BEFORE THE MISSOURI DEPARTMENT OF NATURAL RESOURCES

In the Matter of:	)	
	)	
City of Neosho	)	**Order No. 2019-WPCB-1602**
	)	
Proceeding under the	)	
Missouri Clean Water Law	)	

ABATEMENT ORDER ON CONSENT

The issuing of this Abatement Order on Consent (AOC) No. 2019-WPCB-1602, by the Missouri Department of Natural Resources (Department), is a formal administrative action by the State of Missouri and is being issued because the City of Neosho (Respondent) violated the Missouri Clean Water Law (MCWL). This AOC is issued under the authorities of Sections 644.056 and 644.079, Revised Statutes of Missouri (RSMo). Failure to comply with this AOC is, by itself, a violation of Section 644.076.1, RSMo. Litigation may occur without further notice if there is not compliance with the requirements of this AOC. This AOC does not constitute a waiver or a modification of any requirements for the MCWL, or its implementing regulations, all of which remain in full force and effect. Compliance with the terms of this AOC shall not relieve the Respondent of liability for, or preclude the Department from, initiating an administrative or judicial enforcement action to recover civil or administrative penalties for any future violations of the MCWL, or to seek injunctive relief, pursuant to Chapter 644, RSMo.

FINDINGS OF FACT

1. The Respondent is a Home Rule municipality with a population of approximately 11,835 residents. The Respondent owns and operates a public water system (PWS) that is composed of a surface water treatment plant, drinking water wells, storage reservoirs, storage

towers, and a distribution system with chlorine disinfection.The PWS is located in Newton County, Missouri and produces and delivers an average of 3,000,000 gallons of drinking water per day. The system is located in the Spring River and Elk River Basins.

2. Hickory Creek and its tributaries are waters of the State as the term is defined by Section 644.016(27), RSMo.

3. Chlorinated drinking water is a "water contaminant" as the term is defined in Section 644.016(24), RSMo.

4. The Respondent is not authorized to discharge without a permit issued by the Department. Sections 644.051.2 and 644.076.1, RSMo, and 10 CSR 20-6.010(1)(A) and -(5)(A), make it unlawful to operate, use, construct, or maintain a water contaminant source that discharges to a water of the State without an operating permit.

5. On or about March 7, 2019, a 20-inch main transmission line from Respondent's water treatment plant to its storage and distribution system became separated at a bell housing joint. The transmission line discharged chlorinated drinking water into Hickory Creek and was repaired the same day. After the line was repaired and placed under pressure, a section of 10-inch pipe running from a city well to the transmission line failed. The 10-inch pipe discharged chlorinated drinking water into Hickory Creek overnight until approximately 8 a.m. on March 8, 2019. These line breaks resulted in the discharge of approximatley 4,170,660 gallons of chlorinated drinking water into Hickory Creek. On March 8, 2019, Department Staff and Missouri Department of Conservation (MDC) staff investigated a reported fish kill in Hickory Creek. The discharge of chlorinated drinking water resulted in the death of approximately 134 fish of various species.

6. The MCWL and Section 644.096, RSMo, authorize the State, or any political subdivision or agency, to recover actual damages, including all costs and expenses necessary to establish or collect any sums under Sections 644.006 to 644.141, RSMo, and the costs and expenses of restoring any waters of the State to their condition as they existed before the violation, sustained by it because of any violation.

7. MDC staff determined that Respondent's discharge of chlorinated drinking water on or about March 7 through 8, 2019, resulted in the deaths of 134 fish amounting to an equivalent value of $500.31. Staffing costs, incurred by the State during the fish kill investigation, are $1,583.95. Equipment costs, incurred during investigation of the fish kill, are $24.88. The total amount of costs and damages incurred by the State for the events described in Paragraph 5 is $2,109.15.

STATEMENT OF VIOLATIONS

The Respondent has violated the MCWL and its implementing regulations as follows:

8. Between March 6 and March 8, 2019, the Respondent operated, used, or maintained a water contaminant source which discharged to Hickory Creek, waters of the State, without a Missouri State Operating Permit. The discharge resulted in the mortality of multiple aquatic organisms in Hickory Creek. This is a violation of the MCWL Sections 644.051.2 and 644.076.1, RSMo, and Missouri Clean Water Commission Regulation 10 CSR 20-6.010(1)(A) and (7)(A); and

9. Caused pollution of Hickory Creek, waters of the State, in violation of Sections 644.051.1(1) and 644.076.1, RSMo.

AGREEMENT

10. The Department and the Respondent desire to amicably resolve all claims that may be brought against the Respondent for violations alleged above in Statement of Violations.

11. The Respondent is ordered and agrees to pay the State's investigative costs and damages in the amount of $2,109.15. The payment of the investigative costs in the amount of $2,109.15 shall be in the form of a check made payable to the "State of Missouri." The check shall be delivered to:

Accounting Program
Department of Natural Resources
P.O. Box 477
Jefferson City, MO 65102-0477

12. The Respondent is ordered and agrees to notify the Department's Southwest Regional Office of any non-compliance within 24 hours of becoming aware of the non-compliant condition.

13. The Respondent is ordered and agrees to comply with the MCWL, Chapter 644, RSMo, and its implementing regulations at all times in the future.

SUBMISSIONS

14. All other documentation submitted to the Department for compliance with this AOC shall be submitted within the timeframes specified to:

Ms. Taylor Markway
Department of Natural Resources
Water Protection Program
Compliance and Enforcement Section
P.O. Box 176
Jefferson City, MO 65102-0176

OTHER PROVISIONS

15. Should the Respondent fail to meet the terms of this AOC, including the future fish kill reporting set out in Paragraphs 10 through 13, the Respondent shall be subject to pay stipulated penalties in the following amount:

Days of Violation	Amount of Penalty
1 to 30 days	$100 per day
31 to 90 days	$250 per day
91 days and above	$500 per day

Stipulated penalties will be paid in the form of a check made payable to "Newton County Treasurer, as custodian of the Newton County School Fund." Any such stipulated penalty shall be paid within ten days of demand by the Department and shall be delivered to:

Accounting Program
Department of Natural Resources
P.O. Box 477
Jefferson City, MO 65102-0477

16. Compliance with this AOC resolves only the specific violations described herein, and this AOC shall not be construed as a waiver or modification for any other requirements of the MCWL and regulations, or any other source of law. Nor does this AOC resolve any future violations of this AOC or any law or regulation. Consistent with 10 CSR 20-3.010(5), this AOC shall not be construed as satisfying any claim by the State or federal government for natural resource damages.

17. Nothing in this AOC forgives the Respondent from future non-compliance with the laws of the State of Missouri, nor requires the Department or State of Missouri to forego pursuing by any legal means for any non-compliance with the laws of the State of Missouri. The terms stated herein constitute the entire and exclusive agreement of the parties. There are no other obligations of the parties, be they express or implied, oral or written, except those expressly

set forth herein. The terms of this AOC supersede all previous memoranda of understanding, notes, conversations, and agreements, express or implied. This AOC may not be modified orally.

18. By signing this AOC, all signatories assert that they have read and understood the terms of this AOC, and that they have the authority to sign this AOC on behalf of their respective party.

19. The effective date of the AOC shall be the date the Department signs the AOC. The Department shall send a fully executed copy of this AOC to the Respondent for their records.

WAIVER OF APPEAL RIGHTS

20. By signing this AOC, the Respondent consents to its terms and waives any right to appeal, seek judicial review, or otherwise challenge the terms and conditions of this AOC, including the Cost Analysis for Compliance referenced herein, pursuant to Sections 621.250, 640.010, 640.013, 644.056.3, 644.079.2, Chapter 536, RSMo, 644.145, RSMo, 10 CSR 20-1.020, 10 CSR 20-3.010, 10 CSR 20-6.020(5), the Missouri Constitution, or any other source of law.

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SIGNATORY AUTHORITY

Agreed to and Ordered on this 8 day of JANUARY, 2020

City of Neosho
Mr. David Kennedy, City Manager

Agreed to and Ordered on this 7th day of February, 2020

DEPARTMENT OF NATURAL RESOURCES
Chris Wieberg, Director
Water Protection Program

c: Ms. Cindy Davies, Director, Southwest Regional Office
General Counsel's Office
Accounting Program

Pace Analytical Services, LLC
9608 Loiret Blvd.
Lenexa, KS 66219
(913)599-5665

ANALYTICAL RESULTS

Project: WET TEST
Pace Project No.: 60315310

Sample: DOWNSTREAM EFF WET **Lab ID: 60315310001** Collected: 09/18/19 07:30 Received: 09/18/19 14:45 Matrix: Water

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
Acute Toxicity	Analytical Method: EPA 821/R-02/012							
Toxicity, Acute	**Complete**		1.0	1		09/18/19 15:00		

Sample: DOWNSTREAM EFF **Lab ID: 60315310003** Collected: 09/18/19 08:15 Received: 09/18/19 18:20 Matrix: Water

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
350.1 Ammonia	Analytical Method: EPA 350.1							
Nitrogen, Ammonia	ND	mg/L	0.10	1		09/30/19 12:01	7664-41-7	

REPORT OF LABORATORY ANALYSIS

PACE # 60315310

RESULTS:

THE Ceriodaphnia MORTALITY RESULTS - There was no significant mortality observed of the freshwater invertebrate, Ceriodaphnia dubia, during the 48 hour exposure period to the 100% effluent concentrations. There was no significant mortality in the synthetic control. The LC50 value of the sample to Ceriodaphnia is approximately >100% the TUa <1.

Ceriodaphnia MORTALITY DATA

 # ALIVE

CONC.	REP #	O HOURS	24 HOURS	48 HOURS	% MORT.
SYNTHETIC	1	5	5	5	0
"	2	5	5	5	0
"	3	5	5	5	0
"	4	5	5	5	0
Upstream	1	5	5	5	0
"	2	5	5	5	0
"	3	5	5	5	0
"	4	5	5	5	0
6.25%	1	5	5	5	0
"	2	5	5	5	0
"	3	5	5	5	0
"	4	5	5	5	0
12.5%	1	5	5	5	0
"	2	5	5	5	0
"	3	5	5	5	0
"	4	5	5	5	0
25%	1	5	5	5	0
"	2	5	5	5	0
"	3	5	5	5	0
"	4	5	5	5	0
50%	1	5	5	5	0
"	2	5	5	5	0
"	3	5	5	5	0
"	4	5	5	5	0
100%	1	5	5	5	0
"	2	5	5	5	0
"	3	5	5	5	0
"	4	5	5	5	0

AVG. MORTALITY @ (100% EFFLUENT) =0.0%

PACE # 60315310

THE Pimephales RESULTS - Minnows exposed to effluent collected at the Alliance Water Resources (Shoal Creek) effluent discharge exhibited no significant mortality in the 100% effluent concentration during the 48 hr exposure period. The synthetic control showed no significant mortality during the testing period. The LC50 value of the effluent to fathead minnows is estimated to be >100% the TUa <1.

CONC.	REP #	0 HOURS	24 HOURS	48 HOURS	% MORTALITY
SYNTHETIC	1	10	10	10	0
"	2	10	10	10	0
"	3	10	10	10	0
"	4	10	10	10	0
Upstream	1	10	10	10	0
"	2	10	10	10	0
"	3	10	10	10	0
"	4	10	10	10	0
6.25%	1	10	10	10	0
"	2	10	10	10	0
"	3	10	10	10	0
"	4	10	10	10	0
12.5%	1	10	10	10	0
"	2	10	10	10	0
"	3	10	10	10	0
"	4	10	10	10	0
25%	1	10	10	10	0
"	2	10	10	10	0
"	3	10	10	10	0
"	4	10	10	10	0
50%	1	10	10	10	0
"	2	10	10	10	0
"	3	10	10	10	0
"	4	10	10	10	0
100%	1	10	10	10	0
"	2	10	10	10	0
"	3	10	10	10	0
"	4	10	10	10	0

AVG. MORTALITY @ (100% EFFLUENT) =0.0%

Missouri Department of NATURAL RESOURCES
dnr.mo.gov
Michael L. Parson, Governor
Carol S. Comer, Director

FEB 1 4 2020

CERTIFIED MAIL # 7099 3220 0009 3706 9015

David Kennedy, City Manager
City of Neosho
203 East Main Street
Neosho, MO 64850

RE: Neosho Water Plant, MO-5010560, Newton County

Dear David Kennedy:

Enclosed with this correspondence, please find a copy of fully executed Abatement Order on Consent (AOC) No. 2019-WPCB-1602. The Missouri Department of Natural Resources would like to thank you for your assistance in reaching an agreement in this matter.

Please be advised that the terms of AOC No. 2019-WPCB-1602 are in effect and enforceable as of February 7, 2020. Please note that the AOC requires you to notify the Department's Southwest Regional Office of any non-compliance within 24 hours of becoming aware of the non-complaint condition.

If you have further questions, you may contact Taylor Markway at Department of Natural Resources, Water Protection Program, Compliance and Enforcement Section, P.O. Box 176, Jefferson City, MO 65102-0176; by phone at 573- 522-3454; or by email at taylor.markway@dnr.mo.gov. Thank you for your assistance.

Sincerely,

WATER PROTECTION PROGRAM

Kristi Savage-Clarke
Compliance and Enforcement Section Chief

KSC/tmc

Enclosure

c: Cindy Davies, Director, Southwest Regional Office

{City of Neosho Missouri }
MO-0104906
PRETREATMENT IMPLEMENTATION ANNUAL REPORT
CALENDAR YEAR 2019

The Environmental Protection Agency's (EPA) pretreatment regulations require approved Publicly-Owned Treatment Works (POTW) pretreatment programs to file an annual report [see 40 CFR 403.12(i)] to the Missouri Department of Natural Resources to document program status and activities performed during the previous calendar year. Missouri requests information during the previous calendar year from January 1 to December 31. Using the attached table (Part II) please provide a list of all Significant Industrial Users and the other requested information for those facilities regulated by your Pretreatment Program. If any facility was in Significant Noncompliance (SNC) during a six month reporting period be sure to indicate whether this was for a violation of discharge standards, reporting, or both. If these data are kept by you in a spreadsheet or database, a printout can be substituted for the table.{***MOCWIS*** #} is used for data entry into the Missouri Clean Water Information System (MOCWIS).

Part I: With respect to the industries regulated under the City's Pretreatment Program, please answer the following questions. Use additional paper if necessary.

1. List by name, those SIUs that did not have a valid control mechanism (indicate: expired or unissued) {***MOCWIS #3***} as of December 31, 2019. Of these industries, indicate those that have been without a control mechanism for greater than 180 days. If your approved Pretreatment program does not require you to issue permits, please indicate.

2. List by name those SIUs not sampled by the POTW at least once during calendar year 2019{***MOCWIS #6***}.
N/A

3. List by name those SIUs on a compliance schedule {***MOCWIS #8***} as of December 31, 2019, for achieving compliance with discharge standards. Provide the date of projected final compliance. Indicate those facilities currently in violation of any compliance schedule milestones by 90 days or greater.
N/A

4. List by name those industries for which civil{***MOCWIS #2***} or criminal judicial actions{***MOCWIS #4***} were initiated in the past year. Indicate the amount of any proposed penalties and the amount of penalties collected.
N/A

5. List by name those industries for which -
1) written notices of violation (NOV's){***MOCWIS #12***}, or
2) administrative orders (AO's) or the equivalent{***MOCWIS #1***},were issued in response to noncompliance events that occurred in the past calendar year.

For each industry indicate the total number of each enforcement action type and the amount of penalties collected{***MOCWIS #14***}, if any.

6. List by name those industries who were in Significant Noncompliance (SNC) at any time during the calendar year and public noticed in the largest local newspaper {***MOCWIS #9***}. Provide the date of publication. If publication has not yet occurred, please provide the expected date of publication.
N/A

7. Did the POTW have any numerical NPDES violations in 2018? If so, describe.
N/A

Were any NPDES violations attributed to interference or pass through?
N/A

8. List by name any industry that caused (*see 40 CFR 403.3(k) for the definition of Interference and 40 CFR 403.3(p) for the definition of Pass Through*) in the reporting calendar year from January 1 to December 31{***MOCWIS #15***}:
N/A

(a) **interference** within the POTW
(b) **pass through** of pollutants at the wastewater treatment plan
(c) health problems to POTW workers
(d) water quality violations (violation of city's NPDES permit).

For each industry provide details including information on enforcement actions taken by the city to resolve the violations.

I certify, under penalty of law, that the information in this report was prepared under my direction and supervision in accordance with the system designed to ensure that qualified personnel properly gather and evaluation the information. I am aware that there are significant penalties for false certification including the possibility of fine and imprisonment.

Signature | Local Manager Title | 3-13-20 Date

Duly Authorized--40 CFR 403.12(m). If this report is not signed by a principal executive officer or ranking elected official, then it must be signed by a duly authorized employee.

2019 Pretreatment Annual Report

(City Of Neosho Missouri) Significant Industrial User List and Summary of Compliance Activities										City of Neosho Missouri 203 East Main 64850				
Industry Name and address	Reduced Reporting or NSCIU	Local Limits	Categorical Stnd	Regulated Process	T M T	Type	Regulated Flow	Total Flow	C W F	Compliance Status for Six Month Period Ending: JUN' '18	DEC '18	JUN' '19	DEC '19	2019 Last Inspection
K&S wire 300 Nelson Ave. Neosho	nsicu	N	433	Rinse tank	N	NA	3k	3k	N	c	c	c	c	Oct. 16 2019
LA-Z-BOY Midwest 4301 Howard Bush Dr.	nsciu	N	433	Rinse tank	N	NA	2k	2k	N	c	c	c	C	Oct. 16 2019
Opal Foods 16194 Highway 59	nsciu	N	NA	Egg Hatch ery	N	N/A	4k	4k	N	c	c	c	C	Oct 17 2019
Rembrandt Inc. 409 N. Wood St.	nsciu	N	NA	Raw egg	N	N/A	34k	34k	N	c	c	c	C	Oct 17 2019

Blank table 12/13/2019 TJB

2019 Pretreatment Annual Report

I certify, under penalty of law, that the information in this report was prepared under my direction and supervision in accordance with the system designed to ensure that qualified personnel properly gather and evaluate the information. I am aware that there are significant penalties for false certification including the possibility of fine and imprisonment.

Signature	Local Manager Title	3-13-20 Date

Duly Authorized--40 CFR 403.12(m). If this report is not signed by a principal executive officer or ranking elected official, then it must be signed by a duly authorized employee. This report is required to be submitted as specified in the Missouri.

Missouri Department of NATURAL RESOURCES
dnr.mo.gov
Michael L. Parson, Governor
Carol S. Comer, Director

September 21, 2020

David Kennedy, City Manager
City of Neosho
203 East Main Street
Neosho, MO 64850

UNSATISFACTORY FINDINGS
RESPONSE REQUIRED

Dear David Kennedy:

Staff from the Missouri Department of Natural Resources conducted a pretreatment compliance inspection on August 26, 2020 of the Neosho Wastewater Treatment Plant located in Newton County. The facility operates under the authority of Missouri State Operating Permit MO0104906.

Compliance with Missouri Clean Water Law was evaluated. The enclosed report is being issued with Unsatisfactory Findings for the violations identified.

Please refer to the enclosed report for details on findings and required actions. **A written response documenting actions taken to correct the violations is required by the date specified in the report.**

The Department records will document continued noncompliance of the environmental laws and regulations until the required actions are completed. Please understand that failure to respond or address ongoing violations may result in a follow-up inspection.

If you have any questions or would like to schedule a time to meet with Department staff to discuss compliance requirements, please contact Mr. Sieu T. Dang at 417-891-4300 or in writing at Southwest Regional Office, 2040 W. Woodland, Springfield, Missouri 65807-5912.

Sincerely,

SOUTHWEST REGIONAL OFFICE

Kevin Hess, Chief
Water Pollution Section

KH/sdb

c: Ken Brady, Local Manager, Alliance Water Resources
Jerry Humphrey, Alliance Water Resources
Paul Marshall, EPA Region 7
Todd Blanc, Pretreatment Coordinator, Water Protection Program

145.wpcp.mo0104906.Neosho.x.2020.09.21.pci.x.std

Carbon Copy Address Attachment

Email Addresses:

Ken Brady, Local Manager, Alliance Water Resources
kbrady@alliancewater.com

Jerry Humphrey, Pretreatment Inspector, Alliance Water Resources
shoalcreek@alliancewater.com

Paul Marshall, EPA Region 7
Marshall.paul@epa.gov

Missouri Department of Natural Resources
Southwest Regional Office/Water Pollution Control Branch
Report of Pretreatment Compliance Inspection
Neosho Pretreatment Program
Newton County, Missouri
MO0104906
September 21, 2020

Introduction

On August 26, 2020, a routine pretreatment compliance inspection of the Neosho Wastewater Treatment Plant (WWTP) in Newton County, Missouri was conducted by the Missouri Department of Natural Resources. The purpose of this inspection was to determine compliance with Missouri State Operating Permit (MSOP) MO0104906, the Missouri Clean Water Commission Regulations, and Missouri Clean Water Law. This report presents the findings and observations made during the compliance inspection. Authority for this inspection is provided in Missouri Clean Water Law Section 644.026.1(21), RSMo. The following participants were present during the inspection:

City of Neosho
Ken Brady, Local Manager, Alliance Water Resources, 417-451-8080
Jerry Humphrey, Pretreatment Inspector, Alliance Water Resources, 417-451-8075

Missouri Department of Natural Resources
Sieu T. Dang, Environmental Engineer, 417-891-4300

Facility Description and History

Neosho WWTP, MSOP, MO0104906 includes two separate wastewater treatment facilities which serve the City of Neosho (City). The two facilities were previously permitted separately – Neosho Crowder WWTF MO0039926 and Neosho Shoal Creek WWTF MO0104906. Neosho Crowder WWTF's effluent is sent to the Neosho Shoal Creek WWTF where effluents from the two plants mix together prior to the ultraviolet (UV) disinfection at the Neosho Shoal Creek. The two facilities have a combined capacity of 6 million gallons per day. After the UV disinfection system, the combined effluent discharges into Shoal Creek. The UTM 83 coordinates for this outfall are E 377523, N 4084102. The discharge is located in the 11070207 HUC 8 watershed. The MSOP MO0104906 was last issued on May 1, 2017 and expires on April 30, 2022. Special Condition 21 of the MSOP requires the City to implement and enforce its approved pretreatment program in accordance with the requirements of 10 CSR 20-6.100 and submit an annual report by March 31st of each year describing the City's pretreatment activities during the previous calendar year.

Our records indicate that the previous pretreatment compliance inspection (PCI) of this facility was conducted by the Department on February 27, 2019. Compliance issues noted in the previous PCI included: failure to make required updates to the sewer use ordinance and pretreatment program in accordance with the 2005 amendments to the General Pretreatment Regulations, failure to document evaluation whether a slug control plan is needed for the regulated Significant Industrial Users (SIU), and failure to implement the approved Enforcement Response Plan (ERP).

An Unsatisfactorily Findings letter was issued on March 25, 2019 for the noted violations. The Department received a response from the City on April 26, 2019.

The previous PCI noted the City had four (4) significant industrial users (SIUs) regulated under their pretreatment program. Two of these industries are food processing industries. These are Rembrandt Foods (chicken egg processing) and Opal Foods (formerly known as MOARK Productions, a laying hen facility for table eggs). The other two SIUs are K&S Wire Products (grills, grates, display signs supports) and La Z Boy (furniture). These two (2) SIUs have categorical wastewater discharges that are subject to federal requirements in 40 CFR 433 metal finishing standards. The report also noted Leggett and Platt (box springs for beds) closed its business in 2018.

Discussion of Inspection and Observations

The pretreatment compliance inspection was conducted during normal business hours. Prior notification of the inspection was provided to ensure timely access to the site. I arrived at Neosho WWTP approximately 10:00 AM. I then met with Ken Brady and Jerry Humphrey and outlined the purpose and scope of the inspection. The inspection included a file review, updating the PCI checklist, and interviewing Ken and Jerry. The inspector and the representatives planned to visit Opal Foods but the visit was cancelled due to the pandemic concerns.

We first reviewed compliance issues listed in the previous PCI. The City still has not made modifications to their ordinance to incorporate the requirements set forth in the current General Pretreatment Regulations 40 CFR Part 403. The City submitted a draft ordinance and ERP to the Department on February 27, 2019. The Department's pretreatment coordinator reviewed the submitted documents, made comments, and on April 3, 2020 requested the City to submit a final draft to the Department. To date the Department has not received any further response from the City. Ken said their consulting engineer was working on the submittal and they probably has not get it done. Ken said he would contact the engineer to inquire about the status.

Jerry indicated the City has evaluated the need for a slug control plan at each of the SIU during the annual inspections but they did not record the evaluations. The City needs to document the evaluations and obtain a slug control plan from the SIUs that the City found a slug control plan was necessary.

La Z Boy now conducted the required Total Toxic Organics (TTO) test and submitted the report certification as required in the previous PCI.

The City has an approved ERP but I did not review it during the field portion of the inspection. I asked Ken to email a copy so that I could review at the office. I advised Ken and Humphrey to implement the ERP accordingly.

We discussed pretreatment trainings. Ken reported he and Jerry attended the Department's Pretreatment Workshop in Jefferson in August 2019.

The City has a record keeping procedure and Jerry now keeps all the pretreatment records at the Neosho WWTP.

The Department received the 2019 pretreatment annual report from the City on March 21, 2020. The report indicated all of the SIUs were in compliance with the pretreatment requirements. The 2019 report also indicated all of the SIUs are NSCIU and Jerry asked if they were designated correctly. I advised him that NSCIU stands for Nonsignificant Categorical Industrial User and none of their current SIUs would meet the NSCIU definition.

The list of regulated SIUs was reviewed and Ken reported that Rembrandt closed its business in May 2020. The City now regulates the remaining three (3) SIUs under their pretreatment program.

The City issued all new industrial permits to their SIUs in 2020. A review of the industrial permits indicated these permits appeared to be enforceable and contain necessary requirements including but not limit to effluent limits; a statement of duration; accidental discharge; sampling and analysis procedures; monitoring, reporting, notification, and record keeping requirements; and a statement of civil and criminal penalties. The City also issued permits to their domestic waste haulers.

During the file review, I noted Opal Foods did not include the certification statement along with their periodic reports. Jerry indicated he thought it was not required since Opal Foods was not a CIU. I pointed out that their industrial permit requires the certification and the City should enforce their permit requirements.

Onsite records showed the City inspected all of their SIUs in 2019. The City used a six page inspection checklist for the SIU inspections. The City also used a contract lab to conduct the required samplings at the SIUs.

After completing Section I of the pretreatment inspection checklist, I asked Ken to email me all of new industrial permits and a waste hauler permit, the approved ERP, TTO sample results from La Z Boy, and Opal Foods annual inspection report. We then discussed a possibility of visiting Opal Foods. However, I decided not to visit the industry due to the pandemic concerns. I then ended the inspection.

On September 16 and 17, Ken emailed me the requested information and I then completed Section 2 of the PCI checklist (attached).

Sampling and Monitoring

The inspector did not collect any samples.

Compliance Determination

The City failed to implement an adequate pretreatment program, as required by Section 307 of the Federal Clean Water Act, for the purpose of regulating industrial discharges which could pass through or interfere with the operation or performance of the publicly owned treatment facility. Violation of the Federal Clean Water Act is a violation of the Missouri Clean Water Law Sections 644.051.1 and 644.076.1, RSMo, and Missouri Clean Water Regulation 10 CSR 20-6.100 and MSOP, MO0104906.

Findings and Required Actions

Please submit your responses to the following violations **by October 21, 2020** to the Southwest Regional Office, 2040 W. Woodland, Springfield, MO 65807.

1. The City failed to make required updates to their sewer use ordinance and pretreatment program in accordance with the United States Environmental Protection Agency's (EPA) 2005 streamlining rule (changes) to the General Pretreatment Regulations 40 CFR 403.

Note that the City provided a copy of the draft ordinance to the Department on February 27, 2019. The Department reviewed and made comments to the City on April 3, 2020. To date the City has not responded to the comments.

REQUIRED ACTION: Work with your consultant and coordinate with the Department's Pretreatment Coordinator to complete the ordinance update.

2. The City did not document their evaluation whether a slug control plan is needed for their regulated SIUs as required in 40 CFR 403.8(f)(2)(vi).

A slug discharge is a discharge of a nonroutine, episodic nature, including an accidental spill or noncustomary batch discharge. The City must evaluate whether each SIU needs a plan or other action to control slug discharges. EPA's 1991 *Control of Slug Loadings to POTWs Guidance Manual* provides procedures for developing, implementing, and reviewing slug control plans.

REQUIRED ACTION: Properly document evaluation of whether a slug control plan is needed for the SIUs.

3. The City did not take enforcement actions against Opal Foods for their failure to submit the the report's certification statement as required in their industrial permit. This constitutes a failure to implement the ERP which is a violation of 40 CFR 403.8(f)(5).

REQUIRED ACTION: Work with the SIU to ensure proper certification statement is included in the reports.

Recommendations

1. Thoroughly examine all monitoring results and reports against industrial effluent limits and reporting requirements and take necessary enforcement against noncompliance. The City must annually publish in a newspaper(s) of general circulation that provides meaningful public notice a list of SIUs that were in SNC at any time during the previous 12 months.

2. The City is reminded of implementation of standards for dental offices. The EPA has developed a website at: https://www.epa.gov/eg/dental-effluent-guidelines which include fact sheet and Frequently Asked Questions and guidelines for implementation of the new rule. Should the City have further questions regarding implementation of the standards, please contact Todd Blanc, the Department's pretreatment coordinator, at 314-416-2064.

3. Pursuant to 40 CFR 122.44(j)(2)(ii), the City shall submit to the Department a written technical evaluation of the need to revise local limits under 40 CFR 403.5(c)(1) along with the application for renewal of the MSOP, MO0104906. This requirement is listed in Special Condition 21 of the MSOP.

Signature

SUBMITTED BY:

Sieu T. Dang, P.E.
Environmental Engineer
Southwest Regional Office

Attachments

Attachment – Pretreatment Compliance Inspection Checklist

CONTROL AUTHORITY PRETREATMENT AUDIT CHECKLIST

AUDIT CHECKLIST CONTENTS

Control Authority (CA) name and address	Date(s) of audit
City of Neosho **200 Nelson Ave** **Neosho, MO 64850**	**August 26, 2020**

Treatment Plant Name	NPDES Permit Number	Effective Date	Expiration Date	Permit Reviewed?
Neosho WWTF	**MO0104906**	**May 1, 2017**	**April 30, 2022**	**Yes**

AUDITOR(S)

Name	Title/Affiliation	Telephone Number	Email Address
Sieu T. Dang	**Environmental Engineer/DNR/SWRO**	**417-891-4300**	**Sieu.dang@dnr.mo.gov**

CA REPRESENTATIVE(S)

Name	Title/Affiliation	Telephone Number	Email Address
Ken Brady	**Local Manager***	**417-451-8080**	**kbrady@alliancewater.com**
Jerry Humphrey	**Pretreatment Inspector**	**417-451-8075**	**shoalcreek@alliancewater.com**

*Identified program contact

ACRONYM AND ABBREVIATION LIST

Acronym/Abbreviation	Term
AO	Administrative Order
BMP	Best management practices
BMR	Baseline Monitoring Report
CA	Control Authority
CERCLA	Comprehensive Environmental Remediation, Compensation and Liability Act
CFR	*Code of Federal Regulations*
CIU	Categorical Industrial User
CSO	Combined sewer overflow
CWA	Clean Water Act
CWF	Combined Wastestream Formula
DMR	Discharge Monitoring Report
DSS	Domestic Sewage Study
EP	Extraction Procedure
EPA	U.S. Environmental Protection Agency
ERP	Enforcement Response Plan
FDF	Fundamentally different factors
FTE	Full-time equivalent
FWA	Flow-Weighted Average
gpd	Gallons per day
ICIS	Integrated Compliance Information System
IU	Industrial User
IWS	Industrial Waste Survey
mgd	Million gallons per day
MSW	Municipal solid waste
N/A	Not applicable
ND	Not determined
NOV	Notice of Violation
NPDES	National Pollutant Discharge Elimination System
NSCIU	Nonsignificant Categorical Industrial User
O&G	Oil and grease
PCA	Pretreatment Compliance Audit
PCI	Pretreatment Compliance Inspection
PCS	Permit Compliance System
PIRT	Pretreatment Implementation Review Task Force
POTW	Publicly owned treatment works
QA/QC	Quality assurance/quality control
RCRA	Resource Conservation and Recovery Act
RIDE	Required ICIS Data Element
RNC	Reportable Noncompliance

ACRONYM AND ABBREVIATION LIST (CONTINUED)

Acronym/Abbreviation	Term
SIU	Significant Industrial User
SNC	Significant Noncompliance
SUO	Sewer Use Ordinance
TCLP	Toxicity Characteristic Leachate Procedure
TMDL	Total maximum daily load
TOMP	Toxic Organic Management Plan
TRC	Technical Review Criteria
TRE	Technical Review Evaluation
TRIS	Toxics Release Inventory System
TSDF	Treatment, Storage, and Disposal Facility
TTO	Total toxic organics
UST	Underground Storage Tank
WENDB	Water Enforcement National Data Base
Y/N	Yes or no

GENERAL INSTRUCTIONS

1. As noted in the Introduction, the auditor should review a representative number of SIU files. Section II of this checklist provides space to document several IU files. This should not be construed to mean that is an adequate representation of files to review. The auditor should make as many copies of Section I as needed to document a representative number of files according to the discussion in the Introduction.

2. The auditor should ensure that during the audit, he or she follows up on any and all violations noted in the previous inspection, annual report, or during the course of the audit.

3. Throughout the course of the evaluation, the auditor should look for areas in which the CA should improve the effectiveness and quality of its program.

4. Audit findings should clearly distinguish between violations, deficiencies, and effectiveness issues.

SECTION I: DATA REVIEW

INSTRUCTIONS: Complete this section on the basis of CA activities to implement its pretreatment program. Answers to these questions could be obtained from a combination of sources including discussions with CA personnel, review of general and specific IU files, IU site visits, review of POTW treatment plants, among others. Attach documentation where appropriate. Specific data might be required in some cases.

Write ND (Not Determined) beside the questions or items that were not evaluated during the audit.
Use N/A (Not Applicable) where appropriate.

A. CA PRETREATMENT PROGRAM MODIFICATION [403.18]

1. a. Has the CA made any substantial changes to the pretreatment program that were not reported to the Approval Authority (e.g., legal authority, less stringent limits, multijurisdictional situation)?

Yes	No
	x

If yes, discuss.

b. Is the CA in the process of making any substantial modifications to any pretreatment program component (including legal authority, less stringent local limits, the required pretreatment provisions from the 2005 revisions to the General Pretreatment Regulations, multijurisdictional situation, and others)?

Yes	No
	x

.

If yes, describe

c. Has the CA amended its pretreatment program to include components required under the 2005 amendments to the General Pretreatment Regulations.

Yes	No
	x

The City was working on revising the ordinance to incorporate the requirements.

Note: If not sure, obtain a copy of the latest ordinance, or verify that one is available for later review.

2. a. Are there any planned changes to the POTW's treatment plant(s)?

Yes	No
	x

If yes, describe.

B. LEGAL AUTHORITY [403.8(f)(1)]

	Yes	No
1. a. Are there any contributing jurisdictions discharging wastewater to the POTW?		x

If yes, complete questions b–e.

b. List the contributing jurisdictions.

	Yes	No
c. Does the CA have an agreement in place that addresses pretreatment program responsibilities?		NA

d. Is the CA or the contributing jurisdiction responsible for the following:

	CA Responsibility	Contributing Jurisdiction Responsibility
Updating the IWS		
Notifying IUs of requirements		
Issuance of control mechanisms		
Receiving and reviewing IU reports		
Conducting inspections		
Conducting compliance monitoring		
Enforcement of Pretreatment Standards and Requirements		

	Yes	No
e. Has the CA had any problems with implementation of its pretreatment program within the contributing jurisdictions?		NA

If yes, explain.

	Yes	No
2. a. Has the CA updated its legal authority to reflect the 2005 General Pretreatment Regulation changes?		x
b. Did all contributing jurisdictions update their SUOs to be as stringent as the receiving POTW?		NA
c. Did the CA update its procedures and ERP to implement the changes in its SUO?		x

Explain

SECTION I: DATA REVIEW (CONTINUED)

C. IU CHARACTERIZATION [403.8(f)(2)(i)&(ii)]

1. a. How does the CA define SIU? (Is it the same in contributing jurisdictions? Is it different from the federal definition at 40 CFR 403.3(v)?)

Same

b. If the CA has implemented the middle-tier CIU provisions, how does the CA define *middle-tier CIU?*

NA

c. If the CA has implemented the NSCIU provisions, how does the CA define *NSCIU*?

NA

2. How are SIUs identified and categorized (including those in contributing jurisdictions)?

Defined in Section 705.020

Discuss any problems.

3. a. How and when does the CA update its IWS to identify new IUs (including those in contributing jurisdictions)?

Mainly for new customer. A pre-application for a permit is given for completion and evaluation prior to issuing a discharge permit.

4. How many IUs are identified by the CA in each of the following groups?

a.	**3**		SIUs (as defined by the CA) [WENDB – SIUS, RIDE – SIUs]
		2	CIUs, excluding middle-tier CIUs and NSCIUs [WENDB – CIUS, RIDE - CIUs]
			Middle-tier CIUs** (specify below)
		1	Noncategorical SIUs
b.			Other regulated nonsignificant IUs (specify)
			Noncategorical nonsignificant IUs
			NSCIUs**, excluding zero-discharging CIUs [as defined by 40 CFR 403.3(v)(2)] (specify below)
			Zero-discharging CIUs** (specify below)
c.	**3**		TOTAL

**** The following section is to be completed only if the POTW has adopted middle-tier permitting [40 CFR 403.3(v), 403.8(f)(2)(v)(C), 403.12(e)(3)], general control mechanisms [40 CFR 403.8(f)(1)(iii)(A)], or NSCIUs [40 CFR 403.3(v)(2), 403.8(f)(2)(v)]. In addition the POTW's program must be revised and approved for these classifications before they can be used.**

List of NSCIUs and zero-discharging CIUs:

NA

List of Middle-Tier CIUs :

NA

If middle-tier CIU classification is used, what is 0.01% of the POTW's dry-weather capacity? _____

List of SIUs with general control mechanisms, and the category of general control mechanism:

NA

SECTION I: DATA REVIEW (CONTINUED)

D. CONTROL MECHANISM EVALUATION [403.8(f)(1)(iii)]

1. a. How many and what percent of the total SIUs are not covered by an existing unexpired permit, or other individual control mechanism? [WENDB – NOCM, RIDE – SIUs without Control Mechanisms] [RNC – II]	**0**	**0** %

The City issued all new permits to their industries in 2020.

b. How many control mechanisms were not issued within 180 days of the expiration date of the previous control mechanism or extended beyond 5 years? [RNC – II]	**0**

If any, explain.

