050708.pdf. This procedure will be applicable to new and expanded wastewater facilities and requires the proposed discharge to a water body to undergo a level of Antidegradation Review, which documents that the use of a water body's available assimilative capacity is justified.

- 1.1 An operating permit and antidegradation review public notice requires a Water Quality/Antidegradation Review Sheet to be submitted with the application (No fee required).

CONSTRUCTION PERMIT FEES

A. \$750 for a sewage treatment facility with a design flow of less than 500,000 gallons per day.

B. \$2,200 for a sewage treatment facility with a design flow of 500,000 gallons per day or more.

Different application and construction fees are applicable if only sewer and/or lift stations are to be constructed.

OPERATING PERMIT FEES

If the application is for a site-specific permit re-issuance, send no fees. You will be invoiced separately by the department.

Discharges covered by section 644.052.4 RSMo. (Primary or Categorical Facilities)

\$3,500 for a design flow under 1 mgd

\$5,000 for a design flow of 1 mgd or more

A. Discharges covered by section 644.052.5 RSMo. (Secondary or Non-Categorical Facilities).

\$1,500 for a design flow under 1 million gallons per day (mpg)

\$2,500 for a design flow of 1 mgd or more

SITE-SPECIFIC STORM WATER DISCHARGE FEES

A. \$1,350 for a design flow under 1 mgd.

B. \$2,350 for a design flow of 1 mgd or more.

OPERATING PERMIT MODIFICATIONS, including transfers, are subject to the following fees:

A. Municipals - \$200 each.

B. All others - 25 percent of annual fee.

Note: Facility name and address changes where owner, operator and continuing authority remain the same are not considered transfers.

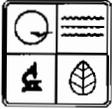
Incomplete permit applications and/or related engineering documents will be returned by the department if they are not completed in the time frame established in a comment letter from the department to the owner. Permit fees for returned applications shall be forfeited. Permit fees for applications being processed by the department that are withdrawn by the applicant shall be forfeited.

2. Facility - Provide the name by which this facility is known locally. Example: Southwest Sewage Treatment Plant, Country Club Mobile Home Park, etc. Also include the street address or location of the facility. If the facility lacks a street name or route number, give the names of the closest intersection, highway, county road, etc.
3. Owner - Provide the legal name and address of owner.
- 3.1 Prior to submitting a permit to public notice, the department shall provide the permit applicant 10 days to review the draft permit for nonsubstantive drafting errors. In the interest of expediting permit issuance, permit applicants may waive the opportunity to review draft permits prior to public notice. Check YES to review the draft permit prior to public notice. Check NO to waive the process and expedite the permit.
4. Continuing Authority - Permanent organization that will serve as the continuing authority for the operation, maintenance and modernization of the facility. The regulatory requirement regarding continuing authority is available at www.sos.mo.gov/adrules/csr/current/10csr/10c20-6a.pdf or contact the appropriate Department of Natural Resources Regional Office.
5. Operator - Provide the name, certificate number and telephone number of the person operating the facility.
6. Provide the name, title and work telephone number of a person who is thoroughly familiar with the operation of the facility and with the facts reported in this application and who can be contacted by the department, if necessary.
- 7.1 An outfall is the point at which wastewater is discharged. Outfalls should be given in terms of the legal description of the facility. Global Positioning System, or GPS, is a satellite-based navigation system. The department prefers that a GPS receiver is used at the outfall pipe and the displayed coordinates submitted. If access to a GPS receiver is not available, please use a mapping system to approximate the coordinates; the department's mapping system is available at www.dnr.mo.gov/internetmapviewer/.
- 7.2 List only your primary Standard Industrial Classification, or SIC, and North American Industry Classification System code for each outfall. The SIC system was devised by the U.S. Office of Management and Budget to cover all economic activities. To find the correct SIC code, an applicant may check his or her unemployment insurance forms or contact the Missouri Division of Employment Security, 573-751-3215. The primary SIC code is that of the operation that generates the most revenue. If this information is not available, the number of employees or, secondly, production rate may be used to determine your SIC code. Additional information is on the Web for Standard Industrial Codes at www.osha.gov/pls/imis/sicsearch.html and for the North American Industry Classification System at www.census.gov/naics or contact the appropriate Department of Natural Resources Regional Office.

