

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-0136166

Owner: H.E. Whitener
Address: P.O. Box 5270, Springfield, MO 65803

Continuing Authority: Trailiner Corporation
Address: Same as above

Facility Name: Trailiner Corporation
Facility Address: 2169 Blaine Street, Springfield, MO 65803

Legal Description: See page 2
UTM Coordinates: See page 2

Receiving Stream: See page 2
First Classified Stream and ID: See page 2
USGS Basin & Sub-watershed No.: See page 2

is authorized to discharge from the facility described herein, in accordance with the effluent limitations and monitoring requirements as set forth herein:

FACILITY DESCRIPTION

See page 2.

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.

September 1, 2016
Effective Date


Sara Parker Pauley, Director, Department of Natural Resources

December 31, 2020
Expiration Date


John Madras, Director, Water Protection Program

FACILITY DESCRIPTION (CONTINUED)

OUTFALL #001 – Stormwater; SIC #4231; NAICS # 488490

Receives stormwater from a motor freight terminal and maintenance facility.

Legal Description: NW¼, SE¼, Sec.8, T29N, R21W, Greene County
UTM Coordinates: X = 477655, Y = 4120429
Receiving Stream: Tributary to North Branch Jordan Creek
First Classified Stream and ID: 8-20-13 MUDD V 1.0 (C) (3960) Losing
USGS Basin & Sub-watershed No.: Headwaters Wilson's Creek (11010002-0301)
Flow in a 10yr 24 hr rainfall event: 0.7 MGD
Actual Flow: Dependent on precipitation

OUTFALLS #002 – Stormwater; SIC #4231; NAICS # 488490

Receives stormwater from a motor freight terminal and maintenance facility.

Legal Description: NW¼, SE¼, Sec.8, T29N, R21W, Greene County
UTM Coordinates: X = 477588, Y = 4120303
Receiving Stream: Tributary to North Branch Jordan Creek
First Classified Stream and ID: 8-20-13 MUDD V 1.0 (C) (3960) Losing
USGS Basin & Sub-watershed No.: Headwaters Wilson's Creek (11010002-0301)
Flow in a 10yr 24 hr rainfall event: 0.3 MGD
Actual flow: Dependent upon precipitation

OUTFALL # 003 – Stormwater; SIC #4231; NAICS # 488490

Receives stormwater from a motor freight terminal and maintenance facility.

Legal Description: NW¼, SE¼, Sec.8, T29N, R21W, Greene County
UTM Coordinates: X = 477554, Y = 4120309
Receiving Stream: Tributary to North Branch Jordan Creek
First Classified Stream and ID: 8-20-13 MUDD V 1.0 (C) (3960) Losing
USGS Basin & Sub-watershed No.: Headwaters Wilson's Creek (11010002-0301)
Flow in a 10yr 24 hr rainfall event: 0.3 MGD
Actual flow: Dependent upon precipitation

OUTFALL # 004 – Stormwater; SIC #4231; NAICS # 488490

Receives stormwater from a motor freight terminal and maintenance facility.

Legal Description: NW¼, SE¼, Sec.8, T29N, R21W, Greene County
UTM Coordinates: X = 477374, Y = 4120374
Receiving Stream: Tributary to North Branch Jordan Creek
First Classified Stream and ID: 8-20-13 MUDD V 1.0 (C) (3960) Losing
USGS Basin & Sub-watershed No.: Headwaters Wilson's Creek (11010002-0301)
Flow in a 10yr 24 hr rainfall event: 0.7 MGD
Actual flow: Dependent upon precipitation

A. EFFLUENT LIMITATIONS AND MONITORING REQUIREMENTS

OUTFALL #001-004 <i>Stormwater Only</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 September 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:					
EFFLUENT PARAMETERS	UNITS	DAILY MAXIMUM LIMITS	BENCH-MARKS	MONITORING REQUIREMENTS [∞]	
				MEASUREMENT FREQUENCY [◇]	SAMPLE TYPE
PHYSICAL					
Flow	MGD	*	-	once/quarter	24 hr. est.
Precipitation	inches	*	-	once/quarter	24 hr. total
CONVENTIONAL					
Chemical Oxygen Demand	mg/L	**	90	once/quarter	grab
Oil & Grease	mg/L	10	-	once/quarter	grab
pH ^Ω	SU	6.5 to 9.0	-	once/quarter	grab
Settleable Solids	mL/L/hr	**	1.0	once/quarter	grab
Total Suspended Solids	mg/L	**	50	once/quarter	grab
TOTAL PETROLEUM HYDROCARBONS					
Gasoline Range Organics (TPH-GRO)	mg/L	*	-	once/quarter	grab
Diesel Range Organics (TPH-DRO)	mg/L	*	-	once/quarter	grab
AROMATIC HYDROCARBONS					
Benzene	µg/L	*	-	once/quarter	grab
MONITORING REPORTS SHALL BE SUBMITTED <u>QUARTERLY</u> ; THE FIRST REPORT IS DUE <u>JANUARY 28, 2017</u> . THERE SHALL BE NO DISCHARGE OF FLOATING SOLIDS OR VISIBLE FOAM IN OTHER THAN TRACE AMOUNTS.					

* Monitoring requirement only.

** Monitoring requirement with associated benchmark. See Special Conditions #9 through #12

∞ 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.

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

◇ Quarterly sampling.

MINIMUM QUARTERLY SAMPLING REQUIREMENTS			
QUARTER	MONTHS	EFFLUENT PARAMETERS	REPORT IS DUE
First	January, February, March	Sample at least once during any month of the quarter	April 28 th
Second	April, May, June	Sample at least once during any month of the quarter	July 28 th
Third	July, August, September	Sample at least once during any month of the quarter	October 28 th
Fourth	October, November, December	Sample at least once during any month of the quarter	January 28 th

B. STANDARD CONDITIONS

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

C. SPECIAL CONDITIONS

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

The permit as modified or reissued under this paragraph shall also contain any other requirements of the Clean Water Act then applicable.
2. All outfalls must be clearly marked in the field.
3. 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.
4. Changes in Discharges of Toxic Pollutant
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).
5. Report as no-discharge when a discharge does not occur during the report period.

C. SPECIAL CONDITIONS, CONTINUED

6. 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) Where the permit contains a Minimum Level (ML) and the permittee is granted authority in the permit to report zero in lieu of the < ML for a specified parameter (conventional, priority pollutants, metals, etc.), then zero (0) is to be reported for that parameter.
- (e) See Standard Conditions Part I, Section A, #4 regarding proper detection limits used for sample analysis.
- (f) When calculating monthly averages, one-half of the minimum detection limit (MDL) should be used instead of a zero. Where all data are below the MDL, the "<MDL" shall be reported as indicated in item (C).

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

8. 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.

9. 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.

10. The permittee shall implement a Stormwater Pollution Prevention Plan (SWPPP). The SWPPP must be prepared and implemented upon permit issuance. The SWPPP must be kept on-site and should not be sent to the department unless specifically requested. The SWPPP must be reviewed and updated, if needed, every five (5) years or as site conditions change. The permittee shall select, install, use, operate, and maintain the Best Management Practices prescribed in the SWPPP in accordance with the concepts and methods described in the following document: *Developing Your Stormwater Pollution Prevention Plan, A Guide for Industrial Operators*, (Document number EPA 833-B-09-002) published by the United States Environmental Protection Agency (USEPA) in February 2009.

The SWPPP must include the following:

- (a) A listing of specific Best Management Practices (BMPs) and a narrative explaining how BMPs will be implemented to control and minimize the amount of potential contaminants that may enter stormwater. The BMPs at the facility should be designed to meet this value during rainfall event up to the 10 year, 24 hour rain event.
- (b) The SWPPP must include a schedule for once per month site inspections and brief written reports. The inspection report must include 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.

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

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.

C. SPECIAL CONDITIONS, CONTINUED

12. Permittee shall adhere to the following minimum Best Management Practices (BMPs):
 - (a) Prevent the spillage or loss of fluids, oil, grease, fuel, etc. from vehicle maintenance, equipment cleaning, or warehouse activities and thereby prevent the contamination of 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) 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.
 - (g) Discharges of vehicle and equipment wash water, including tank cleaning operations, are not authorized by this permit. All wash water is considered industrial process water and must be handled in a no discharge manner.
13. To protect the general criteria found at 10 CSR 20-7.031(4), before releasing water accumulated in secondary containment areas, it must be examined for hydrocarbon odor and presence of sheen. If the presence of odor or sheen is indicated, the water shall be treated using an appropriate method or disposed of in accordance with legally approved methods, such as being sent to a wastewater treatment facility. Following treatment, the water shall be tested for oil and grease, benzene, toluene, ethylbenzene, and xylene using 40 CFR part 136 methods. All pollutant levels must be below the most protective, applicable standards for the receiving stream, found in 10 CSR 20-7.031 Table A. Records of all testing and treatment of water accumulated in secondary containment shall be stored in the SWPPP to be available on demand to MDNR and EPA personnel.
14. 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.