	Yes	No
2. a. Does the CA accept any waste by truck, rail, or dedicated pipe (including septage)?	**x**	
b. Is any of the waste hazardous as defined by RCRA?		**x**
c. Does any waste accepted via truck, rail, or dedicated pipe meet the CA's SIU definition?		**x**

Domestic wastes only. **Haulers have to leave samples and specify type of wastes and where they come from. pH is also checked. The City also requires the haulers to obtain a permit.**

3. Describe the CA's program to control hauled wastes including a designated discharge point (e.g., number of points, control/security procedures). [403.5(b)(8)]

A designated location at the Shoal Creek WWTF (Neosho WWTP).

SECTION I: DATA REVIEW (CONTINUED)

E. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS

1. What limits (categorical, local, other) does the CA apply to wastes that are hauled to the POTW (directly to the treatment plant or within the collection system, including contributing jurisdictions)? [403.1(b)(1)]

Local limits.

2. How does the CA keep abreast of current regulations to ensure proper implementation of standards? [403.8(f)(2)(iii)]

Communication with DNR, inspections, and peers.

3. Local limits evaluation: [403.8(f)(4); 122.21(j)(2)(ii)]

a. For what pollutants have local limits been set?

Arsenic, Cadmium, Copper, Chromium, Cyanide, Lead, Mercury, Nickel, Phenols, Silver, Zinc, Sulfate, pH, Oil and Grease, and Total Toxic Organic (TTO). The City also have surcharges for BOD and TSS when they exceed 250 mg/L.

b. When was the CA's last local limits evaluation? What was the approval date?

October 17, 1991 based on records from the previous inspections. The City's ordinance showed the adoption date of October 5, 1999.

	Yes	No
c. Has the CA identified any pollutants of concern beyond those in its local limits?		**x**

If yes, how has this been addressed?

SECTION I: DATA REVIEW (CONTINUED)

F. COMPLIANCE MONITORING

1. a. How does the CA determine adequate IU monitoring (sampling, inspecting, and reporting) frequencies?

Based on compliance history and follow federal regulations.

b. Is the IU monitoring frequency established in control mechanisms more, less, or the same as required by rule? Explain any difference.

Same for CIUs.

c. Does the CA perform IU monitoring in lieu of requiring IUs to conduct self-monitoring? If yes, list IUs.

No.

2. In the past 12 months, how many, and what percentage of, SIUs were: [403.8(f)(2)(v)] [RNC - II]

(Define the 12-month period **January 2019 to December 2019**)

a. Not sampled or not inspected at least once [WENDB – NOIN]	**0**	%
b. Not sampled at least once [RIDE – SIUs Not Sampled]	**0**	%
c. Not inspected at least once (all parameters)? [RIDE – SIUs Not Inspected]	**0**	%

If any, explain. Indicate how the percentage was determined (e.g., actual, estimated).

SECTION I: DATA REVIEW (CONTINUED)

F. COMPLIANCE MONITORING (continued)

3. a. Indicate the number and percent of SIUs that were identified as being in SNC* with the following requirements as listed in the CA's last pretreatment program report: [WENDB, RIDE] [RNC – II]

SNC Evaluation Period	**January 2019 to December 2019**

	%	Applicable Pretreatment Standards and reporting requirements
	%	Self-monitoring requirements
	%	Pretreatment compliance schedule(s)

*SNC defined by:

POTW	**x**
EPA	

b. Are any of the SIUs that were listed as being in SNC in the most recent pretreatment report still in SNC status? If yes, list SIUs.

NA.

c. Indicate the number of SIUs that have been in 100% compliance with all Pretreatment Standards and Requirements.

Evaluation Period: **January 2019 to December 2019**

Number of SIUs: ___**2**_____

Names of SIUs: **K&S Wire Products and Lazy Boy.**

4. What does the CA's basic inspection include? (process areas, pretreatment facilities, chemical and hazardous waste storage areas, chemical spill prevention areas, hazardous-waste handling procedures, sampling procedures, laboratory procedures, and monitoring records) [403.8(f)(2)(v)&(vii)]

Used EPA's region VII form.

Request a copy of the CA's inspection form, if applicable.

SECTION I: DATA REVIEW (CONTINUED)

F. COMPLIANCE MONITORING (continued)

5. What QA/QC techniques does the CA use for sampling and analysis (e.g., splits, blanks, spikes), including verification of contract laboratory procedures and appropriate analytical methods? [403.8(f)(2)(vii)]

Check all that are applicable.

QA/QC for Sampling	✓	QA/QC for Analysis	✓
Gloves	**ND**	Sample Splits	**ND**
Chain-of-custody forms	**x**	Sample Blanks	**ND**
New Sampling Tubes	**ND**	Sample Spikes	**ND**
Field Blanks	**ND**	Other:	
Other:			

6. a. Did any IUs notify the CA of a hazardous waste discharge since the last PCI or PCA? [403.12(j)&(p)]

Yes	No
	x

If yes, summarize.

b. How does the CA notify its users of the hazardous-waste reporting requirement? [403.12(p)]
When was the last time the CA notified its IUs?

ND

7. a. How and when does the CA evaluate/reevaluate SIUs for the need for a slug discharge control plan? [403.8(f)(2)(vi)]

The City stated they evaluated the facilities during the recent inspections but did not document the evaluations.

List SIUs required to have a slug discharge control plan:

Yes	No
	x

b. For all existing SIUs identified as significant before November 14, 2005, or within a year of becoming an SIU (whichever is later), has the POTW performed the evaluation to determine whether each SIU needs a plan or action to control slug discharges?

No records provided to show an evaluation has been done.

If not, which SIUs have not been evaluated?

SECTION I: DATA REVIEW (CONTINUED)

G. ENFORCEMENT

1. What is the CA's definition of SNC? [403.8(f)(2)(viii)]

In Section 705.170 of the ordinance. It is the same as the prior federal regulation (before 2005).

2. ERP implementation: [403.8(f)(5)]

a. Has the ERP been adopted by the POTW?

A copy of the ERP was not available during the inspection. I requested the City to send me a copy via email.

b. Has the ERP been approved by the Approval Authority?

Records indicated an ERP was approved in 1991.

Note: If not sure if the Enforcement Response Plan has been approved, obtain a copy of the latest ERP, or verify that one is available for later review.

c. Is the ERP effective, and does it lead to timely compliance? Provide examples if any are available.

	Yes	No
3. a. Does the CA use compliance schedules? [403.8(f)(1)(iv)(A)]		x
b. If yes, are they appropriate? Provide a list of SIUs on compliance schedules.		NA

	Yes	No
4. Did the CA publish a list of all SIUs in SNC in a daily newspaper of general circulation that provides meaningful public notice within the jurisdiction served by the POTW in the previous year? [403.8(f)(2)(viii)]		x

If yes, attach a copy.

If no, explain. **The City reported they did not have any SNC and therefore did not publish.**

SECTION I: DATA REVIEW (CONTINUED)

G. ENFORCEMENT (continued)

5. a. How many SIUs are in SNC with self-monitoring requirements and were not inspected (in the four most recent full quarters)?	**0**
b. How many SIUs are in SNC with self-monitoring requirements and were not sampled (in the four most recent full quarters)?	**0**

6. a. Did the CA experience any of the following caused by industrial discharges?

	Yes	No	Unknown	Explain
Interference		x		
Pass through		x		
Fire or explosions (flashpoint, and such)		x		
Corrosive structural damage		x		
Flow obstruction		x		
Excessive flow rates		x		
Excessive pollutant concentrations		x		
Heat problems		x		
Interference due to oil and grease (O&G)		x		
Toxic fumes		x		
Illicit dumping of hauled wastes		x		
Worker health and safety		x		
Other (specify)				

	Yes	No
b. If yes, did the CA take enforcement action against the IUs causing or contributing to pass through or interference? [RNC - I]		**NA**

	Yes	No
7. a. Did any industrial user contribute to sanitary sewer overflows in the POTW's collection system since your last Audit or Inspection?		**x**

Discuss response:

SECTION I: DATA REVIEW (CONTINUED)

H. DATA MANAGEMENT/PUBLIC PARTICIPATION

1. How is confidential information handled by the CA? [403.14]

Section 705.100 of the ordinance.

2. How does the CA ensure public participation during revisions to the SUO and/or local limits? [403.5(c)(3)]

Don't know at this time.

3. How long are records maintained? [403.12(o)]

Did not have sufficient records during the previous inspection but the City generally keeps records much longer than three years.

I. RESOURCES [403.8(f)(3)]

	Yes	No
1. Does the CA have adequate access to monitoring equipment? (Consider: sampling, flow measurement, safety, transportation, and analytical equipment.)	x	

If not, explain.

2. Are there any problems in program implementation?

None reported.

Discuss:

SECTION I: DATA REVIEW (CONTINUED)

J. ENVIRONMENTAL EFFECTIVENESS/POLLUTION PREVENTION		
1. Has the CA investigated the sources contributing to current pollutant loadings to the POTW (i.e., the relative contributions of toxics from industrial, commercial, and domestic sources)?	**Yes**	**No**
		x

If yes, what was found?

K. ADDITIONAL EVALUATIONS/INFORMATION
None.

SECTION I COMPLETED BY: **Sieu T. Dang**	DATE: **8/26/2020**
TITLE: **Environmental Engineer**	TELEPHONE: **417-891-4300**

SECTION II: IU FILE EVALUATION

INSTRUCTIONS: Select a representative number of SIU files to review. Provide relevant details on each file reviewed. Comment on all problems identified and any other areas of interest. Where possible, all CIUs (and SIUs) added since the last PCI or PCA should be evaluated. Make copies of this section to review additional files as necessary.

IU IDENTIFICATION

FILE __1___ Industry name and address	Type of industry: **Opal Foods** SIC Code: NAICS Code:	
Category(ies) [x] Other SIU [ ] Non-SIU [ ] NSCIU	Average total flow (gpd) **9,500** Industry visited during audit	Average process flow (gpd) **9,500** Yes [ ] No [x]
Comments: **Did not visit the facility due to the pandemic concerns.**		
FILE _____ Industry name and address	Type of industry: SIC Code: NAICS Code:	
Category(ies) [ ] Other SIU [ ] Non-SIU [ ] NSCIU	Average total flow (gpd) Industry visited during audit	Average process flow Yes [ ] No [ ]
Comments:		

SECTION II: IU EVALUATION (CONTINUED)

Industry Name						
Opal Foods					**INSTRUCTIONS**: Evaluate the contents of selected IU files; place an emphasis on SIU files. Use N/A (Not Applicable) where necessary. Use ND (Not Determined) where there is insufficient information to evaluate/determine implementation status. Provide comments in the comment area at the bottom of the page for all violations, deficiencies, and/or other problems as well as for any areas of concern or interest noted. Enter a comment number in box and in the comment area at the bottom of the page, followed by the comment. Comments should delineate the extent of the violation, deficiency, and/or problem. Attach relevant copies of IU file information for documentation. Where no comment is needed, or if the item was found to be satisfactory, enter ✓ (check) to indicate area was reviewed. The evaluation should emphasize any areas where improvements in quality and effectiveness can be made.	
File 1	File __	File ___	File ___		**IU FILE REVIEW**	**Reg. Cite**
					A. ISSUANCE OF IU CONTROL MECHANISM	
					1. Issuance or reissuance of control mechanism	403.8(f)(1)(iii)
x					a. Individual control mechanism	
NA					b. General control mechanism	403.8(f)(1)(iii)(A)
					2. Control mechanism contents	403.8(f)(1)(iii)(B)
x					a. Statement of duration (≤ 5 years)	403.8(f)(1)(iii)(B)(1)
x					b. Statement of nontransferability w/o prior notification/approval	403.8(f)(1)(iii)(B)(2)
x					c. Applicable effluent limits (local limits, categorical standards, BMPs	403.8(f)(1)(iii)(B)(3)
					d. Self-monitoring requirements:	403.8(f)(1)(iii)(B)(4)
x					Identification of pollutants to be monitored	
NA					Process for seeking a waiver for pollutant not present or expected to be present (CIUs only)	
N					Is the monitoring waiver certification language included in the control mechanism? (Y/N)	403.12(e)(2)(v)
N					Are conditions for reinstating monitoring requirements if pollutants not present are detected in the future included in the permit? (Y/N)	403.12(e)(2)(vi)
					Sampling frequency	
N					Has the POTW reduced the IU's monitoring requirements for pollutants not present or expected to not to be present? (Y/N)	
x					Sampling locations/discharge points	
x					Sample types (grab or composite)	
x					Reporting requirements (including all monitoring results)	
x					Record-keeping requirements	
Comments:						

SECTION II: IU EVALUATION (CONTINUED)

File 1	File __	File ___	File ___		IU FILE REVIEW	Reg. Cite
					A. ISSUANCE OF IU CONTROL MECHANISM (continued)	
x					e. Statement of applicable civil and criminal penalties	403.8(f)(1)(iii)(B)(5)
NA					f. Compliance schedules/progress reports (if applicable)	403.8(f)(1)(iv)
N					g. Notice of slug loadings	403.12(f)
x					h. Notification of spills, bypasses, upsets, etc .	403.16, 403.17
x					i. Notification of significant change in discharge	403.12(j)
N					j. Notification of change affecting the potential for a slug discharge	403.8(f)(2)(vi)
x					k. 24-hour notification of violation/resample requirement	403.12(g)(2)
N					l. Slug discharge control plan conditions, if determined by the POTW to be necessary	403.8(f)(1)(iii)(B)(6), 403.8(f)(2)(vi)

Comments

SECTION II: IU EVALUATION (CONTINUED)

File 1	File __	File ___	File ___		IU FILE REVIEW	Reg. Cite
					B. CA APPLICATION OF IU PRETREATMENT STANDARDS	
Y					1. IU categorization	403.8(f)(1)(ii)
ND					2. Calculation and application of categorical standards	403.8(f)(1)(ii)
ND					a. Classification by category/subcategory	
ND					b. Classification as new/existing source	
ND					c. Application of limits for all regulated pollutants	
ND					d. Classification as an NSCIU	403.3(v)(2)
ND					e. Documentation for the qualification to be classified as NSCIU	
ND					f. Documentation of reasons for supporting sampling wavier for pollutant not present	403.12(2)(iv)
x					3. Application of local limits	403.5(c)&(d)& 403.8(f)(1)(ii)
NA					4. Application of BMPs	403.8(f)(1)(iii)(B)(3)
NA					5. Calculation and application of production-based standards	403.6(c)

Comments

SECTION II: IU EVALUATION (CONTINUED)

File 1	File __	File ___	File ___		IU FILE REVIEW	Reg. Cite
					B. CA APPLICATION OF IU PRETREATMENT STANDARDS (continued)	
					6. Calculation of equivalent mass limits for concentration limits	403.6(c)(5)
N					a. IU has demonstrated or will demonstrate substantially reduced water usage	403.6(c)(5)(i)(A)
N					b. IU uses control and technologies adequate to achieve compliance	403.6(c)(5)(i)(B)
x					c. IU has provided information regarding actual average daily flow	403.6(c)(5)(i)(C)
x					d. IU does not have variable flow rates, production levels, or pollutant levels	403.6(c)(5)(i)(D)
x					e. IU has consistently complied with applicable categorical requirements	403.6(c)(5)(i)(E)
N					f. Did the CA use appropriate flow rates when developing limits? (Y/N)	406.3(c)(5)(iii)(A)
NA					g. Did the CA use the correct concentration-based limits for the applicable categorical standards? (Y/N)	403.6(c)(5)(iii)(B)
NA					h. Upon notification of revised production rate, did the CA reassess the mass limits? (Y/N)	
					7. Calculation of equivalent concentration limits for flow-based standards	403.6(c)(6)
N					a. Is the IU subject to 40 CFR Part 414, 419, or 455? (Y/N)	
N					b. Documentation that dilution is not being used as treatment? (Y/N)	
NA					8. Calculation and application of CWF or FWA	403.6(d)&(e)
Y					9. Application of most stringent limit	403.8(f)(1)(ii)

Comments:

SECTION II: IU EVALUATION (CONTINUED)

File 1	File __	File ___	File ___		IU FILE REVIEW	Reg. Cite
					C. CA COMPLIANCE MONITORING	
x					1. Inspection (at least once a year, except as otherwise specified)	403.8(f)(2)(v)
NA					a. If the CA has determined a discharger to be an NSCIU	403.8(f)(2)(v)(B)
					Evaluation of discharger with the definition of NSCIU once per year	
					b. If the CA has reduced an IU's reporting requirements	403.8(f)(2)(v)(C)
					Inspect at least once every 2 years	
x					2. Inspection at frequency specified in approved program	403.8(c)
x					3. Documentation of inspection activities	403.8(f)(2)(v)
N					4. Evaluation of need for slug discharge control plan (reevaluation of existing plan)	403.8(f)(2)(vi)
x					5. Sampling (at least once a year, except as otherwise specified)	403.8(f)(2)(v)
					a. If the CA has waived monitoring for a CIU	403.8(f)(2)(v)(A)
NA					Sample waived pollutant(s) at least once during the term of the control mechanism	
					b. If the CA has reduced an IU's reporting requirements	403.8(f)(2)(v)(C)
NA					Sample and analyze IU discharge at least once every 2 years	
x					6. Sampling at the frequency specified in approved program	403.8(c)
x					7. Documentation of sampling activities (chain-of-custody; QA/QC)	403.8(f)(2)(vii)
x					8. Analysis for all regulated parameters	403.12(g)(1)
ND					9. Appropriate analytical methods (40 CFR Part 136)	403.8(f)(2)(vii)

Comments:

SECTION II: IU EVALUATION (CONTINUED)

File 1	File __	File ___	File ___		IU FILE REVIEW	Reg. Cite
					D. CA ENFORCEMENT ACTIVITIES	
N					1. Identification of violations	403.8(f)(2)(vii)
x					a. Discharge violations	
x					IU self-monitoring	
x					CA compliance monitoring	
x					b. Monitoring/reporting violations	
x					IU self-monitoring	
N					Reporting (e.g., frequency, content)	
x					Sampling (e.g., frequency, pollutants)	
ND					Record-keeping	
ND					Notification (e.g., slug, spill, changed discharge, 24-hour notice of violation)	
ND					Slug discharge control plan	
NA					Compliance schedule/reports	
NA					c. Compliance schedule violations	
NA					Start-up/final compliance	
NA					Interim dates	

Comments: **The SIU failed to submit the report certification as required in their industrial permit and the City did not take any enforcement action.**

SECTION II: IU EVALUATION (CONTINUED)

File 1	File __	File ___	File ___		IU FILE REVIEW	Reg. Cite
					D. CA ENFORCEMENT ACTIVITIES (continued)	
x					2. Determination of SNC	403.8(f)(2)(viii)
					a. Chronic	
					b. TRC (Technical Review Criteria)	
					c. Pass through/interference	
					d. Spill/slug reporting load	
					e. Reporting	
					f. Compliance schedule	
					g. Other violations (e.g., BMPs requirements)	
NA					3. Response to violation	
N					4. Adherence to approved ERP	403.8(f)(5)
NA					5. Return to compliance	
					a. Within 90 days	
					b. Within time specified	
					c. Through compliance schedule	
NA					6. Escalation of enforcement	403.8(f)(5)(ii)
NA					7. Publication for SNC	403.8(f)(2)(viii)

Comments:

SECTION II: IU EVALUATION (CONTINUED)

File 1	File __	File ___	File ___		IU FILE REVIEW	Reg. Cite
					E. IU COMPLIANCE STATUS	
x					1. Self-monitoring and reporting	
x					a. Sampling at frequency specified in control mechanism/regulation	403.12(e)&(h)
x					b. Analysis of all required pollutants	403.12(g)(1)&(h)
ND					c. Appropriate analytical methods (40 CFR Part 136)	
x					d. Appropriate sample collection methods	
ND					e. Compliance with sample collection holding times	
NA					f. Submission of BMR/90-day report	403.12(b) &(d)
x					g. Periodic self monitoring reports	403.12(e)&(h)
x					h. Reporting all required pollutants	403.12(g)(1)&(h)
N					i. Signatory/certification of reports	403.12(l)
NA					j. Annual certification by NSCIUs	403.12(q)
NA					k. Submission of compliance schedule reports by required dates	403.12(c)
ND					l. Notification within 24 hours of becoming aware of violations	403.12(g)(2)
x					Discharge violation	
ND					Slug load	
ND					Accidental spill	
NA					m. Resampling/reporting within 30 days of knowledge of violation	403.12(g)(2)
ND					n. Notification of hazardous waste discharge	403.12(j)&(p)
N					o. Submission/implementation of slug discharge control plan	403.8(f)(2)(vii)
ND					p. Notification of significant changes	403.12(j)

Comments:

SECTION II: IU EVALUATION (CONTINUED)

File 1	File __	File ___	File ___		IU FILE REVIEW	Reg. Cite
					E. IU COMPLIANCE STATUS (continued)	
NA					2. Compliance with all general control mechanism requirements	
NA					3. If the CA has classified the discharger as a middle-tier CIU	403.12(e)(3)
					Categorical flow does not exceed 0.01% of the design dry-weather hydraulic capacity or 5,000 gpd (whichever is smaller)	
					Categorical flow does not exceed 0.01% of the design dry weather organic treatment capacity of the POTW	
					Categorical flow does not exceed 0.01% of the maximum allowable headworks loading for any regulated categorical pollutant	
NA					4. If the CA has granted the discharger a monitoring waiver	403.12(e)(2)
					Certification statements with each compliance report	
NA					5. Compliance with BMR requirements, if applicable (Y/N)	
NA					6. If the CA has classified the discharger as an NSCIU	403.3(v)(2)
					IU discharges less than 100 gpd of total categorical wastewater	
					Annual certification statements from the IU	
NA					7. If the CA has established equivalent mass limits for a CIU	403.6(c)(5)(ii)
					IU is effectively operating treatment technologies to achieve compliance	
					IU is recording the facility's flow rates	
					IU is recording the facility's production rates	
					IU has notified the CA whenever production rates vary	
					IU continues to employ water conservation methods/technologies	

Comments:

SECTION II COMPLETED BY: **Sieu T. Dang**	DATE: **9/17/2020**
TITLE: **Environmental Engineer**	TELEPHONE:**417-891-4300**

RECEIVED
09/16/2020
DEQ/SWRO

City of Neosho
Enforcement Response Plan
for Wastewater Pretreatment Program

I. The E.R.P. for the City of Neosho was established for these purposes:

A. To insure that violations will come back in compliance as quickly as possible.
B. A guide for Control Authority Personnel so that all non-compliances will be handled as quickly and consistently as possible.
C. All industrial users can know what type of action will be taken in the event that there is a violation of the City ordinance, discharge permits or Federal Regulations.

II. Description of terms and abbreviations used in the Plan:

AO - Administrative Order
Criminal Investigation- Pursuing punitive measures against an individual and/or organization through a court of law.
Fine - Monetary penalty assessed by Control Authority
I - Inspector
IU - Industrial User
Legal Action - Action taken in court of law to obtain legal and/or equitable relief
Non-significant Violation - Reporting violation not more than 7 days late. Discharge violation not more than 1.5 times the limit.
NOV - Notice of Violation
PC - Pretreatment Coordinator
POTW - Public Owned Treatment Works
S - Superintendent of Wastewater Department
SV - Significant Violation
Show Cause - Formal meeting requiring the Industrial User to appear and demonstrate why the Control Authority should not take a proposed enforcement action against it.

III. Administration

A. Types of Enforcement Actions

1. Phone Call: to notify IU of non-significant violation
2. NOV: Written notice issued by the Superintendent stating the nature of the violation. Within thirty (30) days of the date of the notice a plan of satisfactory correction thereof shall be submitted to the City by the IU.
3. Administrative Orders:

a. Show Cause Order - An order issued by the Superintendent to users who cause or allows an unauthorized discharge to show cause before the City Officials why the proposed enforcement action should not be taken. A notice shall be served on the user specifying the time and place of a hearing to be held by the City regarding the violation, the reasons why the action is to be taken, the proposed enforcement action and directing the user to show cause before City why the proposed enforcement action should not be taken.

b. Consent orders - An agreement between the City and the IU normally containing three elements: (1) compliance schedules; (2) stipulated fines or remedial actions; and (3) signatures of City and industry representatives.

c. Compliance orders - non-negotiable order issued by the City normally containing three elements: (1) findings; (2) stipulated remedial action; and (3) compliance schedule.

d. Cease and Desist order _ an order directing a noncompliant user to cease illegal or authorized discharges immediately or to terminate its discharge altogether.

4. Fines: Any user who is found to have violated an order of the City or the orders, rules, regulations, and permits issued under the City Sewer Use Ordinances, shall be subject to fines not less than five hundred dollars ($500.)
for each offense. Each day on which a violation shall occur or continue shall be deemed a separate and distinct offense

5. Legal Action - Any person found in violation of the Sewer Use Ordinance, federal or state pretreatment requirements or any order of the City, the City attorney may commence an action for appropriate legal and/or equitable relief in the court of law.

6. Criminal Prosecution - Pursuing punitive measures against an individual and/or organization through a court of law who knowingly makes any false statements, representation, or certification in any application, record, reports, plan or other document filed or required to be maintained pursuant to the Sewer Use Ordinance, or wastewater contribution permit, or who falsifies, tampers with, or knowingly renders inaccurate any monitoring device or methods shall, upon conviction, be punished by a fine of not more than five hundred dollars ($500.),or by imprisonment for not more than three months, or by both.

7. Suspension of Service - The City may suspend the wastewater treatment service and/or a wastewater

contribution permit when such suspension is necessary, in the opinion of the City, in order to stop an actual or threatened discharge which presents or may present an immediate or substantial endangerment to the health or welfare of persons, to the environment cause interference to the POTW or cause the City to violate any conditions of its NPDES permit.

B. Responsibility of Enforcement Plan

City Ordinance number 92-1 Sec.30-16(d) "Except as otherwise provided herein, the Superintendent of the City POTW shall administer, implement, and enforce the provisions of this article"

The Superintendent has the full oversite of the pre-treatment program. But there are several employees and officials that are involved in the enforcement part of the program, they are as follows:

Superintendent: Track compliance of IU
Issue all NOV, AO, and fines

Building Inspector: Notify Superintendent of any new or expanding Industry

City Manager: Give approval on all AO and fines, and suspension of service.

City Attorney: To give legal advice and sign AO.And to handle all legal action and criminal prosecution.

Public Works Director: Preside over show cause hearings.

C. Timeframes for response:

1. All violations will be identified and documented within five days of receiving compliance information.
2. Initial enforcement responses (involving contact with industrial user and requesting information on corrective or preventative action(s) will occur within 15 days of violation detection.
3. Follow up actions for continuing or reoccurring violations will be taken within 60 days of the initial enforcement response. For all continuing violations, the response will include a compliance schedule.
4. Violations which threaten health, property or environmental quality are considered emergencies and will receive immediate responses such as halting the discharge or terminating service.
5. All violations meeting the criteria for significant noncompliance will be addressed with an enforceable

order within 30 days of the identification of significant non-compliance.

D. Forms

Included in all administrative orders, and Notice of Violation will be the following:

1. Type of Order
2. Name and address of Industry
3. Legal authority
4. Findings
5. Order
6. Signature of Wastewater Department Superintendent and City attorney. On consent Orders there will be signature of the Industry representative.

Enforcement Response Guide

I. UNAUTHORIZED DISCHARGE (no permit)

A. Unpermitted discharge
   1. IU unaware of requirement; no harm to POTW/environment
      a. Phone call
      b. NOV with application form
   2. Failure to apply continues after notice by POTW; no harm
      a. AO with fine
   3. IU unaware of requirement; harm to POTW
      a. AO with fine
      b. Legal action
   4. Failure to apply continues after notice by POTW
      a. Criminal investigation
      b. Suspension of service
      c. Legal action

B. Nonpermitted discharge (failure to renew)
   1. IU has not submitted application within 10 days of date
      a. Phone call
      b. NOV

II. DISCHARGE LIMIT VIOLATION

A. Exceedance of local or Federal Standard (permit limit)
   1. Isolated, Not significant
      a. Phone call
      b. NOV
   2. Isolated, significant (no harm)
      a. AO to develop spill prevention plan
      b. Fine
   3. Isolated, harm to POTW or environment or pass through
      a. Show cause order
      b. Legal action
   4. Recurring; non-significant
      a. NOV/AO
   5. Recurring; significant (no harm)
      a. AO with fine
   6. Recurring; harm to POTW or environment or pass through
      a. Show cause order
      b. Legal action
      c. Suspension of service

III. MONITORING AND REPORTING VIOLATIONS

A. Reporting Violations
   1. Report is improperly signed or certified
      a. Phone call or NOV b. report to IU
   2. Report is improperly signed or certified after notice by POTW
      a. AO
      b. Show cause
   3. Isolated, non-significant (i.e., 7 days late)
      a. Phone call;NOV
   4. Significant (i.e. report 30 or more days late)
      a. AO
   5. Reports are always late or no reports at all
      a. AO with fine
      b. show cause
      c. legal action
   6. Failure to report spill or changed discharge (no harm)
      a. NOV
   7. Failure to report spill or changed discharge (results in harm)
      a. AO with fine
      b. legal action
   8. Repeated failure to report spills
      a. Show cause order
      b. Suspension of service
   9. Falsification
      a. Criminal investigation
      b. Suspension of service

B. Failure to monitor correctly
   1. Failure to monitor all pollutants as required by permit
      a. NOV or AO
   2. Recurring failure to monitor
      a. AO with fine
      b. Legal action

C. Improper Sampling
   1. Evidence of intent
      a. Criminal investigation
      b. Suspension of service

D. Compliance Schedules

   1. Missed milestone by less than 30 days, or will not affect final milestone
      a. NOV
   2. Missed milestone by more than 30 days, or will affect final milestone (good cause for delay)
      a. AO
      b. Show cause order
      c. Fine
   3. Missed milestone by more than 30 days, or will affect final milestone (no good cause for delay)

a. Show cause order
b. Legal action
c. Suspension of service

4. Recurring violation or violation of schedule in AO
   a. Legal action
   b. Criminal investigation
   c. Suspension of service

IV. OTHER PERMIT VIOLATIONS

A. Waste streams are diluted in lieu of treatment
   1. Initial violation
      a. AO
   2. Recurring
      a. Fine
      b. Show cause order
      c. Suspension of service

B. Failure to mitigate noncompliance or halt
   1. Does not result in harm
      a. NOV
   2. Does result in harm
      a. AO with fine
      b. Legal action

C. Failure to properly operate and maintain pretreatment facility
   1. Does not result in harm
      a. NOV
   2. Does result in harm
      a. AO with fine
      b. Legal action

V. VIOLATIONS DETECTED DURING SITE VISITS

A. Entry Denial
   1. Entry denied or consent withdrawn; copies of records denied
      a. Obtain warrant and return to IU

B. Illegal Discharge
   1. No harm to POTW or environment
      a. AO
   2. Discharges causes harm or evidence of intent/negligence
      a. Fine
      b. Legal action
      c. Suspension of service

ANALYTICAL RESULTS

Project: K&S WIRE SEM-ANN
Pace Project No.: 60323944

Sample: K&S-COMP **Lab ID: 60323944001** Collected: 12/11/19 08:15 Received: 12/11/19 18:30 Matrix: Water

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
200.7 Metals, Total	Analytical Method: EPA 200.7 Preparation Method: EPA 200.7							
Arsenic	ND	ug/L	10.0	1	12/13/19 11:00	12/16/19 16:25	7440-38-2	
Cadmium	ND	ug/L	5.0	1	12/13/19 11:00	12/16/19 16:25	7440-43-9	
Chromium	ND	ug/L	5.0	1	12/13/19 11:00	12/16/19 16:25	7440-47-3	
Copper	**41.7**	ug/L	10.0	1	12/13/19 11:00	12/16/19 16:25	7440-50-8	
Iron	**201**	ug/L	50.0	1	12/13/19 11:00	12/16/19 16:25	7439-89-6	
Lead	ND	ug/L	10.0	1	12/13/19 11:00	12/16/19 16:25	7439-92-1	
Molybdenum	**1300**	ug/L	20.0	1	12/13/19 11:00	12/16/19 16:25	7439-98-7	
Nickel	**6.4**	ug/L	5.0	1	12/13/19 11:00	12/16/19 16:25	7440-02-0	
Silver	ND	ug/L	7.0	1	12/13/19 11:00	12/16/19 16:25	7440-22-4	
Zinc	ND	ug/L	50.0	1	12/13/19 11:00	12/16/19 16:25	7440-66-6	
245.1 Mercury	Analytical Method: EPA 245.1 Preparation Method: EPA 245.1							
Mercury	ND	ug/L	0.20	1	12/13/19 10:20	12/16/19 14:01	7439-97-6	
625 MSSV	Analytical Method: EPA 625 Preparation Method: EPA 625							
Acenaphthene	ND	ug/L	5.0	1	12/12/19 22:09	12/13/19 13:41	83-32-9	
Acenaphthylene	ND	ug/L	5.0	1	12/12/19 22:09	12/13/19 13:41	208-96-8	
Anthracene	ND	ug/L	5.0	1	12/12/19 22:09	12/13/19 13:41	120-12-7	
Benzidine	ND	ug/L	49.8	1	12/12/19 22:09	12/13/19 13:41	92-87-5	
Benzo(a)anthracene	ND	ug/L	5.0	1	12/12/19 22:09	12/13/19 13:41	56-55-3	
Benzo(a)pyrene	ND	ug/L	5.0	1	12/12/19 22:09	12/13/19 13:41	50-32-8	
Benzo(b)fluoranthene	ND	ug/L	5.0	1	12/12/19 22:09	12/13/19 13:41	205-99-2	
Benzo(g,h,i)perylene	ND	ug/L	5.0	1	12/12/19 22:09	12/13/19 13:41	191-24-2	
Benzo(k)fluoranthene	ND	ug/L	5.0	1	12/12/19 22:09	12/13/19 13:41	207-08-9	
4-Bromophenylphenyl ether	ND	ug/L	5.0	1	12/12/19 22:09	12/13/19 13:41	101-55-3	
Butylbenzylphthalate	ND	ug/L	5.0	1	12/12/19 22:09	12/13/19 13:41	85-68-7	
4-Chloro-3-methylphenol	ND	ug/L	5.0	1	12/12/19 22:09	12/13/19 13:41	59-50-7	
bis(2-Chloroethoxy)methane	ND	ug/L	5.0	1	12/12/19 22:09	12/13/19 13:41	111-91-1	
bis(2-Chloroethyl) ether	ND	ug/L	6.0	1	12/12/19 22:09	12/13/19 13:41	111-44-4	
bis(2-Chloroisopropyl) ether	ND	ug/L	6.0	1	12/12/19 22:09	12/13/19 13:41	108-60-1	
2-Chloronaphthalene	ND	ug/L	5.0	1	12/12/19 22:09	12/13/19 13:41	91-58-7	
2-Chlorophenol	ND	ug/L	5.0	1	12/12/19 22:09	12/13/19 13:41	95-57-8	
4-Chlorophenylphenyl ether	ND	ug/L	5.0	1	12/12/19 22:09	12/13/19 13:41	7005-72-3	
Chrysene	ND	ug/L	5.0	1	12/12/19 22:09	12/13/19 13:41	218-01-9	
Dibenz(a,h)anthracene	ND	ug/L	5.0	1	12/12/19 22:09	12/13/19 13:41	53-70-3	
3,3'-Dichlorobenzidine	ND	ug/L	19.9	1	12/12/19 22:09	12/13/19 13:41	91-94-1	
2,4-Dichlorophenol	ND	ug/L	5.0	1	12/12/19 22:09	12/13/19 13:41	120-83-2	
Diethylphthalate	ND	ug/L	5.0	1	12/12/19 22:09	12/13/19 13:41	84-66-2	
2,4-Dimethylphenol	ND	ug/L	5.0	1	12/12/19 22:09	12/13/19 13:41	105-67-9	
Dimethylphthalate	ND	ug/L	5.0	1	12/12/19 22:09	12/13/19 13:41	131-11-3	
Di-n-butylphthalate	ND	ug/L	5.0	1	12/12/19 22:09	12/13/19 13:41	84-74-2	
4,6-Dinitro-2-methylphenol	ND	ug/L	24.9	1	12/12/19 22:09	12/13/19 13:41	534-52-1	
2,4-Dinitrophenol	ND	ug/L	49.8	1	12/12/19 22:09	12/13/19 13:41	51-28-5	
2,4-Dinitrotoluene	ND	ug/L	6.0	1	12/12/19 22:09	12/13/19 13:41	121-14-2	
2,6-Dinitrotoluene	ND	ug/L	5.0	1	12/12/19 22:09	12/13/19 13:41	606-20-2	
Di-n-octylphthalate	ND	ug/L	5.0	1	12/12/19 22:09	12/13/19 13:41	117-84-0	

REPORT OF LABORATORY ANALYSIS

ANALYTICAL RESULTS

Project: K&S WIRE SEM-ANN
Pace Project No.: 60323944

Sample: K&S-COMP **Lab ID: 60323944001** Collected: 12/11/19 08:15 Received: 12/11/19 18:30 Matrix: Water