INSTRUCTIONS FOR COMPLETING FORM A
APPLICATION FOR CONSTRUCTION OR OPERATING PERMIT
(CONTINUED)

8. If you answer yes to A, B, C, D, E or F, then you must complete and file the supplementary form(s) indicated. A U.S. Geological Survey 1" = 2,000' scale map must be submitted with the permit application showing all outfalls, the receiving stream and the location of the downstream property owners. This type of map is available on the Web at www.dnr.mo.gov/internetmapviewer/ or from the Missouri Department of Natural Resources' Division of Geology and Land Survey in Rolla at 573-368-2125.
9. Please provide the name and address of the first downstream landowner, different from that of the permitted facility, through whose property the discharge will flow. Also, please indicate the location on the map. For discharges that leave the permitted facility and flow under a road or highway, or along the right-of-way, the downstream property owner is the landowner that the discharge flows to after leaving the right-of-way. For no discharge facilities, provide this information for the location where discharge would flow if there was one. For land application sites, include the owners of the land application sites and all adjacent landowners.
10. Signature - All applications must be signed as follows and the signature must be **original**:
 - A. For a corporation, by an officer having responsibility for the overall operation of the regulated facility or activity or for environmental matters.
 - B. For a partnership or sole proprietorship, by a general partner or the proprietor.
 - C. For a municipal, state, federal or other public facility, by either a principal executive officer or by an individual having overall responsibility for environmental matters at the facility.

This completed form, along with the applicable permit fees, should be submitted to the appropriate Regional Office. Submittal of an incomplete application may result in the application being returned. A map of the department's regional offices with addresses and phone numbers can be viewed on the Web at www.dnr.mo.gov/regions/ro-map.pdf. If there are any questions concerning this form, contact the appropriate Regional Office or the Department of Natural Resources' Water Protection Program, Water Pollution Control Branch, Permits and Engineering Section at 573-751-6825.



AUG 19 2011

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

FOR AGENCY USE ONLY	
CHECK NO.	
DATE RECEIVED	FEE SUBMITTED

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

1.00 NAME OF FACILITY
 Triumph Foods, LLC

1.10 THIS FACILITY IS NOW IN OPERATION UNDER MISSOURI OPERATING PERMIT NUMBER
 MO-0135356

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).
 N/A

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

A. FIRST Industrial SIC 2011 B. SECOND _____
 C. THIRD _____ D. FOURTH _____

2.10 FOR EACH OUTFALL GIVE THE LEGAL DESCRIPTION.
 OUTFALL NUMBER (LIST) SW 1/4 SW 1/4 SEC 30 T 57N R 35W BUCHANAN COUNTY

2.20 FOR EACH OUTFALL LIST THE NAME OF THE RECEIVING WATER

OUTFALL NUMBER (LIST)	RECEIVING WATER
001	Brown's Branch

2.30 BRIEFLY DESCRIBE THE NATURE OF YOUR BUSINESS
 Triumph Foods, LLC processes live animals into pork products for both domestic and international markets. The primary products are meat cuts and trimmings and by-products that include peptone, bone meal, blood meal, grease, and pet food.

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. FLOW RATE <i>(in mgd)</i>		B. TOTAL VOLUME <i>(specify with units)</i>		
		A. DAYS PER WEEK <i>(specify average)</i>	B. MONTHS PER YEAR <i>(specify average)</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 WHICH MAY AFFECT YOUR DISCHARGES) YOU NOW HAVE UNDER WAY OR WHICH YOU PLAN. 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

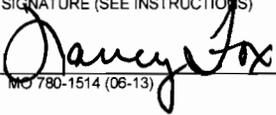
WERE ANY OF THE ANALYSES REPORTED PERFORMED BY A CONTRACT LABORATORY OR CONSULTING FIRM?

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)
Pace Analytical	9608 Loiret Blvd Lenexa, KS 66219	913-599-5665	5 Day BOD Total Suspended Solids Ammonia Oil & Grease E-coli Total Residual Chlorine Surfactants pH

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 THAT THE INFORMATION IS TRUE, ACCURATE AND COMPLETE. I AM AWARE THAT THERE ARE SIGNIFICANT PENALTIES FOR SUBMITTING FALSE INFORMATION, INCLUDING THE POSSIBILITY OF FINE AND IMPRISONMENT.

NAME AND OFFICIAL TITLE (TYPE OR PRINT) Nancy Fox, Vice President of Human Resources	TELEPHONE NUMBER WITH AREA CODE (816) 396-2700
SIGNATURE (SEE INSTRUCTIONS) 	DATE SIGNED 8/2/13

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

FORM C
 TABLE 1 FOR 3.00 ITEM A AND B

INTAKE AND EFFLUENT CHARACTERISTICS

OUTFALL NO

PART A - You must provide the results of at least one analysis for every pollutant in this table. Complete one table for each outfall. See instructions for additional details.

