

Missouri Department of dnr.mo.gov

NATURAL RESOURCES

Michael L. Parson, Governor

Carol S. Comer, Director

August 28, 2020

Sunny Wellesley, NPDES Permits
Environmental Protection Agency Region 7, Water Division
11201 Renner Blvd.
Lenexa, KS 66219

Dear Sunny Wellesley:

Thank you for your comments dated August 14, 2020, concerning the draft renewal of the MOR23A master general permit for chemical manufacturing facilities. Following are our responses.

Comment 1: Sampling for the benchmarks is optional (unless DNR tells them they must do it), but one of the provisions of the SWPPP says: “(g) A provision for evaluating achievement of benchmarks established in this permit.”

Can you explain what is meant by this? Sampling would be the way to evaluate achievement of benchmarks.

Response: Sampling is one way to evaluate achievement of the benchmarks found in the permit. There are other methods the facility may utilize other methods as appropriate. For example, visual evaluation of the effluent for general criteria compliance, ensuring Best Management Practices (BMPs) are operating at the removal efficiency advertised, and ensuring BMPs are maintained per manufacturer’s specification are other methods the facility may use to determine compliance. Sometimes multiple methods may be used in tandem. The Missouri Department of Natural Resources requires the facility to determine the appropriate ways to comply with benchmarks at their site, allowing for site specific adjustments of methods. Stormwater Pollution Prevention Plan (SWPPP) requirement (g) codifies this, and requires the site to record a method of their evaluation and have it available for review by the Department upon request.



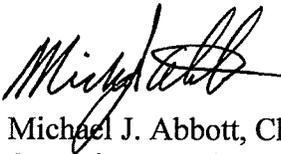
Recycled paper

Sunny Wellesley
Page 2

We appreciate your comments on the draft permit and hope this letter adequately responds to your concerns. If you have any further questions about this permit, please feel free to contact Amberly Schulz by phone at 573-751-8049, email at Amberly.schulz@dnr.mo.gov, or by mail at Department of Natural Resources, Water Protection Program, P.O. Box 176, Jefferson City, MO 65102.

Sincerely,

WATER PROTECTION PROGRAM

A handwritten signature in black ink, appearing to read "Michael J. Abbott", written in a cursive style.

Michael J. Abbott, Chief
Operating Permits Section

MJA:asv