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
625 MSSV	Analytical Method: EPA 625 Preparation Method: EPA 625							
bis(2-Ethylhexyl)phthalate	ND	ug/L	5.0	1	12/12/19 22:09	12/13/19 13:41	117-81-7	
Fluoranthene	ND	ug/L	5.0	1	12/12/19 22:09	12/13/19 13:41	206-44-0	
Fluorene	ND	ug/L	5.0	1	12/12/19 22:09	12/13/19 13:41	86-73-7	
Hexachloro-1,3-butadiene	ND	ug/L	5.0	1	12/12/19 22:09	12/13/19 13:41	87-68-3	
Hexachlorobenzene	ND	ug/L	5.0	1	12/12/19 22:09	12/13/19 13:41	118-74-1	
Hexachlorocyclopentadiene	ND	ug/L	5.0	1	12/12/19 22:09	12/13/19 13:41	77-47-4	L1
Hexachloroethane	ND	ug/L	5.0	1	12/12/19 22:09	12/13/19 13:41	67-72-1	
Indeno(1,2,3-cd)pyrene	ND	ug/L	5.0	1	12/12/19 22:09	12/13/19 13:41	193-39-5	
Isophorone	ND	ug/L	5.0	1	12/12/19 22:09	12/13/19 13:41	78-59-1	
2-Methylphenol(o-Cresol)	ND	ug/L	10	1	12/12/19 22:09	12/13/19 13:41	95-48-7	N2
3&4-Methylphenol(m&p Cresol)	ND	ug/L	19.9	1	12/12/19 22:09	12/13/19 13:41	15831-10-4	N2
Naphthalene	ND	ug/L	5.0	1	12/12/19 22:09	12/13/19 13:41	91-20-3	
Nitrobenzene	ND	ug/L	5.0	1	12/12/19 22:09	12/13/19 13:41	98-95-3	
2-Nitrophenol	ND	ug/L	5.0	1	12/12/19 22:09	12/13/19 13:41	88-75-5	
4-Nitrophenol	ND	ug/L	5.0	1	12/12/19 22:09	12/13/19 13:41	100-02-7	
N-Nitrosodimethylamine	ND	ug/L	5.0	1	12/12/19 22:09	12/13/19 13:41	62-75-9	
N-Nitroso-di-n-propylamine	ND	ug/L	5.0	1	12/12/19 22:09	12/13/19 13:41	621-64-7	
N-Nitrosodiphenylamine	ND	ug/L	5.0	1	12/12/19 22:09	12/13/19 13:41	86-30-6	
Pentachlorophenol	ND	ug/L	5.0	1	12/12/19 22:09	12/13/19 13:41	87-86-5	
Phenanthrene	ND	ug/L	5.0	1	12/12/19 22:09	12/13/19 13:41	85-01-8	
Phenol	ND	ug/L	5.0	1	12/12/19 22:09	12/13/19 13:41	108-95-2	
Pyrene	ND	ug/L	5.0	1	12/12/19 22:09	12/13/19 13:41	129-00-0	
1,2,4-Trichlorobenzene	ND	ug/L	5.0	1	12/12/19 22:09	12/13/19 13:41	120-82-1	
2,4,6-Trichlorophenol	ND	ug/L	5.0	1	12/12/19 22:09	12/13/19 13:41	88-06-2	
Surrogates								
2,4,6-Tribromophenol (S)	86	%	24-126	1	12/12/19 22:09	12/13/19 13:41	118-79-6	
2-Fluorobiphenyl (S)	78	%	24-110	1	12/12/19 22:09	12/13/19 13:41	321-60-8	
2-Fluorophenol (S)	42	%	20-59	1	12/12/19 22:09	12/13/19 13:41	367-12-4	
Nitrobenzene-d5 (S)	76	%	24-110	1	12/12/19 22:09	12/13/19 13:41	4165-60-0	
Phenol-d6 (S)	28	%	11-42	1	12/12/19 22:09	12/13/19 13:41	13127-88-3	
Terphenyl-d14 (S)	84	%	35-118	1	12/12/19 22:09	12/13/19 13:41	1718-51-0	
300.0 IC Anions 28 Days	Analytical Method: EPA 300.0							
Sulfate	**9.9**	mg/L	1.0	1		12/14/19 00:06	14808-79-8	

Sample: K&S-GRAB **Lab ID: 60323944002** Collected: 12/11/19 08:10 Received: 12/11/19 18:30 Matrix: Water

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
624 Volatile Organics	Analytical Method: EPA 624 Low							
Acrolein	ND	ug/L	100	1		12/17/19 11:20	107-02-8	
Acrylonitrile	ND	ug/L	20.0	1		12/17/19 11:20	107-13-1	
Benzene	ND	ug/L	1.0	1		12/17/19 11:20	71-43-2	
Bromodichloromethane	ND	ug/L	1.0	1		12/17/19 11:20	75-27-4	
Bromoform	ND	ug/L	1.0	1		12/17/19 11:20	75-25-2	

REPORT OF LABORATORY ANALYSIS

ANALYTICAL RESULTS

Project: K&S WIRE SEM-ANN
Pace Project No.: 60323944

Sample: K&S-GRAB **Lab ID: 60323944002** Collected: 12/11/19 08:10 Received: 12/11/19 18:30 Matrix: Water

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
624 Volatile Organics	Analytical Method: EPA 624 Low							
Bromomethane	ND	ug/L	5.0	1		12/17/19 11:20	74-83-9	
Carbon tetrachloride	ND	ug/L	1.0	1		12/17/19 11:20	56-23-5	
Chlorobenzene	ND	ug/L	1.0	1		12/17/19 11:20	108-90-7	
Chloroethane	ND	ug/L	1.0	1		12/17/19 11:20	75-00-3	
2-Chloroethylvinyl ether	ND	ug/L	10.0	1		12/17/19 11:20	110-75-8	
Chloroform	**1.1**	ug/L	1.0	1		12/17/19 11:20	67-66-3	
Chloromethane	ND	ug/L	1.0	1		12/17/19 11:20	74-87-3	
Dibromochloromethane	ND	ug/L	1.0	1		12/17/19 11:20	124-48-1	
1,2-Dichlorobenzene	ND	ug/L	1.0	1		12/17/19 11:20	95-50-1	
1,3-Dichlorobenzene	ND	ug/L	1.0	1		12/17/19 11:20	541-73-1	
1,4-Dichlorobenzene	ND	ug/L	1.0	1		12/17/19 11:20	106-46-7	
1,1-Dichloroethane	ND	ug/L	1.0	1		12/17/19 11:20	75-34-3	
1,2-Dichloroethane	ND	ug/L	1.0	1		12/17/19 11:20	107-06-2	
1,1-Dichloroethene	ND	ug/L	1.0	1		12/17/19 11:20	75-35-4	
cis-1,2-Dichloroethene	ND	ug/L	1.0	1		12/17/19 11:20	156-59-2	N2
trans-1,2-Dichloroethene	ND	ug/L	1.0	1		12/17/19 11:20	156-60-5	
1,2-Dichloropropane	ND	ug/L	1.0	1		12/17/19 11:20	78-87-5	
cis-1,3-Dichloropropene	ND	ug/L	1.0	1		12/17/19 11:20	10061-01-5	
trans-1,3-Dichloropropene	ND	ug/L	1.0	1		12/17/19 11:20	10061-02-6	
Ethylbenzene	ND	ug/L	1.0	1		12/17/19 11:20	100-41-4	
Methylene Chloride	ND	ug/L	1.0	1		12/17/19 11:20	75-09-2	
1,1,2,2-Tetrachloroethane	ND	ug/L	1.0	1		12/17/19 11:20	79-34-5	
Tetrachloroethene	ND	ug/L	1.0	1		12/17/19 11:20	127-18-4	
Toluene	ND	ug/L	1.0	1		12/17/19 11:20	108-88-3	
1,1,1-Trichloroethane	ND	ug/L	1.0	1		12/17/19 11:20	71-55-6	
1,1,2-Trichloroethane	ND	ug/L	1.0	1		12/17/19 11:20	79-00-5	
Trichloroethene	ND	ug/L	1.0	1		12/17/19 11:20	79-01-6	
Trichlorofluoromethane	ND	ug/L	1.0	1		12/17/19 11:20	75-69-4	
Vinyl chloride	ND	ug/L	1.0	1		12/17/19 11:20	75-01-4	
Xylene (Total)	ND	ug/L	3.0	1		12/17/19 11:20	1330-20-7	N2
Surrogates								
4-Bromofluorobenzene (S)	101	%	80-120	1		12/17/19 11:20	460-00-4	
Toluene-d8 (S)	100	%	80-120	1		12/17/19 11:20	2037-26-5	
1,2-Dichloroethane-d4 (S)	99	%	80-120	1		12/17/19 11:20	17060-07-0	
Preservation pH	**7.0**		1.0	1		12/17/19 11:20		
Field pH, Electrometric	Analytical Method: SM 4500-H+B							
Field pH	**7.7**	Std. Units	0.10	1		12/10/19 08:10		
Field Temperature	Analytical Method: SM 2550B							
Field Temperature	**28.3**	deg C	0.10	1		12/10/19 08:10		
HEM, Oil and Grease	Analytical Method: EPA 1664A							
Oil and Grease	**6.6**	mg/L	4.8	1		12/23/19 08:38		

REPORT OF LABORATORY ANALYSIS

ANALYTICAL RESULTS

Project: K&S WIRE SEM-ANN
Pace Project No.: 60323944

Sample: K&S-GRAB **Lab ID: 60323944002** Collected: 12/11/19 08:10 Received: 12/11/19 18:30 Matrix: Water

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
Phenolics, Total Recoverable	Analytical Method: EPA 420.1 Preparation Method: EPA 420.1							
Phenolics, Total Recoverable	ND	mg/L	0.050	1	12/19/19 09:01	12/19/19 14:34	64743-03-9	
4500CNE Cyanide, Total	Analytical Method: SM 4500-CN-E Preparation Method: SM 4500-CN-E							
Cyanide	ND	mg/L	0.0050	1	12/13/19 09:22	12/13/19 12:50	57-12-5	

REPORT OF LABORATORY ANALYSIS

ANALYTICAL RESULTS

Project: K&S WIRE SEM-ANN
Pace Project No.: 60337095

Sample: K&S-COMP **Lab ID: 60337095001** Collected: 05/13/20 07:40 Received: 05/13/20 18:30 Matrix: Water

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
200.7 Metals, Total	Analytical Method: EPA 200.7 Preparation Method: EPA 200.7							
	Pace Analytical Services - Kansas City							
Arsenic	ND	ug/L	10.0	1	05/14/20 10:55	05/17/20 19:32	7440-38-2	
Cadmium	ND	ug/L	5.0	1	05/14/20 10:55	05/17/20 19:32	7440-43-9	
Chromium	ND	ug/L	5.0	1	05/14/20 10:55	05/17/20 19:32	7440-47-3	
Copper	**19.7**	ug/L	10.0	1	05/14/20 10:55	05/17/20 19:32	7440-50-8	
Iron	**91.0**	ug/L	50.0	1	05/14/20 10:55	05/17/20 19:32	7439-89-6	
Lead	ND	ug/L	10.0	1	05/14/20 10:55	05/17/20 19:32	7439-92-1	
Molybdenum	**185**	ug/L	20.0	1	05/14/20 10:55	05/17/20 19:32	7439-98-7	
Nickel	ND	ug/L	5.0	1	05/14/20 10:55	05/17/20 19:32	7440-02-0	
Silver	ND	ug/L	7.0	1	05/14/20 10:55	05/17/20 19:32	7440-22-4	
Zinc	ND	ug/L	50.0	1	05/14/20 10:55	05/17/20 19:32	7440-66-6	
245.1 Mercury	Analytical Method: EPA 245.1 Preparation Method: EPA 245.1							
	Pace Analytical Services - Kansas City							
Mercury	ND	ug/L	0.20	1	05/18/20 11:21	05/19/20 13:22	7439-97-6	
625 MSSV	Analytical Method: EPA 625 Preparation Method: EPA 625							
	Pace Analytical Services - Kansas City							
Acenaphthene	ND	ug/L	4.8	1	05/18/20 20:36	05/20/20 03:38	83-32-9	
Acenaphthylene	ND	ug/L	4.8	1	05/18/20 20:36	05/20/20 03:38	208-96-8	
Anthracene	ND	ug/L	4.8	1	05/18/20 20:36	05/20/20 03:38	120-12-7	
Benzidine	ND	ug/L	47.6	1	05/18/20 20:36	05/20/20 03:38	92-87-5	M1
Benzo(a)anthracene	ND	ug/L	4.8	1	05/18/20 20:36	05/20/20 03:38	56-55-3	
Benzo(a)pyrene	ND	ug/L	4.8	1	05/18/20 20:36	05/20/20 03:38	50-32-8	
Benzo(b)fluoranthene	ND	ug/L	4.8	1	05/18/20 20:36	05/20/20 03:38	205-99-2	
Benzo(g,h,i)perylene	ND	ug/L	4.8	1	05/18/20 20:36	05/20/20 03:38	191-24-2	
Benzo(k)fluoranthene	ND	ug/L	4.8	1	05/18/20 20:36	05/20/20 03:38	207-08-9	
4-Bromophenylphenyl ether	ND	ug/L	4.8	1	05/18/20 20:36	05/20/20 03:38	101-55-3	
Butylbenzylphthalate	ND	ug/L	4.8	1	05/18/20 20:36	05/20/20 03:38	85-68-7	
4-Chloro-3-methylphenol	ND	ug/L	4.8	1	05/18/20 20:36	05/20/20 03:38	59-50-7	
bis(2-Chloroethoxy)methane	ND	ug/L	4.8	1	05/18/20 20:36	05/20/20 03:38	111-91-1	
bis(2-Chloroethyl) ether	ND	ug/L	5.7	1	05/18/20 20:36	05/20/20 03:38	111-44-4	
bis(2-Chloroisopropyl) ether	ND	ug/L	5.7	1	05/18/20 20:36	05/20/20 03:38	108-60-1	
2-Chloronaphthalene	ND	ug/L	4.8	1	05/18/20 20:36	05/20/20 03:38	91-58-7	
2-Chlorophenol	ND	ug/L	4.8	1	05/18/20 20:36	05/20/20 03:38	95-57-8	
4-Chlorophenylphenyl ether	ND	ug/L	4.8	1	05/18/20 20:36	05/20/20 03:38	7005-72-3	
Chrysene	ND	ug/L	4.8	1	05/18/20 20:36	05/20/20 03:38	218-01-9	
Dibenz(a,h)anthracene	ND	ug/L	4.8	1	05/18/20 20:36	05/20/20 03:38	53-70-3	
3,3'-Dichlorobenzidine	ND	ug/L	19.0	1	05/18/20 20:36	05/20/20 03:38	91-94-1	
2,4-Dichlorophenol	ND	ug/L	4.8	1	05/18/20 20:36	05/20/20 03:38	120-83-2	
Diethylphthalate	ND	ug/L	4.8	1	05/18/20 20:36	05/20/20 03:38	84-66-2	
2,4-Dimethylphenol	ND	ug/L	4.8	1	05/18/20 20:36	05/20/20 03:38	105-67-9	
Dimethylphthalate	ND	ug/L	4.8	1	05/18/20 20:36	05/20/20 03:38	131-11-3	
Di-n-butylphthalate	ND	ug/L	4.8	1	05/18/20 20:36	05/20/20 03:38	84-74-2	
4,6-Dinitro-2-methylphenol	ND	ug/L	23.8	1	05/18/20 20:36	05/20/20 03:38	534-52-1	
2,4-Dinitrophenol	ND	ug/L	47.6	1	05/18/20 20:36	05/20/20 03:38	51-28-5	

REPORT OF LABORATORY ANALYSIS

ANALYTICAL RESULTS

Project: K&S WIRE SEM-ANN
Pace Project No.: 60337095

Sample: K&S-COMP **Lab ID: 60337095001** Collected: 05/13/20 07:40 Received: 05/13/20 18:30 Matrix: Water

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
625 MSSV	Analytical Method: EPA 625 Preparation Method: EPA 625							
	Pace Analytical Services - Kansas City							
2,4-Dinitrotoluene	ND	ug/L	5.7	1	05/18/20 20:36	05/20/20 03:38	121-14-2	
2,6-Dinitrotoluene	ND	ug/L	4.8	1	05/18/20 20:36	05/20/20 03:38	606-20-2	
Di-n-octylphthalate	ND	ug/L	4.8	1	05/18/20 20:36	05/20/20 03:38	117-84-0	
bis(2-Ethylhexyl)phthalate	ND	ug/L	4.8	1	05/18/20 20:36	05/20/20 03:38	117-81-7	
Fluoranthene	ND	ug/L	4.8	1	05/18/20 20:36	05/20/20 03:38	206-44-0	
Fluorene	ND	ug/L	4.8	1	05/18/20 20:36	05/20/20 03:38	86-73-7	
Hexachloro-1,3-butadiene	ND	ug/L	4.8	1	05/18/20 20:36	05/20/20 03:38	87-68-3	
Hexachlorobenzene	ND	ug/L	4.8	1	05/18/20 20:36	05/20/20 03:38	118-74-1	
Hexachlorocyclopentadiene	ND	ug/L	4.8	1	05/18/20 20:36	05/20/20 03:38	77-47-4	L1
Hexachloroethane	ND	ug/L	4.8	1	05/18/20 20:36	05/20/20 03:38	67-72-1	
Indeno(1,2,3-cd)pyrene	ND	ug/L	4.8	1	05/18/20 20:36	05/20/20 03:38	193-39-5	
Isophorone	ND	ug/L	4.8	1	05/18/20 20:36	05/20/20 03:38	78-59-1	
2-Methylphenol(o-Cresol)	ND	ug/L	9.5	1	05/18/20 20:36	05/20/20 03:38	95-48-7	N2
3&4-Methylphenol(m&p Cresol)	ND	ug/L	19.0	1	05/18/20 20:36	05/20/20 03:38	15831-10-4	N2
Naphthalene	ND	ug/L	4.8	1	05/18/20 20:36	05/20/20 03:38	91-20-3	
Nitrobenzene	ND	ug/L	4.8	1	05/18/20 20:36	05/20/20 03:38	98-95-3	
2-Nitrophenol	ND	ug/L	4.8	1	05/18/20 20:36	05/20/20 03:38	88-75-5	
4-Nitrophenol	ND	ug/L	4.8	1	05/18/20 20:36	05/20/20 03:38	100-02-7	
N-Nitrosodimethylamine	ND	ug/L	4.8	1	05/18/20 20:36	05/20/20 03:38	62-75-9	
N-Nitroso-di-n-propylamine	ND	ug/L	4.8	1	05/18/20 20:36	05/20/20 03:38	621-64-7	
N-Nitrosodiphenylamine	ND	ug/L	4.8	1	05/18/20 20:36	05/20/20 03:38	86-30-6	
Pentachlorophenol	ND	ug/L	4.8	1	05/18/20 20:36	05/20/20 03:38	87-86-5	
Phenanthrene	ND	ug/L	4.8	1	05/18/20 20:36	05/20/20 03:38	85-01-8	
Phenol	ND	ug/L	4.8	1	05/18/20 20:36	05/20/20 03:38	108-95-2	
Pyrene	ND	ug/L	4.8	1	05/18/20 20:36	05/20/20 03:38	129-00-0	
1,2,4-Trichlorobenzene	ND	ug/L	4.8	1	05/18/20 20:36	05/20/20 03:38	120-82-1	
2,4,6-Trichlorophenol	ND	ug/L	4.8	1	05/18/20 20:36	05/20/20 03:38	88-06-2	
Surrogates								
2,4,6-Tribromophenol (S)	88	%	24-126	1	05/18/20 20:36	05/20/20 03:38	118-79-6	
2-Fluorobiphenyl (S)	73	%	24-110	1	05/18/20 20:36	05/20/20 03:38	321-60-8	
2-Fluorophenol (S)	40	%	20-59	1	05/18/20 20:36	05/20/20 03:38	367-12-4	
Nitrobenzene-d5 (S)	71	%	24-110	1	05/18/20 20:36	05/20/20 03:38	4165-60-0	
Phenol-d6 (S)	26	%	11-42	1	05/18/20 20:36	05/20/20 03:38	13127-88-3	
Terphenyl-d14 (S)	78	%	35-118	1	05/18/20 20:36	05/20/20 03:38	1718-51-0	
300.0 IC Anions 28 Days	Analytical Method: EPA 300.0							
	Pace Analytical Services - Kansas City							
Sulfate	**7.0**	mg/L	1.0	1		05/21/20 15:44	14808-79-8	

REPORT OF LABORATORY ANALYSIS

ANALYTICAL RESULTS

Project: K&S WIRE SEM-ANN
Pace Project No.: 60337095

Sample: K&S-GRAB **Lab ID: 60337095002** Collected: 05/13/20 07:50 Received: 05/13/20 18:30 Matrix: Water

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
624 Volatile Organics	Analytical Method: EPA 624 Low Pace Analytical Services - Kansas City							
Benzene	ND	ug/L	1.0	1		05/18/20 17:27	71-43-2	
Bromodichloromethane	**1.0**	ug/L	1.0	1		05/18/20 17:27	75-27-4	
Bromoform	ND	ug/L	1.0	1		05/18/20 17:27	75-25-2	
Bromomethane	ND	ug/L	5.0	1		05/18/20 17:27	74-83-9	
Carbon tetrachloride	ND	ug/L	1.0	1		05/18/20 17:27	56-23-5	
Chlorobenzene	ND	ug/L	1.0	1		05/18/20 17:27	108-90-7	
Chloroethane	ND	ug/L	1.0	1		05/18/20 17:27	75-00-3	
2-Chloroethylvinyl ether	ND	ug/L	10.0	1		05/18/20 17:27	110-75-8	
Chloroform	**4.8**	ug/L	1.0	1		05/18/20 17:27	67-66-3	
Chloromethane	ND	ug/L	1.0	1		05/18/20 17:27	74-87-3	
Dibromochloromethane	ND	ug/L	1.0	1		05/18/20 17:27	124-48-1	
1,2-Dichlorobenzene	ND	ug/L	1.0	1		05/18/20 17:27	95-50-1	
1,3-Dichlorobenzene	ND	ug/L	1.0	1		05/18/20 17:27	541-73-1	
1,4-Dichlorobenzene	ND	ug/L	1.0	1		05/18/20 17:27	106-46-7	
1,1-Dichloroethane	ND	ug/L	1.0	1		05/18/20 17:27	75-34-3	
1,2-Dichloroethane	ND	ug/L	1.0	1		05/18/20 17:27	107-06-2	
1,1-Dichloroethene	ND	ug/L	1.0	1		05/18/20 17:27	75-35-4	
cis-1,2-Dichloroethene	ND	ug/L	1.0	1		05/18/20 17:27	156-59-2	N2
trans-1,2-Dichloroethene	ND	ug/L	1.0	1		05/18/20 17:27	156-60-5	
1,2-Dichloropropane	ND	ug/L	1.0	1		05/18/20 17:27	78-87-5	
cis-1,3-Dichloropropene	ND	ug/L	1.0	1		05/18/20 17:27	10061-01-5	
trans-1,3-Dichloropropene	ND	ug/L	1.0	1		05/18/20 17:27	10061-02-6	
Ethylbenzene	ND	ug/L	1.0	1		05/18/20 17:27	100-41-4	
Methylene Chloride	ND	ug/L	1.0	1		05/18/20 17:27	75-09-2	
1,1,2,2-Tetrachloroethane	ND	ug/L	1.0	1		05/18/20 17:27	79-34-5	
Tetrachloroethene	ND	ug/L	1.0	1		05/18/20 17:27	127-18-4	
Toluene	ND	ug/L	1.0	1		05/18/20 17:27	108-88-3	
1,1,1-Trichloroethane	ND	ug/L	1.0	1		05/18/20 17:27	71-55-6	
1,1,2-Trichloroethane	ND	ug/L	1.0	1		05/18/20 17:27	79-00-5	
Trichloroethene	ND	ug/L	1.0	1		05/18/20 17:27	79-01-6	
Trichlorofluoromethane	ND	ug/L	1.0	1		05/18/20 17:27	75-69-4	
Vinyl chloride	ND	ug/L	1.0	1		05/18/20 17:27	75-01-4	
Xylene (Total)	ND	ug/L	3.0	1		05/18/20 17:27	1330-20-7	N2
Surrogates								
4-Bromofluorobenzene (S)	94	%	80-120	1		05/18/20 17:27	460-00-4	
Toluene-d8 (S)	98	%	80-120	1		05/18/20 17:27	2037-26-5	
1,2-Dichloroethane-d4 (S)	109	%	80-120	1		05/18/20 17:27	17060-07-0	
Preservation pH	**7.0**		1.0	1		05/18/20 17:27		
Field pH, Electrometric	Analytical Method: SM 4500-H+B Pace Analytical Services - SE Kansas							
Field pH	**7.7**	Std. Units	0.10	1		05/12/20 07:50		
Field Temperature	Analytical Method: SM 2550B Pace Analytical Services - SE Kansas							
Field Temperature	**20.6**	deg C	0.10	1		05/12/20 07:50		

REPORT OF LABORATORY ANALYSIS

ANALYTICAL RESULTS

Project: K&S WIRE SEM-ANN
Pace Project No.: 60337095

Sample: K&S-GRAB **Lab ID: 60337095002** Collected: 05/13/20 07:50 Received: 05/13/20 18:30 Matrix: Water

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
HEM, Oil and Grease	Analytical Method: EPA 1664A Pace Analytical Services - Kansas City							
Oil and Grease	ND	mg/L	4.9	1		05/19/20 08:46		
Phenolics, Total Recoverable	Analytical Method: EPA 420.1 Preparation Method: EPA 420.1 Pace Analytical Services - Kansas City							
Phenolics, Total Recoverable	ND	mg/L	0.050	1	05/19/20 08:25	05/19/20 14:23	64743-03-9	
4500CNE Cyanide, Total	Analytical Method: SM 4500-CN-E Preparation Method: SM 4500-CN-E Pace Analytical Services - Kansas City							
Cyanide	ND	mg/L	0.0050	1	05/20/20 08:22	05/20/20 12:45	57-12-5	

REPORT OF LABORATORY ANALYSIS

WASTE HAULERS PERMIT

In accordance with the provisions of the General Ordinances, Chapter 700 of the City of Neosho,

Southwest Septic
10242 Foliage Rd.
Joplin MO 64804

Is hereby authorized to discharge waste from tank trucks into the City of Neosho's Treatment facility in accordance with the conditions set forth in this permit. Compliance with this permit does not relieve the permittee of its obligation to comply with any or all applicable regulations, or requirements under Local, State and Federal laws.

Non-compliance with any term or conditions of this permit will cause the permit to be revoked.

This permit shall become effective on January 28, **2020** and expire at midnight on **January 28, 2022.**

If the permittee wishes to continue the discharge after the expiration date of this permit, a renewal application must be filed a minimum of 60 days prior to the expiration date.

Issued this 28th day of January, 2020

Ken Brady
Utility Supervisor

A. Discharge Point

Permittee is authorized to discharge hauled waste at the designated Head works structure of the Shoal Creek Wastewater Plant at 2201 Scenic Dr., Neosho, MO

B. Discharge Limitations

Permittee is authorized to discharge:

1. Residential Septic Tank Waste
2. Commercial Septic and Holding Tank Waste (provided there is no cooked food service)
3. Industrial- only after meeting all Pollutant Limitations set forth in City Ordinance 705.580 and receiving prior approval of Superintendent.

C. Sampling and Reporting

For each load of waste, permittee is required to:

1. Catch a representative sample and leave in a designated area
2. Fill out a ticket with the following information:
   Date, Name, Number of gallons, and Name and Address of where waste came from.

Permittee is authorized to discharge a maximum of 4000 gallons per day, between the hours of 7:00 a.m. and 3:00 p.m., Monday through Friday.

Permittee is prohibited from discharging any waste containing any of the properties listed in City Ordinance Section 705.570.

INDUSTRIAL USER PERMIT

In accordance with the provisions of The General Ordinances, Chapter 700, of the City of Neosho.

K&S Wire Production
300 Nelson Ave
Neosho, MO 64850

is hereby authorized to discharge industrial wastewater from the above identified facility and through the outfalls identified herein into the City of Neosho sewer system in accordance with the conditions set forth in this permit. Compliance with this permit does not relieve the permittee of it's obligation to comply with any or all applicable pretreatment regulations, standards or requirements under Local, State and Federal laws, including such regulations, standards, requirements, or laws that may become effective during the term of this permit.

Noncompliance with any term or condition of this permit shall constitute a violation of the City of Neosho's sewer use ordinance.

This permit shall become effective on **June 1, 2020** and shall expire at midnight on **May 31 , 2023**

If the permittee wishes to continue the discharge after the expiration date of this permit, an application must be filed for a renewal permit in accordance with the requirements of Sec. 705-490 of the City of Neosho's sewer use ordinance, a minimum of 90 days prior to the expiration date.

Ken Brady
Local Manager for Alliance Water Resources

Issued this 1st day of June, 2020.

Part I

A. DISCHARGE POINTS

1. Location of Discharge Point (s)
Discharge point #1 South Side of Property Along D Highway outside fence in manhole just east of Howard Bush Drive.

B. Effluent Limitations and Monitoring Requirements

The permittee is authorized to discharge from discharge point(s), With serial numbers as specified above in Part 1 Section A. The effluent limitations shall become effective upon issuance and remain in effect until expiration of the permit. Discharges shall be controlled, limited and monitored by the permittee as specified.

Discharge Limitations

	Concentration in mg/l		Minimum Monitoring Requirements	
Effluent Characteristics	Monthly Average	Daily Maximum	Measurement Frequency	Sample Type
Discharge Point 1				
Arsenic	0.069		1/6 months	**
Cadmium	0.09	0.69	1/6 months	**
Copper	1.00	3.38	1/6 months	**
Chromium	1.52	2.77	1/6 months	**
Cyanide	0.032	1.20	1/6 months	grab
Lead	0.4	0.69	1/6 months	**
Mercury	0.007		1/6months	**
Nickel	1.50	3.98	1/6 months	**
Phenols	1.00		1/6 months	grab
Silver	0.24	0.43	1/6 months	**
Zinc	0.69	2.03	1/6 months	**
Flow	*****		monthly	total
PH	***	***	1/6 months	grab
Zinc	0.69	2.03	1/6 months	**
Sulfate		4700	1/6 months	**
TTO		2.13	1/6 months	****
Iron	*****		1/6 months	**
Oil & Grease		200	1/6 months	grab

(*) Sampling shall be done at time of discharge from metal cleaning process
** 24-Hour Composite
*** pH is measured in pH units and is not averaged. The pH is limited to the range **6.0 to 9.0**
**** When the suspended solids or BOD concentration exceed the following Levels, a sewer surcharge shall be levied.

1. Suspended Solids in excess of 250 mg/1 - $0.16 per pound.
2. BOD in excess of 250 mg/1, $0.20 per pound.

This charge will be in addition to the monthly minimum plus volumetric charges.

B. MONITORING AND SAMPLING

1. Representative Sampling
Samples and measurements taken as required herein shall be representative of the volume and nature of the monitors discharge.

2. Reporting
Where self monitoring is required by the permittee or under federal and state regulation, results shall be submitted to the City in a semiannual report due on July 20, and January 20, unless more frequent monitoring is required. Self-monitoring reports shall be signed by an authorized representative of the reporting facility. The monitoring report shall indicate the concentration of pollutants in the effluent limitations stated in this permit. In addition, this report shall include a record of measured or estimated average flows for the reporting period.
Reports shall be submitted to:

Superintendent
Water and Wastewater Office
15318 Kentucky Rd.
Neosho, MO 64850

3. Test Procedures
Test procedures for the analysis of pollutants shall conform to regulations published pursuant to Section 304(g) of the Act and contained in 40 CFR Part 136 and amendments thereto or with any other test procedures approved by the US EPA.

4. Recording of Results
For each measurement or sample taken pursuant to the requirements of this permit, the permittee shall record the following information:

a. The exact place, date and time of sampling;
b. The dates the analyses were performed;
c. The person(s) who performed the analyses;
d. The analytical techniques or methods used; and
e. The results of all required analyses.

5. Additional Monitoring By Permittee
If the permittee monitors any pollutant at the location(s) designated herein more frequently than required by this permit, using approved analytical methods as specified above, the results of such monitoring shall be included in the reporting of the values required in the discharge monitoring report.

6. Records Retention

All records and information resulting from the monitoring activities required by this permit including all record of analyses performed and calibration and maintenance of instrumentation shall be retained for a minimum of three (3) years or longer if requested by the City.

7. Monitoring of TTO's

In lieu of required monitoring for TTO's, the permittee can submit to the City a solvent management plan that specifies to the satisfaction of the City:

1. The toxic organic compounds used.
2. The method of disposal.
3. Procedures for ensuring that toxic organics do not spill or leak into the wastewater system.

The following certification statement shall be included in the permittee's semi-annual monitoring report:

"Based on my inquiry of the person or persons directly responsible for managing compliance with the permit limitation for total toxic organics (TTO), I certify that to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewater has occurred since filing of the last discharge monitoring report. I further certify that this facility is implementing the toxic organic management plan submitted to the permitting authority."

8. Definitions

a. "City" or "the City" refers to the City of Neosho or to the City Council of Neosho, Missouri.

b. "Act" or "the Act" refers to the Federal Water Pollution Control Act, also known as the Clean Water Act, as amended 33 U.S.C. 1251 et. seq.

c. The "monthly average" shall be the highest allowable average of discharges over a calendar month, calculated as the sum of all daily discharges measured during a calendar month divided by the number of daily discharges measured during that month.

d. A "grab sample" shall be an individual sample collected in less than 15 minutes.

e.

f. A "composite sample" is a combination of individual samples obtained at regular intervals over a time period. A 24-hour composite sample consists of several effluent portions collected

in a 24 hour period and composited according to flow if flow measurement devices are present at the sampling point otherwise composited in equal volumes.

g. "Pretreatment ordinance" refers to General Ordinances, Chapter 700 governing the use of the City's sewer system.

PART II

A. MANAGEMENT REQUIREMENTS

1. Change in Discharge

All discharges authorized shall be consistent with the terms and conditions of this permit. The discharge of any pollutant identified in this permit more frequently than or at a level in excess of that authorized shall constitute a violation of the permit. Any anticipated facility expansion, additions, or modifications, as well as any new industrial discharge or substantial change in an existing industrial discharge to the treatment system, which will result in new, different, or increased discharges of pollutants must be reported by submission of a new permit application or , if such changes will not violate the effluent limitations specified in this permit, by notice to the Superintendent of the wastewater treatment plant. Following such notice, the permit may be modified to reflect any necessary changes in permit conditions or to specify and limit any pollutants not previously limited. In no case are any new connections, increased flows or major changes in influent quality permitted that will cause violation of the stated limitations.

2. Accidental Discharge Report

If for any reason, the permittee does not comply with or will be unable to comply with any effluent limitation specified in this permit due to an unusual or extraordinary occurrence, the permittee shall immediately notify and provide the Superintendent of the wastewater treatment plant with the following information, in writing, within five (5) days of becoming aware of such condition:

a. A description of the discharge and cause of non-compliance

b. The period of non-compliance, including exact dates and times; or if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate and prevent recurrence of the non-complying discharge.

3. Noncompliance Notification

If the results of the permittee's wastewater analysis indicates that a violation of this permit has occurred, the permittee must:

1. Inform the City of Neosho of the violation within 24 hours

2. Repeat the sampling and pollutant analysis and submit, in writing, the results of this second analysis within 20 days of the first violation.

4. Signatory Requirements

All applications, reports, or information submitted to the City of Neosho must contain the following certification statement and be signed as required in Sections (a) or (b) below:

"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)By a responsible corporate officer, if the Industrial User submitting the reports is a corporation. For the purpose of this paragraph, a responsible corporate officer means:

(I) a president, secretary, treasurer, or vice president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision making functions for the corporation,

(b)By a general partner or proprietor if the Industrial User submitting the reports is a partnership or sole proprietorship respectively.

5. Adverse Impact

The permittee shall take all reasonable steps to minimize any adverse impact to the sewer system and to the wastewater treatment plant resulting from noncompliance with any effluent limitations specified in this permit, including such accelerated or additional monitoring as necessary to determine the nature and impact of the noncomplying discharge. If as a result of noncompliance on the part of the permittee, the wastewater treatment plants efficiency is impended, the permittee shall be assessed the cost incurred by the wastewater treatment plant to meet the requirements of its N.P.D.E.S. permit.

6. Bypassing

Any diversion from or bypass of facilities necessary to maintain compliance with the terms and conditions of this permit is prohibited, except where unavoidable to prevent loss of life or severe property damage. The permittee shall promptly notify the Superintendent of the Wastewater Treatment Plant of such diversion or bypass.

7. Removed Substances

Solids, sludges, filter backwash, or other pollutants removed from or resulting from treatment or control of wastewaters shall be disposed of in a manner such as to prevent any pollutant from such materials from entering the sewer system.

8. Facility Operation and Quality Control

All waste collection, control, treatment and disposal facilities shall be operated in a manner consistent with the following:

a. At all times, all facilities shall be operated as efficiently as possible and in a manner which will minimize upsets and discharges of excessive pollutants.

b. The permittee shall provide an adequate operating staff which is duly qualified to carry out the operation, maintenance and testing functions required to insure compliance with the conditions of this permit.

c. Maintenance of treatment facilities that results in degradation of effluent quality shall be scheduled during non-critical water quality periods and shall be carried out in a manner approved by the permitting authority.

9. Discharge Consistency

The permitee shall maintain and operate the facilities under his control with sufficient personnel, standby equipment, adequate power, an inventory of replacement parts, and a satisfactory contingency plan to assure that the quality of the discharge(s) will meet the effluent limitation requirements.

B. RESPONSIBILITIES

1. Right of Entry

The permittee shall allow the Superintendent of the wastewater treatment plant or his authorized representatives:

a. To enter upon the permittee's premise, accompanied by permittee's representative, where an effluent source is located or in which any records are required to be kept under the terms and conditions of the permit; and

b. At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect with permittee's representative any monitoring method required in this permit; and to sample any discharge or pollutants.

2. Transfer of Ownership or Control

Wastewater discharge permits are issued to a specific user for a specific operation. A wastewater discharge permit shall not be reassigned or transferred or sold to a new owner, new user, different premises, or a new or changed operation without the approval of the City. Any succeeding owner or user shall also comply with the terms and conditions of the existing permit.

3. Availability of Reports

Except for data determined to be confidential, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the wastewater treatment plant. As required by the pretreatment ordinance, effluent data shall not be considered confidential. Knowingly making any false statement on any such report may result in the imposition of penalties as provided for in the pretreatment ordinance.

4. Permit Modification

After notice and opportunity for a hearing, 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:

a. Violations of any terms or conditions of this permit;

b. Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or

c. A change in any condition that requires either a temporary or permanent reduction or elimination of the authorized discharge.

5. Categorical Pretreatment Standards

Notwithstanding Part II, B-4 above, if the US EPA issues a Categorical Pretreatment Standard that is more strict than any of the effluent limitations stated in this permit, this permit shall be revised or modified in accordance with the Categorical Pretreatment Standards and the permittee so notified.

6. Civil and Criminal Liability

Except as provided in permit conditions on "Bypassing" (Part II, A-5) nothing in this permit shall be construed to relieve the permittee from civil or criminal penalties for noncompliance, whether or not such noncompliance is due to factors beyond his control, such as accidents, equipment breakdowns, or labor disputes.

7. Federal, State and Local

Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities or penalties established pursuant to any applicable Federal, State and Local law or regulation.

8. Property Rights

The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any

injury to private property or any invasion of personal rights, nor any infringement of Federal, State or Local laws or regulations.

9. Severability

The provisions of this permit are severable, and if any provision of this permit, or application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

10. Civil Penalties

Any user who is found to have violated an order of the City Council or the orders, rules, regulations and permits issued under City of Neosho Ord. # 1229, shall be fined not less than five hundred dollars ($500) for each offense. Each day on which a violation shall occur or continue shall be deemed a separate and distinct offense. In addition to the penalties, the City may recover reasonable attorneys' fees, court cost, court reporters' fees and other expenses of litigation by appropriate suit at law against the person found to have violated this article.

Requirements for the Industrial Pre-treatment Program

1. Signatory Requirements

All applications, reports, or information submitted to the City of Neosho must contain the following certification statement and be signed as required in Sections (a) or (b) below:

"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)By a responsible corporate officer, if the Industrial User submitting the reports is a corporation. For the purpose of this paragraph, a responsible corporate officer means:

(I) a president, secretary, treasurer, or vice president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision making functions for the corporation,

(b)By a general partner or proprietor if the Industrial User submitting the reports is a partnership or sole proprietorship respectively.

2. Self Monitoring Reports

Self monitoring reports are due on July 20th for the first six months of the year, and also on January 20th for the last six months of the year. These reports shall include the following:

- Record of the measured or estimated average flows for each six month period
- Changes in operations that would affect the wastewater
- Testing or monitoring results, other than what monitoring the City does.
- Signature by an authorized representative of the reporting facility that includes the
- certification statement above.