1. POLLUTANT (if available)	2. EFFLUENT						3. UNITS (specify if blank)		4. INTAKE (optional)		B. NO. OF ANALYSES	
	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		
	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS				(1) CONCENTRATION		(2) MASS
A. Biochemical Oxygen Demand (BOD)	387	3463					1	mg/L	lb/d			
B. Chemical Oxygen Demand (COD)												
C. Total organic Carbon (TOC)												
D. Total Suspended Solids (TSS)	51	456					1	mg/L	lb/d			
E. Ammonia (as N)	1.7	9.0					1	mg/L	lb/d			
F. Flow	VALUE 1,073		VALUE		VALUE		1			VALUE		
G. Temperature (winter)	VALUE 5.55		VALUE		VALUE		1	°C		VALUE		
H. Temperature (summer)	VALUE		VALUE		VALUE			°C		VALUE		
I. pH	MINIMUM 7.5	MAXIMUM 7.5	MINIMUM	MAXIMUM			1	STANDARD UNITS				

PART B - Mark "X" in column 2A for each pollutant you know or have reason to believe is present. Mark "X" in column 2B for each pollutant you believe to be absent. If you mark column 2A 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 (1)		B. MAXIMUM 30 DAY VALUE (1)		C. LONG TERM AVRG. VALUE (1)		D. NO. OF ANALYSES	A. CONCENTRATION	B. MASS	A. LONG TERM AVRG. VALUE (1)		B. NO. OF ANALYSES
			CONCENTRATION	(2) MASS	CONCENTRATION	(2) MASS	CONCENTRATION	(2) MASS				CONCENTRATION	(2) MASS	
A. Bromide (24959-67-9)	X													
B. Chlorine, Total Residual	X													
C. Color	X													
D. Fecal Coliform	X		530		N/A				1	cfu/100mL				
E. Fluoride (16984-48-8)		X												
F. Nitrate - Nitrate (as N)		X												

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						
G. Nitrogen, Total Organic (as N)		X												
H. Oil and Grease	X		5.3	47.1					1	mg/L	lb/d			
I. Phosphorus (as P), Total (7723-14-0)		X												
J. Sulfate (as SO ⁴) (14808-79-8)		X												
K. Sulfide (as S)		X												
L. Sulfite (as SO ³) (14265-45-3)		X												
M. Surfactants	X		.42	2.2					1	mg/L	lb/d			
N. Aluminum, Total (7429-90-5)		X												
O. Barium, Total (7440-39-3)		X												
P. Boron, Total (7440-42-8)		X												
Q. Cobalt, Total (7440-48-4)		X												
R. Iron, Total (7439-89-6)		X												
S. Magnesium, Total (7439-95-4)		X												
T. Molybdenum, Total (7439-98-7)		X												
U. Manganese, Total (7439-96-5)		X												
V. Tin, Total (7440-31-5)		X												
W. Titanium, Total (7440-32-6)		X												

MO 780-1514 (05-13)

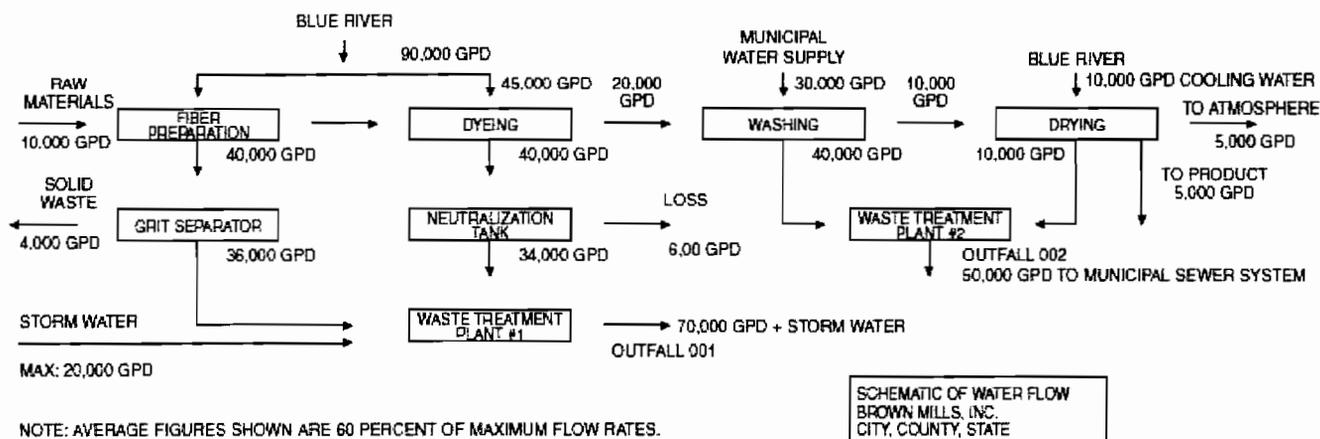
1. POLLUTANT AND CAS NUMBER (if available)	2. MARK "X"		3. EFFLUENT						4. UNITS		5. INTAKE (optional)			
	A. BELIEVED PRESENT	B. BELIEVED ABSENT	A. MAXIMUM DAILY VALUE		B. MAXIMUM 30 DAY VALUE (if available)		C. LONG TERM AVRG. VALUE (if available)		D. NO. OF ANALYSES	A. CONCENTRATION	B. MASS	A. LONG TERM AVRG. VALUE		B. NO. OF ANALYSES
			(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS	(1) CONCENTRATION	(2) MASS						
METALS AND TOTAL PHENOLS														
1M. Antimony, Total (7440-36-9)	X													
2M. Arsenic, Total (7440-38-2)	X													
3M. Beryllium, Total (7440-41-7)	X													
4M. Cadmium, Total (7440-43-9)	X													
5M. Chromium III (16065-83-1)	X													
6M. Chromium VI (18540-29-9)	X													
7M. Copper, Total (7440-50-8)	X													
8M. Lead, Total (7439-92-1)	X													
9M. Mercury, Total (7439-97-6)	X													
10M. Nickel, Total (7440-02-0)	X													
11M. Selenium, Total (7782-49-2)	X													
12M. Silver, Total (7440-22-4)	X													
13M. Thallium, Total (7440-28-0)	X													
14M. Zinc, Total (7440-66-6)	X													
15M. Cyanide, Amenable to Chlorination	X													
16M. Phenols, Total	X													
RADIOACTIVITY														
(1) Alpha Total	X													
(2) Beta Total	X													
(3) Radium Total	X													
(4) Radium 226 Total	X													