MISSOURI DEPARTMENT OF NATURAL RESOURCES
FACT SHEET
FOR THE PURPOSE OF RENEWAL
OF
MO-0136166
TRAILINER CORPORATION

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): 4231
 Facility NAICS Code: 488490
 Application Date: 08/07/2014
 Expiration Date: 02/15/2015
 Last Inspection: 05/26/2009 Not in Compliance

FACILITY DESCRIPTION:

This facility is a terminal and maintenance facility for motor freight operations. The majority of the property is occupied by office and maintenance buildings and parking area for semi-trucks and trailers. The truck parking areas include both gravel surfaced and asphalt paved areas. A vehicle fueling area is located on the north portion of the site. A 2300 gallon AST of diesel fuel is housed within a concrete secondary containment.

PERMITTED FEATURES TABLE:

OUTFALL	AVERAGE FLOW (MGD)	FLOW IN A 10YR 24 HR STORM EVENT* (MGD)	TREATMENT LEVEL	EFFLUENT TYPE
#001	dependent on precipitation	0.7	BMPs	Industrial Stormwater
#002	dependent on precipitation	0.3	BMPs	Industrial Stormwater
#003	dependent on precipitation	0.3	BMPs	Industrial Stormwater
#004	dependent on precipitation	0.7	BMPs	Industrial Stormwater

*Calculated using the rational equation, rational runoff coefficient = 0.7, rainfall intensity 5.5 in/day, drainage area from form 2F

FACILITY PERFORMANCE HISTORY & COMMENTS:

The discharge monitoring reports were reviewed for the last five years. They show one exceedance of the oil and grease parameter at outfall #002 in September 2012. Their records show numerous letters of warning for failure to report DMRs. Their previous inspection in 2009 showed they were out of compliance with the Missouri Clean Water law. The inspection noted the following deficiencies: the facility failed to submit a timely renewal application, the secondary containment for the diesel aboveground storage tank lacked a valve for closure, the facility was improperly exposing batteries and antifreeze fluid to stormwater, and stormwater leaving the site violated the general criteria by having sheen. This facility is not currently under enforcement action and returned to compliance.

FACILITY MAP:



Part II. RECEIVING STREAM INFORMATION

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 WATER BODY'S WATER QUALITY:

The receiving stream Tributary to North Branch Jordan Creek has no concurrent water quality data available. The nearest classified stream, North Branch Jordan Creek (C) (3960) is considered a losing stream. It is not on the 303(d) list. Jordan creek as a whole is on the 303(d) list for contamination with several polycyclic aromatic hydrocarbons (PAHs); however, it is unknown whether this facility is a contributor to this pollution. The North Branch Jordan Creek (C) (3960) is now classified whereas it was not classified in the previous permit, as EPA has approved the Department's new stream classifications. The entire James River watershed is under a 2001 TMDL for nutrients, specifically total nitrogen and total phosphorus. This facility is not believed to contribute to these pollutants.

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; Jordan Creek is listed on the 2014 Missouri 303(d) List for multiple PAHs due to non-point pollution.
- ✓ It is unknown at this time if the facility is a source of the above listed pollutant(s) or considered to contribute to the impairment of Jordan Creek. Once a TMDL is developed, the permit may be modified to include WLAs from the TMDL.

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 James River watershed is associated with the 2001 EPA Approved TMDL for Nutrients, specifically Total Nitrogen and Total Phosphorus
- ✓ This facility is not considered to be a source of the above listed pollutant(s).

MIXING CONSIDERATIONS:

Mixing zone: not allowed [10 CSR 20-7.031(5)(A)4.B.(I)(a)].
 Zone of initial dilution: not allowed [10 CSR 20-7.031(5)(A)4.B.(I)(b)].

RECEIVING STREAM MONITORING REQUIREMENTS:

No receiving water monitoring requirements are recommended at this time.

RECEIVING STREAMS TABLE:

OUTFALL	WATERBODY NAME	CLASS	WBID	DESIGNATED USES	DISTANCE TO SEGMENT	12-DIGIT HUC
#001	Tributary to North Branch Jordan Creek	n/a	n/a	GEN	0.0 mi	11010002-0301 Headwaters Wilson's Creek
	North Branch Jordan Creek (8-20-13 MUDD V 1.0) Losing	C	3960	AQL, HHP, IRR, LWW, SCR, WBC-B	0.15 mi	
#002	Tributary to North Branch Jordan Creek	n/a	n/a	GEN	0.0 mi	
	North Branch Jordan Creek (8-20-13 MUDD V 1.0) Losing	C	3960	AQL, HHP, IRR, LWW, SCR, WBC-B	0.03 mi	
#003	Tributary to North Branch Jordan Creek	n/a	n/a	GEN	0.0 mi	
	North Branch Jordan Creek (8-20-13 MUDD V 1.0) Losing	C	3960	AQL, HHP, IRR, LWW, SCR, WBC-B	0.04 mi	
#004	Tributary to North Branch Jordan Creek	n/a	n/a	GEN	0.0 mi	
	North Branch Jordan Creek (8-20-13 MUDD V 1.0) Losing	C	3960	AQL, HHP, IRR, LWW, SCR, WBC-B	0.09 mi	

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

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)] 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. Five years of DMR data was made available to the permit writer which showed justification for removing the following parameters from the permit: Ethylbenzene, Toluene, and Xylene. Consolidated monitoring for these constituents will continue under the Gasoline Range Organics (TPH-GRO) test.
 - ✓ The previous permit limits for outfall #001-004 were established in error, based on limits for process wastewater, however, this are 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 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.

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 are consistently achieved in stormwater discharges by a variety of other industries with SWPPs and is deemed protective of instream 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.

✓ Not applicable; this condition is not applicable to the permittee for this 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 standards. 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; a RPA was not conducted for this facility, all outfalls are stormwater outfalls.

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.

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:

There are two general types of effluent limitations, technology-based effluent limits (TBELs) and water quality based effluent limits (WQBELs). If TBELs do not provide adequate protection for the receiving waters, then WQBEL must be used.

- ✓ Not applicable; a WLA study was either not submitted or determined not applicable by Department staff.

WATER QUALITY STANDARDS:

Per [10 CSR 20-7.031(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.

Part IV. EFFLUENT LIMITS DETERMINATION

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

PARAMETERS OUTFALLS #001-004	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. EST
PRECIPITATION	INCHES	6	*	-	SAME	ONCE/QUARTER	ONCE/QUARTER	24 HR. TOT.
CONVENTIONAL								
COD	MG/L	6	**	90	*	ONCE/QUARTER	ONCE/QUARTER	GRAB
OIL & GREASE	MG/L	1, 9	10	-	15, 10	ONCE/QUARTER	ONCE/QUARTER	GRAB
pH ‡	SU	1, 3	6.5 TO 9.0	-	SAME	ONCE/QUARTER	ONCE/QUARTER	GRAB
SETTLEABLE SOLIDS	ML/L/HR	6	**	1.0	1.0, 0.5	ONCE/QUARTER	ONCE/QUARTER	GRAB
TSS	MG/L	6, 10	**	50	NEW	ONCE/QUARTER	ONCE/QUARTER	GRAB
TOTAL PETROLEUM HYDROCARBONS								
GASOLINE RANGE ORGANICS (TPH-GRO)	mg/L	6	*	-	NEW	ONCE/QUARTER	ONCE/QUARTER	GRAB
DIESEL RANGE ORGANICS (TPH-GRO)	mg/L	6	*	-	NEW	ONCE/QUARTER	ONCE/QUARTER	GRAB
AROMATIC HYDROCARBONS								
BENZENE	µg/L	6, 9	*	-	SAME	ONCE/QUARTER	ONCE/QUARTER	GRAB

* - Monitoring requirement only ** - Monitoring with associated benchmark NEW = Parameter not established in previous operating permit
 ‡ The facility will report the minimum and maximum pH values; pH is not to be averaged

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. Benchmark based on Missouri General Permit MOR80C |
| 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 OUTFALLS #001- #004—STORMWATER OUTFALLS:

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 quarter because of the readily available on-line data.