Reports shall be submitted to:

Superintendent
Water and Wastewater Office

INDUSTRIAL USER PERMIT

In accordance with the provisions of The General Ordinances, Chapter 700, of the City of Neosho.

La-Z-Boy
4301 Howard Bush Dr.
Neosho, MO 64850

is hereby authorized to discharge industrial wastewater from the above identified facility and through the outfalls identified herein into the City of Neosho sewer system in accordance with the conditions set forth in this permit. Compliance with this permit does not relieve the permittee of it's obligation to comply with any or all applicable pretreatment regulations, standards or requirements under Local, State and Federal laws, including such regulations, standards, requirements, or laws that may become effective during the term of this permit.

Noncompliance with any term or condition of this permit shall constitute a violation of the City of Neosho's sewer use ordinance.

This permit shall become effective on **August 5, 2020** and shall expire at midnight on **August 6, 2022**

If the permittee wishes to continue the discharge after the expiration date of this permit, an application must be filed for a renewal permit in accordance with the requirements of Sec. 705-490 of the City of Neosho's sewer use ordinance, a minimum of 90 days prior to the expiration date.

Ken Brady
Local Manager for Alliance Water Resources

Issued this 5th day of Aug, 2020.

Permit # CN-00014

Part I

A. DISCHARGE POINTS

1. Location of Discharge Point (s)
Discharge point #1 South Side of Property Along D Highway outside fence in manhole just east of Howard Bush Drive.

B. Effluent Limitations and Monitoring Requirements

The permittee is authorized to discharge from discharge point(s), With serial numbers as specified above in Part 1 Section A. The effluent limitations shall become effective upon issuance and remain in effect until expiration of the permit. Discharges shall be controlled, limited and monitored by the permittee as specified.

Discharge Limitations

	Concentration in mg/l		Minimum Monitoring Requirements	
Effluent Characteristics	Monthly Average	Daily Maximum	Measurement Frequency	Sample Type
Discharge Point 1				
Arsenic	0.069		1/6 months	**
Cadmium	0.09	0.69	monthly	**
Copper	1.00	3.38	monthly	**
Chromium	1.52	2.77	monthly	**
Cyanide	0.032	1.20	monthly	grab
Lead	0.4	0.69	1/6 months	**
Mercury	0.007		1/6months	**
Nickel	1.50	3.98	monthly	**
Phenols	1.00		1/6 months	grab
Silver	0.24	0.43	1/6 months	**
Zinc	0.69	2.03	1/6 months	**
Flow	*****		monthly	total
PH	***	***	monthly	grab
Zinc	0.69	2.03	1/6 months	**
Sulfate		4700	1/6 months	**
TTO		2.13	1/6 months	****
Iron	*****		1/6 months	**
Oil & Grease		200	monthly	grab

(*) Sampling shall be done at time of discharge from metal cleaning process
** 24-Hour Composite
*** pH is measured in pH units and is not averaged. The pH is limited to the range **6.0 to 9.0**
**** When the suspended solids or BOD concentration exceed the following Levels, a sewer surcharge shall be levied.

1. Suspended Solids in excess of 250 mg/1 - $0.16 per pound.
2. BOD in excess of 250 mg/1, $0.20 per pound.

This charge will be in addition to the monthly minimum plus volumetric charges.

B. MONITORING AND SAMPLING

1. Representative Sampling
   Samples and measurements taken as required herein shall be representative of the volume and nature of the monitors discharge.

2. Reporting
   Where self monitoring is required by the permittee or under federal and state regulation, results shall be submitted to the City in a semiannual report due on July 20, and January 20, unless more frequent monitoring is required. Self-monitoring reports shall be signed by an authorized representative of the reporting facility. The monitoring report shall indicate the concentration of pollutants in the effluent limitations stated in this permit. In addition, this report shall include a record of measured or estimated average flows for the reporting period.
   Reports shall be submitted to:

   Utilities Superintendent
   Wastewater Dept.
   15318 Kentucky Rd.
   Neosho, MO 64850

3. Test Procedures
   Test procedures for the analysis of pollutants shall conform to regulations published pursuant to Section 304(g) of the Act and contained in 40 CFR Part 136 and amendments thereto or with any other test procedures approved by the US EPA.

4. Recording of Results
   For each measurement or sample taken pursuant to the requirements of this permit, the permittee shall record the following information:

   a. The exact place, date and time of sampling;
   b. The dates the analyses were performed;
   c. The person(s) who performed the analyses;
   d. The analytical techniques or methods used; and
   e. The results of all required analyses.

5. Additional Monitoring By Permittee
   If the permittee monitors any pollutant at the location(s) designated herein more frequently than required by this permit, using approved analytical methods as specified above, the results of such monitoring shall be included in the reporting of the values required in the discharge monitoring report.

6. Records Retention

All records and information resulting from the monitoring activities required by this permit including all record of analyses performed and calibration and maintenance of instrumentation shall be retained for a minimum of three (3) years or longer if requested by the City.

7. Definitions

a. "City" or "the City" refers to the City of Neosho or to the City Council of Neosho, Missouri.

b. "Act" or "the Act" refers to the Federal Water Pollution Control Act, also known as the Clean Water Act, as amended 33 U.S.C. 1251 et. seq.

c. The "monthly average" shall be the highest allowable average of discharges over a calendar month, calculated as the sum of all daily discharges measured during a calendar month divided by the number of daily discharges measured during that month.

d. A "grab sample" shall be an individual sample collected in less than 15 minutes.

e. A"composite sample" is a combination of individual samples obtained at regular intervals over a time period. A 24-hour composite sample consists of several effluent portions collected in a 24 hour period and composted according to flow if flow measurement devices are present at the sampling point otherwise composited in equal volumes.

f. "Pretreatment ordinance" refers to General Ordinances, Chapter 700 governing the use of the City's sewer system.

PART II

A. MANAGEMENT REQUIREMENTS

1. Change in Discharge

All discharges authorized shall be consistent with the terms and conditions of this permit. The discharge of any pollutant identified in this permit more frequently than or at a level in excess of that authorized shall constitute a violation of the permit. Any anticipated facility expansion, additions, or modifications, as well as any new industrial discharge or substantial change in an existing industrial discharge to the treatment system, which will result in new, different, or increased discharges of pollutants must be reported by submission of a new permit application, or if such changes will not violate the effluent limitations specified in this permit, by notice to the Superintendent of the wastewater treatment plant. Following such notice, the permit may be modified to reflect any necessary changes in permit conditions or to specify and limit any pollutants not previously limited. In no case are any new connections, increased flows or major changes in influent quality permitted that will cause violation of the stated limitations.

2. Accidental Discharge Report

If for any reason, the permittee does not comply with or will be unable to comply with any effluent limitation specified in this permit due to an unusual or extraordinary occurrence, the permittee shall immediately notify and provide the Superintendent of the wastewater treatment plant with the following information, in writing, within five (5) days of becoming aware of such condition:

a. A description of the discharge and cause of non-compliance

b. The period of non-compliance, including exact dates and times; or if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate and prevent recurrence of the non-complying discharge.

c. A description of the discharge and cause of non-compliance

d. The period of non-compliance, including exact dates and times; or if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate and prevent recurrence of the non-complying discharge.

3. Noncompliance Notification

If the results of the permittee's wastewater analysis indicates that a violation of this permit has occurred, the permittee must:

1. Inform the City of Neosho of the violation within 24 hours

2. Repeat the sampling and pollutant analysis and submit, in writing, the results of this second analysis within 20 days of the first violation.

4. Signatory Requirements

All applications, reports, or information submitted to the City of Neosho must contain the following certification statement and be signed as required in Sections (a) or (b) below:

"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)By a responsible corporate officer, if the Industrial User submitting the reports is a corporation. For the purpose of this paragraph, a responsible corporate officer means:

(I) a president, secretary, treasurer, or vice president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision making functions for the corporation,

(b)By a general partner or proprietor if the Industrial User submitting the reports is a partnership or sole proprietorship respectively.

5. Adverse Impact

The permittee shall take all reasonable steps to minimize any adverse impact to the sewer system and to the wastewater treatment plant resulting from noncompliance with any effluent limitations specified in this permit, including such accelerated or additional monitoring as necessary to determine the nature and impact of the noncomplying discharge. If as a result of noncompliance on the part of the permittee, the wastewater treatment plants efficiency is impended, the permittee shall be assessed the cost incurred by the wastewater treatment plant to meet the requirements of its N.P.D.E.S. permit.

6. Bypassing

Any diversion from or bypass of facilities necessary to maintain compliance with the terms and conditions of this permit is prohibited, except where unavoidable to prevent loss of life or severe property damage. The permittee shall promptly notify the Superintendent of the Wastewater Treatment Plant of such diversion or bypass.

7. Removed Substances

Solids, sludges, filter backwash, or other pollutants removed from or resulting from treatment or control of wastewaters shall be disposed of in a manner such as to prevent any pollutant from such materials from entering the sewer system.

8. Facility Operation and Quality Control

All waste collection, control, treatment and disposal facilities shall be operated in a manner consistent with the following:

a. At all times, all facilities shall be operated as efficiently as possible and in a manner which will minimize upsets and discharges of excessive pollutants.

b. The permittee shall provide an adequate operating staff which is duly qualified to carry out the operation, maintenance and testing functions required to insure compliance with the conditions of this permit.

c. Maintenance of treatment facilities that results in degradation of effluent quality shall be scheduled during non-critical water quality periods and shall be carried out in a manner approved by the permitting authority.

9. Discharge Consistency

The permitee shall maintain and operate the facilities under his control with sufficient personnel, standby equipment, adequate power, an inventory of replacement parts, and a satisfactory contingency plan to assure that the quality of the discharge(s) will meet the effluent limitation requirements.

B. RESPONSIBILITIES

1. Right of Entry

The permittee shall allow the Superintendent of the wastewater treatment plant or his authorized representatives:

a. To enter upon the permittee's premise, accompanied by permittee's representative, where an effluent source is located or in which any records are required to be kept under the terms and conditions of the permit; and

b. At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect with permittee's representative any monitoring method required in this permit; and to sample any discharge or pollutants.

2. Transfer of Ownership or Control

Wastewater discharge permits are issued to a specific user for a specific operation. A wastewater discharge permit shall not be reassigned or transferred or sold to a new owner, new user, different premises, or a new or changed operation without the approval of the City. Any succeeding owner or user shall also comply with the terms and conditions of the existing permit.

3. Availability of Reports

Except for data determined to be confidential, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the wastewater treatment plant. As required by the pretreatment ordinance, effluent data shall not be considered confidential. Knowingly making any false statement on any such report may result in the imposition of penalties as provided for in the pretreatment ordinance.

4. Permit Modification

After notice and opportunity for a hearing, 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:

a. Violations of any terms or conditions of this permit;

b. Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or

c. A change in any condition that requires either a temporary or permanent reduction or elimination of the authorized discharge.

5. Categorical Pretreatment Standards

Notwithstanding Part II, B-4 above, if the US EPA issues a Categorical Pretreatment Standard that is more strict than any of the effluent limitations stated in this permit, this permit shall be revised or modified in accordance with the Categorical Pretreatment Standards and the permittee so notified.

6. Civil and Criminal Liability

Except as provided in permit conditions on "Bypassing" (Part II, A-5) nothing in this permit shall be construed to relieve the permittee from civil or criminal penalties for noncompliance, whether or not such noncompliance is due to factors beyond his control, such as accidents, equipment breakdowns, or labor disputes.

7. Federal, State and Local

Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities or penalties established pursuant to any applicable Federal, State and Local law or regulation.

8. Property Rights

The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State or Local laws or regulations.

9. Severability

The provisions of this permit are severable, and if any provision of this permit, or application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

10. Civil Penalties

Any user who is found to have violated an order of the City Council or the orders, rules, regulations and permits issued under City of Neosho Ord. # 1229, shall be fined not less than five hundred dollars ($500) for each offense. Each day on which a violation shall occur or continue shall be deemed a separate and distinct offense. In addition to the penalties, the City may recover reasonable attorneys' fees, court cost, court reporters' fees and other expenses of litigation by appropriate suit at law against the person found to have violated this article.

Part III

OTHER REQUIREMENTS

1. Facility Descriptions

The facility manufactures chairs and sofas.
This facility has a metal finish department that manufactures, cleans and paints metal components.
Cleaning process is a phosphate cleaning that is a closed loop system.
Discharge is done periodically as needed.

2. Additional Monitoring and Reporting Requirements

INDUSTRIAL USER PERMIT

In accordance with the provisions of The General Ordinances, Chapter 700, of the City of Neosho.

Opal Foods LLC-Timberview Plant
16194 Highway 59
Neosho, MO 64850

is hereby authorized to discharge industrial wastewater from the above identified facility and through the outfalls identified herein into the City of Neosho sewer system in accordance with the conditions set forth in this permit. Compliance with this permit does not relieve the permittee of it's obligation to comply with any or all applicable pretreatment regulations, standards or requirements under Local, State and Federal laws, including such regulations, standards, requirements, or laws that may become effective during the term of this permit.

Noncompliance with any term or condition of this permit shall constitute a violation of the City of Neosho's sewer use ordinance.

This permit shall become effective on **April 7, 2020** and shall expire at midnight on **April 6, 2023**

If the permittee wishes to continue the discharge after the expiration date of this permit, an application must be filed for a renewal permit in accordance with the requirements of Sec. 705-490 of the City of Neosho's sewer use ordinance, a minimum of 90 days prior to the expiration date.

Ken Brady
Local Manager for Alliance Water Resources

Issued this 7th day of April, 2020.

Part I

A. DISCHARGE LIMITATIONS

1. Location of Discharge Point (s)
   A. Discharge point #1 into the sewer lift station at Timberview processing plant.

2. Effluent Limitations and Monitoring Requirements
   A. The permittee is authorized to discharge from discharge point (s), with serial numbers as specified in Part 1 Section A. The effluent limitations shall become effective upon issuance and remain in effect until expiration of the permit. Discharges shall be controlled, limited and monitored by the permittee as specified.

Discharge Limitations

	Concentration in mg/l		Minimum Monitoring Requirements	
Effluent Characteristics	Monthly Average	Daily Maximum	Measurement Frequency	Sample Type
Discharge Point 1				
pH	***	***	*1/month	grab
Total Suspended Solids		****	*1/month	**
BOD		****	*1/month	**
Oil & Grease		200	*1/month	grab

* This sampling will be conducted by the City.
** 24-Hour Composite
*** pH is measured in pH units and is not averaged. The pH is limited to the range 6.0 to 9.0.
**** When the suspended solids or BOD concentration exceed the following levels, a sewer surcharge shall be levied.

Suspended Solids in excess of 290 mg/l - $.000329 per 1,000 gallons per mg/l.

BOD in excess of 250 mg/l up to 500 mg/l will be assessed at the rate of $.000335 per 1,000 gallons per mg/l.

BOD in excess of 500 mg/l up to 1000 mg/l will be assessed at the rate of $.000500 per 1,000 gallons per mg/l.

BOD in excess of 1000 mg/l will be assessed at the rate of $.000670 per 1,000 gallons per mg/l.

B. MONITORING AND SAMPLING

1. Representative Sampling
   Samples and measurements taken as required herein shall be representative of the volume and nature of the monitores discharge.

2. Reporting
   Where self monitoring is required by the permittee or under federal and state regulation, results shall be submitted to the City in a semiannual report due on July 20, and January 20, unless more frequent monitoring is required. Self-monitoring reports shall be signed by an authorized representative of the reporting facility. The monitoring report shall indicate the concentration of pollutants in the effluent limitations stated in this permit. In addition, this report shall include a record of measured or estimated average flows for the reporting period.
   Reports shall be submitted to:

   Superintendent
   Water and Wastewater Office.
   15318 Kentucky Rd.
   Neosho, MO 64850

3. Test Procedures
   Test procedures for the analysis of pollutants shall conform to regulations published pursuant to Section 304(g) of the Act and contained in 40 CFR Part 136 and amendments thereto or with any other test procedures approved by the US EPA.

4. Recording of Results
   For each measurement or sample taken pursuant to the requirements of this permit, the permittee shall record the following information:

   a. The exact place, date and time of sampling;
   b. The dates the analyses were performed;
   c. The person(s) who performed the analyses;
   d. The analytical techniques or methods used; and
   e. The results of all required analyses.

5. Additional Monitoring By Permittee

If the permittee monitors any pollutant at the location(s) designated herein more frequently than required by this permit, using approved analytical methods as specified above, the results of such monitoring shall be included in the reporting of the values required in the discharge monitoring report.

6. Records Retention

All records and information resulting from the monitoring activities required by this permit including all record of analyses performed and calibration and maintenance of instrumentation shall be retained for a minimum of three (3) years or longer if requested by the City.

7. Definitions

a. "City" or "the City" refers to the City of Neosho or to the City Council of Neosho, Missouri.

b. "Act" or "the Act" refers to the Federal Water Pollution Control Act, also known as the Clean Water Act, as amended 33 U.S.C. 1251 et. seq.

c. The "monthly average" shall be the highest allowable average of discharges over a calendar month, calculated as the sum of all daily discharges measured during a calendar month divided by the number of daily discharges measured during that month.

d. A "grab sample" shall be an individual sample collected in less than 15 minutes.

e. A "composite sample" is a combination of individual samples obtained at regular intervals over a time period. A 24-hour composite sample consists of several effluent portions collected in a 24 hour period and composited according to flow if flow measurement devices are present at the sampling point otherwise composited in equal volumes.

f. "Pretreatment ordinance" refers to General Ordinances, Chapter 700 governing the use of the City's sewer system.

PART II

A. MANAGEMENT REQUIREMENTS

1. Change in Discharge

All discharges authorized shall be consistent with the terms and conditions of this permit. The discharge of any pollutant identified in this permit more frequently than or at a level in excess of that authorized shall constitute a violation of the permit. Any anticipated facility expansion, additions, or modifications, as well as any new industrial discharge or substantial change in an existing industrial discharge to the treatment system, which will result in new, different, or increased discharges of pollutants must be reported by submission of a new permit application or , if such changes will not violate the effluent limitations specified in this permit, by notice to the Superintendent of the wastewater treatment plant. Following such notice, the permit may be modified to reflect any necessary changes in permit conditions or to specify and limit any pollutants not previously limited. In no case are any new connections, increased flows or major changes in influent quality permitted that will cause violation of the stated limitations.

2. Accidental Discharge Report

If for any reason, the permittee does not comply with or will be unable to comply with any effluent limitation specified in this permit due to an unusual or extraordinary occurrence, the permittee shall immediately notify and provide the Superintendent of the wastewater treatment plant with the following information, in writing, within five (5) days of becoming aware of such condition:

a. A description of the discharge and cause of non-compliance

b. The period of non-compliance, including exact dates and times; or if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate and prevent recurrence of the non-complying discharge.

3. Noncompliance Notification

If the results of the permittee's wastewater analysis indicates that a violation of this permit has occurred, the permittee must:

1. Inform the City of Neosho of the violation within 24 hours

2. Repeat the sampling and pollutant analysis and submit, in writing, the results of this second analysis within 20 days of the first violation.

4. Signatory Requirements

All applications, reports, or information submitted to the City of Neosho must contain the following certification statement and be signed as required in Sections (a) or (b) below:

"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)By a responsible corporate officer, if the Industrial User submitting the reports is a corporation. For the purpose of this paragraph, a responsible corporate officer means:

(I) a president, secretary, treasurer, or vice president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision making functions for the corporation,

(b)By a general partner or proprietor if the Industrial User submitting the reports is a partnership or sole proprietorship respectively.

5. Adverse Impact

The permittee shall take all reasonable steps to minimize any adverse impact to the sewer system and to the wastewater treatment plant resulting from noncompliance with any effluent limitations specified in this permit, including such accelerated or additional monitoring as necessary to determine the nature and impact of the noncomplying discharge. If as a result of noncompliance on the part of the permittee, the wastewater treatment plants efficiency is impended, the permittee shall be assessed the cost incurred by the wastewater treatment plant to meet the requirements of its N.P.D.E.S. permit.

6. Bypassing

Any diversion from or bypass of facilities necessary to maintain compliance with the terms and conditions of this permit is prohibited, except where unavoidable to prevent loss of life or severe property damage. The permittee shall promptly notify the Superintendent of the Wastewater Treatment Plant of such diversion or bypass.

7. Removed Substances

Solids, sludges, filter backwash, or other pollutants removed from or resulting from treatment or control of wastewaters shall be disposed of in a manner such as to prevent any pollutant from such materials from entering the sewer system.

8. Facility Operation and Quality Control

All waste collection, control, treatment and disposal facilities shall be operated in a manner consistent with the following:

a. At all times, all facilities shall be operated as efficiently as possible and in a manner which will minimize upsets and discharges of excessive pollutants.

b. The permittee shall provide an adequate operating staff which is duly qualified to carry out the operation, maintenance and testing functions required to insure compliance with the conditions of this permit.

c. Maintenance of treatment facilities that results in degradation of effluent quality shall be scheduled during non-critical water quality periods and shall be carried out in a manner approved by the permitting authority.

9. Discharge Consistency

The permitee shall maintain and operate the facilities under his control with sufficient personnel, standby equipment, adequate power, an inventory of replacement parts, and a satisfactory contingency plan to assure that the quality of the discharge(s) will meet the effluent limitation requirements.

B. RESPONSIBILITIES

1. Right of Entry

The permittee shall allow the Superintendent of the wastewater treatment plant or his authorized representatives:

a. To enter upon the permittee's premise, accompanied by permittee's representative, where an effluent source is located or in which any records are required to be kept under the terms and conditions of the permit; and

b. At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect with permittee's representative any monitoring method required in this permit; and to sample any discharge or pollutants.

2. Transfer of Ownership or Control

Wastewater discharge permits are issued to a specific user for a specific operation. A wastewater discharge permit shall not be reassigned or transferred or sold to a new owner, new user, different premises, or a new or changed operation without the approval of the City. Any succeeding owner or user shall also comply with the terms and conditions of the existing permit.

3. Availability of Reports

Except for data determined to be confidential, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the wastewater treatment plant. As required by the pretreatment ordinance, effluent data shall not be considered confidential. Knowingly

making any false statement on any such report may result in the imposition of penalties as provided for in the pretreatment ordinance.

4. Permit Modification

After notice and opportunity for a hearing, 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:

a. Violations of any terms or conditions of this permit;

b. Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or

c. A change in any condition that requires either a temporary or permanent reduction or elimination of the authorized discharge.

5. Categorical Pretreatment Standards

Notwithstanding Part II, B-4 above, if the US EPA issues a Categorical Pretreatment Standard that is more strict than any of the effluent limitations stated in this permit, this permit shall be revised or modified in accordance with the Categorical Pretreatment Standards and the permittee so notified.

6. Civil and Criminal Liability

Except as provided in permit conditions on "Bypassing" (Part II, A-5) nothing in this permit shall be construed to relieve the permittee from civil or criminal penalties for noncompliance, whether or not such noncompliance is due to factors beyond his control, such as accidents, equipment breakdowns, or labor disputes.

7. Federal, State and Local

Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities or penalties established pursuant to any applicable Federal, State and Local law or regulation.

8. Property Rights

The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State or Local laws or regulations.

9. Severability

The provisions of this permit are severable, and if any provision of this permit, or application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

10. Civil Penalties

Any user who is found to have violated an order of the City Council or the orders, rules, regulations and permits issued under City of Neosho Ord. # 1229, shall be fined not less than five hundred dollars ($500) for each offense. Each day on which a violation shall occur or continue shall be deemed a separate and distinct offense. In addition to the penalties, the City may recover reasonable attorneys' fees, court cost, court reporters' fees and other expenses of litigation by appropriate suit at law against the person found to have violated this article.

PART III

OTHER REQUIREMENTS

1. Facility Description
   none

2. Additional Monitoring and Reporting Requirements

Self monitoring reports are due on July 20th for the first six months of the year, and also on January 20th for the last six months of the previous year. These reports shall include the following:

- Record of the measured or estimated average flows for each six month period
- Changes in operations that would affect the wastewater
- Testing or monitoring results, other than what monitoring the City does.
- Signature by an authorized representative of the reporting facility that includes
- the certification statement on page 6 under signatory requirements.

Reports shall be submitted to:

Superintendent
Water and Wastewater Office
15318 Kentucky Rd.
Neosho, MO 64850

Missouri Department of NATURAL RESOURCES
dnr.mo.gov
Michael L. Parson, Governor
Carol S. Comer, Director

October 23, 2020

David Kennedy, City Manager
City of Neosho
203 East Main Street
Neosho, MO 64850

RETURN TO COMPLIANCE

Dear David Kennedy:

Staff from the Missouri Department of Natural Resources conducted a pretreatment compliance inspection on August 26, 2020 of the Neosho Wastewater Treatment Plant located in Newton County. The facility operates under the authority of Missouri State Operating Permit MO0104906.

On October 21, 2020, a sufficient response was received to the required actions in the September 21, 2020 inspection report. No further response is required to address the report.

The response shows that you recognize our mutual goal in providing a quality life for Missouri's citizens through environmental compliance. The Department appreciates your voluntary efforts to comply with the laws of Missouri and your continued efforts to work with us to improve protection of Missouri citizens and our natural resources.

If you should have any questions regarding the report or would like to schedule a time to meet in person, please contact Sieu T. Dang by calling 417-891-4300 or via mail at Southwest Regional Office, 2040 W. Woodland, Springfield, Missouri 65807-5912.

Sincerely,

SOUTHWEST REGIONAL OFFICE

Kevin Hess, Chief
Water Pollution Section

KH/sdr

c: Ken Brady, Local Manager, Alliance Water Resources
Jerry Humphrey, Alliance Water Resources
Paul Marshall, EPA Region 7
Todd Blanc, Pretreatment Coordinator, Water Protection Program

145.wpcp.mo0104906.Neosho.x.2020.10.23.rtc.x.std

Carbon Copy Address Attachment

Email Addresses:

Ken Brady, Local Manager, Alliance Water Resources
kbrady@alliancewater.com

Jerry Humphrey, Pretreatment Inspector, Alliance Water Resources
shoalcreek@alliancewater.com

Paul Marshall, EPA Region 7
Marshall.paul@epa.gov

RECEIVED
APR 23 2021
DEQ/SWRO

Incident Report

March 13, 2021

On March 13, 2021, at approx. 09:35 am, Alliance Water Resources staff member Matt Votipka received a call on the wastewater on-call phone regarding a sewer back-up in a basement at 2005 W. Glen Street in Neosho. The caller's name was Mike Spiva. Mr. Votipka advised dispatch that he would be responding.

Mr. Votipka was doing weekend rounds and was at the Crowder WW facility on the south side of town. Mr. Votipka contacted WW Collections supervisor Kent Hartman. Mr. Hartman advised Mr. Votipka to meet him at the Shoal Creek WW facility on the north side of town to pick up the jetter truck and they would respond to the location of the call.

Mr. Hartman states they arrived on scene at approximately 10:30 am and checked a manhole on Sherry Lea Drive downstream from the caller's residence. Mr. Hartman states the City sewer main had flow but was flowing slowly, indicating a possible partial blockage. Mr. Hartman states there were no overflows from manholes in the area. Mr. Hartman called to advise me of the situation at approx. 10:45 am and I responded to the scene arriving at approx. 11:30 am.

Mr. Hartman states they inserted the jetter truck hose into the City sewer main on Sherry Lea Drive and ran the jetter hose upstream in the direction of the caller's residence. Mr. Hartman stated he could feel a slight resistance on the hose, indicating a partial blockage had most likely been encountered. Mr. Hartman stated as the jetter hose was removed, normal flow appeared to resume and the water level inside the manhole began to drop.

Upon arrival at the Spiva residence, I met with Mr. Mike Spiva and Neosho Police Officer Rusty Schlessman. Mr. Spiva and Officer Schlessman were standing near a manhole in front of the Spiva residence. Mr. Spiva had removed the manhole lid and as I walked up Mr. Spiva stated "It's going down now", referring to the level of water in the manhole. Mr. Spiva stated that sometime during the night, most likely between 2 am and when it was discovered around 9:30 am, the sewer had backed up inside his basement. Officer Schlessman left at this time.

Mr. Spiva asked if I would like to see the situation inside his basement, I agreed and accompanied him inside. The basement is a finished, walk-out basement. Upon entering the basement, I observed approximately a half inch of water throughout the basement. Mr. Spiva showed me a utility room with a floor drain which appeared to be the source of entry for the sewer backup. Mr. Spiva stated the water level had been much higher when it was originally discovered, but stated he was unsure of the exact level, possibly 2-3 inches.

I recalled a previous back-up at this location (March 2017) and asked Mr. Spiva if he had installed a back flow device after the previous occurrence. Mr. Spiva stated there had been some discussion with the City regarding installing a back flow device after the previous incident.

Mr. Spiva stated he had acquired some bids for a back flow device at that time but the City refused to assist him with the purchase and one was never installed as he felt it was the City's responsibility.

I gave Mr. Spiva my card with my contact information and advised him I would submit a claim form related to the sewer back-up.

As I left the Spiva residence, I checked the manhole directly in front of his residence and noted that the level inside had returned to a normal level. I then met with Mr. Hartman and Mr. Votipka who were still checking manholes downstream. At that time, all levels, flows had returned to normal.

Ken Brady

Local Manager- Neosho Div. 42

Alliance Water Resources

City Of Neosho
MO-0104906
PRETREATMENT IMPLEMENTATION ANNUAL REPORT
CALENDAR YEAR 2020

The Environmental Protection Agency's (EPA) pretreatment regulations require approved Publicly-Owned Treatment Works (POTW) pretreatment programs to file an annual report [see 40 CFR 403.12(i)] to the Missouri Department of Natural Resources to document program status and activities performed during the previous calendar year. Missouri requests information during the previous calendar year from January 1 to December 31. Using the attached table (Part II) please provide a list of all Significant Industrial Users and the other requested information for those facilities regulated by your Pretreatment Program. If any facility was in Significant Noncompliance (SNC) during a six-month reporting period be sure to indicate whether this was for a violation of discharge standards, reporting, or both. If you keep these data in a spreadsheet or database, a printout can be substituted for the table. {***MOCWIS*** #} is used for data entry into the Missouri Clean Water Information System (MOCWIS). Please do not delete.

Part I: With respect to the industries regulated under the City's Pretreatment Program, please answer the following questions. Use additional paper if necessary.

1. List by name, those SIUs that did not have a valid control mechanism (indicate: expired or unissued) {***MOCWIS #3***} as of December 31, 2020. Of these industries, indicate those that have been without a control mechanism for greater than 180 days. If your approved Pretreatment program does not require you to issue permits, please indicate. NONE

2. List by name those SIUs not sampled by the POTW at least once during calendar year 2020 {***MOCWIS #6***}. NONE

3. List by name those SIUs on a compliance schedule {***MOCWIS #8***} as of December 31, 2020, for achieving compliance with discharge standards. Provide the date of projected final compliance. Indicate those facilities currently in violation of any compliance schedule milestones by 90 days or greater. NONE

4. List by name those industries for which civil {***MOCWIS #2***} or criminal judicial actions {***MOCWIS #4***} were initiated in the past year. Indicate the amount of any proposed penalties and the amount of penalties collected. NONE

5. List by name those industries for which -
1) written notices of violation (NOV's) {***MOCWIS #12***}, or
2) Administrative orders (AO's) or the equivalent {***MOCWIS #1***}, were issued in response to noncompliance events that occurred in the past calendar year.

For each industry indicate the total number of each enforcement action type and the amount of penalties collected {***MOCWIS #14***}, if any. NONE

6. List by name those industries who were in Significant Noncompliance (SNC) at any time during the calendar year and public noticed in the largest local newspaper {***MOCWIS #9***}. Provide the date of publication. If publication has not yet occurred, please provide the expected date of publication. NONE

7. Did the POTW have any numerical NPDES violations in 2020? If so, describe.
NONE

Were any NPDES violations attributed to interference or pass through?
NONE

8. List by name any industry that caused (*see 40 CFR 403.3(k) for the definition of Interference and 40 CFR 403.3(p) for the definition of Pass Through*) in the reporting calendar year from January 1 to December 31{***MOCWIS #15***}: NONE

(a) **interference** within the POTW
(b) **pass through** of pollutants at the wastewater treatment plan
(c) health problems to POTW workers
(d) water quality violations (violation of city's NPDES permit).

For each industry, provide details including information on enforcement actions taken by the city to resolve the violations.

I certify, under penalty of law, that the information in this report was prepared under my direction and supervision in accordance with the system designed to ensure that qualified personnel properly gather and evaluation the information. I am aware that there are significant penalties for false certification including the possibility of fine and imprisonment.

Signature | Local Manager - AWR (Title) | 3-19-21 (Date)

Duly Authorized--40 CFR 403.12(m). If this report is not signed by a principal executive officer or ranking elected official, then it must be signed by a duly authorized employee.

2020 Pretreatment Annual Report

City of Neosho Significant Industrial User List and Summary of Compliance Activities										City of Neosho 203 East Main Neosho, Missouri				
Industry Name and address	Reduced Reporting or NSCIU	Local Limits	Categorical Stnd	Regulated Process	T M T	Type	Regulated Flow	Total Flow	C W F	Compliance Status for Six Month Period Ending: JUN' '19	DEC '19	JUN' '20	DEC '20	2020 Last Inspection
LA-Z-BOY 4301 Howard Bush Dr. Neosho Mo. 64850		N	433	As,Cd Cu, Cr, Pb,Hg Ni,Ag, Zn	N			3k	N	C	C	C	C	Oct. 5th 2020
K&S Wire 300 Nelson Ave. Neosho Mo. 64850		N	433	As,Cd Cu, Cr, Pb,Hg Ni,Ag, Zn	N			2K	N	C	C	C	C	Oct. 5th 2020
Opal Foods 16194 Highway 59		N		Bod, Tss	N			5k	N	C	C	C	C	Oct. 13th 2020

2020 Pretreatment Annual Report

I certify under penalty of law that the information in this report was prepared under my direction and supervision in accordance with the system designed to ensure that qualified personnel properly gather and evaluate the information. I am aware that there are significant penalties for false certification including the possibility of fine and imprisonment.

Signature	Local Manager - AWR Title	3-19-21 Date

Duly Authorized--40 CFR 403.12(m). If this report is not signed by a principal executive officer or ranking elected official, then it must be signed by a duly authorized employee. This report is required to be submitted as specified in the Missouri.

MISSOURI DEPARTMENT OF NATURAL RESOURCES
DIVISION OF ENVIRONMENTAL QUALITY
CONCERN INVESTIGATION

145.wpcp.mo0104906.Neosho.45783.2021.04.26.fconc.29146.std

Concern #: 29146 ACE #: 45783 MEERTS #:

INTERVIEW INFORMATION

Referred From: Person Receiving: McNeill, Brooks Received Date: 4/22/2021	Nearest City: Neosho County: Newton Region: SWRO	Programs: 1: Water Pollution Control Branch 2: 3:

Concern Types:
1. Bypass or Sewer Overflow 2. 3.

Initial Interview:
The following was taken from the online form and forwarded by Cindy Davies:

"We have a partially collapsed sewer main that is leaking sewage in to the ground/ground water. Has been ongoing and City of Neosho is aware but has not fixed it. Very concerned about ground water and issue not being addressed. The collapse also causes periodic backups where sewage comes out manhole covers. It is in a place where people live and walk and play and is creating a hazard."

Driving Directions:
"The main issue is just east of a home located at 2005 W. Glen St., Neosho, MO 64850. It is on a vacant lot but the backup overflow occurs at various manholes in that area. Has also been in homes previously."

Concern Location: Easting: Northing:

2005 W. Glen St., Neosho.

ALLEGED SOURCE OF CONCERN

	Name	Type	Number	Ext.
David Kennedy City Manager City of Neosho MO0104906 203 E. Main St. Neosho, MO 64850		Business	417-451-8050	

PROPERTY OWNER

	Name	Type	Number	Ext.
David Kennedy City Manager City of Neosho 203 E. Main St. Neosho, MO 64850				

IF REFERRED TO ANOTHER AGENCY, COPY SENT TO:

	Name	Type	Number	Ext.

CONCERNED PARTY

Mike Spiva
2005 W. Glen St.
Neosho, MO 64850

Name	Type	Number	Ext.
	Mobile	417-793-5478	

INVESTIGATION

Investigator:
Dang, Sieu

Assigned: 4/22/2021 Investigated: 4/22/2021
Person Contacted: Ken Brady

Findings:

I contacted Ken Brady of the City regarding the concern. Ken stated that the issue was a sewer backup at the concerned property. He provided a report from the City that detailed the backup happened on March 13, 2021 due to a blockage in the sewer main and the City has cleared the blockage and the flow was returned back to normal. Ken also informed me that the City's engineer is working on replacing approximately 1000 feet of sewer main at this location. See attached emails and report for details.

I then contacted the concerned party (CP). The CP insisted that the issue was due to a collapsed sewer main and he has been working with City for the last four years to get the issue resolved without success. The CP stated he just installed a backflow device at his property to resolve the backup issue and indicated there was a sewer overflow at the nearby mainholes in the past and it likely would occur again due to the damaged main. I advised him that since the City stated they are working on replacing the sewer main at the affected area, the Department would monitor the progress to ensure the City follows through with their plan. I also advised the CP to contact the City the next time he observes an overflow first and then contact the Department so we would be aware of the issue. See attached emails for further details.

Conclusions:

The City stated that was a sewer backup issue in March 13, 2021 and there were no sanitary sewer overflows from the manholes. The City is in process of replacing the sewer main at this location to get the matter resolved. The concerned party was advised to notify the City and then the Department the next time the same issue occurs.

Action Type	Action Number	Action Date

Environmental Impact
On: Human Health
Impacted Waterbody:

Source of Concern
Final Action: E-mail Message
Final Action Date: 4/26/2021
NOV/NOEE Number:

Followup
Needed: No
Date:

Concerned Party
Final Action: E-mail Message
Final Action Date: 4/26/2021

Incident Report

March 13, 2021

On March 13, 2021, at approx. 09:35 am, Alliance Water Resources staff member Matt Votipka received a call on the wastewater on-call phone regarding a sewer back-up in a basement at 2005 W. Glen Street in Neosho. The caller's name was Mike Spiva. Mr. Votipka advised dispatch that he would be responding.

Mr. Votipka was doing weekend rounds and was at the Crowder WW facility on the south side of town. Mr. Votipka contacted WW Collections supervisor Kent Hartman. Mr. Hartman advised Mr. Votipka to meet him at the Shoal Creek WW facility on the north side of town to pick up the jetter truck and they would respond to the location of the call.

Mr. Hartman states they arrived on scene at approximately 10:30 am and checked a manhole on Sherry Lea Drive downstream from the caller's residence. Mr. Hartman states the City sewer main had flow but was flowing slowly, indicating a possible partial blockage. Mr. Hartman states there were no overflows from manholes in the area. Mr. Hartman called to advise me of the situation at approx. 10:45 am and I responded to the scene arriving at approx. 11:30 am.