INSTRUCTIONS FOR FILLING OUT APPLICATION FOR DISCHARGE PERMIT FORM C – MANUFACTURING, COMMERCIAL, MINING AND SILVICULTURE OPERATIONS.

All blanks must be filled in when the application is submitted to the appropriate regional office (see map). The form must be signed as indicated.

This application is to be completed only for wastewater facilities with a discharge. Include any facility with possibility of discharge, even if normally there is no discharge. If this form is not adequate for you to describe your existing operation, then sufficient information should be attached so that an evaluation of the discharge can be made.

- 1.00 Name of Facility – By what title or name is this facility known locally?
- 1.10 and 1.20 Self-explanatory.
- 2.00 List in descending order of significance the four digit Standard Industrial Classification (SIC) codes that best describe your facility in terms of the principal products or services you produce or provide. Also, specify each classification in words.
- SIC code numbers are descriptions that may be found in the "Standard Industrial Classification Manual" prepared by the Executive Office of the President, Office of Management and Budget, that is available from the Government Printing Office, Washington, D.C. Use the current edition of the manual. If you have any questions concerning the appropriate SIC code for your facility, contact the Missouri Department of Natural Resources Regional office in your area (see map).
- 2.10 Point of discharge should be given in terms of the legal description of the waste treatment plant, location or sufficient information so that it may be located.
- 2.20 Receiving Water – the name of the stream to which the discharge is directed and any subsequent tributary until a continuous flowing stream is reached.
- 2.30 Self-explanatory.
- 2.40 A. The line drawing should show generally the route taken by water in your facility from intake to discharge. Show all operations contributing wastewater, including process and production areas, sanitary flows, cooling water and storm water runoff. You may group similar operations into a single unit labeled to correspond to the more detailed listing. The water balance should show average and maximum flows. Show all significant losses of water to products, atmosphere, discharge and public sewer systems. You should use actual measurements whenever available; otherwise, use your best estimate. An example of any acceptable line drawing appears below.



NOTE: AVERAGE FIGURES SHOWN ARE 60 PERCENT OF MAXIMUM FLOW RATES.

B. List all sources of wastewater to each outfall. Operations may be described in general terms (for example, "dye-making reactor" or a distillation tower"). You may estimate the flow contributed by each source if no data is available, and for storm water, you may use any reasonable measure of duration, volume or frequency. For each treatment unit, indicate its size, flow rate and retention time, and describe the ultimate disposal of any solid or liquid wastes not discharged. Treatment units should be listed in order and you should select the proper code from Table A to fill in column 3B for each treatment unit. Insert "XX" into column 3B if no code corresponds to a treatment unit you list.

TABLE A – CODES FOR TREATMENT UNITS

PHYSICAL TREATMENT PROCESSES

1-AAmmonia Stripping	1-MGrit Removal
1-BDialysis	1-NMicrostraining
1-CDiatomaceous Earth Filtration	1-OMixing
1-DDistillation	1-PMoving Bed Filters
1-EElectrodialysis	1-QMultimedia Filtration
1-FEvaporation	1-RRapid Sand Filtration
1-GFlocculation	1-SReverse Osmosis (Hyperfiltration)
1-HFlotation	1-TScreening
1-IFoam Fractionation	1-USedimentation (Settling)
1-JFreezing	1-VSlow Sand Filtration
1-KGas-Phase Separation	1-WSolvent Extraction
1-LGrinding (Comminutors)	1-XSorption