CONVENTIONAL:

Chemical Oxygen Demand (COD)

Monitoring with 90 mg/L daily maximum benchmark. The previous permit had monitoring only on this parameter. The past five years of data show this facility has a fairly consistent discharge of COD that is within the range of values seen issued on similar industrial permits; however, this facility shows an occasional spike in COD levels that could be of concern for instream water quality. It is in the permit writer’s best professional judgment to set a benchmark that is reflective of the industrial process on site. There is no water quality standard for COD; however, increased oxygen demand may impact instream water quality. COD is also a valuable indicator parameter. COD monitoring allows the permittee to identify increases in COD that may indicate materials/chemicals coming into contact with stormwater that cause an increase in oxygen demand. Increases in COD may

indicate a need for maintenance or improvement of BMPs. 90 mg/L is found in other industrial permits, and provides a guideline for the permittee to assess BMP performance.

Oil & Grease

Daily maximum limit of 10 mg/L. The previous permit had maximum daily limits of 15 mg/L and a monthly average limit of 10 mg/L. This facility had one exceedance of this parameter at outfall #002 in the last permit cycle. Oil and grease is a conventional pollutant. Oil and grease is a comprehensive test which measures for gasoline, diesel, crude oil, creosote, kerosene, heating oils, heavy fuel oils, lubricating oils, waxes, and some asphalt and pitch. The test can also detect some volatile organics such as benzene, toluene, ethylbenzene, or toluene, but these constituents are often lost during testing due to their boiling points. It is recommended to perform separate testing for these constituents if they are a known pollutant of concern at the site, i.e. aquatic life toxicity or human health is a concern. Results do not allow for separation of specific pollutants within the test, they are reported, totaled, as "Oil and grease". Per 10 CSR 20-7.031 Table A: *Criteria for Designated Uses*; 10 mg/L is the monthly average (chronic standard) for this parameter. 10 mg/L is the level at which sheen is expected to form on receiving waters. Oils and greases of different densities will possibly form sheen or unsightly bottom deposits at levels which vary from 10 mg/L. To protect the general criteria, it is the responsibility of the permittee to visually observe the discharge and receiving waters for sheen or bottom deposits. A schedule of compliance will not be offered for this parameter, as it is in the best professional judgment of the permit writer, after review of the available DMRs, the facility can reasonably meet the limits. The DMRs show consistent measurements of 5 mg/L-6 mg/L at all outfalls, barring the one anomalous value of 27 mg/L at outfall #002. Jordan Creek is listed on the 2014 303(d) list for PAH pollution. A common source of PAHs is used motor oils. The facility reports managing BMPs using vegetated buffers and frequent site inspections. The permit writer is unsure if this facility will be considered a contributor of this pollutant when the TMDL is developed.

pH

6.5 to 9.0 SU. The Water Quality Standard at 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)

Monitoring, with a daily maximum benchmark of 1.0 mL/L/hr. The previous permit had a daily maximum limit of 1.0 mg/L/hr, and a monthly average limit of 0.5 mg/L/hr. This facility had no problem consistently meeting this limit; therefore, a benchmark will be placed on this parameter rather than a limit for BMP evaluation. There is no water quality standard for SS; however, sediment discharges can negatively impact aquatic life 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.

Total Suspended Solids (TSS)

Monitoring with a benchmark set at 50 mg/L. This is a new parameter for this permit. The application materials submitted by this facility indicate an elevated level of Total Suspended Solids in the effluent. There is no numeric water quality standard for TSS; however, sediment discharges can negatively impact aquatic life habitat and thus lead to a violation of the general criteria which are applicable to all waters of the state at all times per 10 CSR 20-7.031 (4). 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. A benchmark value will be implemented for this parameter so the facility can assess their BMP effectiveness. The benchmark value will be set at 50 mg/L. This value falls within the range of values implemented in other permits that have similar industrial activities and the Missouri State General Permit for Motor Freight Transportation, MOR80C.

TOTAL PETROLEUM HYDROCARBONS

Gasoline Range Organics (TPH-GRO)

Monitoring only. This is a new parameter for this permit. This parameter will be added to replace BTEX sampling for individual pollutants. Monitoring for Toluene, Ethylbenzene, and Total Xylenes in the last permit cycle showed consistently low levels of these pollutants; however, they are common pollutants of concerns with facilities of this type. The TPH-GRO test covers hydrocarbons in the range of 6-10 carbon atoms. Toluene, Ethylbenzene, and Xylene all fall within this range; therefore this test will be indicative of discharge of these pollutants should it occur. Benzene will continue to be monitored separately due to concerns with toxicity in groundwater (See Aromatic Hydrocarbons—Benzene for more information).

Diesel Range Organics (TPH-DRO)

Monitoring only. This parameter will be added to monitor for diesel fuel in the effluent due to the 2300 gallon AST holding diesel fuel at this facility.

AROMATIC HYDROCARBONS

Benzene:

Monitoring only, continued from previous permit. The facility consistently reported 5µg/L for this pollutant in the previous permit cycle, which is the chronic groundwater standard found at 10 CSR 20-7.031. It is in the best professional judgment of the permit writer that it is unlikely that the chronic conditions will be met in stream due to the intermittent and variable nature of stormwater events. Benzene is a known indicator pollutant for other aromatic hydrocarbons, and controlling it in the effluent will also control other gasoline discharges not covered comprehensively in this permit. It is important the permittee utilize sufficiently sensitive methods to ensure compliance with permit limits and benchmarks. See Part V, Sufficiently Sensitive Methods, for further information.

Ethylbenzene:

This parameter will be removed from this permit. It will now be monitored for with the “Total petroleum hydrocarbons-Gasoline Range Organics” test.

Toluene:

This parameter will be removed from this permit. It will now be monitored for with the “Total petroleum hydrocarbons-Gasoline Range Organics” test.

Xylene:

This parameter will be removed from this permit. It will now be monitored for with the “Total petroleum hydrocarbons-Gasoline Range Organics” test.

Part V. SAMPLING AND REPORTING REQUIREMENTS:

ELECTRONIC DISCHARGE MONITORING REPORTING:

Due to recently enacted federal regulations, all facilities will need to 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>.

SUFFICIENTLY SENSITIVE ANALYTICAL METHODS:

Please review Standard Conditions Part 1, Section A, number 4. The analytical and sampling methods used shall conform to the reference methods listed in 10 CSR 20-7.015 unless alternatives 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. 40 CFR 136 lists the approved methods accepted by the department.

SAMPLING FREQUENCY JUSTIFICATION:

Sampling and reporting frequency was generally retained from previous permit. Precipitation changed from daily reporting to quarterly reporting only due to readily available precipitation data being available online.

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. Discharges with altering effluent should have composite sampling; discharges with uniform effluent can have grab samples. Grab samples are usually appropriate for stormwater.

Part VI. 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 4th quarter, 2020.*

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 04/15/2016 to 05/16/2016. No responses were received. This permit has been changed after Public Notice to reflect stream name changes, which is a minor change that does not require an additional Public Notice.

DATE OF FACT SHEET: 03/23/2016

COMPLETED BY:

AMBERLY SCHULZ, ENVIRONMENTAL SPECIALIST
MISSOURI DEPARTMENT OF NATURAL RESOURCES
WATER PROTECTION PROGRAM
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STANDARD CONDITIONS FOR NPDES PERMITS
ISSUED BY
THE MISSOURI DEPARTMENT OF NATURAL RESOURCES
MISSOURI CLEAN WATER COMMISSION
REVISED
AUGUST 1, 2014

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

Part I – General Conditions

Section A – Sampling, Monitoring, and Recording

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

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

Section B – Reporting Requirements

1. **Planned Changes.**
 - a. The permittee shall give notice to the Department as soon as possible of any planned physical alterations or additions to the permitted facility when:
 - i. The alteration or addition to a permitted facility may meet one of the criteria for determining whether a facility is a new source in 40 CFR 122.29(b); or
 - ii. The alteration or addition could significantly change the nature or increase the quantity of pollutants discharged. This notification applies to pollutants which are subject neither to effluent limitations in the permit, nor to notification requirements under 40 CFR 122.42;
 - 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.



ENVIRONMENTAL WORKS

OUR EXPERTISE. YOUR SUCCESS.

August 5, 2014

Ms. Amanda Sappington
Missouri Department of Natural Resources
Water Protection Program
PO Box 176
Jefferson City, MO 65102-0176

**RE: NPDES Permit Renewal Application
Missouri Operating Permit MO-0136166
Trailer Corporation
2169 East Blaine Street
Springfield, Missouri 65803**

RECEIVED

AUG 7 2014

Dear Ms. Sappington:

WATER PROTECTION PROGRAM

Please find enclosed the NPDES permit renewal application for the above referenced facility.