Mr. Hartman states they inserted the jetter truck hose into the City sewer main on Sherry Lea Drive and ran the jetter hose upstream in the direction of the caller's residence. Mr. Hartman stated he could feel a slight resistance on the hose, indicating a partial blockage had most likely been encountered. Mr. Hartman stated as the jetter hose was removed, normal flow appeared to resume and the water level inside the manhole began to drop.

Upon arrival at the Spiva residence, I met with Mr. Mike Spiva and Neosho Police Officer Rusty Schlessman. Mr. Spiva and Officer Schlessman were standing near a manhole in front of the Spiva residence. Mr. Spiva had removed the manhole lid and as I walked up Mr. Spiva stated "It's going down now", referring to the level of water in the manhole. Mr. Spiva stated that sometime during the night, most likely between 2 am and when it was discovered around 9:30 am, the sewer had backed up inside his basement. Officer Schlessman left at this time.

Mr. Spiva asked if I would like to see the situation inside his basement, I agreed and accompanied him inside. The basement is a finished, walk-out basement. Upon entering the basement, I observed approximately a half inch of water throughout the basement. Mr. Spiva showed me a utility room with a floor drain which appeared to be the source of entry for the sewer backup. Mr. Spiva stated the water level had been much higher when it was originally discovered, but stated he was unsure of the exact level, possibly 2-3 inches.

I recalled a previous back-up at this location (March 2017) and asked Mr. Spiva if he had installed a back flow device after the previous occurrence. Mr. Spiva stated there had been some discussion with the City regarding installing a back flow device after the previous incident.

Mr. Spiva stated he had acquired some bids for a back flow device at that time but the City refused to assist him with the purchase and one was never installed as he felt it was the City's responsibility.

I gave Mr. Spiva my card with my contact information and advised him I would submit a claim form related to the sewer back-up.

As I left the Spiva residence, I checked the manhole directly in front of his residence and noted that the level inside had returned to a normal level. I then met with Mr. Hartman and Mr. Votipka who were still checking manholes downstream. At that time, all levels, flows had returned to normal.

Ken Brady

Local Manager- Neosho Div. 42

Alliance Water Resources

Dang, Sieu

From: Ken Brady <kbrady@alliancewater.com>
Sent: Monday, April 26, 2021 10:11 AM
To: Dang, Sieu
Cc: Hess, Kevin
Subject: RE: Sewer Main Break Concern at 2005 W. Glen St., Neosho

Sieu,
I will absolutely let you know a schedule as soon as I have the information. The City just got their engineer (Allgeir Martin) involved last week and I know the City's desire is to move quickly to resolve this matter.

Thanks,

Ken Brady
Local Manager ll
Alliance Water Resources, Inc.
15318 Kentucky Rd.
Neosho, MO. 64850
417-451-8080
kbrady@alliancewater.com

WATER RESOURCES®
Alliance
Professional Water and Wastewater Operations

From: Dang, Sieu <Sieu.Dang@dnr.mo.gov>
Sent: Monday, April 26, 2021 10:07 AM
To: Ken Brady <kbrady@alliancewater.com>
Cc: Hess, Kevin <kevin.hess@dnr.mo.gov>
Subject: RE: Sewer Main Break Concern at 2005 W. Glen St., Neosho

Hi Ken,

I spoke with the concerned party, Mr. Mike Spiva and he insisted that the occasional blockages were caused by a sewer main collapse in the area which restricted the flow. He said he knew that via a report from the City that he obtained via Sunshine Law request. He mentioned that he and his neighbors have been working with the City for the last four years and did not seem to get the issue resolved. He also noted that he recently installed a backflow prevention device at his house. I advised him that the City and their engineer is working on replacing the sewer main at this location and that I would ask for a schedule of completion. I also advised him to contact the City first when he'll notice a backup or sewer overflow from the manholes and then contact the Department in the future.

Could you contact the City and the engineer for the schedule of completion of the sewer main replacement project and provide it to us?

Thanks again for your help in the matter,

Sieu

From: Ken Brady <kbrady@alliancewater.com>
Sent: Friday, April 23, 2021 3:10 PM
To: Dang, Sieu <Sieu.Dang@dnr.mo.gov>
Cc: Hess, Kevin <kevin.hess@dnr.mo.gov>
Subject: RE: Sewer Main Break Concern at 2005 W. Glen St., Neosho

Thank you sir!

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Local Manager ll
Alliance Water Resources, Inc.
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417-451-8080
kbrady@alliancewater.com

From: Dang, Sieu <Sieu.Dang@dnr.mo.gov>
Sent: Friday, April 23, 2021 3:02 PM
To: Ken Brady <kbrady@alliancewater.com>

Cc: Hess, Kevin <kevin.hess@dnr.mo.gov>
Subject: RE: Sewer Main Break Concern at 2005 W. Glen St., Neosho

Brady,

Thanks for your prompt response. I'll review the document and contact the concerned party. I'll keep you updated my conversation with the concerned party.

Have a good weekend!

Sieu

From: Ken Brady <kbrady@alliancewater.com>
Sent: Friday, April 23, 2021 2:51 PM
To: Dang, Sieu <Sieu.Dang@dnr.mo.gov>
Subject: RE: Sewer Main Break Concern at 2005 W. Glen St., Neosho

Sieu,
Attached is a copy of the incident report. I was in a conference call with the City Manager (David Kennedy) and Mike Atkinson (Allgeir-Martin) on Thursday 4-22-21. Mr. Atkinson will be providing the City with an estimate to replace approx. 1,000' of 8" sewer main in the affected area. If you need further, please let me know.

Thanks,

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From: Dang, Sieu <Sieu.Dang@dnr.mo.gov>
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To: Ken Brady <kbrady@alliancewater.com>
Subject: RE: Sewer Main Break Concern at 2005 W. Glen St., Neosho

Thanks Ken,

Could you send me the records of response the City did? We'd like to know the day and time of the backup(s) and any response the made when the backup was reported. And if possible, can you let me know the current status of the engineering work? Once I get the information, I'll contact the concerned party.

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Sieu,
Yes I'm familiar with this location and event. This was not a sewer main break. This was a backup into a residential basement due to an overwhelmed main after a rain event. The City is aware of the issue at this location and is currently working with their engineer to address the problem area. Let me know if you need further.

Thanks,

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The Department received an environmental concern regarding a partially sewer main break at the east of the 2005 W Glen St. that caused sewer backups and overflows from nearby manholes. Do you have any knowledge about the issues?

Sieu

Sieu T. Dang
Environmental Engineer
Missouri Department of Natural Resources
Southwest Regional Office
2040 W. Woodland
Springfield, MO 65807
417-891-4300

Dang, Sieu

From: Mike Spiva <mspiva68@gmail.com>
Sent: Monday, April 26, 2021 10:47 AM
To: Dang, Sieu
Subject: Re: 2005 W Glen St, Neosho Concern

Thank you.

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If you have further questions, please contact me.

Sincerely,

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Environmental Engineer

Missouri Department of Natural Resources

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>
> Sieu T. Dang
>
> Environmental Engineer
>
> Missouri Department of Natural Resources

Southwest Regional Office

2040 W. Woodland

Springfield, MO 65807

417-891-4300

Neosho WWTP
Old Scenic Dr 0.1 miles north of
NEOSHO, MO, Newton

State of Missouri
Department of Natural Resources
National Pollutant Discharge Elimination System (NPDES)
Discharge Monitoring Report (DMR)

Southwest Regional Office
2040 W. Woodland
Springfield, MO, 65807

Permit Number	Outfall Number
MO0104906	001A
Monitoring Period	
12/1/21	12/31/21
NODI:	*****

Parameters	Reporting Requirements			Unit	Reporting Requirements		Unit
Flow, in conduit or thru treatment plant	*****	*****	*****	*****	2.2	1.7	Mgal/d
Mon. Location.: End of Pipe	*****:*****	*****:*****	*****:*****		Daily Max.:Monitoring Required	Monthly Avg.:Monitoring Required	
Sample Type: Total Measured							
Frequency: Daily							
Nitrogen, ammonia total (as N)	7.3	*****	3.7	mg/L	*****	*****	*****
Mon. Location.: End of Pipe	Daily Max.:11.9	*****:*****	Monthly Avg.:2.2		*****:*****	*****:*****	
Sample Type: Grab							
Frequency: Twice Per Month							
pH	7.49	*****	7.55	SU	*****	*****	*****
Mon. Location.: End of Pipe	Minimum:6.0	*****:*****	Maximum:9.0		*****:*****	*****:*****	
Sample Type: Grab							
Frequency: Weekly							

Comments:
higher than normal SAMPLE RESULT

Neosho WWTP
Old Scenic Dr 0.1 miles north of
NEOSHO, MO, Newton

State of Missouri
Department of Natural Resources
National Pollutant Discharge Elimination System (NPDES)
Discharge Monitoring Report (DMR)

Southwest Regional Office
2040 W. Woodland
Springfield, MO, 65807

Permit Number	Outfall Number
MO0104906	002A
Monitoring Period	
12/1/21	12/31/21
NODI:	**C**

Parameters	Reporting Requirements			Unit	Reporting Requirements		Unit
Phosphorus, total (as P)	*****	*****	*****	*****		*****	lb/day
Mon. Location.: End of Pipe	*****:*****	*****:*****	*****:*****		Daily Max.:Monitoring Required	*****:*****	
Sample Type: Grab							
Frequency: Daily							
Flow, in conduit or thru treatment plant	*****	*****	*****	*****		*****	Mgal/d
Mon. Location.: End of Pipe	*****:*****	*****:*****	*****:*****		Daily Max.:Monitoring Required	Monthly Avg.:Monitoring Required	
Sample Type: Total Measured							
Frequency: Daily							
BOD, 5-day, 20 deg. C	*****	*****	*****	mg/L	*****	*****	*****
Mon. Location.: End of Pipe	*****:*****	Weekly Avg.:15	Monthly Avg.:10		*****:*****	*****:*****	
Sample Type: 24 Hour Composite							
Frequency: Weekly							
Total Suspended Solids (TSS)	*****	*****	*****	mg/L	*****	*****	*****
Mon. Location.: End of Pipe	*****:*****	Weekly Avg.:20	Monthly Avg.:15		*****:*****	*****:*****	
Sample Type: 24 Hour Composite							
Frequency: Weekly							
Nitrogen, ammonia total (as N)	*****	*****	*****	mg/L	*****	*****	*****
Mon. Location.: End of Pipe	Daily Max.:7.5	*****:*****	Monthly Avg.:2.9		*****:*****	*****:*****	
Sample Type: Grab							
Frequency: Twice Per Month							
Escherichia coli (E. coli)	*****	*****	*****	#/100mL	*****	*****	*****
Mon. Location.: End of Pipe	Daily Max.:126	*****:*****	30 Day Geo. Mean:Monitoring Required		*****:*****	*****:*****	
Sample Type: Grab							
Frequency: Weekly							
Chlorine, total residual (TRC)	*****	*****	*****	ug/L	*****	*****	*****
Mon. Location.: End of Pipe	Daily Max.:17	*****:*****	Monthly Avg.:8		*****:*****	*****:*****	
Sample Type: Grab							
Frequency: Weekly							

Neosho WWTP
Old Scenic Dr 0.1 miles north of
NEOSHO, MO, Newton

State of Missouri
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National Pollutant Discharge Elimination System (NPDES)
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Southwest Regional Office
2040 W. Woodland
Springfield, MO, 65807

Nitrogen, nitrate total (as N)	*****	*****	*****	mg/L	*****	*****	*****
Mon. Location.: End of Pipe	Daily Max.:Monitoring Required	*****:*****	Monthly Avg.:Monitoring Required		*****:*****	*****:*****	
Sample Type: Grab							
Frequency: Monthly							
pH	*****	*****	*****	SU	*****	*****	*****
Mon. Location.: End of Pipe	Minimum:6.5	*****:*****	Maximum:9.0		*****:*****	*****:*****	
Sample Type: Grab							
Frequency: Weekly							

Comments:

Neosho WWTP
Old Scenic Dr 0.1 miles north of
NEOSHO, MO, Newton

State of Missouri
Department of Natural Resources
National Pollutant Discharge Elimination System (NPDES)
Discharge Monitoring Report (DMR)

Southwest Regional Office
2040 W. Woodland
Springfield, MO, 65807

Permit Number	Outfall Number
MO0104906	IP2A
Monitoring Period	
12/1/21	12/31/21
NODI:	**C**

Parameters	Reporting Requirements			Unit	Reporting Requirements		Unit
Flow, in conduit or thru treatment plant	*****	*****	*****	*****		*****	Mgal/d
Mon. Location.: End of Pipe	*****:*****	*****:*****	*****:*****		Daily Max.:Monitoring Required	Monthly Avg.:Monitoring Required	
Sample Type: Total Measured							
Frequency: Daily							
BOD, 5-day, 20 deg. C	*****	*****	*****	mg/L	*****	*****	*****
Mon. Location.: End of Pipe	*****:*****	Weekly Avg.:15	Monthly Avg.:10		*****:*****	*****:*****	
Sample Type: 24 Hour Composite							
Frequency: Weekly							
Total Suspended Solids (TSS)	*****	*****	*****	mg/L	*****	*****	*****
Mon. Location.: End of Pipe	*****:*****	Weekly Avg.:20	Monthly Avg.:15		*****:*****	*****:*****	
Sample Type: 24 Hour Composite							
Frequency: Weekly							
Nitrogen, ammonia total (as N)	*****	*****	*****	mg/L	*****	*****	*****
Mon. Location.: End of Pipe	Daily Max.:7.5	*****:*****	Monthly Avg.:2.9		*****:*****	*****:*****	
Sample Type: Grab							
Frequency: Twice Per Month							
Escherichia coli (E. coli)	*****	*****	*****	#/100mL	*****	*****	*****
Mon. Location.: End of Pipe	Daily Max.:126	*****:*****	Monthly Avg.:Monitoring Required		*****:*****	*****:*****	
Sample Type: Grab							
Frequency: Weekly							
Chlorine, total residual (TRC)	*****	*****	*****	ug/L	*****	*****	*****
Mon. Location.: End of Pipe	Daily Max.:17	*****:*****	Monthly Avg.:8		*****:*****	*****:*****	
Sample Type: Grab							
Frequency: Weekly							
Nitrogen, nitrate total (as N)	*****	*****	*****	mg/L	*****	*****	*****
Mon. Location.: End of Pipe	Daily Max.:Monitoring Required	*****:*****	Monthly Avg.:Monitoring Required		*****:*****	*****:*****	
Sample Type: Grab							
Frequency: Monthly							

Neosho WWTP
Old Scenic Dr 0.1 miles north of
NEOSHO, MO, Newton

State of Missouri
Department of Natural Resources
National Pollutant Discharge Elimination System (NPDES)
Discharge Monitoring Report (DMR)

Southwest Regional Office
2040 W. Woodland
Springfield, MO, 65807

pH	*****	*****	*****	SU	*****	*****	*****
Mon. Location.: End of Pipe	Minimum:6.5	*****:*****	Maximum:9.0		*****:*****	*****:*****	
Sample Type: Grab							
Frequency: Weekly							

Comments:

Neosho WWTP
Old Scenic Dr 0.1 miles north of
NEOSHO, MO, Newton

State of Missouri
Department of Natural Resources
National Pollutant Discharge Elimination System (NPDES)
Discharge Monitoring Report (DMR)

Southwest Regional Office
2040 W. Woodland
Springfield, MO, 65807

Permit Number	Outfall Number
MO0104906	IP3A
Monitoring Period	
12/1/21	12/31/21
NODI:	*****

Parameters	Reporting Requirements			Unit	Reporting Requirements		Unit
Flow, in conduit or thru treatment plant	*****	*****	*****	*****	0	0	Mgal/d
Mon. Location.: End of Pipe	*****:*****	*****:*****	*****:*****		Daily Max.:Monitoring Required	Monthly Avg.:Monitoring Required	
Sample Type: Total Measured							
Frequency: Daily							
BOD, 5-day, 20 deg. C	*****	16.3	7.8	mg/L	*****	*****	*****
Mon. Location.: End of Pipe	*****:*****	Weekly Avg.:65	Monthly Avg.:45		*****:*****	*****:*****	
Sample Type: 24 Hour Composite							
Frequency: Weekly							
Total Suspended Solids (TSS)	*****	7.9	5.26	mg/L	*****	*****	*****
Mon. Location.: End of Pipe	*****:*****	Weekly Avg.:65	Monthly Avg.:45		*****:*****	*****:*****	
Sample Type: 24 Hour Composite							
Frequency: Weekly							
pH	7.42	*****	7.53	SU	*****	*****	*****
Mon. Location.: End of Pipe	Minimum:6.0	*****:*****	Maximum:9.0		*****:*****	*****:*****	
Sample Type: Grab							
Frequency: Weekly							
BOD, 5-day, percent removal	*****	*****	99.1	%	*****	*****	*****
Mon. Location.: End of Pipe	*****:*****	*****:*****	Monthly Avg. Min.:65		*****:*****	*****:*****	
Sample Type: Calculated							
Frequency: Monthly							
Suspended Solids, percent removal	*****	*****	97.9	%	*****	*****	*****
Mon. Location.: End of Pipe	*****:*****	*****:*****	Monthly Avg. Min.:65		*****:*****	*****:*****	
Sample Type: Calculated							
Frequency: Monthly							

Comments:

Neosho WWTP
Old Scenic Dr 0.1 miles north of
NEOSHO, MO, Newton

State of Missouri
Department of Natural Resources
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2040 W. Woodland
Springfield, MO, 65807

Permit Number	Outfall Number
MO0104906	IP5A
Monitoring Period	
12/1/21	12/31/21
NODI:	*****

Parameters	Reporting Requirements			Unit	Reporting Requirements		Unit
Flow, in conduit or thru treatment plant	*****	*****	*****	*****	2.2	1.7	Mgal/d
Mon. Location.: End of Pipe	*****:*****	*****:*****	*****:*****		Daily Max.:Monitoring Required	Monthly Avg.:Monitoring Required	
Sample Type: Total Measured							
Frequency: Daily							
BOD, 5-day, 20 deg. C	*****	1.0	1.0	mg/L	*****	*****	*****
Mon. Location.: End of Pipe	*****:*****	Weekly Avg.:45	Monthly Avg.:30		*****:*****	*****:*****	
Sample Type: 24 Hour Composite							
Frequency: Weekly							
Total Suspended Solids (TSS)	*****	2.5	2.5	mg/L	*****	*****	*****
Mon. Location.: End of Pipe	*****:*****	Weekly Avg.:45	Monthly Avg.:30		*****:*****	*****:*****	
Sample Type: 24 Hour Composite							
Frequency: Weekly							
pH	7.4	*****	7.9	SU	*****	*****	*****
Mon. Location.: End of Pipe	Minimum:6.0	*****:*****	Maximum:9.0		*****:*****	*****:*****	
Sample Type: Grab							
Frequency: Weekly							
BOD, 5-day, percent removal	*****	*****	95.7	%	*****	*****	*****
Mon. Location.: End of Pipe	*****:*****	*****:*****	Monthly Avg. Min.:85		*****:*****	*****:*****	
Sample Type: Calculated							
Frequency: Monthly							
Suspended Solids, percent removal	*****	*****	92.9	%	*****	*****	*****
Mon. Location.: End of Pipe	*****:*****	*****:*****	Monthly Avg. Min.:85		*****:*****	*****:*****	
Sample Type: Calculated							
Frequency: Monthly							

Comments:

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2040 W. Woodland
Springfield, MO, 65807

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.		
eSignature **Jerry Humphrey**	**Submission Date** **January 25, 2022**	**User Phone Number** **(417)451-8075**

Pace Analytical Services, LLC
9608 Loiret Blvd.
Lenexa, KS 66219
(913)599-5665

RECEIVED
FEB 18 2022
DEQ/SWRO

December 22, 2021

Ken Brady
Alliance Water Resources
200 Nelson Ave
Neosho, MO 64850

RE: Project: LAZY BOY MONTHLY SAMPLING
Pace Project No.: 60388044

Dear Ken Brady:

Enclosed are the analytical results for sample(s) received by the laboratory on December 08, 2021. The results relate only to the samples included in this report. Results reported herein conform to the applicable TNI/NELAC Standards and the laboratory's Quality Manual, where applicable, unless otherwise noted in the body of the report.

The test results provided in this final report were generated by each of the following laboratories within the Pace Network:

- Pace Analytical Services - Kansas City
- Pace Analytical Services - SE Kansas

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

Sincerely,

Jeffrey Shopper
jeff.shopper@pacelabs.com
1(913)563-1408
Project Manager

Enclosures

cc: Jane Brozek, City of Neosho, MO
Jake Lanke, Alliance Water Resources
Crowder Plant Operator, Crowder Plant Operator

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CERTIFICATIONS

Project: LAZY BOY MONTHLY SAMPLING
Pace Project No.: 60388044

Pace Analytical Services Kansas

9608 Loiret Boulevard, Lenexa, KS 66219
Missouri Inorganic Drinking Water Certification #: 10090
Arkansas Drinking Water
Arkansas Certification #: 20-020-0
Arkansas Drinking Water
Illinois Certification #: 2000302021-3
Iowa Certification #: 118
Kansas/NELAP Certification #: E-10116
Louisiana Certification #: 03055
Nevada Certification #: KS000212020-2
Oklahoma Certification #: 9205/9935
Florida: Cert E871149 SEKS WET
Texas Certification #: T104704407-19-12
Utah Certification #: KS000212019-9
Illinois Certification #: 004592
Kansas Field Laboratory Accreditation: # E-92587
Missouri SEKS Micro Certification: 10070

Pace Analytical Services Southeast Kansas

808 West McKay, Frontenac, KS 66763
Arkansas Certification #: 18-016-0
Iowa Certification #: 118
Kansas/NELAP Certification #: E-10426
Louisiana Certification #: 03055
Oklahoma Certification #: 9935
Texas Certification #: T104704407
Utah Certification #: KS00021

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SAMPLE SUMMARY

Project: LAZY BOY MONTHLY SAMPLING
Pace Project No.: 60388044

Lab ID	Sample ID	Matrix	Date Collected	Date Received
60388044001	**LAZY BOY COMP**	Water	12/08/21 10:15	12/08/21 19:25
60388044002	**LAZY BOY GRAB**	Water	12/08/21 10:00	12/08/21 19:25

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SAMPLE ANALYTE COUNT

Project: LAZY BOY MONTHLY SAMPLING
Pace Project No.: 60388044

Lab ID	Sample ID	Method	Analysts	Analytes Reported	Laboratory
60388044001	**LAZY BOY COMP**	EPA 200.7	MA1	9	PASI-K
		EPA 245.1	CJH1	1	PASI-K
		SM 2540D	BLA	1	PASI-K
		SM 5210B	MAP	1	PASI-K
		EPA 300.0	SK	1	PASI-K
60388044002	**LAZY BOY GRAB**	SM 4500-H+B	TDH	1	PASI-SE
		SM 2550B	TDH	1	PASI-SE
		EPA 1664A	JDS	1	PASI-K
		EPA 420.1	HM1	1	PASI-K
		SM 4500-CN-E	HM1	1	PASI-K

PASI-K = Pace Analytical Services - Kansas City
PASI-SE = Pace Analytical Services - SE Kansas

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ANALYTICAL RESULTS

Project: LAZY BOY MONTHLY SAMPLING
Pace Project No.: 60388044

Sample: LAZY BOY COMP **Lab ID: 60388044001** Collected: 12/08/21 10:15 Received: 12/08/21 19:25 Matrix: Water

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
200.7 Metals, Total	Analytical Method: EPA 200.7 Preparation Method: EPA 200.7 Pace Analytical Services - Kansas City							
Arsenic	ND	ug/L	10.0	1	12/16/21 13:45	12/17/21 22:18	7440-38-2	
Cadmium	ND	ug/L	5.0	1	12/16/21 13:45	12/17/21 22:18	7440-43-9	
Chromium	**6.7**	ug/L	5.0	1	12/16/21 13:45	12/17/21 22:18	7440-47-3	
Copper	**53.7**	ug/L	10.0	1	12/16/21 13:45	12/17/21 22:18	7440-50-8	
Iron	**2960**	ug/L	50.0	1	12/16/21 13:45	12/17/21 22:18	7439-89-6	
Lead	ND	ug/L	10.0	1	12/16/21 13:45	12/17/21 22:18	7439-92-1	
Nickel	**26.5**	ug/L	5.0	1	12/16/21 13:45	12/17/21 22:18	7440-02-0	
Silver	ND	ug/L	7.0	1	12/16/21 13:45	12/17/21 22:18	7440-22-4	
Zinc	**351**	ug/L	50.0	1	12/16/21 13:45	12/17/21 22:18	7440-66-6	
245.1 Mercury	Analytical Method: EPA 245.1 Preparation Method: EPA 245.1 Pace Analytical Services - Kansas City							
Mercury	ND	ug/L	0.20	1	12/21/21 10:10	12/21/21 15:39	7439-97-6	
2540D Total Suspended Solids	Analytical Method: SM 2540D Pace Analytical Services - Kansas City							
Total Suspended Solids	**242**	mg/L	50.0	1		12/14/21 05:28		
5210B BOD, 5 day	Analytical Method: SM 5210B Preparation Method: SM 5210B Pace Analytical Services - Kansas City							
BOD, 5 day	**758**	mg/L	2.0	1	12/09/21 13:52	12/14/21 09:59		B1,L2
300.0 IC Anions 28 Days	Analytical Method: EPA 300.0 Pace Analytical Services - Kansas City							
Sulfate	**15.9**	mg/L	10.0	10		12/22/21 15:03	14808-79-8	

Sample: LAZY BOY GRAB **Lab ID: 60388044002** Collected: 12/08/21 10:00 Received: 12/08/21 19:25 Matrix: Water

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
Field pH, Electrometric	Analytical Method: SM 4500-H+B Pace Analytical Services - SE Kansas							
Field pH	**8.8**	Std. Units	0.10	1		12/08/21 10:00		
Field Temperature	Analytical Method: SM 2550B Pace Analytical Services - SE Kansas							
Field Temperature	**16.1**	deg C	0.10	1		12/08/21 10:00		
HEM, Oil and Grease	Analytical Method: EPA 1664A Pace Analytical Services - Kansas City							
Oil and Grease	**19.8**	mg/L	5.0	1		12/20/21 10:30		

REPORT OF LABORATORY ANALYSIS

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ANALYTICAL RESULTS

Project: LAZY BOY MONTHLY SAMPLING
Pace Project No.: 60388044

Sample: LAZY BOY GRAB **Lab ID: 60388044002** Collected: 12/08/21 10:00 Received: 12/08/21 19:25 Matrix: Water

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
Phenolics, Total Recoverable	Analytical Method: EPA 420.1 Preparation Method: EPA 420.1 Pace Analytical Services - Kansas City							
Phenolics, Total Recoverable	**0.44**	mg/L	0.050	1	12/16/21 09:10	12/16/21 14:31	64743-03-9	
4500CNE Cyanide, Total	Analytical Method: SM 4500-CN-E Preparation Method: SM 4500-CN-E Pace Analytical Services - Kansas City							
Cyanide	ND	mg/L	0.0050	1	12/14/21 09:06	12/14/21 10:53	57-12-5	

REPORT OF LABORATORY ANALYSIS

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QUALITY CONTROL DATA

Project: LAZY BOY MONTHLY SAMPLING
Pace Project No.: 60388044

QC Batch: 762953
QC Batch Method: EPA 245.1
Analysis Method: EPA 245.1
Analysis Description: 245.1 Mercury
Laboratory: Pace Analytical Services - Kansas City
Associated Lab Samples: 60388044001

METHOD BLANK: 3052149 Matrix: Water
Associated Lab Samples: 60388044001

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Mercury	ug/L	ND	0.20	12/21/21 15:03	

LABORATORY CONTROL SAMPLE: 3052150

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Mercury	ug/L	5	4.9	98	85-115	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 3052151 3052152

Parameter	Units	60388001002 Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
Mercury	ug/L	ND	5	5	4.8	4.8	95	96	70-130	0	20	

MATRIX SPIKE SAMPLE: 3052153

Parameter	Units	60388664005 Result	Spike Conc.	MS Result	MS % Rec	% Rec Limits	Qualifiers
Mercury	ug/L	ND	5	4.8	95	70-130	

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REPORT OF LABORATORY ANALYSIS

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QUALITY CONTROL DATA

Project: LAZY BOY MONTHLY SAMPLING
Pace Project No.: 60388044

QC Batch: 762169
QC Batch Method: EPA 200.7
Analysis Method: EPA 200.7
Analysis Description: 200.7 Metals, Total
Laboratory: Pace Analytical Services - Kansas City
Associated Lab Samples: 60388044001

METHOD BLANK: 3049438 Matrix: Water
Associated Lab Samples: 60388044001

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Arsenic	ug/L	ND	10.0	12/17/21 21:58	
Cadmium	ug/L	ND	5.0	12/17/21 21:58	
Chromium	ug/L	ND	5.0	12/17/21 21:58	
Copper	ug/L	ND	10.0	12/17/21 21:58	
Iron	ug/L	ND	50.0	12/17/21 21:58	
Lead	ug/L	ND	10.0	12/17/21 21:58	
Nickel	ug/L	ND	5.0	12/17/21 21:58	
Silver	ug/L	ND	7.0	12/17/21 21:58	
Zinc	ug/L	ND	50.0	12/17/21 21:58	

LABORATORY CONTROL SAMPLE: 3049439

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Arsenic	ug/L	1000	944	94	85-115	
Cadmium	ug/L	1000	1060	106	85-115	
Chromium	ug/L	1000	1050	105	85-115	
Copper	ug/L	1000	1040	104	85-115	
Iron	ug/L	10000	10100	101	85-115	
Lead	ug/L	1000	1040	104	85-115	
Nickel	ug/L	1000	1080	108	85-115	
Silver	ug/L	500	509	102	85-115	
Zinc	ug/L	1000	1060	106	85-115	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 3049440 3049441

Parameter	Units	60387813001 Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
Arsenic	ug/L	ND	1000	1000	958	959	96	96	70-130	0	20	
Cadmium	ug/L	ND	1000	1000	1050	1060	105	106	70-130	0	20	
Chromium	ug/L	ND	1000	1000	1050	1050	105	104	70-130	0	20	
Copper	ug/L	ND	1000	1000	1060	1060	106	106	70-130	0	20	
Iron	ug/L	ND	10000	10000	10200	10300	101	102	70-130	1	20	
Lead	ug/L	ND	1000	1000	1040	1050	104	105	70-130	0	20	
Nickel	ug/L	ND	1000	1000	1090	1090	109	109	70-130	0	20	
Silver	ug/L	ND	500	500	514	512	103	102	70-130	0	20	
Zinc	ug/L	57.6	1000	1000	1120	1120	107	106	70-130	0	20	

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REPORT OF LABORATORY ANALYSIS

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(913)599-5665

QUALITY CONTROL DATA

Project: LAZY BOY MONTHLY SAMPLING
Pace Project No.: 60388044

MATRIX SPIKE SAMPLE: 3049442

Parameter	Units	60388268001 Result	Spike Conc.	MS Result	MS % Rec	% Rec Limits	Qualifiers
Arsenic	ug/L	ND	1000	941	94	70-130	
Cadmium	ug/L	ND	1000	1040	104	70-130	
Chromium	ug/L	ND	1000	1030	103	70-130	
Copper	ug/L	ND	1000	1060	106	70-130	
Iron	ug/L	ND	10000	10100	101	70-130	
Lead	ug/L	ND	1000	1030	103	70-130	
Nickel	ug/L	ND	1000	1090	109	70-130	
Silver	ug/L	ND	500	506	101	70-130	
Zinc	ug/L	0.27 mg/L	1000	1330	106	70-130	

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REPORT OF LABORATORY ANALYSIS

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QUALITY CONTROL DATA

Project: LAZY BOY MONTHLY SAMPLING
Pace Project No.: 60388044

QC Batch: 761271
QC Batch Method: SM 4500-H+B
Analysis Method: SM 4500-H+B
Analysis Description: Field pH, Electrometric
Laboratory: Pace Analytical Services - SE Kansas

Associated Lab Samples: 60388044002

SAMPLE DUPLICATE: 3046276

Parameter	Units	60388044002 Result	Dup Result	RPD	Max RPD	Qualifiers
Field pH	Std. Units	8.8	8.8	0	5	

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REPORT OF LABORATORY ANALYSIS

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QUALITY CONTROL DATA

Project: LAZY BOY MONTHLY SAMPLING
Pace Project No.: 60388044

QC Batch: 762534
QC Batch Method: EPA 1664A
Analysis Method: EPA 1664A
Analysis Description: 1664 HEM, Oil and Grease
Laboratory: Pace Analytical Services - Kansas City
Associated Lab Samples: 60388044002

METHOD BLANK: 3050825 Matrix: Water
Associated Lab Samples: 60388044002

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Oil and Grease	mg/L	ND	5.0	12/20/21 10:24	

LABORATORY CONTROL SAMPLE: 3050826

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Oil and Grease	mg/L	40	40.0	100	78-114	

MATRIX SPIKE SAMPLE: 3050827

Parameter	Units	60387933001 Result	Spike Conc.	MS Result	MS % Rec	% Rec Limits	Qualifiers
Oil and Grease	mg/L	<4.9	96.2	99.5	102	78-114	

SAMPLE DUPLICATE: 3050828

Parameter	Units	60388033001 Result	Dup Result	RPD	Max RPD	Qualifiers
Oil and Grease	mg/L	ND	ND		18	

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REPORT OF LABORATORY ANALYSIS

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QUALITY CONTROL DATA

Project: LAZY BOY MONTHLY SAMPLING
Pace Project No.: 60388044

QC Batch: 761445
QC Batch Method: SM 2540D
Analysis Method: SM 2540D
Analysis Description: 2540D Total Suspended Solids
Laboratory: Pace Analytical Services - Kansas City
Associated Lab Samples: 60388044001

METHOD BLANK: 3046792 Matrix: Water
Associated Lab Samples: 60388044001

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Total Suspended Solids	mg/L	ND	5.0	12/14/21 05:24	

SAMPLE DUPLICATE: 3046793

Parameter	Units	60388015011 Result	Dup Result	RPD	Max RPD	Qualifiers
Total Suspended Solids	mg/L	231	232	0	10	

SAMPLE DUPLICATE: 3046794

Parameter	Units	60387929002 Result	Dup Result	RPD	Max RPD	Qualifiers
Total Suspended Solids	mg/L	1210	1290	6	10	

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REPORT OF LABORATORY ANALYSIS

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QUALITY CONTROL DATA

Project: LAZY BOY MONTHLY SAMPLING
Pace Project No.: 60388044

QC Batch: 760762
QC Batch Method: SM 5210B
Analysis Method: SM 5210B
Analysis Description: 5210B BOD, 5 day
Laboratory: Pace Analytical Services - Kansas City
Associated Lab Samples: 60388044001

METHOD BLANK: 3043936 Matrix: Water
Associated Lab Samples: 60388044001

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
BOD, 5 day	mg/L	ND	2.0	12/14/21 09:30	

LABORATORY CONTROL SAMPLE: 3043937

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
BOD, 5 day	mg/L	198	134	68	85-115	L2

SAMPLE DUPLICATE: 3043938

Parameter	Units	60388062001 Result	Dup Result	RPD	Max RPD	Qualifiers
BOD, 5 day	mg/L	260	625	82	17	D6

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REPORT OF LABORATORY ANALYSIS

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QUALITY CONTROL DATA

Project: LAZY BOY MONTHLY SAMPLING
Pace Project No.: 60388044

QC Batch: 762952
QC Batch Method: EPA 300.0
Analysis Method: EPA 300.0
Analysis Description: 300.0 IC Anions
Laboratory: Pace Analytical Services - Kansas City

Associated Lab Samples: 60388044001

METHOD BLANK: 3052140 Matrix: Water
Associated Lab Samples: 60388044001

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Sulfate	mg/L	ND	1.0	12/22/21 10:32	

LABORATORY CONTROL SAMPLE: 3052141

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Sulfate	mg/L	5	4.7	95	90-110	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 3052142 3052143

Parameter	Units	60388044001 Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
Sulfate	mg/L	15.9	50	50	67.4	67.7	103	104	80-120	0	15	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 3052144 3052145

Parameter	Units	60388675006 Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
Sulfate	mg/L	ND	100	100	97.9	98.0	93	93	80-120	0	15	

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REPORT OF LABORATORY ANALYSIS

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QUALITY CONTROL DATA

Project: LAZY BOY MONTHLY SAMPLING
Pace Project No.: 60388044

QC Batch: 762096
QC Batch Method: EPA 420.1
Analysis Method: EPA 420.1
Analysis Description: 420.1 Phenolics Macro
Laboratory: Pace Analytical Services - Kansas City

Associated Lab Samples: 60388044002

METHOD BLANK: 3049091 Matrix: Water
Associated Lab Samples: 60388044002

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Phenolics, Total Recoverable	mg/L	ND	0.050	12/16/21 11:50	

LABORATORY CONTROL SAMPLE: 3049092

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Phenolics, Total Recoverable	mg/L	0.25	0.26	104	90-110	

MATRIX SPIKE SAMPLE: 3049093

Parameter	Units	60388089001 Result	Spike Conc.	MS Result	MS % Rec	% Rec Limits	Qualifiers
Phenolics, Total Recoverable	mg/L	ND	0.25	0.42	162	90-110	M1

SAMPLE DUPLICATE: 3049094

Parameter	Units	60388044002 Result	Dup Result	RPD	Max RPD	Qualifiers
Phenolics, Total Recoverable	mg/L	0.44	0.36	19	20	

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REPORT OF LABORATORY ANALYSIS

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QUALITY CONTROL DATA

Project: LAZY BOY MONTHLY SAMPLING
Pace Project No.: 60388044

QC Batch: 761581
QC Batch Method: SM 4500-CN-E
Analysis Method: SM 4500-CN-E
Analysis Description: 4500CNE Cyanide, Total
Laboratory: Pace Analytical Services - Kansas City
Associated Lab Samples: 60388044002

METHOD BLANK: 3047195 Matrix: Water
Associated Lab Samples: 60388044002

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Cyanide	mg/L	ND	0.0050	12/14/21 10:44	

LABORATORY CONTROL SAMPLE: 3047196

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Cyanide	mg/L	0.1	0.10	103	69-126	

MATRIX SPIKE SAMPLE: 3047197

Parameter	Units	60388193013 Result	Spike Conc.	MS Result	MS % Rec	% Rec Limits	Qualifiers
Cyanide	mg/L	ND	0.1	0.088	87	55-124	

SAMPLE DUPLICATE: 3047198

Parameter	Units	60388193013 Result	Dup Result	RPD	Max RPD	Qualifiers
Cyanide	mg/L	ND	ND		46	

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REPORT OF LABORATORY ANALYSIS

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QUALIFIERS

Project: LAZY BOY MONTHLY SAMPLING
Pace Project No.: 60388044

DEFINITIONS

DF - Dilution Factor, if reported, represents the factor applied to the reported data due to dilution of the sample aliquot.