CHEMICAL TREATMENT PROCESSES

2-ACarbon Absorption	2-GDisinfection (Ozone)
2-BChemical Oxidation	2-HDisinfection (Other)
2-CChemical Precipitation	2-IElectrochemical Treatment
2-DCoagulation	2-JIon Exchange
2-EDechlorination	2-KNeutralization
2-FDisinfection (Chlorine)	2-LReduction

BIOLOGICAL TREATMENT PROCESSES

3-AActivated Sludge	3-EPre-Aeration
3-BAerated Lagoons	3-FSpray Irrigation/Land Application
3-CAnaerobic Treatment	3-GStabilization Ponds
3-DNitrification-Denitrification	3-HTrickling Filtration

OTHER PROCESSES

4-ADischarge to Surface Water	4-CReuse/Recycle of Treated Effluent
4-BOcean Discharge Through Outfall	4-DUnderground Injection

SLUDGE TREATMENT AND DISPOSAL PROCESSES

5-AAerobic Digestion	5-MHeat Drying
5-BAnaerobic Digestion	5-NHeat Treatment
5-CBelt Filtration	5-OIncineration
5-DCentrifugation	5-PLand Application
5-EChemical Conditioning	5-QLandfill
5-FChlorine Treatment	5-RPressure Filtration
5-GComposting	5-SPyrolysis
5-HDrying Beds	5-TSludge Lagoons
5-IElutriation	5-UVacuum Filtration
5-JFlotation Thickening	5-VVibration
5-KFreezing	5-WWeb Oxidation
5-LGravity Thickening		

2.40 C. A discharge is intermittent unless it occurs without interruption during the operating hours of the facility, except for infrequent shutdowns for maintenance, process changes or other similar activities. A discharge is seasonal if it occurs only during certain parts of the year. Fill in every applicable column in this item for each source of intermittent or seasonal discharges. Base your answers on actual data whenever available; otherwise, provide your best estimate. Report the highest daily value for flow rate and total volume in the "Maximum Daily" columns. Report the average of all daily values measures during days when discharge occurred within the last year in the "Long Term Average" columns.

2.50 A. All effluent guidelines promulgated by EPA appear in the Federal Register and are published annually in 40 CFR Subchapter N. A guideline applies to you if you have any operations contributing process wastewater in any subcategory covered by BPT, BCT, or BAT guidelines. If you are unsure whether you are covered by a promulgated effluent guideline, check with your Missouri Department of Natural Resources' Regional Office. You must check yes if an applicable effluent guideline has been promulgated, even if the guideline limitations are being contested in court. If you believe that a promulgated effluent guideline has been remanded for reconsideration by a court and does not apply to your operations, you may check no.

B. An effluent guideline is expressed in terms of production (or other measure of operation) if the limitations are expressed as mass of pollutant per operational parameter; for example, "pounds of BOD per cubic foot of logs from which bark is removed," or "pounds of TSS per megawatt hour of electrical energy consumed by smelting furnace." An example of a guideline not expressed in terms of a measure of operation is one which limits the concentration of pollutants.

C. This item must be completed only if you checked yes to item B. The production information requested here is necessary to apply effluent guidelines to your facility and you may not claim it as confidential. However, you do not have to indicate how the reported information was calculated.

Report quantities in the units of measurement used in the applicable effluent guideline. The figures provided must be a measure of actual operation over a one month period, such as the production for the highest month during the last twelve months, or the monthly average production for the highest year of the last five years, or other reasonable measure of actual operation, but may not be based on design capacity or on predictions of future increases in operation.

2.60 A. If you check yes to this question, complete all parts of the chart, or attach a copy of any previous submission you have made containing the same information.

B. You are not required to submit a description of future pollution control projects if you do not wish to or if none is planned.

3.00 These items require you to collect and report data on the pollutants discharged from each of your outfalls. Each part of this item addresses a different set of pollutants and must be completed in accordance with the specific instructions for that part. The following general instructions apply to the entire item.

GENERAL INSTRUCTIONS. Part A requires you to report at least one analysis for each pollutant. Part B requires you to mark "X" in either the "Believe Present" column or the "Believe Absent" column (column 2A or 2B, Part B) based on your best estimate, and test for those which you believe to be present. Part C requires you to list any of a group of pollutants which you believe to be present, with a brief explanation of why you believe it to be present. (See specific instructions on the form and below Parts A through C).

Base your determination that a pollutant is present in or absent from your discharge on your knowledge of your raw materials, maintenance chemicals, intermediate and final products and byproducts, and any previous analyses known to you of your effluent or of any similar effluent. (For example, if you manufacture pesticides, you should expect those pesticides to be present in contaminated storm water runoff.) If you would expect a pollutant to be present solely as a result of its presence in your intake water, you must mark "Believe Present" but you are not required to analyze for that pollutant. Instead, mark an "X" in the "Intake" column.