Please feel free to contact me or Tommy Bieker of EWI at (417) 890-9500 if you have any questions.

Sincerely,

Jeremy S. Snow
Associate Scientist

1455 E. Chestnut Expy
Springfield, MO 65802
P: 417.890.9500
F: 417.823.9659

201 Main Street, Suite 200
Kansas City, MO 64105
P: 816.285.8410
F: 816.285.8409

St. Louis, MO

24-Hr. 877.827.9500
www.environmentalworks.com

RECEIVED

AP 19296



MISSOURI DEPARTMENT OF NATURAL RESOURCES
WATER PROTECTION PROGRAM
FORM A - APPLICATION FOR NONDOMESTIC PERMIT UNDER MISSOURI
CLEAN WATER LAW

FOR AGENCY USE ONLY	
CHECK NUMBER	
DATE RECEIVED	5/11/14
FEE SUBMITTED	000

Note PLEASE READ THE ACCOMPANYING INSTRUCTIONS BEFORE COMPLETING THIS FORM.

1. This application is for:

An operating permit for a new or unpermitted facility:
Please indicate the original Construction Permit # _____

An operating permit renewal:
Please indicate the permit # MO-0136166 Expiration Date 2/15/2015

An operating permit modification:
Please indicate the permit # MO-_____ Modification Reason: _____

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

2. FACILITY

NAME Trailiner Corporation		TELEPHONE NUMBER WITH AREA CODE 417-866-0082	
		FAX 417-866-1168	
ADDRESS (PHYSICAL) 2169 E. Blaine St.	CITY Springfield	STATE MO	ZIP CODE 65803

3. OWNER

NAME H.E. Whitener		TELEPHONE NUMBER WITH AREA CODE 417-866-0082	
		FAX 417-866-1168	
ADDRESS (MAILING) PO Box 5270	CITY Springfield	STATE MO	ZIP CODE 65801

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

4. CONTINUING AUTHORITY

NAME Trailiner Corporation		TELEPHONE NUMBER WITH AREA CODE 417-866-0082	
		FAX 417-866-1168	
ADDRESS (MAILING) PO BOX 5270	CITY Springfield	STATE MO	ZIP CODE 65801

5. OPERATOR

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

6. FACILITY CONTACT

NAME Larry Sanner		TELEPHONE NUMBER WITH AREA CODE 417-866-0082	
		FAX 417-866-1168	
TITLE Executive Vice President			
E-MAIL ADDRESS Larry.S@trailiner.com			

7. ADDITIONAL FACILITY INFORMATION

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

001 NW 1/4 SE 1/4 Sec 8 T 29N R 21W Greene County
UTM Coordinates Easting (X): 477655 Northing (Y): 4120429
For Universal Transverse Mercator (UTM), Zone 15 North referenced to North American Datum 1983 (NAD83)

002 NE 1/4 SW 1/4 Sec 8 T 29N R 21W Greene County
UTM Coordinates Easting (X): 477588 Northing (Y): 4120303

003 NE 1/4 SW 1/4 Sec 8 T 29N R 21W Greene County
UTM Coordinates Easting (X): 477554 Northing (Y): 4120309

004 NE 1/4 SW 1/4 Sec 8 T 29N R 21W Greene County
UTM Coordinates Easting (X): 477974 Northing (Y): 4120374

7.2 Primary Standard Industrial Classification (SIC) and Facility North American Industrial Classification System (NAICS) Codes.

001 - SIC 4231 and NAICS 488490 002 - SIC 4231 and NAICS 488490
003 - SIC 4231 and NAICS 488490 004 - SIC 4231 and NAICS 488490

RECEIVED

AUG 7 2014

WATER PROTECTION PROGRAM

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

- A. Is your facility a manufacturing, commercial, mining or silviculture waste treatment facility? YES NO
If yes, complete Form C or 2F.
(2F is the U.S. EPA's Application for Storm Water Discharges Associate with Industrial Activity.)
- B. Is application for storm water discharges only? YES NO
If yes, complete Form C or 2F.
- C. Is your facility considered a "Primary Industry" under EPA guidelines: YES NO
If yes, complete Forms C or 2F and D.
- D. Is wastewater land applied? YES NO
If yes, complete Form I.
- E. Is sludge, biosolids, ash or residuals generated, treated, stored or land applied? YES NO
If yes, complete Form R.
- F. If you are a Class IA CAFO, please disregard part D and E of this section. However, please attach any revision to your Nutrient Management Plan.
- F. Attach a map showing all outfalls and the receiving stream at 1" = 2,000' scale.

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

NAME <i>N/A</i>			
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) <i>Larry Sanner, Executive Vice President</i>	TELEPHONE NUMBER WITH AREA CODE <i>417-866-7258</i>
SIGNATURE <i>Larry Sanner EHP</i>	DATE SIGNED <i>8-5-2014</i>

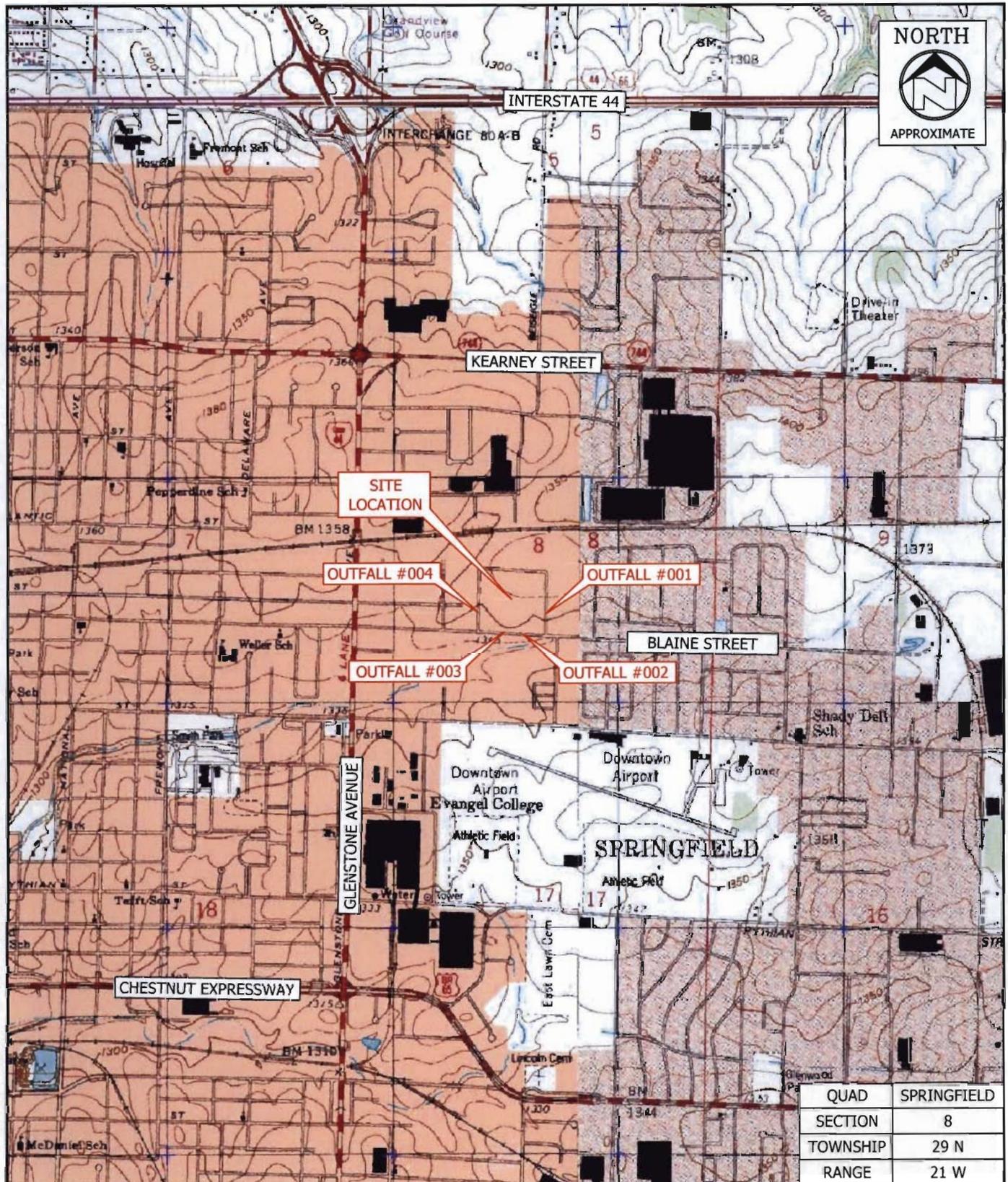
MO 780-479 (07-14)

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 or 2F, if applicable?
- Form D, if applicable?
- Form I (Irrigation), if applicable?
- Form R (Sludge), if applicable?
- Revised Nutrient Management Plan, if applicable?