ND - Not Detected at or above adjusted reporting limit.

TNTC - Too Numerous To Count

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

MDL - Adjusted Method Detection Limit.

PQL - Practical Quantitation Limit.

RL - Reporting Limit - The lowest concentration value that meets project requirements for quantitative data with known precision and bias for a specific analyte in a specific matrix.

S - Surrogate

1,2-Diphenylhydrazine decomposes to and cannot be separated from Azobenzene using Method 8270. The result for each analyte is a combined concentration.

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.

Reported results are not rounded until the final step prior to reporting. Therefore, calculated parameters that are typically reported as "Total" may vary slightly from the sum of the reported component parameters.

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

TNI - The NELAC Institute.

ANALYTE QUALIFIERS

B1	Less than 1.0 mg/L DO remained for all dilutions set. The reported value is an estimated greater than value and is calculated for the dilution using the least amount of sample.
D6	The precision between the sample and sample duplicate exceeded laboratory control limits.
L2	Analyte recovery in the laboratory control sample (LCS) was below QC limits. Results for this analyte in associated samples may be biased low.
M1	Matrix spike recovery exceeded QC limits. Batch accepted based on laboratory control sample (LCS) recovery.

Pace Analytical Services, LLC
9608 Loiret Blvd.
Lenexa, KS 66219
(913)599-5665

QUALITY CONTROL DATA CROSS REFERENCE TABLE

Project: LAZY BOY MONTHLY SAMPLING
Pace Project No.: 60388044

Lab ID	Sample ID	QC Batch Method	QC Batch	Analytical Method	Analytical Batch
60388044001	**LAZY BOY COMP**	EPA 200.7	762169	EPA 200.7	762384
60388044001	**LAZY BOY COMP**	EPA 245.1	762953	EPA 245.1	763168
60388044002	**LAZY BOY GRAB**	SM 4500-H+B	761271		
60388044002	**LAZY BOY GRAB**	SM 2550B	761272		
60388044002	**LAZY BOY GRAB**	EPA 1664A	762534		
60388044001	**LAZY BOY COMP**	SM 2540D	761445		
60388044001	**LAZY BOY COMP**	SM 5210B	760762	SM 5210B	762650
60388044001	**LAZY BOY COMP**	EPA 300.0	762952		
60388044002	**LAZY BOY GRAB**	EPA 420.1	762096	EPA 420.1	762218
60388044002	**LAZY BOY GRAB**	SM 4500-CN-E	761581	SM 4500-CN-E	761609

Pace Analytical
www.pacelabs.com

Sample Condition Upon Receipt

WO# : 60388044

60388044

Client Name: Alliance Water

Courier: FedEx ☐ UPS ☐ VIA ☒ Clay ☐ PEX ☐ ECI ☐ Pace ☐ Xroads ☐ Client ☐ 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 ☒ ZPLC

Thermometer Used: T099 **Type of Ice:** (Wet) Blue None

Cooler Temperature (°C): As-read 1.8 **Corr. Factor** -0.2 **Corrected** 1.6

Date and initials of person examining contents: SM 12/9/21

Temperature should be above freezing to 6°C

Chain of Custody present:	☑Yes ☐No ☐N/A	
Chain of Custody relinquished:	☑Yes ☐No ☐N/A	
Samples arrived within holding time:	☑Yes ☐No ☐N/A	
Short Hold Time analyses (<72hr):	☑Yes ☐No ☐N/A	1500
Rush Turn Around Time requested:	☐Yes ☒No ☐N/A	
Sufficient volume:	☑Yes ☐No ☐N/A	
Correct containers used:	☑Yes ☐No ☐N/A	
Pace containers used:	☑Yes ☐No ☐N/A	
Containers intact:	☑Yes ☐No ☐N/A	
Unpreserved 5035A / TX1005/1006 soils frozen in 48hrs?	☐Yes ☐No ☒N/A	
Filtered volume received for dissolved tests?	☐Yes ☐No ☒N/A	
Sample labels match COC: Date / time / ID / analyses	☑Yes ☐No ☐N/A	
Samples contain multiple phases? Matrix: WT	☐Yes ☒No ☐N/A	
Containers requiring pH preservation in compliance? (HNO3, H2SO4, HCl<2; NaOH>9 Sulfide, NaOH>10 Cyanide) (Exceptions: VOA, Micro, O&G, KS TPH, OK-DRO) LOT# 603173 603222	☒Yes ☐No ☐N/A	List sample IDs, volumes, lot #'s of preservative and the date/time added.
Cyanide water sample checks: Lead acetate strip turns dark? (Record only)	☐Yes ☒No	
Potassium iodide test strip turns blue/purple? (Preserve)	☐Yes ☒No	
Trip Blank present:	☐Yes ☐No ☒N/A	
Headspace in VOA vials (>6mm):	☐Yes ☐No ☒N/A	
Samples from USDA Regulated Area: State:	☐Yes ☒No ☐N/A	
Additional labels attached to 5035A / TX1005 vials in the field?	☐Yes ☒No ☐N/A	

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

Person Contacted: _____ Date/Time: _____

Comments/ Resolution: _____

Project Manager Review: _____ Date: _____

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www.pacelabs.com

CHAIN-OF-CUSTODY / Analytical Request Document

The Chain-of-Custody is a LEGAL DOCUMENT. All relevant fields must be completed accurately

Page: 1 1

Required Client Information: Section A		Required Client Information: Section B		Client Information (Check quote/contract):		To Be Completed by Pace Analytical Client: Section C	
Company:	Alliance Water Res Neosho	Report To:	KENDAL	Requested Due Date:		Quote Reference:	
Address:	15318 Kentucky Rd	Copy To:		*TAT:	Standard	Project Manager:	
	Neosho, MO 64850	Invoice To:		* Turn around times less than 14 days subject		Project #:	
Phone: 417-451-8075	Fax:	P.O.		laboratory and contractual obligations and may		Profile #:	9408
		Project Name:	Lazy Boy Monthly Sampling	in a Rush Turnaround Surcharge.			
		Project Number:		Turn Around Time (TAT) in calender days.			

Required Client Information: Section D

Valid Matrix Codes	
Matrix	Code
Water	WT
Soil	SL
Oil	OL
Wipe	WP
Air	AR
Tissue	TS
Other	OT

#	SAMPLE ID	MATRIX CODE	Composite Start DATE COLLECTED	Composite Start TIME COLLECTED	Composite End DATE COLLECTED	Composite End TIME COLLECTED	# Containers	Unpreserved	H2SO4	HNO3	HCl	NaOH	Na2S2O3	Methanol	Ar, Cd, Cu, Cr, Pb, Hg, NI	Ag, Zn, Fe, Sulfate	Field pH/Temp, O&Gr	CN, Phenols	BOD,TSS	SEKS Trip	SEKS Field	SEKS Comp	REMARKS / Lab ID 60388044
1	LAZY BOY COMP		12/7/21	10:15	12/8/21	10:15	3	2		1					X	X			X	X	X	X	
2	LAZY BOY GRAB				12/8/21	10:00	4		1		2	1					X	X					FieldPH 8.80 Temp 16.1
3																							FieldPH 8.83 Temp 16.1
4																							
5																							
6																							
7																							
8																							
9																							
10																							
11																							

SHIPMENT METHOD	AIRBILL NO.	SHIPPING DATE	ITEM #	RELINQUISHED BY / AFFILIATION	DATE	TIME	ACCEPTED BY / AFFILIATION	DATE	TIME
				Tim Harrell Pace	12/8/21	16:0?	[illegible]/Pace	12/8	1925

SAMPLE CONDITION:

Temp in C	1.6
Received on Ice	(Y)/ N
Sealed Cooler	(Y)/ N
Sample Intact	(Y)/ N

SAMPLE NOTES:

- [ ] Hach Photo 2 Serial 17110E342903
- [ ] Oakton pH 450 Serial 2881231
- [ ] YSI Pro 20i Serial 19A104699
- [x] Oakton ph 150 Serial 2798093

Additional Comments:

SAMPLER NAME AND SIGNATURE

PRINT Name of SAMPLER: Tim Harrell

SIGNATURE of SAMPLER: Tim Harrell

DATE Signed: 12/8/21

INDUSTRIAL USER INSPECTION CHECKLIST

DATE 12/16/2021 TIME 1:00PM

Industry Name: La- z- Boy Midwest			
Location Address	4301 Howard Bush Drive Neosho, MO 64850	Mailing Address	Same
Industry Contacts (w/titles):		FAX:	
Jarrod Newcomb/ EHS MANAGER		Phone: 417-451-54004	
		Phone:	

Products: Furniture

Raw Materials:
Raw Steel, Pre-cut Sewn wood, Pre-sewn uph., polyurethane

Manufacturing Processes:
Assemble Furniture and components
(Degreaser, paint/water separator, Rinse tanks)

Planned Changes to Plant:
Phosphatizing process has been started

Applicable Categorical Standards:	Pollutants of Concern:

No. of employees:	No. of shifts per day:	Days worked per week:	Is production seasonal?
300	2	4-5	No

Employee showers (Y/N):	Scheduled shutdowns:
N	None

Number of Outfalls		Sampling Location(s):
Total:	Regulated:	
1	1	Parking lot- South side of plant

Persons Present During Inspection:

Industry:	POTW:

II. WATER BALANCE

1. Complete the following table based on current water consumption.

SOURCE	AVG. FLOW	METERED?
Water company	1,500 GPD	Yes
Private well		
TOTAL:		

2. What are the water uses within the plant? List all processes that use water when completing the table below. Attach a copy of the Plant's process schematic and show the locations from which wastewaters are generated.

WASTEWATER GENERATING PROCESS	AVG. FLOW	BATCH OR CONTINUOUS	BATCH FREQUENCY	MEASURED/ ESTIMATED	TREATED (YIN)
A.Process	20%				
B.					
C.					
D.					
E.					
F. Contact cooling					
SUBTOTALS:					
G. Boiler blowdown					
H. Evaporation					
I. Non-contact cooling	27%				NA
J. Lawn maintenance					NA
K. Sanitary	51%				
L. In product	1%				NA
M. Other	1%				
TOTAL:	100%				

COMMENTS:

III. MONITORING AND REPORTING

3. Sampling/Reporting Procedures (complete the following table):

Permit Requirements		Industry Practice
Monthly	Sampling Frequency (Pollutants of concern)	
	Sampling Frequency (other Pollutants)	
	Sample type: Metals	
	Sample type: CN, O&G, pH	
	Reporting Frequency	

4. Did the facility sample more frequently than required by the permit in the last reporting period?

NO

Were all results submitted with the industry's reports?

YES

5. Does the facility sample only during periods of process waste discharge or treatment system operation/discharge?

NO

6. Flow Measurement and Sample Analysis

Flow Measurement — Can flows be measured at sampling location? No	
ARE flows measured at sampling location? NA	Measuring device(s): NA
Sample Analysis: — Pollutants analyzed in-house: 0	
Do in-house analysis methods conform to 40 CFR Part 136? NA	
Do contract lab methods conform to 40 CFR Part 136? Yes	

COMMENTS:

VI. WASTEWATER TREATMENT

7. If the industry treats its process wastewaters before discharge to the POTW, complete the following.

Treatment type: Degreaser- Rinse Tank, Water/ Paint Separator- Rinse Tank		Date originally installed: 2016
Design flow:	Treatment - batch or continuous:	
Actual flow:	Discharge - batch or continuous: batch	
Operation	Reagents:(include usage rates, if known)	
Hours/day: 10 / Days/week: 5-6		
FTEs needed to operate:		
Clarifier volume:	Effluent filtration media:(if applicable)	
Description of overall condition:		

8. Has the facility experienced any operational/upset problems since the last inspection? If so, describe.

NO

V. SLUDGE GENERATION/WASTE HAULING

9. Sludge/Hauled Waste Disposal (Complete the table for facilities that generate sludge or haul regulated wastes)

Sludge dewatering method:	Moisture content:	Amount generated, 55gal bbl/mo.:	Disposal method:
Storage (bbls):		Hazardous?:	Shipment frequency:
Sludge Hauler(s):		Disposal location:	

COMMENTS:

VI. FOR INDUSTRIES SUBJECT TO CATEGORICAL PRETREATMENT STANDARDS

10. Electroplating/Metal Finishing:

NA

Regulated Process(es) (eg. Zinc plating, Chemical etching, etc):		Hours of operation:
Does the facility phosphatize? yes	Metallic salts in the phosphoric acid:	Basis mtl. phosphatized:
Does the facility ever phosphatize galvanized mtl.?		
Does the facility use Cyanide? no	In what process(es):	Method of destruction:
Has the facility investigated a replacement for CN?		
Does facility use Hex Chrome? no	Method of reduction to trivalent state:	

Plating Methods	Rinsing Methods and Rates (gpm)		
	Countercurrent	Parallel	Dead Rinse
Barrel,%:			
Rack,%:			

COMMENTS:

11. Production Based Standards (determination of production rates)

Applicable Standard(s):			
Process Qualifying for Allowance (see applicable CFR)	Production Normalizing Parameter (avg daily production rate)		
1			
2			
3			
4			
5			
6			

COMBINED WASTESTREAM FORMULA:

12. Are dilution wastestreams present at the sample location? no

A. Is the combined wastestream formula used at the facility?
1. How are the flows determined?

water usage

B. Should the facility be using the Combined Wastestream Formula?

13. Complete the following if the facility is subject to TTO limits or has chemicals on site that could cause interference or pass through.

<table>
<tr><th>Metal Finishing and Electroplating Industries</th><th>Production Based Standards</th></tr>
<tr><td>Does the facility have a Solvent Management Plan? no</td><td>Is the facility allowed to sample for Oil and Grease as a surrogate parameter?</td></tr>
<tr><td rowspan="3">Chemical Inventory:</td><td>Proximity to floor drains:
no drains</td></tr>
<tr><td>Is chemical containment needed?</td></tr>
<tr><td>Does facility have a spill prevention plan?
yes</td></tr>
<tr><td colspan="2">Does the facility need a spill control plan? Yes</td></tr>
</table>

VII. NOTES

INDUSTRIAL USER INSPECTION CHECKLIST

DATE 12/16/2021 TIME 1:00PM

Industry Name: La- z- Boy Midwest			
Location Address	4301 Howard Bush Drive Neosho, MO 64850	Mailing Address	Same
Industry Contacts (w/titles):		FAX:	
Jarrod Newcomb/ EHS MANAGER		Phone: 417-451-54004	
		Phone:	

Products: Furniture

Raw Materials:
Raw Steel, Pre-cut Sewn wood, Pre-sewn uph., polyurethane

Manufacturing Processes:
Assemble Furniture and components
(Degreaser, paint/water separator, Rinse tanks)

Planned Changes to Plant:
Phosphatizing process has been started

Applicable Categorical Standards:	Pollutants of Concern:

No. of employees:	No. of shifts per day:	Days worked per week:	Is production seasonal?
300	2	4-5	No

Employee showers (Y/N):	Scheduled shutdowns:
N	None

Number of Outfalls		Sampling Location(s):
Total:	Regulated:	
1	1	Parking lot- South side of plant

Persons Present During Inspection:

Industry:	POTW:

II. WATER BALANCE

1. Complete the following table based on current water consumption.

SOURCE	AVG. FLOW	METERED?
Water company	1,500 GPD	Yes
Private well		
TOTAL:		

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C.					
D.					
E.					
F. Contact cooling					
SUBTOTALS:					
G. Boiler blowdown					
H. Evaporation					
I. Non-contact cooling	27%				NA
J. Lawn maintenance					NA
K. Sanitary	51%				
L. In product	1%				NA
M. Other	1%				
TOTAL:	100%				

COMMENTS:

III. MONITORING AND REPORTING

3. Sampling/Reporting Procedures (complete the following table):

Permit Requirements		Industry Practice
Monthly	Sampling Frequency (Pollutants of concern)	
	Sampling Frequency (other Pollutants)	
	Sample type: Metals	
	Sample type: CN, O&G, pH	
	Reporting Frequency	

4. Did the facility sample more frequently than required by the permit in the last reporting period?

NO

Were all results submitted with the industry's reports?

YES

5. Does the facility sample only during periods of process waste discharge or treatment system operation/discharge?

NO

6. Flow Measurement and Sample Analysis

Flow Measurement — Can flows be measured at sampling location? No	
ARE flows measured at sampling location? NA	Measuring device(s): NA
Sample Analysis: — Pollutants analyzed in-house: 0	
Do in-house analysis methods conform to 40 CFR Part 136? NA	
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COMMENTS:

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Operation		Reagents:(include usage rates, if known)
Hours/day: 10	Days/week: 5-6	
FTEs needed to operate:		
Clarifier volume:	Effluent filtration media:(if applicable)	
Description of overall condition:		

8. Has the facility experienced any operational/upset problems since the last inspection? If so, describe.

NO

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9. Sludge/Hauled Waste Disposal (Complete the table for facilities that generate sludge or haul regulated wastes)

Sludge dewatering method:	Moisture content:	Amount generated, 55gal bbl/mo.:	Disposal method:
Storage (bbls):		Hazardous?:	Shipment frequency:
Sludge Hauler(s):		Disposal location:	

COMMENTS:

VI. FOR INDUSTRIES SUBJECT TO CATEGORICAL PRETREATMENT STANDARDS

10. Electroplating/Metal Finishing:

NA

Regulated Process(es) (eg. Zinc plating, Chemical etching, etc):		Hours of operation:
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Does the facility ever phosphatize galvanized mtl.?		
Does the facility use Cyanide? no	In what process(es):	Method of destruction:
Has the facility investigated a replacement for CN?		
Does facility use Hex Chrome? no	Method of reduction to trivalent state:	

Plating Methods	Rinsing Methods and Rates (gpm)		
	Countercurrent	Parallel	Dead Rinse
Barrel,%:			
Rack,%:			

COMMENTS:

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Applicable Standard(s):			
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</table>

VII. NOTES

Permit # CN-00016

INDUSTRIAL USER PERMIT

In accordance with the provisions of The General Ordinances, Chapter 700, of the City of Neosho.

K&S Wire Production
300 Nelson Ave
Neosho, MO 64850

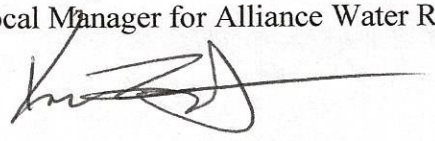
is hereby authorized to discharge industrial wastewater from the above identified facility and through the outfalls identified herein into the City of Neosho sewer system in accordance with the conditions set forth in this permit. Compliance with this permit does not relieve the permittee of it's obligation to comply with any or all applicable pretreatment regulations, standards or requirements under Local, State and Federal laws, including such regulations, standards, requirements, or laws that may become effective during the term of this permit.

Noncompliance with any term or condition of this permit shall constitute a violation of the City of Neosho's sewer use ordinance.

This permit shall become effective on **June 1, 2020** and shall expire at midnight on **May 31 , 2023**

If the permittee wishes to continue the discharge after the expiration date of this permit, an application must be filed for a renewal permit in accordance with the requirements of Sec. 705-490 of the City of Neosho's sewer use ordinance, a minimum of 90 days prior to the expiration date.

Ken Brady
Local Manager for Alliance Water Resources



Issued this 1st day of June, 2020.

Part I

A. DISCHARGE POINTS

1. Location of Discharge Point (s)

Discharge point # 1 inside main building

B. Effluent Limitations and Monitoring Requirements

The permittee is authorized to discharge from discharge point(s), With serial numbers as specified above in Part 1 Section A. The effluent limitations shall become effective upon issuance and remain in effect until expiration of the permit. Discharges shall be controlled, limited and monitored by the permittee as specified.

Discharge Limitations

Effluent Characteristics	Concentration in mg/I Monthly Average	Daily Maximum	Minimum Monitoring Requirements Measurement Frequency	Sample ~	
Discharge Point 1					
Arsenic	0.069		1/6 months		**
Cadmium	0.09	0.69	1/6 months		**
Copper	1.00	3.38	1/6 months		**
Chromium	1.52	2.77	1/6 months		**
Cyanide	0.032	1.20	1/6 months		grab
Lead	0.4	0.69	1/6 months		**
Mercury	0.007		1/6months		**
Nickel	1.50	3.98	1/6 months		**
Phenols	1.00		1/6 months		grab
Silver	0.24	0.43	1/6 months		**
Zinc	0.69	2.03	1/6 months		**
Flow			monthly	total	
PH	**		1/6 months	grab	
Zinc	0.69	2.03	1/6 months		**
Sulfate		4700	1/6 months		**
TTO		2.13	1/6 months		**
Iron			1/6 months		**
Oil & Grease		200	1/6 months		grab

(*) Sampling shall be done at time of discharge from metal cleaning process
** 24-Hour Composite
** pH is measured in pH units and is not averaged. The pH is limited to the range
* **6.0 to 9.0**
**** When the suspended solids or BOD concentration exceed the following Levels, a sewer surcharge shall be levied.

1. Suspended Solids in excess of 250 mg/1 - $0.16 per pound.
2. BOD in excess of 250 mg/1, $0.20 per pound.

This charge will be in addition to the monthly minimum plus volumetric charges.

B. MONITORING AND SAMPLING

1. Representative Sampling

Samples and measurements taken as required herein shall be representative of the volume and nature of the monitors discharge.

2. Reporting

Where self monitoring is required by the permittee or under federal and state regulation, results shall be submitted to the City in a semiannual report due on July 20, and January 20, unless more frequent monitoring is required. Self-monitoring reports shall be signed by an authorized representative of the reporting facility. The monitoring report shall indicate the concentration of pollutants in the effluent limitations stated in this permit. In addition, this report shall include a record of measured or estimated average flows for the reporting period.
Reports shall be submitted to:

Superintendent
Water and Wastewater Office
15318 Kentucky Rd.
Neosho, MO 64850

3. Test Procedures

Test procedures for the analysis of pollutants shall conform to regulations published pursuant to Section 304(g) of the Act and contained in 40 CFR Part 136 and amendments thereto or with any other test procedures approved by the US EPA.

4. Recording of Results

For each measurement or sample taken pursuant to the requirements of this permit, the permittee shall record the following information:

a. The exact place, date and time of sampling;
b. The dates the analyses were performed;
c. The person(s) who performed the analyses;
d. The analytical techniques or methods used; and
e. The results of all required analyses.

5. Additional Monitoring By Permittee

If the permittee monitors any pollutant at the location(s) designated herein more frequently than required by this permit, using approved analytical methods as specified above, the results of such monitoring shall be included in the reporting of the values required in the discharge monitoring report.

6. Records Retention

All records and information resulting from the monitoring activities required by this permit including all record of analyses performed and calibration and maintenance of instrumentation shall be retained for a minimum of three (3) years or longer if requested by the City.

7. Monitoring of TTO's

In lieu of required monitoring for TTO's, the permittee can submit to the City a solvent management plan that specifies to the satisfaction of the City:

1. The toxic organic compounds used.
2. The method of disposal.
3. Procedures for ensuring that toxic organics do not spill or leak into the wastewater system.

The following certification statement shall be included in the permittee's semi-annual monitoring report:

"Based on my inquiry of the person or persons directly responsible for managing compliance with the permit limitation for total toxic organics (TTO), I certify that to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewater has occurred since filing of the last discharge monitoring report. I further certify that this facility is implementing the toxic organic management plan submitted to the permitting authority."

8. Definitions

a. "City" or "the City" refers to the City of Neosho or to the City Council of Neosho, Missouri.

b. "Act" or "the Act" refers to the Federal Water Pollution Control Act, also known as the Clean Water Act, as amended 33 U.S.C. 1251 et. seq.

c. The "monthly average" shall be the highest allowable average of discharges over a calendar month, calculated as the sum of all daily discharges measured during a calendar month divided by the number of daily discharges measured during that month.

d. A "grab sample" shall be an individual sample collected in less than 15 minutes.

e.

f. A "composite sample" is a combination of individual samples obtained at regular intervals over a time period. A 24-hour composite sample consists of several effluent portions collected

in a 24 hour period and composited according to flow if flow measurement devices are present at the sampling point otherwise composited in equal volumes.

g. "Pretreatment ordinance" refers to General Ordinances, Chapter 700 governing the use of the City's sewer system.

PART II

A. MANAGEMENT REQUIREMENTS

1. Change in Discharge

All discharges authorized shall be consistent with the terms and conditions of this permit. The discharge of any pollutant identified in this permit more frequently than or at a level in excess of that authorized shall constitute a violation of the permit. Any anticipated facility expansion, additions, or modifications, as well as any new industrial discharge or substantial change in an existing industrial discharge to the treatment system, which will result in new, different, or increased discharges of pollutants must be reported by submission of a new permit application or , if such changes will not violate the effluent limitations specified in this permit, by notice to the Superintendent of the wastewater treatment plant. Following such notice, the permit may be modified to reflect any necessary changes in permit conditions or to specify and limit any pollutants not previously limited. In no case are any new connections, increased flows or major changes in influent quality permitted that will cause violation of the stated limitations.

2. Accidental Discharge Report

If for any reason, the permittee does not comply with or will be unable to comply with any effluent limitation specified in this permit due to an unusual or extraordinary occurrence, the permittee shall immediately notify and provide the Superintendent of the wastewater treatment plant with the following information, in writing, within five (5) days of becoming aware of such condition:

a. A description of the discharge and cause of non-compliance

b. The period of non-compliance, including exact dates and times; or if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate and prevent recurrence of the non-complying discharge.

3. Noncompliance Notification

If the results of the permittee's wastewater analysis indicates that a violation of this permit has occurred, the permittee must:

1. Inform the City of Neosho of the violation within 24 hours

2. Repeat the sampling and pollutant analysis and submit, in writing, the results of this second analysis within 20 days of the first violation.

4. Signatory Requirements

All applications, reports, or information submitted to the City of Neosho must contain the following certification statement and be signed as required in Sections (a) or (b) below:

"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)By a responsible corporate officer, if the Industrial User submitting the reports is a corporation. For the purpose of this paragraph, a responsible corporate officer means:

(I) a president, secretary, treasurer, or vice president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision making functions for the corporation,

(b)By a general partner or proprietor if the Industrial User submitting the reports is a partnership or sole proprietorship respectively.

5. Adverse Impact

The permittee shall take all reasonable steps to minimize any adverse impact to the sewer system and to the wastewater treatment plant resulting from noncompliance with any effluent limitations specified in this permit, including such accelerated or additional monitoring as necessary to determine the nature and impact of the noncomplying discharge. If as a result of noncompliance on the part of the permittee, the wastewater treatment plants efficiency is impended, the permittee shall be assessed the cost incurred by the wastewater treatment plant to meet the requirements of its N.P.D.E.S. permit.

6. Bypassing

Any diversion from or bypass of facilities necessary to maintain compliance with the terms and conditions of this permit is prohibited, except where unavoidable to prevent loss of life or severe property damage. The permittee shall promptly notify the Superintendent of the Wastewater Treatment Plant of such diversion or bypass.

7. Removed Substances

Solids, sludges, filter backwash, or other pollutants removed from or resulting from treatment or control of wastewaters shall be disposed of in a manner such as to prevent any pollutant from such materials from entering the sewer system.

8. Facility Operation and Quality Control

All waste collection, control, treatment and disposal facilities shall be operated in a manner consistent with the following:

a. At all times, all facilities shall be operated as efficiently as possible and in a manner which will minimize upsets and discharges of excessive pollutants.

b. The permittee shall provide an adequate operating staff which is duly qualified to carry out the operation, maintenance and testing functions required to insure compliance with the conditions of this permit.

c. Maintenance of treatment facilities that results in degradation of effluent quality shall be scheduled during non-critical water quality periods and shall be carried out in a manner approved by the permitting authority.

9. Discharge Consistency

The permitee shall maintain and operate the facilities under his control with sufficient personnel, standby equipment, adequate power, an inventory of replacement parts, and a satisfactory contingency plan to assure that the quality of the discharge(s) will meet the effluent limitation requirements.

B. RESPONSIBILITIES

1. Right of Entry

The permittee shall allow the Superintendent of the wastewater treatment plant or his authorized representatives:

a. To enter upon the permittee's premise, accompanied by permittee's representative, where an effluent source is located or in which any records are required to be kept under the terms and conditions of the permit; and

b. At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect with permittee's representative any monitoring method required in this permit; and to sample any discharge or pollutants.

2. Transfer of Ownership or Control

Wastewater discharge permits are issued to a specific user for a specific operation. A wastewater discharge permit shall not be reassigned or transferred or sold to a new owner, new user, different premises, or a new or changed operation without the approval of the City. Any succeeding owner or user shall also comply with the terms and conditions of the existing permit.

3. Availability of Reports

Except for data determined to be confidential, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the wastewater treatment plant. As required by the pretreatment ordinance, effluent data shall not be considered confidential. Knowingly making any false statement on any such report may result in the imposition of penalties as provided for in the pretreatment ordinance.

4. Permit Modification

After notice and opportunity for a hearing, 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:

a. Violations of any terms or conditions of this permit;

b. Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or

c. A change in any condition that requires either a temporary or permanent reduction or elimination of the authorized discharge.

5. Categorical Pretreatment Standards

Notwithstanding Part II, B-4 above, if the US EPA issues a Categorical Pretreatment Standard that is more strict than any of the effluent limitations stated in this permit, this permit shall be revised or modified in accordance with the Categorical Pretreatment Standards and the permittee so notified.

6. Civil and Criminal Liability

Except as provided in permit conditions on "Bypassing" (Part II, A-5) nothing in this permit shall be construed to relieve the permittee from civil or criminal penalties for noncompliance, whether or not such noncompliance is due to factors beyond his control, such as accidents, equipment breakdowns, or labor disputes.

7. Federal, State and Local

Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities or penalties established pursuant to any applicable Federal, State and Local law or regulation.

8. Property Rights

The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any

injury to private property or any invasion of personal rights, nor any infringement of Federal, State or Local laws or regulations.

9. Severability

The provisions of this permit are severable, and if any provision of this permit, or application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

10. Civil Penalties

Any user who is found to have violated an order of the City Council or the orders, rules, regulations and permits issued under City of Neosho Ord. # 1229, shall be fined not less than five hundred dollars ($500) for each offense. Each day on which a violation shall occur or continue shall be deemed a separate and distinct offense. In addition to the penalties, the City may recover reasonable attorneys' fees, court cost, court reporters' fees and other expenses of litigation by appropriate suit at law against the person found to have violated this article.

Requirements for the Industrial Pre-treatment Program

1. Signatory Requirements

All applications, reports, or information submitted to the City of Neosho must contain the following certification statement and be signed as required in Sections (a) or (b) below:

"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)By a responsible corporate officer, if the Industrial User submitting the reports is a corporation. For the purpose of this paragraph, a responsible corporate officer means:

(I) a president, secretary, treasurer, or vice president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision making functions for the corporation,

(b)By a general partner or proprietor if the Industrial User submitting the reports is a partnership or sole proprietorship respectively.

2. Self Monitoring Reports

Self monitoring reports are due on July 20th for the first six months of the year, and also on January 20th for the last six months of the year. These reports shall include the following:

- Record of the measured or estimated average flows for each six month period
- Changes in operations that would affect the wastewater
- Testing or monitoring results, other than what monitoring the City does.
- Signature by an authorized representative of the reporting facility that includes the
- certification statement above.

Reports shall be submitted to:

Superintendent
Water and Wastewater Office

INDUSTRIAL USER PERMIT

In accordance with the provisions of The General Ordinances, Chapter 700, of the City of Neosho.

La-Z-Boy
4301 Howard Bush Dr.
Neosho, MO 64850

is hereby authorized to discharge industrial wastewater from the above identified facility and through the outfalls identified herein into the City of Neosho sewer system in accordance with the conditions set forth in this permit. Compliance with this permit does not relieve the permittee of it's obligation to comply with any or all applicable pretreatment regulations, standards or requirements under Local, State and Federal laws, including such regulations, standards, requirements, or laws that may become effective during the term of this permit.

Noncompliance with any term or condition of this permit shall constitute a violation of the City of Neosho's sewer use ordinance.

This permit shall become effective on **August 5, 2020** and shall expire at midnight on **August 6, 2022**

If the permittee wishes to continue the discharge after the expiration date of this permit, an application must be filed for a renewal permit in accordance with the requirements of Sec. 705-490 of the City of Neosho's sewer use ordinance, a minimum of 90 days prior to the expiration date.

Ken Brady
Local Manager for Alliance Water Resources

Issued this 5th day of Aug, 2020.

Part I

A. DISCHARGE POINTS

1. Location of Discharge Point (s)
Discharge point #1 South Side of Property Along D Highway outside fence in manhole just east of Howard Bush Drive.

B. Effluent Limitations and Monitoring Requirements

The permittee is authorized to discharge from discharge point(s), With serial numbers as specified above in Part 1 Section A. The effluent limitations shall become effective upon issuance and remain in effect until expiration of the permit. Discharges shall be controlled, limited and monitored by the permittee as specified.

Discharge Limitations

	Concentration in mg/l		Minimum Monitoring Requirements	
Effluent Characteristics	Monthly Average	Daily Maximum	Measurement Frequency	Sample Type
Discharge Point 1				
Arsenic	0.069		1/6 months	**
Cadmium	0.09	0.69	monthly	**
Copper	1.00	3.38	monthly	**
Chromium	1.52	2.77	monthly	**
Cyanide	0.032	1.20	monthly	grab
Lead	0.4	0.69	1/6 months	**
Mercury	0.007		1/6months	**
Nickel	1.50	3.98	monthly	**
Phenols	1.00		1/6 months	grab
Silver	0.24	0.43	1/6 months	**
Zinc	0.69	2.03	1/6 months	**
Flow			monthly	total
PH	***	***	monthly	grab
Zinc	0.69	2.03	1/6 months	**
Sulfate		4700	1/6 months	**
TTO		2.13	1/6 months	**
Iron			1/6 months	**
Oil & Grease		200	monthly	grab

(*) Sampling shall be done at time of discharge from metal cleaning process
** 24-Hour Composite
*** pH is measured in pH units and is not averaged. The pH is limited to the range **6.0 to 9.0**
**** When the suspended solids or BOD concentration exceed the following Levels, a sewer surcharge shall be levied.

1. Suspended Solids in excess of 250 mg/1 - $0.16 per pound.
2. BOD in excess of 250 mg/1, $0.20 per pound.

This charge will be in addition to the monthly minimum plus volumetric charges.

B. MONITORING AND SAMPLING

1. Representative Sampling
   Samples and measurements taken as required herein shall be representative of the volume and nature of the monitors discharge.

2. Reporting
   Where self monitoring is required by the permittee or under federal and state regulation, results shall be submitted to the City in a semiannual report due on July 20, and January 20, unless more frequent monitoring is required. Self-monitoring reports shall be signed by an authorized representative of the reporting facility. The monitoring report shall indicate the concentration of pollutants in the effluent limitations stated in this permit. In addition, this report shall include a record of measured or estimated average flows for the reporting period.
   Reports shall be submitted to:

   Utilities Superintendent
   Wastewater Dept.
   15318 Kentucky Rd.
   Neosho, MO 64850

3. Test Procedures
   Test procedures for the analysis of pollutants shall conform to regulations published pursuant to Section 304(g) of the Act and contained in 40 CFR Part 136 and amendments thereto or with any other test procedures approved by the US EPA.

4. Recording of Results
   For each measurement or sample taken pursuant to the requirements of this permit, the permittee shall record the following information:

   a. The exact place, date and time of sampling;
   b. The dates the analyses were performed;
   c. The person(s) who performed the analyses;
   d. The analytical techniques or methods used; and
   e. The results of all required analyses.

5. Additional Monitoring By Permittee
   If the permittee monitors any pollutant at the location(s) designated herein more frequently than required by this permit, using approved analytical methods as specified above, the results of such monitoring shall be included in the reporting of the values required in the discharge monitoring report.

6. Records Retention

All records and information resulting from the monitoring activities required by this permit including all record of analyses performed and calibration and maintenance of instrumentation shall be retained for a minimum of three (3) years or longer if requested by the City.

7. Definitions

a. "City" or "the City" refers to the City of Neosho or to the City Council of Neosho, Missouri.

b. "Act" or "the Act" refers to the Federal Water Pollution Control Act, also known as the Clean Water Act, as amended 33 U.S.C. 1251 et. seq.

c. The "monthly average" shall be the highest allowable average of discharges over a calendar month, calculated as the sum of all daily discharges measured during a calendar month divided by the number of daily discharges measured during that month.

d. A "grab sample" shall be an individual sample collected in less than 15 minutes.

e. A"composite sample" is a combination of individual samples obtained at regular intervals over a time period. A 24-hour composite sample consists of several effluent portions collected in a 24 hour period and composted according to flow if flow measurement devices are present at the sampling point otherwise composited in equal volumes.

f. "Pretreatment ordinance" refers to General Ordinances, Chapter 700 governing the use of the City's sewer system.

PART II

A. MANAGEMENT REQUIREMENTS

1. Change in Discharge

All discharges authorized shall be consistent with the terms and conditions of this permit. The discharge of any pollutant identified in this permit more frequently than or at a level in excess of that authorized shall constitute a violation of the permit. Any anticipated facility expansion, additions, or modifications, as well as any new industrial discharge or substantial change in an existing industrial discharge to the treatment system, which will result in new, different, or increased discharges of pollutants must be reported by submission of a new permit application, or if such changes will not violate the effluent limitations specified in this permit, by notice to the Superintendent of the wastewater treatment plant. Following such notice, the permit may be modified to reflect any necessary changes in permit conditions or to specify and limit any pollutants not previously limited. In no case are any new connections, increased flows or major changes in influent quality permitted that will cause violation of the stated limitations.

2. Accidental Discharge Report

If for any reason, the permittee does not comply with or will be unable to comply with any effluent limitation specified in this permit due to an unusual or extraordinary occurrence, the permittee shall immediately notify and provide the Superintendent of the wastewater treatment plant with the following information, in writing, within five (5) days of becoming aware of such condition:

a. A description of the discharge and cause of non-compliance

b. The period of non-compliance, including exact dates and times; or if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate and prevent recurrence of the non-complying discharge.

c. A description of the discharge and cause of non-compliance

d. The period of non-compliance, including exact dates and times; or if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate and prevent recurrence of the non-complying discharge.

3. Noncompliance Notification

If the results of the permittee's wastewater analysis indicates that a violation of this permit has occurred, the permittee must:

1. Inform the City of Neosho of the violation within 24 hours

2. Repeat the sampling and pollutant analysis and submit, in writing, the results of this second analysis within 20 days of the first violation.

4. Signatory Requirements

All applications, reports, or information submitted to the City of Neosho must contain the following certification statement and be signed as required in Sections (a) or (b) below:

"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)By a responsible corporate officer, if the Industrial User submitting the reports is a corporation. For the purpose of this paragraph, a responsible corporate officer means:

(I) a president, secretary, treasurer, or vice president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision making functions for the corporation,

(b)By a general partner or proprietor if the Industrial User submitting the reports is a partnership or sole proprietorship respectively.