REPORTING. All levels must be reported as a concentration and as total mass. You may report some or all of the required data by attaching separate sheets of paper. (Use the following abbreviations in the columns headed "Units" (column 3, Part A, and column 4, Part B).

CONCENTRATION

ppm	parts per million
mg/L	milligrams per liter
ppb	parts per billion
ug/L	micrograms per liter

MASS

lbs	pounds
ton	tons (English tons)
mg	Milligrams
g	grams
kg	kilograms
T	tonnes (metric tons)

If you measure only one daily value, complete only the "Maximum Daily Values" columns and insert "1" into the "number of analyses" columns (columns 2A and 2B, Part A, and columns 3A and 3D, Part B). The Missouri Department of Natural Resources may require you to conduct additional analyses to further characterize your discharges.

For composite samples, the daily value is the total mass or average concentration found in a complete sample taken over the operating hours of the facility during a 24 hour period; for grab samples, the daily value is the arithmetic or flow-weighted total mass or average concentration found in a series of at least four grab samples taken over the operating hours of the facility during a 24 hour period.

If you measure more than one daily value for a pollutant, determine the average of all values within the last year and report the concentration and mass under the "Long Term Average Values" columns (column 2C, Part A, and column 3C, Part B), and the total number of daily values under the "Number of Analyses" columns (column 2D, Part A, and column 3D, Part B). Also, determine the average of all daily values taken during each calendar month, and report the highest average of all daily values taken during each calendar month, and report the highest average under the "Maximum 30 Day Values" columns (column 2B, Part A, and column 3B, Part B).

SAMPLING. The collection of the samples for the reported analyses should be supervised by a person experienced in performing sampling of industrial wastewater. You may contact your Missouri Department of Natural Resources' Regional Office for detailed guidance on sampling techniques and for answers to specific questions. Any specific requirements contained in the applicable analytical methods should be followed for sample containers, sample preservation, holding times, the collection of duplicate samples, etc. The time when you sample should be representative of your normal operation, to the extent feasible, with all processes which contribute wastewater in normal operation and with your treatment system operating properly with no system upsets. Samples should be collected from the center of the flow channel, where turbulence is at a maximum, at a site specified in your present permit or at any site adequate for the collection of a representative sample.

Grab and composite samples are defined as follows:

GRAB SAMPLE. An individual sample of at least 100 milliliters collected at a randomly selected time over a period not exceeding 15 minutes.

COMPOSITE SAMPLE. A combination of at least eight sample aliquots of at least 100 milliliters, collected at periodic intervals during the operating hours of a facility over a 24 hour period. For volatile pollutants, aliquots must be combined in the laboratory immediately before analysis. The composite must be flow proportional; either the time interval between each aliquot or the volume of each aliquot must be proportional to either the stream flow at the time of sampling or the total stream flow since the collection of the previous aliquot. Aliquots may be collected manually or automatically.

ANALYSIS. You must use test methods promulgated in 40 CFR Part 136; however, if none has been promulgated for a particular pollutant, you may use any suitable method for measuring the level of the pollutant in your discharge provided that you submit a description of the method or a reference to a published method. Your description should include the sample holding times, preservation techniques and the quality control measures which you used.

If you have two or more substantially identical outfalls, you may request permission from the Missouri Department of Natural Resources to sample and analyze only one outfall and submit the results of the analysis for other substantially identical outfalls. If your request is granted by the Missouri Department of Natural Resources, on a separate sheet attached to the application form, identify which outfall you did test and describe why the outfalls which you did not test are substantially identical to the outfall which you did test.

REPORTING OF INTAKE DATA. You are not required to report data under the "Intake" columns unless you wish to demonstrate your eligibility for a "net" effluent limitation for one or more pollutants, that is, an effluent limitation adjusted by subtracting the average level of the pollutant(s) present in your intake water. National Pollutant Discharge Elimination System (NPDES) regulations allow net limitations only in certain circumstances. To demonstrate your eligibility, under the Intake columns report the average of the results of analyses on your intake water (if your water is treated before use, test the water after it is treated), and attach a separate sheet containing the following for each pollutant:

1. A statement that the intake water is drawn from the body of water into which the discharge is made. (Otherwise, you are not eligible for net limitations.)
2. A statement of the extent to which the level of the pollutant is reduced by treatment of your wastewater. (Your limitations will be adjusted only to the extent that the pollutant is not removed.)
3. When applicable, a demonstration of the extent to which the pollutants in the intake vary physically, chemically, or biologically from the pollutants contained in your discharge. For example, when the pollutant represents a class of compounds. Your limitations will be adjusted only to the extent that the intake pollutants do not vary from the discharged pollutants.