QUAD	SPRINGFIELD
SECTION	8
TOWNSHIP	29 N
RANGE	21 W

SOURCE: www.mapcard.com (2000)

CHECKED BY:
T. BIEKER

EWI# 140110
DRAWN BY: JSS
Aug. 5, 2014

SCALE (FEET)

0 1000 2000

APPROXIMATE



AREA TOPOGRAPHIC MAP

TRAILINER CORPORATION
2169 EAST BLAINE STREET
SPRINGFIELD, GREENE COUNTY, MISSOURI

FIGURE
1.0

Continued from the Front

IV. Narrative Description of Pollutant Sources

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

Outfall Number	Area of Impervious Surface (provide units)	Total Area Drained (provide units)	Outfall Number	Area of Impervious Surface (provide units)	Total Area Drained (provide units)
OF #001	4.57-ACRES	6.7-ACRES	OF #003	3.19-ACRES	3.19-ACRES
OF #002	2.8-ACRES	2.8-ACRES	OF #004	3.14-ACRES	6.47-ACRES

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

The facility is a terminal and maintenance facilities for motor freight operations. The majority of the property is occupied by office and maintenance buildings and parking areas for the semi-trucks and trailers. The parking areas include both gravel-surfaced and asphalt paved areas. Trucks and trailers are housed in area of the site until utilized. The trucks and trailers have regularly scheduled maintenance and inspections to ensure that no leaks or spills of significant materials are exposed while they parked in the holding areas. An equipment fueling area is located on the north portion of the site. A 2,300-gallon AST of diesel fuel is housed within a concrete secondary containment. Any other significant material are placed within the buildings onsite to minimize exposure to stormwater. All storage containers are continuously monitored and managed through the facilities SWPPP and SPCC Plan.

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

Outfall Number	Treatment	List Codes from Table 2F-1
#001 #002 #003 #004	All outfalls are continuously monitored through the facilities SWPPP & SPCCP, inspections, and routine maintenance. BMPs including: natural vegetation to reduce erosion potential, gravel parking areas to control runoff, a drainage system that allows debris to settle out, and a grass-lined drainage ditch are located throughout the site. These BMPs are in place and help ensure that stormwater meets the facilities permit requirements.	

V. Nonstormwater Discharges

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

Name and Official Title (type or print)	Signature	Date Signed
Larry Sanna EITP.	Larry Sanna	8-5-2014

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

NONE

VI. Significant Leaks or Spills

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

NONE

VII. Discharge Information

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

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

Yes (list all such pollutants below) No (go to Section IX)

OIL & GREASE BENZENE TOLUENE ETHYLBENZENE XYLENES	
---	--

VIII. Biological Toxicity Testing Data

Do you have any knowledge or reason to believe that any biological test for acute or chronic toxicity has been made on any of your discharges or on a receiving water in relation to your discharge within the last 3 years?

Yes (list all such pollutants below) No (go to Section IX)

--	--

IX. Contract Analysis Information

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

Yes (list the name, address, and telephone number of, and pollutants analyzed by, each such laboratory or firm below) No (go to Section X)

A. Name	B. Address	C. Area Code & Phone No.	D. Pollutants Analyzed
MIDWEST ENVIRONMENTAL CONSULTANTS	1350 E. KINGSLEY STREET, SUITE E SPRINGFIELD, MO 65804	417-886-9200	
ENVIRONMENTAL WORKS, INC	1455 E. CHESTNUT EXPRESSWAY SPRINGFIELD, MO 65802	417-890-9500	OIL & GREASE BENZENE TOLUENE ETHYLBENZENE XYLENES SETTLABLE SOLIDS COD
PACE ANALYTICAL SERVICES, INC.	9608 LOIRET BOULEVARD LENEXA, KS 66219	913-599-5665	
PDC LABORATORIES	1805 W. SUNSET STREET SPRINGFIELD, MO 65807	417-864-8924	

X. Certification

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

A. Name & Official Title (Type of Permit) Larry Sanner, ERP.	B. Area Code and Phone No. 417-866-7258
C. Signature 	D. Date Signed 8-5-2014

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RETURN FORM TO: Southwest Regional Office
2040 W. Woodland
Springfield, MO 65807

Facility Name	Trailiner Corp.	Current Address:	Owner	X	Billing	<input type="checkbox"/>	Address Change For:	Owner	<input type="checkbox"/>	Billing	<input type="checkbox"/>
Permit Number	MO-0136166	Trailiner Corporation									
County	Greene	2169 East Blaine Street									
Facility Type	Truck Maintenance Repair - Stormwater only	Springfield, Missouri 65803									
SAMPLES COLLECTED BY	Vance Madow	ANALYSES PERFORMED BY (Lab)	Pace Analytical Services, Inc.								
SIGNATURE AND TITLE OF INDIVIDUAL PREPARING REPORT	<i>[Signature]</i> Associate Scientist	PHONE NUMBER	(417) 890-9500								
SIGNATURE OF OWNER OR PERSON IN CHARGE APPROVING REPORT	<i>[Signature]</i>	E-MAIL ADDRESS (Optional)	jsnow@environmentalworks.com								
		E-MAIL ADDRESS (Optional)	ibekker@environmentalworks.com								
		DATE	6/27/2014								
		PHONE NUMBER	(417) 890-9500								
		DATE	6/27/2014								
		PHONE NUMBER	(417) 890-9500								
Outfall #001		Final Permit Limitations									NO DISCHARGE <input type="checkbox"/>
Parameter	Units	Daily Maximum	Weekly Average	Monthly Average	Frequency	Sample Type	Due Date				
Flow	GPD	*		*	Quarterly	24 hr. estimate					
Chemical Oxygen Demand	mg/L	*		*	Quarterly	grab					
Settleable Solids	mL/L/hr	1		0.5	Quarterly	grab					
pH - Units	SU	6.5-9		6.5-9	Quarterly	grab					
Benzene	mg/L	*		*	Quarterly	grab					
Toluene	mg/L	*		*	Quarterly	grab					
Xylenes, Total	mg/L	*		*	Quarterly	grab					
Ethylbenzene	mg/L	*		*	Quarterly	grab					
Oil & Grease	mg/L	15		10	Quarterly	grab					

MONITORING REPORTS SHALL BE SUBMITTED QUARTERLY. THE FIRST REPORT IS DUE APRIL 30, 2011.

IF A VIOLATION OCCURRED, PLEASE ATTACH THE FOLLOWING: AN EXPLANATION OF POSSIBLE CAUSE, EXACT DATE OF NON-COMPLIANCE, DATE ANTICIPATED TO RETURN TO COMPLIANCE, AND WHAT STEPS YOUR OPERATION WILL TAKE TO PREVENT A REOCCURRENCE OF THE VIOLATION.

* Monitoring requirement only.