5. Adverse Impact

The permittee shall take all reasonable steps to minimize any adverse impact to the sewer system and to the wastewater treatment plant resulting from noncompliance with any effluent limitations specified in this permit, including such accelerated or additional monitoring as necessary to determine the nature and impact of the noncomplying discharge. If as a result of noncompliance on the part of the permittee, the wastewater treatment plants efficiency is impended, the permittee shall be assessed the cost incurred by the wastewater treatment plant to meet the requirements of its N.P.D.E.S. permit.

6. Bypassing

Any diversion from or bypass of facilities necessary to maintain compliance with the terms and conditions of this permit is prohibited, except where unavoidable to prevent loss of life or severe property damage. The permittee shall promptly notify the Superintendent of the Wastewater Treatment Plant of such diversion or bypass.

7. Removed Substances

Solids, sludges, filter backwash, or other pollutants removed from or resulting from treatment or control of wastewaters shall be disposed of in a manner such as to prevent any pollutant from such materials from entering the sewer system.

8. Facility Operation and Quality Control

All waste collection, control, treatment and disposal facilities shall be operated in a manner consistent with the following:

a. At all times, all facilities shall be operated as efficiently as possible and in a manner which will minimize upsets and discharges of excessive pollutants.

b. The permittee shall provide an adequate operating staff which is duly qualified to carry out the operation, maintenance and testing functions required to insure compliance with the conditions of this permit.

c. Maintenance of treatment facilities that results in degradation of effluent quality shall be scheduled during non-critical water quality periods and shall be carried out in a manner approved by the permitting authority.

9. Discharge Consistency

The permitee shall maintain and operate the facilities under his control with sufficient personnel, standby equipment, adequate power, an inventory of replacement parts, and a satisfactory contingency plan to assure that the quality of the discharge(s) will meet the effluent limitation requirements.

B. RESPONSIBILITIES

1. Right of Entry

The permittee shall allow the Superintendent of the wastewater treatment plant or his authorized representatives:

a. To enter upon the permittee's premise, accompanied by permittee's representative, where an effluent source is located or in which any records are required to be kept under the terms and conditions of the permit; and

b. At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect with permittee's representative any monitoring method required in this permit; and to sample any discharge or pollutants.

2. Transfer of Ownership or Control

Wastewater discharge permits are issued to a specific user for a specific operation. A wastewater discharge permit shall not be reassigned or transferred or sold to a new owner, new user, different premises, or a new or changed operation without the approval of the City. Any succeeding owner or user shall also comply with the terms and conditions of the existing permit.

3. Availability of Reports

Except for data determined to be confidential, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the wastewater treatment plant. As required by the pretreatment ordinance, effluent data shall not be considered confidential. Knowingly making any false statement on any such report may result in the imposition of penalties as provided for in the pretreatment ordinance.

4. Permit Modification

After notice and opportunity for a hearing, 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:

a. Violations of any terms or conditions of this permit;

b. Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or

c. A change in any condition that requires either a temporary or permanent reduction or elimination of the authorized discharge.

5. Categorical Pretreatment Standards

Notwithstanding Part II, B-4 above, if the US EPA issues a Categorical Pretreatment Standard that is more strict than any of the effluent limitations stated in this permit, this permit shall be revised or modified in accordance with the Categorical Pretreatment Standards and the permittee so notified.

6. Civil and Criminal Liability

Except as provided in permit conditions on "Bypassing" (Part II, A-5) nothing in this permit shall be construed to relieve the permittee from civil or criminal penalties for noncompliance, whether or not such noncompliance is due to factors beyond his control, such as accidents, equipment breakdowns, or labor disputes.

7. Federal, State and Local

Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities or penalties established pursuant to any applicable Federal, State and Local law or regulation.

8. Property Rights

The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State or Local laws or regulations.

9. Severability

The provisions of this permit are severable, and if any provision of this permit, or application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

10. Civil Penalties

Any user who is found to have violated an order of the City Council or the orders, rules, regulations and permits issued under City of Neosho Ord. # 1229, shall be fined not less than five hundred dollars ($500) for each offense. Each day on which a violation shall occur or continue shall be deemed a separate and distinct offense. In addition to the penalties, the City may recover reasonable attorneys' fees, court cost, court reporters' fees and other expenses of litigation by appropriate suit at law against the person found to have violated this article.

Part III

OTHER REQUIREMENTS

1. Facility Descriptions

   The facility manufactures chairs and sofas.
   This facility has a metal finish department that manufactures, cleans and paints metal components.
   Cleaning process is a phosphate cleaning that is a closed loop system.
   Discharge is done periodically as needed.

2. Additional Monitoring and Reporting Requirements

Pace Analytical Services, LLC
9608 Loiret Blvd.
Lenexa, KS 66219
(913)599-5665

November 24, 2021

Ken Brady
Alliance Water Resources
200 Nelson Ave
Neosho, MO 64850

RE: Project: LAZY BOY MONTHLY SAMPLING
Pace Project No.: 60385791

Dear Ken Brady:

Enclosed are the analytical results for sample(s) received by the laboratory on November 10, 2021. The results relate only to the samples included in this report. Results reported herein conform to the applicable TNI/NELAC Standards and the laboratory's Quality Manual, where applicable, unless otherwise noted in the body of the report.

The test results provided in this final report were generated by each of the following laboratories within the Pace Network:

- Pace Analytical Services - Kansas City
- Pace Analytical Services - SE Kansas

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

Sincerely,

Angie Brown for
Jeffrey Shopper
jeff.shopper@pacelabs.com
1(913)563-1408
Project Manager

Enclosures

cc: Jane Brozek, City of Neosho, MO
Jake Lanke, Alliance Water Resources
Crowder Plant Operator, Crowder Plant Operator

Pace Analytical Services, LLC
9608 Loiret Blvd.
Lenexa, KS 66219
(913)599-5665

CERTIFICATIONS

Project: LAZY BOY MONTHLY SAMPLING
Pace Project No.: 60385791

Pace Analytical Services Kansas

9608 Loiret Boulevard, Lenexa, KS 66219
Missouri Inorganic Drinking Water Certification #: 10090
Arkansas Drinking Water
Arkansas Certification #: 20-020-0
Arkansas Drinking Water
Illinois Certification #: 2000302021-3
Iowa Certification #: 118
Kansas/NELAP Certification #: E-10116
Louisiana Certification #: 03055
Nevada Certification #: KS000212020-2
Oklahoma Certification #: 9205/9935
Florida: Cert E871149 SEKS WET
Texas Certification #: T104704407-19-12
Utah Certification #: KS000212019-9
Illinois Certification #: 004592
Kansas Field Laboratory Accreditation: # E-92587
Missouri SEKS Micro Certification: 10070

Pace Analytical Services Southeast Kansas

808 West McKay, Frontenac, KS 66763
Arkansas Certification #: 18-016-0
Iowa Certification #: 118
Kansas/NELAP Certification #: E-10426
Louisiana Certification #: 03055
Oklahoma Certification #: 9935
Texas Certification #: T104704407
Utah Certification #: KS00021

REPORT OF LABORATORY ANALYSIS

Pace Analytical Services, LLC
9608 Loiret Blvd.
Lenexa, KS 66219
(913)599-5665

SAMPLE SUMMARY

Project: LAZY BOY MONTHLY SAMPLING
Pace Project No.: 60385791

Lab ID	Sample ID	Matrix	Date Collected	Date Received
60385791001	**LAZY BOY COMP**	Water	11/10/21 08:05	11/10/21 18:20
60385791002	**LAZY BOY GRAB**	Water	11/10/21 09:10	11/10/21 18:20

Pace Analytical Services, LLC
9608 Loiret Blvd.
Lenexa, KS 66219
(913)599-5665

SAMPLE ANALYTE COUNT

Project: LAZY BOY MONTHLY SAMPLING
Pace Project No.: 60385791

Lab ID	Sample ID	Method	Analysts	Analytes Reported	Laboratory
60385791001	**LAZY BOY COMP**	EPA 200.7	MA1	9	PASI-K
		EPA 245.1	CJH	1	PASI-K
		SM 2540D	BLA	1	PASI-K
		SM 5210B	MAP	1	PASI-K
		EPA 300.0	LDB	1	PASI-K
60385791002	**LAZY BOY GRAB**	SM 4500-H+B	TDH	1	PASI-SE
		SM 2550B	TDH	1	PASI-SE
		EPA 1664A	JDS	1	PASI-K
		EPA 420.1	HM1	1	PASI-K
		SM 4500-CN-E	HM1	1	PASI-K

PASI-K = Pace Analytical Services - Kansas City
PASI-SE = Pace Analytical Services - SE Kansas

Pace Analytical Services, LLC
9608 Loiret Blvd.
Lenexa, KS 66219
(913)599-5665

ANALYTICAL RESULTS

Project: LAZY BOY MONTHLY SAMPLING
Pace Project No.: 60385791

Sample: LAZY BOY COMP **Lab ID: 60385791001** Collected: 11/10/21 08:05 Received: 11/10/21 18:20 Matrix: Water

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
200.7 Metals, Total	Analytical Method: EPA 200.7 Preparation Method: EPA 200.7 Pace Analytical Services - Kansas City							
Arsenic	**84.0**	ug/L	10.0	1	11/19/21 11:42	11/23/21 17:32	7440-38-2	
Cadmium	ND	ug/L	5.0	1	11/19/21 11:42	11/23/21 17:32	7440-43-9	
Chromium	**13.3**	ug/L	5.0	1	11/19/21 11:42	11/23/21 17:32	7440-47-3	
Copper	**228**	ug/L	10.0	1	11/19/21 11:42	11/23/21 17:32	7440-50-8	
Iron	**45900**	ug/L	50.0	1	11/19/21 11:42	11/23/21 17:32	7439-89-6	
Lead	ND	ug/L	10.0	1	11/19/21 11:42	11/23/21 17:32	7439-92-1	
Nickel	**193**	ug/L	5.0	1	11/19/21 11:42	11/23/21 17:32	7440-02-0	
Silver	ND	ug/L	7.0	1	11/19/21 11:42	11/23/21 17:32	7440-22-4	
Zinc	**486**	ug/L	50.0	1	11/19/21 11:42	11/23/21 17:32	7440-66-6	
245.1 Mercury	Analytical Method: EPA 245.1 Preparation Method: EPA 245.1 Pace Analytical Services - Kansas City							
Mercury	ND	ug/L	0.20	1	11/22/21 16:18	11/24/21 11:42	7439-97-6	
2540D Total Suspended Solids	Analytical Method: SM 2540D Pace Analytical Services - Kansas City							
Total Suspended Solids	**284**	mg/L	100	1		11/16/21 06:38		
5210B BOD, 5 day	Analytical Method: SM 5210B Preparation Method: SM 5210B Pace Analytical Services - Kansas City							
BOD, 5 day	**62.1**	mg/L	2.0	1	11/11/21 17:33	11/16/21 12:54		
300.0 IC Anions 28 Days	Analytical Method: EPA 300.0 Pace Analytical Services - Kansas City							
Sulfate	**13.6**	mg/L	1.0	1		11/20/21 17:21	14808-79-8	

Sample: LAZY BOY GRAB **Lab ID: 60385791002** Collected: 11/10/21 09:10 Received: 11/10/21 18:20 Matrix: Water

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
Field pH, Electrometric	Analytical Method: SM 4500-H+B Pace Analytical Services - SE Kansas							
Field pH	**8.7**	Std. Units	0.10	1		11/10/21 09:10		
Field Temperature	Analytical Method: SM 2550B Pace Analytical Services - SE Kansas							
Field Temperature	**17.5**	deg C	0.10	1		11/10/21 09:10		
HEM, Oil and Grease	Analytical Method: EPA 1664A Pace Analytical Services - Kansas City							
Oil and Grease	**34.4**	mg/L	4.9	1		11/23/21 10:09		

REPORT OF LABORATORY ANALYSIS

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ANALYTICAL RESULTS

Project: LAZY BOY MONTHLY SAMPLING
Pace Project No.: 60385791

Sample: LAZY BOY GRAB **Lab ID: 60385791002** Collected: 11/10/21 09:10 Received: 11/10/21 18:20 Matrix: Water

Parameters	Results	Units	Report Limit	DF	Prepared	Analyzed	CAS No.	Qual
Phenolics, Total Recoverable	Analytical Method: EPA 420.1 Preparation Method: EPA 420.1 Pace Analytical Services - Kansas City							
Phenolics, Total Recoverable	**0.12**	mg/L	0.050	1	11/17/21 12:09	11/17/21 15:22	64743-03-9	
4500CNE Cyanide, Total	Analytical Method: SM 4500-CN-E Preparation Method: SM 4500-CN-E Pace Analytical Services - Kansas City							
Cyanide	ND	mg/L	0.0050	1	11/22/21 09:15	11/22/21 17:02	57-12-5	

REPORT OF LABORATORY ANALYSIS

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QUALITY CONTROL DATA

Project: LAZY BOY MONTHLY SAMPLING
Pace Project No.: 60385791

QC Batch: 757938
QC Batch Method: EPA 245.1
Analysis Method: EPA 245.1
Analysis Description: 245.1 Mercury
Laboratory: Pace Analytical Services - Kansas City
Associated Lab Samples: 60385791001

METHOD BLANK: 3033268 Matrix: Water
Associated Lab Samples: 60385791001

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Mercury	ug/L	ND	0.20	11/24/21 11:21	

LABORATORY CONTROL SAMPLE: 3033269

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Mercury	ug/L	5	4.7	93	85-115	

MATRIX SPIKE SAMPLE: 3033270

Parameter	Units	60385728001 Result	Spike Conc.	MS Result	MS % Rec	% Rec Limits	Qualifiers
Mercury	ug/L	ND	5	5.0	98	70-130	

MATRIX SPIKE SAMPLE: 3033271

Parameter	Units	60386062004 Result	Spike Conc.	MS Result	MS % Rec	% Rec Limits	Qualifiers
Mercury	ug/L	ND	5	4.8	96	70-130	

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REPORT OF LABORATORY ANALYSIS

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QUALITY CONTROL DATA

Project: LAZY BOY MONTHLY SAMPLING
Pace Project No.: 60385791

QC Batch: 757452
QC Batch Method: EPA 200.7
Analysis Method: EPA 200.7
Analysis Description: 200.7 Metals, Total
Laboratory: Pace Analytical Services - Kansas City
Associated Lab Samples: 60385791001

METHOD BLANK: 3031060 Matrix: Water
Associated Lab Samples: 60385791001

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Arsenic	ug/L	ND	10.0	11/23/21 16:49	
Cadmium	ug/L	ND	5.0	11/23/21 16:49	
Chromium	ug/L	ND	5.0	11/23/21 16:49	
Copper	ug/L	ND	10.0	11/23/21 16:49	
Iron	ug/L	ND	50.0	11/23/21 16:49	
Lead	ug/L	ND	10.0	11/23/21 16:49	
Nickel	ug/L	ND	5.0	11/23/21 16:49	
Silver	ug/L	ND	7.0	11/23/21 16:49	
Zinc	ug/L	ND	50.0	11/23/21 16:49	

LABORATORY CONTROL SAMPLE: 3031061

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Arsenic	ug/L	1000	917	92	85-115	
Cadmium	ug/L	1000	957	96	85-115	
Chromium	ug/L	1000	949	95	85-115	
Copper	ug/L	1000	945	94	85-115	
Iron	ug/L	10000	9530	95	85-115	
Lead	ug/L	1000	929	93	85-115	
Nickel	ug/L	1000	969	97	85-115	
Silver	ug/L	500	459	92	85-115	
Zinc	ug/L	1000	949	95	85-115	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 3031062 3031063

Parameter	Units	60385661001 Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
Arsenic	ug/L	ND	1000	1000	893	919	89	92	70-130	3	20	
Cadmium	ug/L	ND	1000	1000	909	917	91	92	70-130	1	20	
Chromium	ug/L	ND	1000	1000	918	921	92	92	70-130	0	20	
Copper	ug/L	51.9	1000	1000	1010	1020	96	96	70-130	1	20	
Iron	ug/L	541	10000	10000	9780	10100	92	95	70-130	3	20	
Lead	ug/L	ND	1000	1000	885	908	88	91	70-130	3	20	
Nickel	ug/L	ND	1000	1000	917	922	91	92	70-130	0	20	
Silver	ug/L	ND	500	500	456	458	91	92	70-130	0	20	
Zinc	ug/L	466	1000	1000	1390	1410	92	94	70-130	1	20	

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REPORT OF LABORATORY ANALYSIS

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QUALITY CONTROL DATA

Project: LAZY BOY MONTHLY SAMPLING
Pace Project No.: 60385791

MATRIX SPIKE SAMPLE: 3031064

Parameter	Units	60385791001 Result	Spike Conc.	MS Result	MS % Rec	% Rec Limits	Qualifiers
Arsenic	ug/L	84.0	1000	993	91	70-130	
Cadmium	ug/L	ND	1000	940	94	70-130	
Chromium	ug/L	13.3	1000	940	93	70-130	
Copper	ug/L	228	1000	1210	98	70-130	
Iron	ug/L	45900	10000	55500	97	70-130	
Lead	ug/L	ND	1000	918	91	70-130	
Nickel	ug/L	193	1000	1140	95	70-130	
Silver	ug/L	ND	500	459	92	70-130	
Zinc	ug/L	486	1000	1440	96	70-130	

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REPORT OF LABORATORY ANALYSIS

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QUALITY CONTROL DATA

Project: LAZY BOY MONTHLY SAMPLING
Pace Project No.: 60385791

QC Batch: 757323
QC Batch Method: SM 4500-H+B
Analysis Method: SM 4500-H+B
Analysis Description: Field pH, Electrometric
Laboratory: Pace Analytical Services - SE Kansas

Associated Lab Samples: 60385791002

SAMPLE DUPLICATE: 3030572

Parameter	Units	60385791002 Result	Dup Result	RPD	Max RPD	Qualifiers
Field pH	Std. Units	8.7	8.7	0	5	

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REPORT OF LABORATORY ANALYSIS

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QUALITY CONTROL DATA

Project: LAZY BOY MONTHLY SAMPLING
Pace Project No.: 60385791

QC Batch: 757924
QC Batch Method: EPA 1664A
Analysis Method: EPA 1664A
Analysis Description: 1664 HEM, Oil and Grease
Laboratory: Pace Analytical Services - Kansas City
Associated Lab Samples: 60385791002

METHOD BLANK: 3033192 Matrix: Water
Associated Lab Samples: 60385791002

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Oil and Grease	mg/L	ND	5.0	11/23/21 10:08	

LABORATORY CONTROL SAMPLE: 3033193

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Oil and Grease	mg/L	40	37.5	94	78-114	

MATRIX SPIKE SAMPLE: 3033194

Parameter	Units	60385598004 Result	Spike Conc.	MS Result	MS % Rec	% Rec Limits	Qualifiers
Oil and Grease	mg/L	1050	111	1180	111	78-114	

SAMPLE DUPLICATE: 3033195

Parameter	Units	60385715001 Result	Dup Result	RPD	Max RPD	Qualifiers
Oil and Grease	mg/L	<1.3	ND		18	

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QUALITY CONTROL DATA

Project: LAZY BOY MONTHLY SAMPLING
Pace Project No.: 60385791

QC Batch: 756426
QC Batch Method: SM 2540D
Analysis Method: SM 2540D
Analysis Description: 2540D Total Suspended Solids
Laboratory: Pace Analytical Services - Kansas City
Associated Lab Samples: 60385791001

METHOD BLANK: 3027053 Matrix: Water
Associated Lab Samples: 60385791001

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Total Suspended Solids	mg/L	ND	5.0	11/16/21 06:38	

SAMPLE DUPLICATE: 3027054

Parameter	Units	60385692003 Result	Dup Result	RPD	Max RPD	Qualifiers
Total Suspended Solids	mg/L	231	238	3	10	

SAMPLE DUPLICATE: 3027055

Parameter	Units	60385694002 Result	Dup Result	RPD	Max RPD	Qualifiers
Total Suspended Solids	mg/L	221	215	3	10	

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QUALITY CONTROL DATA

Project: LAZY BOY MONTHLY SAMPLING
Pace Project No.: 60385791

QC Batch: 755817
QC Batch Method: SM 5210B
Analysis Method: SM 5210B
Analysis Description: 5210B BOD, 5 day
Laboratory: Pace Analytical Services - Kansas City
Associated Lab Samples: 60385791001

METHOD BLANK: 3024565 Matrix: Water
Associated Lab Samples: 60385791001

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
BOD, 5 day	mg/L	ND	2.0	11/16/21 12:40	

LABORATORY CONTROL SAMPLE: 3024566

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
BOD, 5 day	mg/L	198	183	92	85-115	

SAMPLE DUPLICATE: 3024567

Parameter	Units	60385580002 Result	Dup Result	RPD	Max RPD	Qualifiers
BOD, 5 day	mg/L	ND	ND		17	

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QUALITY CONTROL DATA

Project: LAZY BOY MONTHLY SAMPLING
Pace Project No.: 60385791

QC Batch: 756749
QC Batch Method: EPA 300.0
Analysis Method: EPA 300.0
Analysis Description: 300.0 IC Anions
Laboratory: Pace Analytical Services - Kansas City
Associated Lab Samples: 60385791001

METHOD BLANK: 3028333 Matrix: Water
Associated Lab Samples: 60385791001

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Sulfate	mg/L	ND	1.0	11/18/21 19:27	

METHOD BLANK: 3032298 Matrix: Water
Associated Lab Samples: 60385791001

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Sulfate	mg/L	ND	1.0	11/20/21 15:11	

METHOD BLANK: 3033018 Matrix: Water
Associated Lab Samples: 60385791001

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Sulfate	mg/L	ND	1.0	11/19/21 06:44	

METHOD BLANK: 3035246 Matrix: Water
Associated Lab Samples: 60385791001

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Sulfate	mg/L	ND	1.0	11/24/21 07:22	

METHOD BLANK: 3035260 Matrix: Water
Associated Lab Samples: 60385791001

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Sulfate	mg/L	ND	1.0	11/21/21 13:18	

LABORATORY CONTROL SAMPLE: 3028334

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Sulfate	mg/L	5	5.5	110	90-110	

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REPORT OF LABORATORY ANALYSIS

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QUALITY CONTROL DATA

Project: LAZY BOY MONTHLY SAMPLING
Pace Project No.: 60385791

LABORATORY CONTROL SAMPLE: 3032299

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Sulfate	mg/L	5	5.4	108	90-110	

LABORATORY CONTROL SAMPLE: 3033019

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Sulfate	mg/L	5	5.2	105	90-110	

LABORATORY CONTROL SAMPLE: 3035247

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Sulfate	mg/L	5	5.0	100	90-110	

LABORATORY CONTROL SAMPLE: 3035261

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Sulfate	mg/L	5	4.9	98	90-110	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 3028335 3028336

Parameter	Units	60385861001 Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
Sulfate	mg/L	41.5	25	25	68.8	68.9	109	109	80-120	0	15	

MATRIX SPIKE & MATRIX SPIKE DUPLICATE: 3028338 3028339

Parameter	Units	60385866001 Result	MS Spike Conc.	MSD Spike Conc.	MS Result	MSD Result	MS % Rec	MSD % Rec	% Rec Limits	RPD	Max RPD	Qual
Sulfate	mg/L	41.7	25	25	68.1	68.4	105	107	80-120	1	15	

SAMPLE DUPLICATE: 3028337

Parameter	Units	60385861001 Result	Dup Result	RPD	Max RPD	Qualifiers
Sulfate	mg/L	41.5	41.7	0	15	

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REPORT OF LABORATORY ANALYSIS

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QUALITY CONTROL DATA

Project: LAZY BOY MONTHLY SAMPLING
Pace Project No.: 60385791

SAMPLE DUPLICATE: 3028340

Parameter	Units	60385866001 Result	Dup Result	RPD	Max RPD	Qualifiers
Sulfate	mg/L	41.7	42.4	2	15	

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REPORT OF LABORATORY ANALYSIS

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QUALITY CONTROL DATA

Project: LAZY BOY MONTHLY SAMPLING
Pace Project No.: 60385791

QC Batch: 756692
QC Batch Method: EPA 420.1
Analysis Method: EPA 420.1
Analysis Description: 420.1 Phenolics Macro
Laboratory: Pace Analytical Services - Kansas City

Associated Lab Samples: 60385791002

METHOD BLANK: 3027999 Matrix: Water
Associated Lab Samples: 60385791002

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Phenolics, Total Recoverable	mg/L	ND	0.050	11/17/21 14:58	

LABORATORY CONTROL SAMPLE: 3028000

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Phenolics, Total Recoverable	mg/L	0.25	0.25	99	90-110	

MATRIX SPIKE SAMPLE: 3028001

Parameter	Units	60384688039 Result	Spike Conc.	MS Result	MS % Rec	% Rec Limits	Qualifiers
Phenolics, Total Recoverable	mg/L	ND	0.25	0.22	84	90-110	M1

MATRIX SPIKE SAMPLE: 3028003

Parameter	Units	60385209002 Result	Spike Conc.	MS Result	MS % Rec	% Rec Limits	Qualifiers
Phenolics, Total Recoverable	mg/L	ND	0.25	0.22	78	90-110	M1

SAMPLE DUPLICATE: 3028002

Parameter	Units	60384688041 Result	Dup Result	RPD	Max RPD	Qualifiers
Phenolics, Total Recoverable	mg/L	0.031J	ND		20	

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REPORT OF LABORATORY ANALYSIS

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QUALITY CONTROL DATA

Project: LAZY BOY MONTHLY SAMPLING
Pace Project No.: 60385791

QC Batch: 757779
QC Batch Method: SM 4500-CN-E
Analysis Method: SM 4500-CN-E
Analysis Description: 4500CNE Cyanide, Total
Laboratory: Pace Analytical Services - Kansas City
Associated Lab Samples: 60385791002

METHOD BLANK: 3032452 Matrix: Water
Associated Lab Samples: 60385791002

Parameter	Units	Blank Result	Reporting Limit	Analyzed	Qualifiers
Cyanide	mg/L	ND	0.0050	11/22/21 16:55	

LABORATORY CONTROL SAMPLE: 3032453

Parameter	Units	Spike Conc.	LCS Result	LCS % Rec	% Rec Limits	Qualifiers
Cyanide	mg/L	0.1	0.10	103	69-126	

MATRIX SPIKE SAMPLE: 3032454

Parameter	Units	60386062004 Result	Spike Conc.	MS Result	MS % Rec	% Rec Limits	Qualifiers
Cyanide	mg/L	ND	0.1	0.086	85	55-124	

SAMPLE DUPLICATE: 3032455

Parameter	Units	60386062004 Result	Dup Result	RPD	Max RPD	Qualifiers
Cyanide	mg/L	ND	ND		46	

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REPORT OF LABORATORY ANALYSIS

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QUALIFIERS

Project: LAZY BOY MONTHLY SAMPLING
Pace Project No.: 60385791

DEFINITIONS

DF - Dilution Factor, if reported, represents the factor applied to the reported data due to dilution of the sample aliquot.

ND - Not Detected at or above adjusted reporting limit.

TNTC - Too Numerous To Count

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

MDL - Adjusted Method Detection Limit.

PQL - Practical Quantitation Limit.

RL - Reporting Limit - The lowest concentration value that meets project requirements for quantitative data with known precision and bias for a specific analyte in a specific matrix.

S - Surrogate

1,2-Diphenylhydrazine decomposes to and cannot be separated from Azobenzene using Method 8270. The result for each analyte is a combined concentration.

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.

Reported results are not rounded until the final step prior to reporting. Therefore, calculated parameters that are typically reported as "Total" may vary slightly from the sum of the reported component parameters.

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

TNI - The NELAC Institute.

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: LAZY BOY MONTHLY SAMPLING
Pace Project No.: 60385791

Lab ID	Sample ID	QC Batch Method	QC Batch	Analytical Method	Analytical Batch
60385791001	**LAZY BOY COMP**	EPA 200.7	757452	EPA 200.7	757532
60385791001	**LAZY BOY COMP**	EPA 245.1	757938	EPA 245.1	757991
60385791002	**LAZY BOY GRAB**	SM 4500-H+B	757323		
60385791002	**LAZY BOY GRAB**	SM 2550B	757326		
60385791002	**LAZY BOY GRAB**	EPA 1664A	757924		
60385791001	**LAZY BOY COMP**	SM 2540D	756426		
60385791001	**LAZY BOY COMP**	SM 5210B	755817	SM 5210B	756713
60385791001	**LAZY BOY COMP**	EPA 300.0	756749		
60385791002	**LAZY BOY GRAB**	EPA 420.1	756692	EPA 420.1	757062
60385791002	**LAZY BOY GRAB**	SM 4500-CN-E	757779	SM 4500-CN-E	758067

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Sample Condition Upon Receipt

WO# : 60385791

60385791

Client Name: ALLIANCE WATER

Courier: FedEx ☐ UPS ☐ VIA ☒ Clay ☐ PEX ☐ ECI ☐ Pace ☐ Xroads ☐ Client ☐ 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 ☒ ZPLC

Thermometer Used: D99 **Type of Ice:** Wet Blue None

Cooler Temperature (°C): **As-read** 1.1 **Corr. Factor** -0.2 **Corrected** 0.9

Date and initials of person examining contents: JM 11/11/21

Temperature should be above freezing to 6°C

Chain of Custody present:	☒Yes ☐No ☐N/A	
Chain of Custody relinquished:	☒Yes ☐No ☐N/A	
Samples arrived within holding time:	☒Yes ☐No ☐N/A	
Short Hold Time analyses (<72hr):	☒Yes ☐No ☐N/A	B20 LINE 1
Rush Turn Around Time requested:	☐Yes ☒No ☐N/A	
Sufficient volume:	☒Yes ☐No ☐N/A	
Correct containers used:	☒Yes ☐No ☐N/A	
Pace containers used:	☒Yes ☐No ☐N/A	
Containers intact:	☒Yes ☐No ☐N/A	
Unpreserved 5035A / TX1005/1006 soils frozen in 48hrs?	☐Yes ☐No ☒N/A	
Filtered volume received for dissolved tests?	☐Yes ☐No ☒N/A	
Sample labels match COC: Date / time / ID / analyses	☒Yes ☐No ☐N/A	
Samples contain multiple phases? Matrix: WT	☐Yes ☒No ☐N/A	
Containers requiring pH preservation in compliance? (HNO3, H2SO4, HCl<2; NaOH>9 Sulfide, NaOH>10 Cyanide) (Exceptions: VOA, Micro, O&G, KS TPH, OK-DRO) LOT# 603173 603222	☒Yes ☐No ☐N/A	List sample IDs, volumes, lot #'s of preservative and the date/time added.
Cyanide water sample checks: Lead acetate strip turns dark? (Record only)	☐Yes ☒No	
Potassium iodide test strip turns blue/purple? (Preserve)	☐Yes ☒No	
Trip Blank present:	☐Yes ☒No ☐N/A	
Headspace in VOA vials (>6mm):	☐Yes ☐No ☒N/A	
Samples from USDA Regulated Area: State:	☐Yes ☒No ☐N/A	
Additional labels attached to 5035A / TX1005 vials in the field?	☐Yes ☒No ☐N/A	

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

Person Contacted: _____ Date/Time: _____

Comments/ Resolution: _____

Project Manager Review: Jeffrey Shopper Date: _____

Pace Analytical
www.pacelabs.com

CHAIN-OF-CUSTODY / Analytical Request Document

The Chain-of-Custody is a LEGAL DOCUMENT. All relevant fields must be completed accurately

Page: 1 1

Required Client Information: **Section A**	Required Client Information: **Section B**	**Client Information (Check quote/contract):**	To Be Completed by Pace Analytical Client: **Section C**
Company: Alliance Water Res Neosho	Report To: KENDAL	Requested Due Date:	Quote Reference:
Address: 15318 Kentucky Rd	Copy To:	*TAT: Standard	Project Manager:
Neosho, MO 64850	Invoice To:	* Turn around times less than 14 days subject	Project #:
Phone: 417-451-8075 Fax:	P.O.	laboratory and contractual obligations and may	Profile #: 9408
	Project Name: Lazy Boy Monthly Sampling	in a Rush Turnaround Surcharge.	
	Project Number:	Turn Around Time (TAT) in calender days.	

Required Client Information: **Section D**

Valid Matrix Codes

Matrix	Code
Water	WT
Soil	SL
Oil	OL
Wipe	WP
Air	AR
Tissue	TS
Other	OT

	SAMPLE ID	MATRIX CODE	Composite Start: DATE COLLECTED	Composite Start: TIME COLLECTED	Composite End: DATE COLLECTED	Composite End: TIME COLLECTED	Preservatives: # Containers	Unpreserved	H2SO4	HNO3	HCl	NaOH	Na2S2O3	Methanol	Requested Analysis: Ar, Cd, Cu, Cr, Pb, Hg, Ni	Ag, Zn, Fe, Sulfate	Field pH/Temp, O&Gr	CN, Phenols	BOD,TSS	SEKS Trip	SEKS Field	SEKS Comp	REMARKS / Lab ID
1	LAZY BOY COMP		11/9/21	8:05	11/10/21	8:05	3	2		1					X	X			X	X	X	X	6038591
2	LAZY BOY GRAB				11/10/21	9:10	4		1		2	1					X	X					FieldPH 8.70 Temp 12.5
3																							FieldPH 8.70 Temp 12.5
4																							
5																							
6																							
7																							
8																							
9																							
10																							
11																							

SHIPMENT METHOD	AIRBILL NO.	SHIPPING DATE	ITEM #	RELINQUISHED BY / AFFILIATION	DATE	TIME	ACCEPTED BY / AFFILIATION	DATE	TIME
					11/10/21	1600		11/10	1820

SAMPLE CONDITION:

Temp in C	2.9
Received on Ice	Y / N
Sealed Cooler	Y / N
Sample Intact	Y / N

SAMPLE NOTES:

- [ ] Hach Photo 2 Serial 17110E342903
- [x] Oakton pH 450 Serial 2881231
- [ ] YSI Pro 20i Serial 19A104699
- [ ] Oakton ph 150 Serial 2798093

Additional Comments:

SAMPLER NAME AND SIGNATURE

PRINT Name of SAMPLER: Mike Bodine

SIGNATURE of SAMPLER

DATE Signed: 11/10/21

COC PAGE 1 of 1

SBS
DI
MeOH (only)
BK
Kit

Client: ALLIANCE WATER

Site: LAZY BOY MONTHLY SAMPLING

Sample Container Count

Profile # 9408

Notes

COC Line Item	Matrix	R	VG9H	DG9H	DG9Q	VG9U	DG9U	BG1U	AG1H	AG1U	AG2U	AG3S	AG4U	AG5U	BP1U	BP2U	BP3U	BP1N	BP3N	BP3F	BP3S	BP3C	BP3Z	JGFU	WGKU	ZPLC	DG9M	DG9B				
1															1	1			1		1											
2									2												1	1										
3																																
4																																
5																																
6																																
7																																
8																																
9																																
10																																
11																																
12																																

Container Codes

Glass			
DG9B	40mL bisulfate clear vial	WGKU	8oz clear soil jar
DG9H	40mL HCl amber voa vial	WGFU	4oz clear soil jar
DG9M	40mL MeOH clear vial	WG2U	2oz clear soil jar
DG9Q	40mL TSP amber vial	JGFU	4oz unpreserved amber wide
DG9S	40mL H2SO4 amber vial	AG0U	100mL unores amber glass
DG9T	40mL Na Thio amber vial	AG1H	1L HCl amber glass
DG9U	40mL amber unpreserved	AG1S	1L H2SO4 amber glass
VG9H	40mL HCl clear vial	AG1T	1L Na Thiosulfate clear/amber glass
VG9T	40mL Na Thio. clear vial	AG1U	1liter unpres amber glass
VG9U	40mL unpreserved clear vial	AG2N	500mL HNO3 amber glass
BG1S	1liter H2SO4 clear glass	AG2S	500mL H2SO4 amber glass
BG1U	1liter unpres glass	AG3S	250mL H2SO4 amber glass
BG3H	250mL HCL Clear glass	AG2U	500mL unpres amber glass
BG3U	250mL Unpres Clear glass	AG3U	250mL unpres amber glass
		AG4U	125mL unpres amber glass
		AG5U	100mL unpres amber glass

Plastic	
BP1C	1L NAOH plastic
BP1N	1L HNO3 plastic
BP1S	1L H2SO4 plastic
BP1U	1L unpreserved plastic
BP1Z	1L NaOH, Zn Acetate
BP2C	500mL NAOH plastic
BP2N	500mL HNO3 plastic
BP2S	500mL H2SO4 plastic
BP2U	500mL unpreserved plastic
BP2Z	500mL NaOH, Zn Acetate
BP3C	250mL NaOH plastic
BP3F	250mL HNO3 plastic - field filtered
BP3N	250mL HNO3 plastic
BP3U	250mL unpreserved plastic
BP3S	250mL H2SO4 plastic
BP3Z	250mL NaOH, Zn Acetate
BP4U	125mL unpreserved plastic
BP4N	125mL HNO3 plastic
BP4S	125mL H2SO4 plastic

Misc.	
I	Wipe/Swab
SP5T	120mL Coliform Na Thiosulfate
ZPLC	Ziploc Bag
AF	Air Filter
C	Air Cassettes
R	Terracore Kit
U	Summa Can

Matrix	
WT	Water
SL	Solid
NAL	Non-aqueous Liquid
OL	OIL
WP	Wipe
DW	Drinking Water

INDUSTRIAL USER INSPECTION CHECKLIST

DATE 12/16/2021 TIME 1:00PM

Industry Name: La- z- Boy Midwest			
Location Address	4301 Howard Bush Drive Neosho, MO 64850	Mailing Address	Same
Industry Contacts (w/titles):		FAX:	
Jarrod Newcomb/ EHS MANAGER		Phone: 417-451-54004	
		Phone:	
Products: Furniture			
Raw Materials: Raw Steel, Pre-cut Sewn wood, Pre-sewn uph., polyurethane			
Manufacturing Processes: Assemble Furniture and components (Degreaser, paint/water separator, Rinse tanks)			
Planned Changes to Plant: Phosphatizing process has been started			
Applicable Categorical Standards:	Pollutants of Concern:		
No. of employees: 300	No. of shifts per day: 2	Days worked per week: 4-5	Is production seasonal? No
Employee showers (Y/N): N		Scheduled shutdowns: None	
Number of Outfalls		Sampling Location(s):	
Total: 1	Regulated: 1	Parking lot- South side of plant	
Persons Present During Inspection:			
Industry:		POTW:	

II. WATER BALANCE

1. Complete the following table based on current water consumption.

SOURCE	AVG. FLOW	METERED?
Water company	1,500 GPD	Yes
Private well		
TOTAL:		

2. What are the water uses within the plant? List all processes that use water when completing the table below. Attach a copy of the Plant's process schematic and show the locations from which wastewaters are generated.