3.00 Part A must be completed by all applicants for all outfalls, including outfalls containing only noncontact cooling water or storm runoff. However, at your request, the Missouri Department of Natural Resources may waive the requirements to test for one or more of these pollutants, upon a determination that testing for the pollutant(s) is not appropriate for your effluent.

Use composite samples for all pollutants in this part, except use grab samples for pH and temperature. See discussion in instructions above for definitions of the columns in Part A. The "Long Term Average Values" column (column 2C) and "Maximum 30 Day Values" column (column 2B) are not compulsory but should be filled out if data is available.

3.00 Part B must be completed by all applicants for all outfalls, including outfalls containing only noncontact cooling water or storm runoff.

Use composite samples for all pollutants you analyze for in this part, except use grab samples for residual chlorine, oil and grease and fecal coliform. The Long Term Average Values column (column 3C) and Maximum 30 Day Values column (column 3B) are not compulsory but should be filled out if data is available.

3.00 List any pollutants in Table B that you believe to be present and explain why you believe them to be present in part C. No analysis is required, but you have analytical, you must report it.

TABLE B – TOXIC POLLUTANTS AND HAZARDOUS SUBSTANCES REQUIRED TO BE IDENTIFIED BY APPLICANTS IF EXPECTED TO BE PRESENT

TOXIC POLLUTANT	HAZARDOUS SUBSTANCES	HAZARDOUS SUBSTANCES
Asbestos	Dichlorvos	Nalad
	Diethylamine	Napthenic acid
HAZARDOUS SUBSTANCES	Dimethylamine	Nitrotoluene
	Dintrobenzene	Parathion
Acetaldehyde	Diquat	Phenolsulfonate
Allyl alcohol	Disulfoton	Phosgene
Allyl chloride	Diuron	Propargite
Amyl acetate	Epichlorohydrin	Propylene oxide
Aniline	Ethion	Pyrethrins
Benzonitrile	Ethylene diamine	Quinoline
Benzyl chloride	Ethylene dibromide	Resorcinol
Butyl acetate	Formaldehyde	Strontium
Butylamine	Furfural	Strychnine
Captan	Guthion	Sytrene

TABLE B – (continued)

HAZARDOUS SUBSTANCES	HAZARDOUS SUBSTANCES	HAZARDOUS SUBSTANCES
Carbaryl	Isoprene	2, 4, 5-T (2,4,5-Trichloro- phenoxyacetic acid)
Carbofuran	Isopropanolamine	TDE (Tetrachlorodiphenyl ethane)
Carbon disulfide	Kelthane	2, 4, 5-TP (2-(2,4,5-Trichloro- phenoxy) propanoic acid)
Chlorpyrifos	Kepone	Trichlorofon
Coumaphos	Malathion	Triethanolamine
Cresol	Mercaptodimethur	Triethylamine
Crotonaldehyde	Methoxychlor	Uranium
2,4-D (2,4-Dichloro- Phenoxyacetic acid)	Methyl mercaptan	Vanadium
Diazinon	Methyl parathion	Vinyl acetate
Dicamba	Mevinphos	Xylene
Dichlobenil	Mexacarbate	Xylenol
2,2-Dichloropropionic acid	Monethyl amine	Zirconium
	Monomethyl amine	

3.10 Self-explanatory. Additional information may be requested by the Missouri Department of Natural Resources.

3.20 Self-explanatory.

3.30 The Clean Water Act provides for severe penalties for submitting false information on this application form.

Section 309(c)(2) of the Clean Water Act provides that "Any person who knowingly makes any false statement, representation, or certification in any application . . . shall upon conviction, be punished by a fine of no more \$10,000 or by imprisonment for not more than six months, or both.

All applications must be signed as follows and the signature must be original.

- A. For a corporation, by an officer having responsibility for the overall operation of the regulated facility or activity or for environmental matters.
- B. For a partnership or sole proprietorship, by a general partner or the proprietor.
- C. For a municipal, state, federal or other public facility, by either a principal executive officer or by an individual having overall responsibility for environmental matters at the facility.