THIS DMR EXPIRES ON:
February 15, 2015

DMR Page 1 of 4

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RETURN FORM TO: Southwest Regional Office
 2040 W. Woodland
 Springfield, MO 65807

Facility Name	Trailiner Corp.	Current Address:	Owner	X	Billing	<input type="checkbox"/>	Address Change For:	Owner	<input type="checkbox"/>	Billing	<input type="checkbox"/>
Permit Number	MO-0136166	Trailiner Corporation									
County	Greene	2169 East Blaine Street Springfield, Missouri 65803									
Facility Type	Truck Maintenance Repair - Stormwater only										
SAMPLES COLLECTED BY	Vance Marlow	SAMPLE DATE	4/27/2014	PHONE NUMBER	(417) 890-9500	PHONE NUMBER (Lab)	(913) 599-5665	This report covers the period of: April 1, 2014 to June 30, 2014			
SIGNATURE AND TITLE OF INDIVIDUAL PREPARING REPORT	<i>[Signature]</i> Associate Scientist	DATE	6/27/2014	PHONE NUMBER	(417) 890-9500	E-MAIL ADDRESS (Optional)	isnow@environmentalworks.com				
SIGNATURE OF OWNER OR DESIGNEE APPROVING REPORT	<i>[Signature]</i> Associate Scientist	DATE	6/27/2014	PHONE NUMBER	(417) 890-9500	E-MAIL ADDRESS (Optional)	lbleker@environmentalworks.com				
Outfall #003	Final Permit Limitations	Monitoring Requirement	Due Date								
Parameter	Units	Daily Maximum	Weekly Average	Monthly Average	Frequency	Sample Type	24 hr. estimate				
Flow	GPD	*	*	*	Quarterly	grab					
Chemical Oxygen Demand	mg/L	*	*	*	Quarterly	grab					
Settleable Solids	mL/L/hr	1		0.5	Quarterly	grab					
pH - Units	SU	6.5-9		6.5-9	Quarterly	grab					
Benzene	mg/L	*	*	*	Quarterly	grab					
Toluene	mg/L	*	*	*	Quarterly	grab					
Xylenes, Total	mg/L	*	*	*	Quarterly	grab					
Ethylbenzene	mg/L	*	*	*	Quarterly	grab					
Oil & Grease	mg/L	15		10	Quarterly	grab					
Parameter	Daily Minimum	Daily Maximum	Weekly Average	Monthly Average							
Flow		45,822									
Chemical Oxygen Demand		45.7									
Settleable Solids		ND									
pH - Units		7.7									
Benzene		ND									
Toluene		ND									
Xylenes, Total		ND									
Ethylbenzene		ND									
Oil & Grease		ND									

MONITORING REPORTS SHALL BE SUBMITTED QUARTERLY. THE FIRST REPORT IS DUE APRIL 28, 2010.

IF A VIOLATION OCCURRED, PLEASE ATTACH THE FOLLOWING: AN EXPLANATION OF POSSIBLE CAUSE, EXACT DATE OF NON-COMPLIANCE, DATE ANTICIPATED TO RETURN TO COMPLIANCE, AND WHAT STEPS YOUR OPERATION WILL TAKE TO PREVENT A REOCCURRENCE OF THE VIOLATION.

* Monitoring requirement only

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RETURN FORM TO: Southwest Regional Office
2040 W. Woodland
Springfield, MO 65807

Facility Name	Trailiner Corp.	Current Address:	Owner	X	Billing	<input type="checkbox"/>	Address Change For:	Owner	<input type="checkbox"/>	Billing	<input type="checkbox"/>
Permit Number	MO-0136166	Trailiner Corporation									
County	Greene	2160 East Blaine Street									
Facility Type	Truck Maintenance Repair - Stormwater only	Springfield, Missouri 65803									
SAMPLES COLLECTED BY	Vance Marlow	PHONE NUMBER	ANALYSES PERFORMED BY (Lab)								
SIGNATURE AND TITLE OF INDIVIDUAL PREPARING REPORT		DATE	Pace Analytical Services, Inc								
SIGNATURE OF OWNER OR DESIGNEE APPROVING REPORT		DATE	E-MAIL ADDRESS (Optional)								
Associate Scientist		6/27/2014	janow@environmentalworks.com								
DATE		6/27/2014	E-MAIL ADDRESS (Optional)								
DATE		6/27/2014	bliska@environmentalworks.com								
PHONE NUMBER		(417) 890-9500									
PHONE NUMBER		(417) 890-9500									
NO DISCHARGE		<input type="checkbox"/>									
April 1, 2014 to		June									
30, 2014											
This report covers the period of:											
Outfall #004											
Parameter	Units	Daily Maximum	Daily Maximum	Weekly Average	Monthly Average						
Flow	GPD	*	54,628								
Chemical Oxygen Demand	mg/L	*	67.8								
Settleable Solids	mL/L/hr	1	NID								
pH - Units	SU	6.5-9	6.8								
Benzene	mg/L	*	NID								
Toluene	mg/L	*	NID								
Xylenes, Total	mg/L	*	NID								
Ethylbenzene	mg/L	*	NID								
Oil & Grease	mg/L	15	NID								

MONITORING REPORTS SHALL BE SUBMITTED QUARTERLY. THE FIRST REPORT IS DUE APRIL 28, 2010.

IF A VIOLATION OCCURRED, PLEASE ATTACH THE FOLLOWING: AN EXPLANATION OF POSSIBLE CAUSE, EXACT DATE OF NON-COMPLIANCE, DATE ANTICIPATED TO RETURN TO COMPLIANCE, AND WHAT STEPS YOUR OPERATION WILL TAKE TO PREVENT A REOCCURRENCE OF THE VIOLATION.

THIS DMR EXPIRES ON:
February 15, 2015

DMR Page 4 of 4



Facility Name	Trailer Corporation
Permit Number	MO-0136166
County	Greene

Page 1 of 1	
Month	April
Year (4-digit)	2014

Rainfall data

DATE	Precipitation Inches Daily	Snow Inches Daily	Total Inches Daily
1	Trace	0.00	Trace
2	0.02	0.00	0.02
3	0.15	0.00	0.15
4	0.00	0.00	0.00
5	0.00	0.00	0.00
6	0.04	0.00	0.04
7	0.24	0.00	0.24
8	Trace	0.00	Trace
9	0.00	0.00	0.00
10	0.00	0.00	0.00
11	0.00	0.00	0.00
12	0.00	0.00	0.00
13	0.39	0.00	0.39
14	Trace	Trace	Trace
15	0.00	0.00	0.00
16	0.00	0.00	0.00
17	0.00	0.00	0.00
18	0.00	0.00	0.00
19	0.00	0.00	0.00
20	0.00	0.00	0.00
21	0.17	0.00	0.17
22	0.00	0.00	0.00
23	0.00	0.00	0.00
24	0.51	0.00	0.51
25	0.00	0.00	0.00
26	0.01	0.00	0.01
27	0.53	0.00	0.53
28	Trace	0.00	Trace
29	0.02	0.00	0.02
30	Trace	0.00	Trace
Total	2.08	0.00	2.08
Average	0.08	0.00	0.08

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May 08, 2014

TOM BIEKER
ENVIRONMENTAL WORKS
1455 E CHESTNUT EXPRESSWAY
Springfield, MO 65807

RE: Project: TRAILINER SW
Pace Project No.: 60167987

Dear TOM BIEKER:

Enclosed are the analytical results for sample(s) received by the laboratory on April 29, 2014. The results relate only to the samples included in this report. Results reported herein conform to the most current TNI standards and the laboratory's Quality Assurance Manual, where applicable, unless otherwise noted in the body of the report.

If you have any questions concerning this report, please feel free to contact me.

Sincerely,



Angie Brown
Angie.Brown@pacelabs.com
Project Manager

Enclosures

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REPORT OF LABORATORY ANALYSIS

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CERTIFICATIONS

Project: TRAILINER SW
Pace Project No.: 60167987

Kansas Certification IDs

9608 Loiret Boulevard, Lenexa, KS 66219
WY STR Certification #: 2456.01
Arkansas Certification #: 13-012-0
Illinois Certification #: 003097
Iowa Certification #: 118
Kansas/NELAP Certification #: E-10116

Louisiana Certification #: 03055
Nevada Certification #: KS000212008A
Oklahoma Certification #: 9205/9935
Texas Certification #: T104704407-13-4
Utah Certification #: KS000212013-3
Illinois Certification #: 003097

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SAMPLE SUMMARY

Project: TRAILINER SW
Pace Project No.: 60167987

Lab ID	Sample ID	Matrix	Date Collected	Date Received
60167987001	OF #001	Water	04/27/14 13:39	04/29/14 06:15
60167987002	OF #002	Water	04/27/14 13:50	04/29/14 06:15
60167987003	OF #003	Water	04/27/14 13:56	04/29/14 06:15
60167987004	OF #004	Water	04/27/14 14:07	04/29/14 06:15

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SAMPLE ANALYTE COUNT

Project: TRAILINER SW
Pace Project No.: 60167987

Lab ID	Sample ID	Method	Analysts	Analytes Reported
60167987001	OF #001	EPA 8260	JTS	8
		EPA 1664A	JMC1	1
		SM 2540F	RAH	1
		EPA 410.4	JML	1
60167987002	OF #002	EPA 8260	JTS	8
		EPA 1664A	JMC1	1
		SM 2540F	RAH	1
		EPA 410.4	JML	1
60167987003	OF #003	EPA 8260	JTS	8
		EPA 1664A	JMC1	1
		SM 2540F	RAH	1
		EPA 410.4	JML	1
60167987004	OF #004	EPA 8260	JTS	8
		EPA 1664A	JMC1	1
		SM 2540F	RAH	1
		EPA 410.4	JML	1

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ANALYTICAL RESULTS

Project: TRAILINER SW
Pace Project No.: 60167987

Sample: OF #001	Lab ID: 60167987001	Collected: 04/27/14 13:39	Received: 04/29/14 06:15	Matrix: Water				
Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
8260 MSV UST, Water	Analytical Method: EPA 8260							
Benzene	ND	ug/L	1.0	1		05/06/14 17:07	71-43-2	
Ethylbenzene	ND	ug/L	1.0	1		05/06/14 17:07	100-41-4	
Toluene	ND	ug/L	1.0	1		05/06/14 17:07	108-88-3	
Xylene (Total)	ND	ug/L	3.0	1		05/06/14 17:07	1330-20-7	
Surrogates								
Toluene-d8 (S)	98 %		80-120	1		05/06/14 17:07	2037-26-5	
4-Bromofluorobenzene (S)	98 %		80-120	1		05/06/14 17:07	460-00-4	
1,2-Dichloroethane-d4 (S)	99 %		80-120	1		05/06/14 17:07	17060-07-0	
Preservation pH	1.0		1.0	1		05/06/14 17:07		
HEM, Oil and Grease	Analytical Method: EPA 1664A							
Oil and Grease	ND	mg/L	5.0	1		05/05/14 07:41		
2540F Total Settleable Solids	Analytical Method: SM 2540F							
Total Settleable Solids	0.20	mL/L/hr	0.20	1		04/29/14 09:15		
410.4 COD	Analytical Method: EPA 410.4							
Chemical Oxygen Demand	52.5	mg/L	10.0	1		05/08/14 10:42		

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ANALYTICAL RESULTS

Project: TRAILINER SW
Pace Project No.: 60167987

Sample: OF #002	Lab ID: 60167987002	Collected: 04/27/14 13:50	Received: 04/29/14 06:15	Matrix: Water				
Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
8260 MSV UST, Water	Analytical Method: EPA 8260							
Benzene	ND	ug/L	1.0	1		05/06/14 17:24	71-43-2	
Ethylbenzene	ND	ug/L	1.0	1		05/06/14 17:24	100-41-4	
Toluene	ND	ug/L	1.0	1		05/06/14 17:24	108-88-3	
Xylene (Total)	ND	ug/L	3.0	1		05/06/14 17:24	1330-20-7	
Surrogates								
Toluene-d8 (S)	98 %		80-120	1		05/06/14 17:24	2037-26-5	
4-Bromofluorobenzene (S)	96 %		80-120	1		05/06/14 17:24	460-00-4	
1,2-Dichloroethane-d4 (S)	100 %		80-120	1		05/06/14 17:24	17060-07-0	
Preservation pH	1.0		1.0	1		05/06/14 17:24		
HEM, Oil and Grease	Analytical Method: EPA 1664A							
Oil and Grease	ND	mg/L	5.0	1		05/05/14 07:42		
2540F Total Settleable Solids	Analytical Method: SM 2540F							
Total Settleable Solids	ND	mL/L/hr	0.20	1		04/29/14 09:15		
410.4 COD	Analytical Method: EPA 410.4							
Chemical Oxygen Demand	16.3	mg/L	10.0	1		05/08/14 10:44		

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ANALYTICAL RESULTS

Project: TRAILINER SW
Pace Project No.: 60167987

Sample: OF #003	Lab ID: 60167987003	Collected: 04/27/14 13:56	Received: 04/29/14 06:15	Matrix: Water				
Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
8260 MSV UST, Water	Analytical Method: EPA 8260							
Benzene	ND ug/L		1.0	1		05/06/14 14:54	71-43-2	
Ethylbenzene	ND ug/L		1.0	1		05/06/14 14:54	100-41-4	
Toluene	ND ug/L		1.0	1		05/06/14 14:54	108-88-3	
Xylene (Total)	ND ug/L		3.0	1		05/06/14 14:54	1330-20-7	
Surrogates								
Toluene-d8 (S)	98 %		80-120	1		05/06/14 14:54	2037-26-5	
4-Bromofluorobenzene (S)	97 %		80-120	1		05/06/14 14:54	460-00-4	
1,2-Dichloroethane-d4 (S)	97 %		80-120	1		05/06/14 14:54	17060-07-0	
Preservation pH	1.0		1.0	1		05/06/14 14:54		
HEM, Oil and Grease	Analytical Method: EPA 1664A							
Oil and Grease	ND mg/L		5.0	1		05/05/14 07:42		
2540F Total Settleable Solids	Analytical Method: SM 2540F							
Total Settleable Solids	ND mL/L/hr		0.20	1		04/29/14 09:15		
410.4 COD	Analytical Method: EPA 410.4							
Chemical Oxygen Demand	45.7 mg/L		10.0	1		05/08/14 10:44		

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ANALYTICAL RESULTS

Project: TRAILINER SW
Pace Project No.: 60167987

Sample: OF #004	Lab ID: 60167987004	Collected: 04/27/14 14:07	Received: 04/29/14 06:15	Matrix: Water				
Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
8260 MSV UST, Water	Analytical Method: EPA 8260							
Benzene	ND ug/L		1.0	1		05/06/14 15:11	71-43-2	
Ethylbenzene	ND ug/L		1.0	1		05/06/14 15:11	100-41-4	
Toluene	ND ug/L		1.0	1		05/06/14 15:11	108-88-3	
Xylene (Total)	ND ug/L		3.0	1		05/06/14 15:11	1330-20-7	
Surrogates								
Toluene-d8 (S)	98 %		80-120	1		05/06/14 15:11	2037-26-5	
4-Bromofluorobenzene (S)	96 %		80-120	1		05/06/14 15:11	460-00-4	
1,2-Dichloroethane-d4 (S)	98 %		80-120	1		05/06/14 15:11	17060-07-0	
Preservation pH	1.0		1.0	1		05/06/14 15:11		
HEM, Oil and Grease	Analytical Method: EPA 1664A							
Oil and Grease	ND mg/L		5.0	1		05/05/14 07:42		
2540F Total Settleable Solids	Analytical Method: SM 2540F							
Total Settleable Solids	ND mL/L/hr		0.20	1		04/29/14 09:15		
410.4 COD	Analytical Method: EPA 410.4							
Chemical Oxygen Demand	67.8 mg/L		10.0	1		05/08/14 10:44		

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QUALITY CONTROL DATA

Project: TRAILINER SW
Pace Project No.: 60167987

QC Batch: MSV/61393 Analysis Method: EPA 8260
QC Batch Method: EPA 8260 Analysis Description: 8260 MSV UST-WATER
Associated Lab Samples: 60167987003, 60167987004

METHOD BLANK: 1372566 Matrix: Water
Associated Lab Samples: 60167987003, 60167987004

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Benzene	ug/L	ND	1.0	05/06/14 09:41	
Ethylbenzene	ug/L	ND	1.0	05/06/14 09:41	
Toluene	ug/L	ND	1.0	05/06/14 09:41	
Xylene (Total)	ug/L	ND	3.0	05/06/14 09:41	
1,2-Dichloroethane-d4 (S)	%	97	80-120	05/06/14 09:41	
4-Bromofluorobenzene (S)	%	98	80-120	05/06/14 09:41	
Toluene-d8 (S)	%	98	80-120	05/06/14 09:41	

LABORATORY CONTROL SAMPLE: 1372567

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Benzene	ug/L	20	19.7	99	80-120	
Ethylbenzene	ug/L	20	20.3	101	80-121	
Toluene	ug/L	20	19.5	97	80-122	
Xylene (Total)	ug/L	60	61.2	102	80-121	
1,2-Dichloroethane-d4 (S)	%			95	80-120	
4-Bromofluorobenzene (S)	%			99	80-120	
Toluene-d8 (S)	%			98	80-120	

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QUALITY CONTROL DATA

Project: TRAILINER SW
Pace Project No.: 60167987

QC Batch: MSV/61415 Analysis Method: EPA 8260
QC Batch Method: EPA 8260 Analysis Description: 8260 MSV UST-WATER
Associated Lab Samples: 60167987001, 60167987002

METHOD BLANK: 1372772 Matrix: Water
Associated Lab Samples: 60167987001, 60167987002

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Benzene	ug/L	ND	1.0	05/06/14 16:34	
Ethylbenzene	ug/L	ND	1.0	05/06/14 16:34	
Toluene	ug/L	ND	1.0	05/06/14 16:34	
Xylene (Total)	ug/L	ND	3.0	05/06/14 16:34	
1,2-Dichloroethane-d4 (S)	%	100	80-120	05/06/14 16:34	
4-Bromofluorobenzene (S)	%	98	80-120	05/06/14 16:34	
Toluene-d8 (S)	%	99	80-120	05/06/14 16:34	