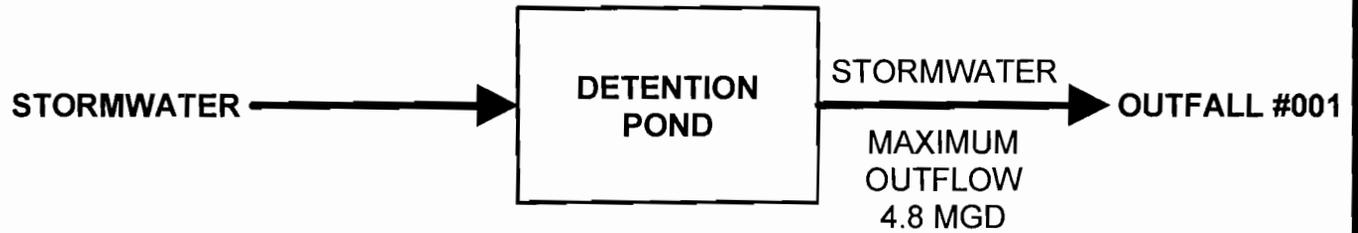
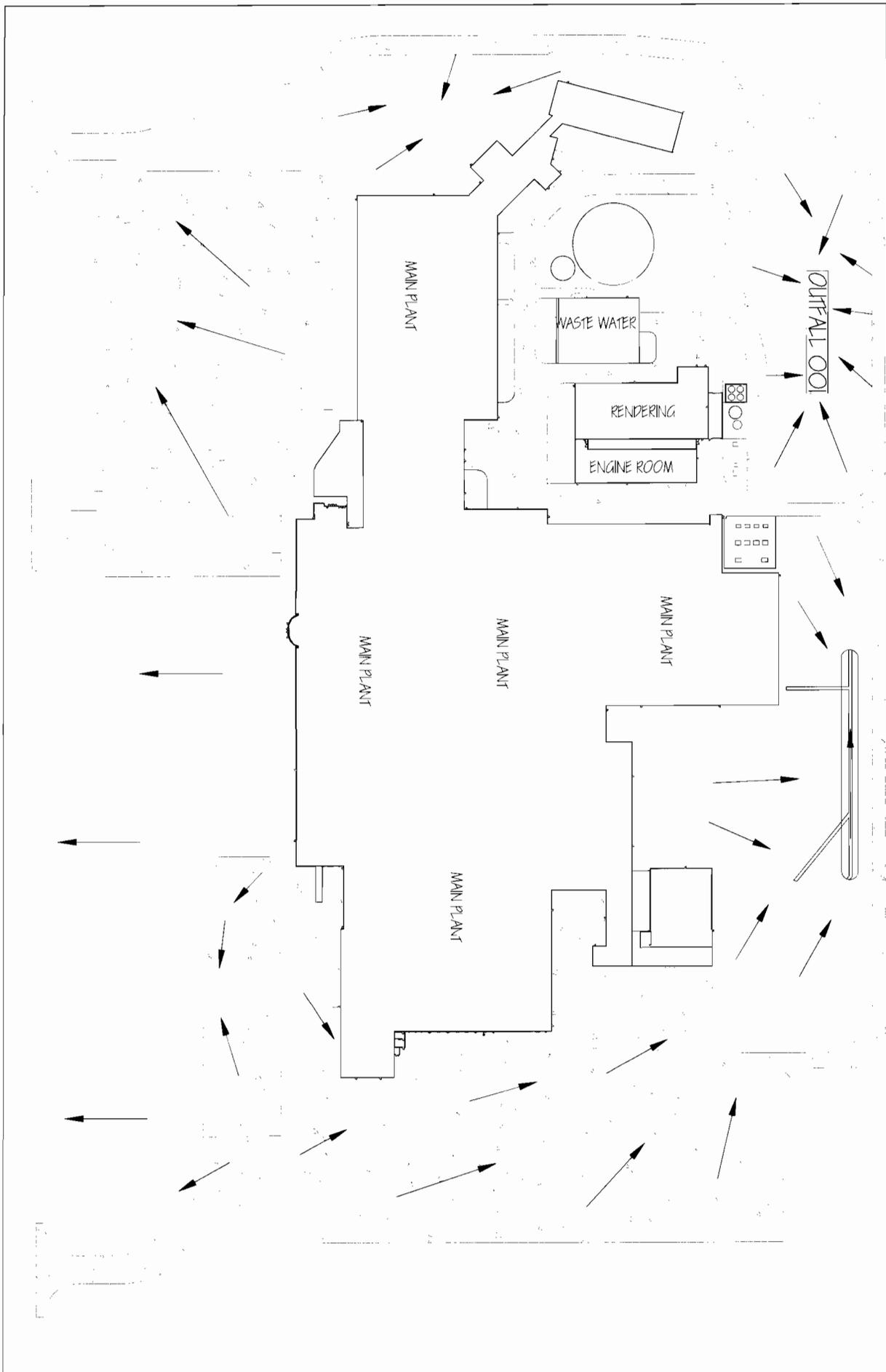


Figure 2.04 A
Triumph Foods, LLC
SCHEMATIC OF
WATER FLOW



PROJECT NUMBER: ##-##-##-##-##	REVISIONS:	FACILITY STORM WATER DRAINAGE FOR TRIUMPH FOODS L.L.C. 5302 Stockyards Expressway Saint Joseph Missouri 64504
	1	
	2	
	3	
	4	
DRAWN BY: JAS		
CHECKED BY: JAS		
DATE: 08/07/2013		

FIGURE 2.04A