LABORATORY CONTROL SAMPLE: 1372773

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Benzene	ug/L	20	19.7	98	80-120	
Ethylbenzene	ug/L	20	19.9	99	80-121	
Toluene	ug/L	20	19.9	99	80-122	
Xylene (Total)	ug/L	60	60.1	100	80-121	
1,2-Dichloroethane-d4 (S)	%			99	80-120	
4-Bromofluorobenzene (S)	%			98	80-120	
Toluene-d8 (S)	%			98	80-120	

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REPORT OF LABORATORY ANALYSIS

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QUALITY CONTROL DATA

Project: TRAILINER SW
Pace Project No.: 60167987

QC Batch: WET/47662 Analysis Method: EPA 1664A
QC Batch Method: EPA 1664A Analysis Description: 1664 HEM, Oil and Grease
Associated Lab Samples: 60167987001, 60167987002, 60167987003, 60167987004

METHOD BLANK: 1371958 Matrix: Water
Associated Lab Samples: 60167987001, 60167987002, 60167987003, 60167987004

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Oil and Grease	mg/L	ND	5.0	05/05/14 07:38	

LABORATORY CONTROL SAMPLE: 1371959

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Oil and Grease	mg/L	40	39.3	98	78-114	

MATRIX SPIKE SAMPLE: 1371962

Parameter	Units	60167914001 Result	Spike Conc.	MS Result	MS % Rec	% Rec Limits	Qualifiers
Oil and Grease	mg/L	ND	44	43.1	97	78-114	

SAMPLE DUPLICATE: 1371963

Parameter	Units	60167915001 Result	Dup Result	RPD	Max RPD	Qualifiers
Oil and Grease	mg/L	ND	ND		18	

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QUALITY CONTROL DATA

Project: TRAILINER SW
Pace Project No.: 60167987

QC Batch: WETA/29325 Analysis Method: EPA 410.4
QC Batch Method: EPA 410.4 Analysis Description: 410.4 COD
Associated Lab Samples: 60167987001, 60167987002, 60167987003, 60167987004

METHOD BLANK: 1373607 Matrix: Water
Associated Lab Samples: 60167987001, 60167987002, 60167987003, 60167987004

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Chemical Oxygen Demand	mg/L	ND	10.0	05/08/14 10:26	

LABORATORY CONTROL SAMPLE: 1373608

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Chemical Oxygen Demand	mg/L	50	52.2	104	90-110	

MATRIX SPIKE SAMPLE: 1373609

Parameter	Units	60167831003 Result	Spike Conc.	MS Result	MS % Rec	% Rec Limits	Qualifiers
Chemical Oxygen Demand	mg/L	12.6	50	55.2	85	90-110	M1

MATRIX SPIKE SAMPLE: 1373611

Parameter	Units	60167800001 Result	Spike Conc.	MS Result	MS % Rec	% Rec Limits	Qualifiers
Chemical Oxygen Demand	mg/L	78.2	50	125	93	90-110	

SAMPLE DUPLICATE: 1373610

Parameter	Units	60167905004 Result	Dup Result	RPD	Max RPD	Qualifiers
Chemical Oxygen Demand	mg/L	2920	2810	4	25	

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QUALIFIERS

Project: TRAILINER SW
Pace Project No.: 60167987

DEFINITIONS

DF - Dilution Factor, if reported, represents the factor applied to the reported data due to changes in sample preparation, dilution of the sample aliquot, or moisture content.

ND - Not Detected at or above adjusted reporting limit.

J - Estimated concentration above the adjusted method detection limit and below the adjusted reporting limit.

MDL - Adjusted Method Detection Limit.

PRL - Pace Reporting Limit.

RL - Reporting Limit.

S - Surrogate

1,2-Diphenylhydrazine (8270 listed analyte) decomposes to Azobenzene.

Consistent with EPA guidelines, unrounded data are displayed and have been used to calculate % recovery and RPD values.

LCS(D) - Laboratory Control Sample (Duplicate)

MS(D) - Matrix Spike (Duplicate)

DUP - Sample Duplicate

RPD - Relative Percent Difference

NC - Not Calculable.

SG - Silica Gel - Clean-Up

U - Indicates the compound was analyzed for, but not detected.

N-Nitrosodiphenylamine decomposes and cannot be separated from Diphenylamine using Method 8270. The result reported for each analyte is a combined concentration.

Pace Analytical is TNI accredited. Contact your Pace PM for the current list of accredited analytes.

TNI - The NELAC Institute.

BATCH QUALIFIERS

Batch: MSV/61393

[M5] A matrix spike/matrix spike duplicate was not performed for this batch due to insufficient sample volume.

Batch: MSV/61415

[M5] A matrix spike/matrix spike duplicate was not performed for this batch due to insufficient sample volume.

ANALYTE QUALIFIERS

M1 Matrix spike recovery exceeded QC limits. Batch accepted based on laboratory control sample (LCS) recovery.

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QUALITY CONTROL DATA CROSS REFERENCE TABLE

Project: TRAILINER SW
Pace Project No.: 60167987

Lab ID	Sample ID	QC Batch Method	QC Batch	Analytical Method	Analytical Batch
60167987001	OF #001	EPA 8260	MSV/61415		
60167987002	OF #002	EPA 8260	MSV/61415		
60167987003	OF #003	EPA 8260	MSV/61393		
60167987004	OF #004	EPA 8260	MSV/61393		
60167987001	OF #001	EPA 1664A	WET/47662		
60167987002	OF #002	EPA 1664A	WET/47662		
60167987003	OF #003	EPA 1664A	WET/47662		
60167987004	OF #004	EPA 1664A	WET/47662		
60167987001	OF #001	SM 2540F	WET/47577		
60167987002	OF #002	SM 2540F	WET/47577		
60167987003	OF #003	SM 2540F	WET/47577		
60167987004	OF #004	SM 2540F	WET/47577		
60167987001	OF #001	EPA 410.4	WETA/29325		
60167987002	OF #002	EPA 410.4	WETA/29325		
60167987003	OF #003	EPA 410.4	WETA/29325		
60167987004	OF #004	EPA 410.4	WETA/29325		

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Sample Condition Upon Receipt

WO#: 60167987



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Client Name: ENI

Courier: Fed Ex UPS USPS Client DEQ/SWRO Commercial Pace Other

Tracking #: _____ Pace Shipping Label Used? Yes No

Custody Seal on Cooler/Box Present: Yes No Seals intact: Yes No

Packing Material: Bubble Wrap Bubble Bags Foam None Other 2PIL

Thermometer Used: T-239 T-194 Type of Ice: Wet Blue None Samples received on ice, cooling process has begun.

Cooler Temperature: 3.0

Date and initials of person examining contents: puh 29/14

Temperature should be above freezing to 6°C

Chain of Custody present:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	1.
Chain of Custody filled out:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	2.
Chain of Custody relinquished:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	3.
Sampler name & signature on COC:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	4.
Samples arrived within holding time:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	5.
Short Hold Time analyses (<72hr):	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	6. <u>S-S</u>
Rush Turn Around Time requested:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	7.
Sufficient volume:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	8.
Correct containers used:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Pace containers used:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	9.
Containers intact:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	10.
Unpreserved 5035A soils frozen w/in 48hrs?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	11.
Filtered volume received for dissolved tests?	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	12.
Sample labels match COC:	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
Includes date/time/ID/analyses Matrix: <u>WT</u>		13.
All containers needing preservation have been checked.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	
All containers needing preservation are found to be in compliance with EPA recommendation.	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No <input type="checkbox"/> N/A	14.
Exceptions: <u>VOA</u> coliform, TOC, <u>O&G</u> WI-DRO (water), Phenolics	<input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Initial when completed
Trip Blank present:	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	Lot # of added preservative
Pace Trip Blank lot # (if purchased):		15.
Headspace in VOA vials (>6mm):	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No <input type="checkbox"/> N/A	16.
Project sampled in USDA Regulated Area:	<input type="checkbox"/> Yes <input type="checkbox"/> No <input checked="" type="checkbox"/> N/A	17. List State: <u>MO</u>

Client Notification/ Resolution: Copy COC to Client? Y / N Field Data Required? Y / N

Person Contacted: _____ Date/Time: _____

Comments/ Resolution: _____

Project Manager Review: [Signature] Date: [Signature]