WASTEWATER GENERATING PROCESS	AVG. FLOW	BATCH OR CONTINUOUS	BATCH FREQUENCY	MEASURED/ ESTIMATED	TREATED (Y/N)
A. Process	20%				
B.					
C.					
D.					
E.					
F. Contact cooling					
SUBTOTALS:					
G. Boiler blowdown					
H. Evaporation					
I. Non-contact cooling	27%				NA
J. Lawn maintenance					NA
K. Sanitary	51%				
L. In product	1%				NA
M. Other	1%				
TOTAL:	100%				

COMMENTS:

III. MONITORING AND REPORTING

3. Sampling/Reporting Procedures (complete the following table):

Permit Requirements		Industry Practice
Monthly	Sampling Frequency (Pollutants of concern)	
	Sampling Frequency (other Pollutants)	
	Sample type: Metals	
	Sample type: CN, O&G, pH	
	Reporting Frequency	

4. Did the facility sample more frequently than required by the permit in the last reporting period?

NO

Were all results submitted with the industry's reports?

YES

5. Does the facility sample only during periods of process waste discharge or treatment system operation/discharge?

NO

6. Flow Measurement and Sample Analysis

Flow Measurement — Can flows be measured at sampling location? No	
ARE flows measured at sampling location? NA	Measuring device(s): NA
Sample Analysis: — Pollutants analyzed in-house: 0	
Do in-house analysis methods conform to 40 CFR Part 136? NA	
Do contract lab methods conform to 40 CFR Part 136? Yes	

COMMENTS:

VI. WASTEWATER TREATMENT

7. If the industry treats its process wastewaters before discharge to the POTW, complete the following.

Treatment type: Degreaser- Rinse Tank, Water/ Paint Separator- Rinse Tank		Date originally installed: 2016
Design flow:	Treatment - batch or continuous:	
Actual flow:	Discharge - batch or continuous: batch	
Operation	Reagents:(include usage rates, if known)	
Hours/day: 10 / Days/week: 5-6		
FTEs needed to operate:		
Clarifier volume:	Effluent filtration media:(if applicable)	
Description of overall condition:		

8. Has the facility experienced any operational/upset problems since the last inspection? If so, describe.

NO

V. SLUDGE GENERATION/WASTE HAULING

9. Sludge/Hauled Waste Disposal (Complete the table for facilities that generate sludge or haul regulated wastes)

Sludge dewatering method:	Moisture content:	Amount generated, 55gal bbl/mo.:	Disposal method:
Storage (bbls):		Hazardous?:	Shipment frequency:
Sludge Hauler(s):		Disposal location:	

COMMENTS:

VI. FOR INDUSTRIES SUBJECT TO CATEGORICAL PRETREATMENT STANDARDS

10. Electroplating/Metal Finishing:

NA

Regulated Process(es) (eg. Zinc plating, Chemical etching, etc):		Hours of operation:
Does the facility phosphatize? yes	Metallic salts in the phosphoric acid:	Basis mtl. phosphatized:
Does the facility ever phosphatize galvanized mtl.?		
Does the facility use Cyanide? no	In what process(es):	Method of destruction:
Has the facility investigated a replacement for CN?		
Does facility use Hex Chrome? no	Method of reduction to trivalent state:	

Plating Methods	Rinsing Methods and Rates (gpm)		
	Countercurrent	Parallel	Dead Rinse
Barrel,%:			
Rack,%:			

COMMENTS:

11. Production Based Standards (determination of production rates)

Applicable Standard(s):			
Process Qualifying for Allowance (see applicable CFR)	Production Normalizing Parameter (avg daily production rate)		
1			
2			
3			
4			
5			
6			

COMBINED WASTESTREAM FORMULA:

12. Are dilution wastestreams present at the sample location? no

A. Is the combined wastestream formula used at the facility?
1. How are the flows determined?

water usage

B. Should the facility be using the Combined Wastestream Formula?

13. Complete the following if the facility is subject to TTO limits or has chemicals on site that could cause interference or pass through.

<table>
<tr><th>Metal Finishing and Electroplating Industries</th><th>Production Based Standards</th></tr>
<tr><td>Does the facility have a Solvent Management Plan? no</td><td>Is the facility allowed to sample for Oil and Grease as a surrogate parameter?</td></tr>
<tr><td rowspan="3">Chemical Inventory:</td><td>Proximity to floor drains:
no drains</td></tr>
<tr><td>Is chemical containment needed?</td></tr>
<tr><td>Does facility have a spill prevention plan?
yes</td></tr>
<tr><td colspan="2">Does the facility need a spill control plan? Yes</td></tr>
</table>

VII. NOTES

INDUSTRIAL USER PERMIT

In accordance with the provisions of The General Ordinances, Chapter 700, of the City of Neosho.

Opal Foods LLC-Timberview Plant
16194 Highway 59
Neosho, MO 64850

is hereby authorized to discharge industrial wastewater from the above identified facility and through the outfalls identified herein into the City of Neosho sewer system in accordance with the conditions set forth in this permit. Compliance with this permit does not relieve the permittee of it's obligation to comply with any or all applicable pretreatment regulations, standards or requirements under Local, State and Federal laws, including such regulations, standards, requirements, or laws that may become effective during the term of this permit.

Noncompliance with any term or condition of this permit shall constitute a violation of the City of Neosho's sewer use ordinance.

This permit shall become effective on **April 7, 2020** and shall expire at midnight on **April 6, 2023**

If the permittee wishes to continue the discharge after the expiration date of this permit, an application must be filed for a renewal permit in accordance with the requirements of Sec. 705-490 of the City of Neosho's sewer use ordinance, a minimum of 90 days prior to the expiration date.

Ken Brady
Local Manager for Alliance Water Resources

Issued this 7th day of April, 2020.

Part I

A. DISCHARGE LIMITATIONS

1. Location of Discharge Point (s)
   A. Discharge point #1 into the sewer lift station at Timberview processing plant.

2. Effluent Limitations and Monitoring Requirements
   A. The permittee is authorized to discharge from discharge point (s), with serial numbers as specified in Part 1 Section A. The effluent limitations shall become effective upon issuance and remain in effect until expiration of the permit. Discharges shall be controlled, limited and monitored by the permittee as specified.

Discharge Limitations

Effluent Characteristics	Concentration in mg/l Monthly Average	Concentration in mg/l Daily Maximum	Minimum Monitoring Requirements Measurement Frequency	Minimum Monitoring Requirements Sample Type
Discharge Point 1				
pH	***	***	*1/month	grab
Total Suspended Solids		****	*1/month	**
BOD		****	*1/month	**
Oil & Grease		200	*1/month	grab

* This sampling will be conducted by the City.
** 24-Hour Composite
*** pH is measured in pH units and is not averaged. The pH is limited to the range 6.0 to 9.0.
**** When the suspended solids or BOD concentration exceed the following levels, a sewer surcharge shall be levied.

Suspended Solids in excess of 290 mg/l - $.000329 per 1,000 gallons per mg/l.

BOD in excess of 250 mg/l up to 500 mg/l will be assessed at the rate of $.000335 per 1,000 gallons per mg/l.

BOD in excess of 500 mg/l up to 1000 mg/l will be assessed at the rate of $.000500 per 1,000 gallons per mg/l.

BOD in excess of 1000 mg/l will be assessed at the rate of $.000670 per 1,000 gallons per mg/l.

B. MONITORING AND SAMPLING

1. Representative Sampling
   Samples and measurements taken as required herein shall be representative of the volume and nature of the monitores discharge.

2. Reporting
   Where self monitoring is required by the permittee or under federal and state regulation, results shall be submitted to the City in a semiannual report due on July 20, and January 20, unless more frequent monitoring is required. Self-monitoring reports shall be signed by an authorized representative of the reporting facility. The monitoring report shall indicate the concentration of pollutants in the effluent limitations stated in this permit. In addition, this report shall include a record of measured or estimated average flows for the reporting period.
   Reports shall be submitted to:

   Superintendent
   Water and Wastewater Office.
   15318 Kentucky Rd.
   Neosho, MO 64850

3. Test Procedures
   Test procedures for the analysis of pollutants shall conform to regulations published pursuant to Section 304(g) of the Act and contained in 40 CFR Part 136 and amendments thereto or with any other test procedures approved by the US EPA.

4. Recording of Results
   For each measurement or sample taken pursuant to the requirements of this permit, the permittee shall record the following information:

   a. The exact place, date and time of sampling;
   b. The dates the analyses were performed;
   c. The person(s) who performed the analyses;
   d. The analytical techniques or methods used; and
   e. The results of all required analyses.

5. Additional Monitoring By Permittee

If the permittee monitors any pollutant at the location(s) designated herein more frequently than required by this permit, using approved analytical methods as specified above, the results of such monitoring shall be included in the reporting of the values required in the discharge monitoring report.

6. Records Retention

All records and information resulting from the monitoring activities required by this permit including all record of analyses performed and calibration and maintenance of instrumentation shall be retained for a minimum of three (3) years or longer if requested by the City.

7. Definitions

a. "City" or "the City" refers to the City of Neosho or to the City Council of Neosho, Missouri.

b. "Act" or "the Act" refers to the Federal Water Pollution Control Act, also known as the Clean Water Act, as amended 33 U.S.C. 1251 et. seq.

c. The "monthly average" shall be the highest allowable average of discharges over a calendar month, calculated as the sum of all daily discharges measured during a calendar month divided by the number of daily discharges measured during that month.

d. A "grab sample" shall be an individual sample collected in less than 15 minutes.

e. A "composite sample" is a combination of individual samples obtained at regular intervals over a time period. A 24-hour composite sample consists of several effluent portions collected in a 24 hour period and composited according to flow if flow measurement devices are present at the sampling point otherwise composited in equal volumes.

f. "Pretreatment ordinance" refers to General Ordinances, Chapter 700 governing the use of the City's sewer system.

PART II

A. MANAGEMENT REQUIREMENTS

1. Change in Discharge

All discharges authorized shall be consistent with the terms and conditions of this permit. The discharge of any pollutant identified in this permit more frequently than or at a level in excess of that authorized shall constitute a violation of the permit. Any anticipated facility expansion, additions, or modifications, as well as any new industrial discharge or substantial change in an existing industrial discharge to the treatment system, which will result in new, different, or increased discharges of pollutants must be reported by submission of a new permit application or , if such changes will not violate the effluent limitations specified in this permit, by notice to the Superintendent of the wastewater treatment plant. Following such notice, the permit may be modified to reflect any necessary changes in permit conditions or to specify and limit any pollutants not previously limited. In no case are any new connections, increased flows or major changes in influent quality permitted that will cause violation of the stated limitations.

2. Accidental Discharge Report

If for any reason, the permittee does not comply with or will be unable to comply with any effluent limitation specified in this permit due to an unusual or extraordinary occurrence, the permittee shall immediately notify and provide the Superintendent of the wastewater treatment plant with the following information, in writing, within five (5) days of becoming aware of such condition:

a. A description of the discharge and cause of non-compliance

b. The period of non-compliance, including exact dates and times; or if not corrected, the anticipated time the non-compliance is expected to continue, and steps being taken to reduce, eliminate and prevent recurrence of the non-complying discharge.

3. Noncompliance Notification

If the results of the permittee's wastewater analysis indicates that a violation of this permit has occurred, the permittee must:

1. Inform the City of Neosho of the violation within 24 hours

2. Repeat the sampling and pollutant analysis and submit, in writing, the results of this second analysis within 20 days of the first violation.

4. Signatory Requirements

All applications, reports, or information submitted to the City of Neosho must contain the following certification statement and be signed as required in Sections (a) or (b) below:

"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)By a responsible corporate officer, if the Industrial User submitting the reports is a corporation. For the purpose of this paragraph, a responsible corporate officer means:

(I) a president, secretary, treasurer, or vice president of the corporation in charge of a principal business function, or any other person who performs similar policy or decision making functions for the corporation,

(b)By a general partner or proprietor if the Industrial User submitting the reports is a partnership or sole proprietorship respectively.

5. Adverse Impact

The permittee shall take all reasonable steps to minimize any adverse impact to the sewer system and to the wastewater treatment plant resulting from noncompliance with any effluent limitations specified in this permit, including such accelerated or additional monitoring as necessary to determine the nature and impact of the noncomplying discharge. If as a result of noncompliance on the part of the permittee, the wastewater treatment plants efficiency is impended, the permittee shall be assessed the cost incurred by the wastewater treatment plant to meet the requirements of its N.P.D.E.S. permit.

6. Bypassing

Any diversion from or bypass of facilities necessary to maintain compliance with the terms and conditions of this permit is prohibited, except where unavoidable to prevent loss of life or severe property damage. The permittee shall promptly notify the Superintendent of the Wastewater Treatment Plant of such diversion or bypass.

7. Removed Substances

Solids, sludges, filter backwash, or other pollutants removed from or resulting from treatment or control of wastewaters shall be disposed of in a manner such as to prevent any pollutant from such materials from entering the sewer system.

8. Facility Operation and Quality Control

All waste collection, control, treatment and disposal facilities shall be operated in a manner consistent with the following:

a. At all times, all facilities shall be operated as efficiently as possible and in a manner which will minimize upsets and discharges of excessive pollutants.

b. The permittee shall provide an adequate operating staff which is duly qualified to carry out the operation, maintenance and testing functions required to insure compliance with the conditions of this permit.

c. Maintenance of treatment facilities that results in degradation of effluent quality shall be scheduled during non-critical water quality periods and shall be carried out in a manner approved by the permitting authority.

9. Discharge Consistency

The permitee shall maintain and operate the facilities under his control with sufficient personnel, standby equipment, adequate power, an inventory of replacement parts, and a satisfactory contingency plan to assure that the quality of the discharge(s) will meet the effluent limitation requirements.

B. RESPONSIBILITIES

1. Right of Entry

The permittee shall allow the Superintendent of the wastewater treatment plant or his authorized representatives:

a. To enter upon the permittee's premise, accompanied by permittee's representative, where an effluent source is located or in which any records are required to be kept under the terms and conditions of the permit; and

b. At reasonable times to have access to and copy any records required to be kept under the terms and conditions of this permit; to inspect with permittee's representative any monitoring method required in this permit; and to sample any discharge or pollutants.

2. Transfer of Ownership or Control

Wastewater discharge permits are issued to a specific user for a specific operation. A wastewater discharge permit shall not be reassigned or transferred or sold to a new owner, new user, different premises, or a new or changed operation without the approval of the City. Any succeeding owner or user shall also comply with the terms and conditions of the existing permit.

3. Availability of Reports

Except for data determined to be confidential, all reports prepared in accordance with the terms of this permit shall be available for public inspection at the wastewater treatment plant. As required by the pretreatment ordinance, effluent data shall not be considered confidential. Knowingly

making any false statement on any such report may result in the imposition of penalties as provided for in the pretreatment ordinance.

4. Permit Modification

After notice and opportunity for a hearing, 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:

a. Violations of any terms or conditions of this permit;

b. Obtaining this permit by misrepresentation or failure to disclose fully all relevant facts; or

c. A change in any condition that requires either a temporary or permanent reduction or elimination of the authorized discharge.

5. Categorical Pretreatment Standards

Notwithstanding Part II, B-4 above, if the US EPA issues a Categorical Pretreatment Standard that is more strict than any of the effluent limitations stated in this permit, this permit shall be revised or modified in accordance with the Categorical Pretreatment Standards and the permittee so notified.

6. Civil and Criminal Liability

Except as provided in permit conditions on "Bypassing" (Part II, A-5) nothing in this permit shall be construed to relieve the permittee from civil or criminal penalties for noncompliance, whether or not such noncompliance is due to factors beyond his control, such as accidents, equipment breakdowns, or labor disputes.

7. Federal, State and Local

Nothing in this permit shall be construed to preclude the institution of any legal action or relieve the permittee from any responsibilities, liabilities or penalties established pursuant to any applicable Federal, State and Local law or regulation.

8. Property Rights

   The issuance of this permit does not convey any property rights in either real or personal property, or any exclusive privileges, nor does it authorize any injury to private property or any invasion of personal rights, nor any infringement of Federal, State or Local laws or regulations.

9. Severability

   The provisions of this permit are severable, and if any provision of this permit, or application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby.

10. Civil Penalties

    Any user who is found to have violated an order of the City Council or the orders, rules, regulations and permits issued under City of Neosho Ord. # 1229, shall be fined not less than five hundred dollars ($500) for each offense. Each day on which a violation shall occur or continue shall be deemed a separate and distinct offense. In addition to the penalties, the City may recover reasonable attorneys' fees, court cost, court reporters' fees and other expenses of litigation by appropriate suit at law against the person found to have violated this article.

PART III

OTHER REQUIREMENTS

1. Facility Description
   none

2. Additional Monitoring and Reporting Requirements

Self monitoring reports are due on July 20th for the first six months of the year, and also on January 20th for the last six months of the previous year. These reports shall include the following:

- Record of the measured or estimated average flows for each six month period
- Changes in operations that would affect the wastewater
- Testing or monitoring results, other than what monitoring the City does.
- Signature by an authorized representative of the reporting facility that includes
- the certification statement on page 6 under signatory requirements.

Reports shall be submitted to:

Superintendent
Water and Wastewater Office
15318 Kentucky Rd.
Neosho, MO 64850

SAFETY DATA SHEET

Date of issue/Date of revision 21 March 2017
Version 1.01

Section 1. Identification

Product name : ULTRAGUARD LTP57D
Product code : UGLTP57D/DT
Other means of identification : UGLTP57D
Product type : Liquid.

Relevant identified uses of the substance or mixture and uses advised against

Product use : Industrial applications.
Use of the substance/ mixture : Coating. Paints. Painting-related materials.
Uses advised against : Not applicable.

Manufacturer : PPG Industries, Inc.
One PPG Place
Pittsburgh, PA 15272
Emergency telephone number : (412) 434-4515 (U.S.)
(514) 645-1320 (Canada)
01-800-00-21-400 (Mexico)
Technical Phone Number : 1-800-245-2590 (CLEVELAND, OH) 8:00 a.m. - 5:00 p.m. EST

Section 2. Hazards identification

OSHA/HCS status : This material is considered hazardous by the OSHA Hazard Communication Standard (29 CFR 1910.1200).
Classification of the substance or mixture : SKIN IRRITATION - Category 2
SERIOUS EYE DAMAGE - Category 1
SKIN SENSITIZATION - Category 1

GHS label elements
Hazard pictograms :

Signal word : Danger
Hazard statements : Causes serious eye damage.
Causes skin irritation.
May cause an allergic skin reaction.

Section 2. Hazards identification

Precautionary statements

Prevention : Wear protective gloves. Wear eye or face protection. Avoid breathing vapor. Wash hands thoroughly after handling. Contaminated work clothing must not be allowed out of the workplace.

Response : IF ON SKIN: Wash with plenty of soap and water. Wash contaminated clothing before reuse. If skin irritation or rash occurs: Get medical attention. IF IN EYES: Rinse cautiously with water for several minutes. Remove contact lenses, if present and easy to do. Continue rinsing. Immediately call a POISON CENTER or physician.

Storage : Not applicable.

Disposal : Dispose of contents and container in accordance with all local, regional, national and international regulations.

Supplemental label elements : Emits toxic fumes when heated.

Hazards not otherwise classified : None known.

Section 3. Composition/information on ingredients

Substance/mixture : Mixture

Product name : ULTRAGUARD LTP57D

Other means of identification : UGLTP57D

Ingredient name	%	CAS number
sodium dihydrogenorthophosphate	≥10 - <20	7558-80-7
sodium 3-nitrobenzenesulphonate	≥1.0 - ≤5.0	127-68-4
Phosphoric acid, solution	≥1.0 - <5.0	7664-38-2
Alcohols, C9-11, ethoxylated	≥1.0 - ≤5.0	68439-46-3

SUB codes represent substances without registered CAS Numbers.

Any concentration shown as a range is to protect confidentiality or is due to batch variation.

There are no additional ingredients present which, within the current knowledge of the supplier and in the concentrations applicable, are classified as hazardous to health or the environment and hence require reporting in this section.

Occupational exposure limits, if available, are listed in Section 8.

Section 4. First aid measures

If ingestion, irritation, any type of overexposure or symptoms of overexposure occur during or persists after use of this product, contact a POISON CONTROL CENTER, EMERGENCY ROOM OR PHYSICIAN immediately; have Safety Data Sheet information available. Never give anything by mouth to an unconscious or convulsing person.

Description of necessary first aid measures

Eye contact : Remove contact lenses, irrigate copiously with clean, fresh water, holding the eyelids apart for at least 10 minutes and seek immediate medical advice.

Inhalation : Remove to fresh air. Keep person warm and at rest. If not breathing, if breathing is irregular or if respiratory arrest occurs, provide artificial respiration or oxygen by trained personnel.

Section 4. First aid measures

Skin contact : Remove contaminated clothing and shoes. Wash skin thoroughly with soap and water or use recognized skin cleanser. Do NOT use solvents or thinners.

Ingestion : If swallowed, seek medical advice immediately and show this container or label. Keep person warm and at rest. Do NOT induce vomiting.

Most important symptoms/effects, acute and delayed

Potential acute health effects

Eye contact : Causes serious eye damage.

Inhalation : No known significant effects or critical hazards.

Skin contact : Causes skin irritation. May cause an allergic skin reaction.

Ingestion : No known significant effects or critical hazards.

Over-exposure signs/symptoms

Eye contact : Adverse symptoms may include the following:
pain
watering
redness

Inhalation : No specific data.

Skin contact : Adverse symptoms may include the following:
pain or irritation
redness
blistering may occur

Ingestion : Adverse symptoms may include the following:
stomach pains

Indication of immediate medical attention and special treatment needed, if necessary

Notes to physician : In case of inhalation of decomposition products in a fire, symptoms may be delayed. The exposed person may need to be kept under medical surveillance for 48 hours.

Specific treatments : No specific treatment.

Protection of first-aiders : No action shall be taken involving any personal risk or without suitable training. If it is suspected that fumes are still present, the rescuer should wear an appropriate mask or self-contained breathing apparatus. It may be dangerous to the person providing aid to give mouth-to-mouth resuscitation. Wash contaminated clothing thoroughly with water before removing it, or wear gloves.

See toxicological information (Section 11)

Section 5. Fire-fighting measures

Extinguishing media

Suitable extinguishing media : Use an extinguishing agent suitable for the surrounding fire.

Unsuitable extinguishing media : None known.

Specific hazards arising from the chemical : In a fire or if heated, a pressure increase will occur and the container may burst.

Section 5. Fire-fighting measures

Hazardous thermal decomposition products : Decomposition products may include the following materials:
carbon oxides
nitrogen oxides
sulfur oxides
phosphorus oxides
metal oxide/oxides

Special protective actions for fire-fighters : Promptly isolate the scene by removing all persons from the vicinity of the incident if there is a fire. No action shall be taken involving any personal risk or without suitable training.

Special protective equipment for fire-fighters : Fire-fighters should wear appropriate protective equipment and self-contained breathing apparatus (SCBA) with a full face-piece operated in positive pressure mode.

Section 6. Accidental release measures

Personal precautions, protective equipment and emergency procedures

For non-emergency personnel : No action shall be taken involving any personal risk or without suitable training. Evacuate surrounding areas. Keep unnecessary and unprotected personnel from entering. Do not touch or walk through spilled material. Do not breathe vapor or mist. Provide adequate ventilation. Wear appropriate respirator when ventilation is inadequate. Put on appropriate personal protective equipment.

For emergency responders : If specialized clothing is required to deal with the spillage, take note of any information in Section 8 on suitable and unsuitable materials. See also the information in "For non-emergency personnel".

Environmental precautions : Avoid dispersal of spilled material and runoff and contact with soil, waterways, drains and sewers. Inform the relevant authorities if the product has caused environmental pollution (sewers, waterways, soil or air).

Methods and materials for containment and cleaning up

Small spill : Stop leak if without risk. Move containers from spill area. Dilute with water and mop up if water-soluble. Alternatively, or if water-insoluble, absorb with an inert dry material and place in an appropriate waste disposal container. Dispose of via a licensed waste disposal contractor.

Large spill : Stop leak if without risk. Move containers from spill area. Approach release from upwind. Prevent entry into sewers, water courses, basements or confined areas. Wash spillages into an effluent treatment plant or proceed as follows. Contain and collect spillage with non-combustible, absorbent material e.g. sand, earth, vermiculite or diatomaceous earth and place in container for disposal according to local regulations (see Section 13). Dispose of via a licensed waste disposal contractor. Contaminated absorbent material may pose the same hazard as the spilled product. Note: see Section 1 for emergency contact information and Section 13 for waste disposal.

Section 7. Handling and storage

Precautions for safe handling

Protective measures : Put on appropriate personal protective equipment (see Section 8). Persons with a history of skin sensitization problems should not be employed in any process in which this product is used. Do not get in eyes or on skin or clothing. Do not breathe vapor or mist. Do not ingest. If during normal use the material presents a respiratory hazard, use only with adequate ventilation or wear appropriate respirator. Keep in the original container or an approved alternative made from a compatible material, kept tightly closed when not in use. Empty containers retain product residue and can be hazardous. Do not reuse container.

Advice on general occupational hygiene : Eating, drinking and smoking should be prohibited in areas where this material is handled, stored and processed. Workers should wash hands and face before eating, drinking and smoking. Remove contaminated clothing and protective equipment before entering eating areas. See also Section 8 for additional information on hygiene measures.

Conditions for safe storage, including any incompatibilities : Store in accordance with local regulations. Store in original container protected from direct sunlight in a dry, cool and well-ventilated area, away from incompatible materials (see Section 10) and food and drink. Store locked up. Keep container tightly closed and sealed until ready for use. Containers that have been opened must be carefully resealed and kept upright to prevent leakage. Do not store in unlabeled containers. Use appropriate containment to avoid environmental contamination.

Section 8. Exposure controls/personal protection

Control parameters

Occupational exposure limits

Ingredient name	Exposure limits
sodium dihydrogenorthophosphate	None.
sodium 3-nitrobenzenesulphonate	None.
Phosphoric acid, solution	**ACGIH TLV (United States, 3/2016).** STEL: 3 mg/m³ 15 minutes. TWA: 1 mg/m³ 8 hours. **OSHA PEL (United States, 6/2016).** TWA: 1 mg/m³ 8 hours.
Alcohols, C9-11, ethoxylated	None.

Key to abbreviations

A	=	Acceptable Maximum Peak	S	=	Potential skin absorption
ACGIH	=	American Conference of Governmental Industrial Hygienists.	SR	=	Respiratory sensitization
C	=	Ceiling Limit	SS	=	Skin sensitization
F	=	Fume	STEL	=	Short term Exposure limit values
IPEL	=	Internal Permissible Exposure Limit	TD	=	Total dust
OSHA	=	Occupational Safety and Health Administration.	TLV	=	Threshold Limit Value
R	=	Respirable	TWA	=	Time Weighted Average
Z	=	OSHA 29 CFR 1910.1200 Subpart Z - Toxic and Hazardous Substances			

Consult local authorities for acceptable exposure limits.

Recommended monitoring procedures : If this product contains ingredients with exposure limits, personal, workplace atmosphere or biological monitoring may be required to determine the effectiveness of the ventilation or other control measures and/or the necessity to use respiratory protective equipment. Reference should be made to appropriate monitoring standards. Reference to national guidance documents for methods for the determination of hazardous substances will also be required.

Section 8. Exposure controls/personal protection

Appropriate engineering controls : If user operations generate dust, fumes, gas, vapor or mist, use process enclosures, local exhaust ventilation or other engineering controls to keep worker exposure to airborne contaminants below any recommended or statutory limits.

Environmental exposure controls : Emissions from ventilation or work process equipment should be checked to ensure they comply with the requirements of environmental protection legislation. In some cases, fume scrubbers, filters or engineering modifications to the process equipment will be necessary to reduce emissions to acceptable levels.

Individual protection measures

Hygiene measures : Wash hands, forearms and face thoroughly after handling chemical products, before eating, smoking and using the lavatory and at the end of the working period. Appropriate techniques should be used to remove potentially contaminated clothing. Contaminated work clothing should not be allowed out of the workplace. Wash contaminated clothing before reusing. Ensure that eyewash stations and safety showers are close to the workstation location.

Eye/face protection : Chemical splash goggles and face shield.

Skin protection

Hand protection : Chemical-resistant, impervious gloves complying with an approved standard should be worn at all times when handling chemical products if a risk assessment indicates this is necessary. Considering the parameters specified by the glove manufacturer, check during use that the gloves are still retaining their protective properties. It should be noted that the time to breakthrough for any glove material may be different for different glove manufacturers. In the case of mixtures, consisting of several substances, the protection time of the gloves cannot be accurately estimated.

Gloves : butyl rubber

Body protection : Personal protective equipment for the body should be selected based on the task being performed and the risks involved and should be approved by a specialist before handling this product.

Other skin protection : Appropriate footwear and any additional skin protection measures should be selected based on the task being performed and the risks involved and should be approved by a specialist before handling this product.

Respiratory protection : Respirator selection must be based on known or anticipated exposure levels, the hazards of the product and the safe working limits of the selected respirator. If workers are exposed to concentrations above the exposure limit, they must use appropriate, certified respirators. Use a properly fitted, air-purifying or air-fed respirator complying with an approved standard if a risk assessment indicates this is necessary.

Section 9. Physical and chemical properties

Appearance

Physical state : Liquid.

Color : Not available.

Odor : Not available.

Odor threshold : Not available.

pH : 2.6

Melting point : Not available.

Boiling point : >37.78°C (>100°F)

Flash point : Closed cup: Not applicable. [Product does not sustain combustion.]

Section 9. Physical and chemical properties

Auto-ignition temperature : Not available.

Decomposition temperature : Not available.

Flammability (solid, gas) : Not available.

Lower and upper explosive (flammable) limits : Not available.

Evaporation rate : Not available.

Vapor pressure : Not available.

Vapor density : Not available.

Relative density : 1.08

Density (lbs / gal) : 9.01

Solubility : Soluble in the following materials: cold water.

Partition coefficient: n-octanol/water : Not available.

Viscosity : Kinematic (40°C (104°F)): >0.21 cm^2/s (>21 cSt)

Volatility : 82% (v/v), 76.346% (w/w)

% Solid. (w/w) : 23.654

Section 10. Stability and reactivity

Reactivity : No specific test data related to reactivity available for this product or its ingredients.

Chemical stability : The product is stable.

Possibility of hazardous reactions : Under normal conditions of storage and use, hazardous reactions will not occur.

Conditions to avoid : When exposed to high temperatures may produce hazardous decomposition products.
Refer to protective measures listed in sections 7 and 8.

Incompatible materials : Keep away from the following materials to prevent strong exothermic reactions: oxidizing agents, strong alkalis, strong acids.

Hazardous decomposition products : Decomposition products may include the following materials: carbon monoxide, carbon dioxide, smoke, oxides of nitrogen.

Section 11. Toxicological information

Information on toxicological effects

Acute toxicity

Section 11. Toxicological information

Product/ingredient name	Result	Species	Dose	Exposure
sodium dihydrogenorthophosphate	LD50 Oral	Rat	8290 mg/kg	-
sodium 3-nitrobenzenesulphonate	LD50 Oral	Rat	11 g/kg	-
Phosphoric acid, solution	LD50 Dermal	Rabbit	2.74 g/kg	-
	LD50 Oral	Rat	1.25 g/kg	-
Alcohols, C9-11, ethoxylated	LD50 Oral	Rat	1.18 g/kg	-

Conclusion/Summary : There are no data available on the mixture itself.

Irritation/Corrosion

Conclusion/Summary

Skin : There are no data available on the mixture itself.

Eyes : There are no data available on the mixture itself.

Respiratory : There are no data available on the mixture itself.

Sensitization

Conclusion/Summary

Skin : There are no data available on the mixture itself.

Respiratory : There are no data available on the mixture itself.

Mutagenicity

Conclusion/Summary : There are no data available on the mixture itself.

Carcinogenicity

Conclusion/Summary : There are no data available on the mixture itself.

Reproductive toxicity

Conclusion/Summary : There are no data available on the mixture itself.

Teratogenicity

Conclusion/Summary : There are no data available on the mixture itself.

Specific target organ toxicity (single exposure)

Name	Category
sodium dihydrogenorthophosphate	Category 3

Specific target organ toxicity (repeated exposure)

Not available.

Target organs : Contains material which may cause damage to the following organs: upper respiratory tract, skin, eye, lens or cornea.

Aspiration hazard

Not available.

Information on the likely routes of exposure

Potential acute health effects

Eye contact : Causes serious eye damage.

Inhalation : No known significant effects or critical hazards.

Skin contact : Causes skin irritation. May cause an allergic skin reaction.

Section 11. Toxicological information

Ingestion : No known significant effects or critical hazards.

Over-exposure signs/symptoms

Eye contact : Adverse symptoms may include the following:
pain
watering
redness

Inhalation : No specific data.

Skin contact : Adverse symptoms may include the following:
pain or irritation
redness
blistering may occur

Ingestion : Adverse symptoms may include the following:
stomach pains

Delayed and immediate effects and also chronic effects from short and long term exposure

Conclusion/Summary : There are no data available on the mixture itself. If splashed in the eyes, the liquid may cause irritation and reversible damage. Ingestion may cause nausea, diarrhea and vomiting. This takes into account, where known, delayed and immediate effects and also chronic effects of components from short-term and long-term exposure by oral, inhalation and dermal routes of exposure and eye contact.

Short term exposure

Potential immediate effects : There are no data available on the mixture itself.

Potential delayed effects : There are no data available on the mixture itself.

Long term exposure

Potential immediate effects : There are no data available on the mixture itself.

Potential delayed effects : There are no data available on the mixture itself.

Potential chronic health effects

General : Once sensitized, a severe allergic reaction may occur when subsequently exposed to very low levels.

Carcinogenicity : No known significant effects or critical hazards.

Mutagenicity : No known significant effects or critical hazards.

Teratogenicity : No known significant effects or critical hazards.

Developmental effects : No known significant effects or critical hazards.

Fertility effects : No known significant effects or critical hazards.

Numerical measures of toxicity

Acute toxicity estimates

Route	ATE value
Oral Dermal	22329.3 mg/kg 78744.6 mg/kg

Section 12. Ecological information

Toxicity

Not available.

Persistence and degradability

Not available.

Bioaccumulative potential

Product/ingredient name	$LogP_{ow}$	BCF	Potential
sodium 3-nitrobenzenesulphonate	-2.61	5.01	low
Alcohols, C9-11, ethoxylated	-	237	low

Mobility in soil

Soil/water partition coefficient (K_{OC}) : Not available.

Section 13. Disposal considerations

Disposal methods : The generation of waste should be avoided or minimized wherever possible. Disposal of this product, solutions and any by-products should at all times comply with the requirements of environmental protection and waste disposal legislation and any regional local authority requirements. Dispose of surplus and non-recyclable products via a licensed waste disposal contractor. Waste should not be disposed of untreated to the sewer unless fully compliant with the requirements of all authorities with jurisdiction. Waste packaging should be recycled. Incineration or landfill should only be considered when recycling is not feasible. This material and its container must be disposed of in a safe way. Care should be taken when handling emptied containers that have not been cleaned or rinsed out. Empty containers or liners may retain some product residues. Avoid dispersal of spilled material and runoff and contact with soil, waterways, drains and sewers.

Disposal should be in accordance with applicable regional, national and local laws and regulations.

Refer to Section 7: HANDLING AND STORAGE and Section 8: EXPOSURE CONTROLS/PERSONAL PROTECTION for additional handling information and protection of employees. Section 6. Accidental release measures

14. Transport information

	DOT	IMDG	IATA
UN number	Not regulated.	Not regulated.	Not regulated.
UN proper shipping name	-	-	-
Transport hazard class (es)	-	-	-
Packing group	-	-	-

14. Transport information

Environmental hazards	No.	No.	No.
Marine pollutant substances	Not applicable.	Not applicable.	Not applicable.

Additional information

DOT : None identified.

IMDG : None identified.

IATA : None identified.

Special precautions for user : **Transport within user's premises:** always transport in closed containers that are upright and secure. Ensure that persons transporting the product know what to do in the event of an accident or spillage.

Section 15. Regulatory information

United States

United States inventory (TSCA 8b) : All components are listed or exempted.

United States - TSCA 12(b) - Chemical export notification:
sodium 3-nitrobenzenesulphonate One time notification

SARA 302/304

SARA 304 RQ : Not applicable.

Composition/information on ingredients

No products were found.

SARA 311/312

Classification : Immediate (acute) health hazard

Composition/information on ingredients

Name	Fire hazard	Sudden release of pressure	Reactive	Immediate (acute) health hazard	Delayed (chronic) health hazard
sodium dihydrogenorthophosphate	Yes.	No.	No.	Yes.	No.
sodium 3-nitrobenzenesulphonate	Yes.	No.	No.	Yes.	No.
Phosphoric acid, solution	No.	No.	No.	Yes.	No.
Alcohols, C9-11, ethoxylated	No.	No.	No.	Yes.	No.

Additional environmental information is contained on the Environmental Data Sheet for this product, which can be obtained from your PPG representative.

Section 16. Other information

Hazardous Material Information System (U.S.A.)

Health : 3 **Flammability** : 0 **Physical hazards** : 0
(*) - Chronic effects

Caution: HMIS® ratings are based on a 0-4 rating scale, with 0 representing minimal hazards or risks, and 4 representing significant hazards or risks Although HMIS® ratings are not required on MSDSs under 29 CFR 1910.1200, the preparer may choose to provide them. HMIS® ratings are to be used with a fully implemented HMIS® program. HMIS® is a registered mark of the National Paint & Coatings Association (NPCA). HMIS® materials may be purchased exclusively from J. J. Keller (800) 327-6868.

The customer is responsible for determining the PPE code for this material.

National Fire Protection Association (U.S.A.)

Health : 3 **Flammability** : 0 **Instability** : 0

Date of previous issue : **3/9/2017**

Organization that prepared the MSDS : EHS

Key to abbreviations : ATE = Acute Toxicity Estimate
BCF = Bioconcentration Factor
GHS = Globally Harmonized System of Classification and Labelling of Chemicals
IATA = International Air Transport Association
IBC = Intermediate Bulk Container
IMDG = International Maritime Dangerous Goods
LogPow = logarithm of the octanol/water partition coefficient
MARPOL = International Convention for the Prevention of Pollution From Ships, 1973 as modified by the Protocol of 1978. ("Marpol" = marine pollution)
UN = United Nations

Indicates information that has changed from previously issued version.

Disclaimer

The information contained in this data sheet is based on present scientific and technical knowledge. The purpose of this information is to draw attention to the health and safety aspects concerning the products supplied by PPG, and to recommend precautionary measures for the storage and handling of the products. No warranty or guarantee is given in respect of the properties of the products. No liability can be accepted for any failure to observe the precautionary measures described in this data sheet or for any misuse of the products.

From: Dang, Sieu
To: "Ken Brady"
Cc: Blanc, Todd
Subject: RE: Neosho Pretreatment Audit Response
Date: Monday, May 2, 2022 10:46:58 AM

Hi Ken,

Todd indicated that you are partially done with the 2005 Streamlining Rule revision. Can you go ahead with completing the ordinance modification to incorporate the Streamlining Rule first and continue with the local limit evaluation? Also, I noticed the Neosho MSOP expired on April 30, 2022. Have you applied for the permit renewal yet?

Sieu

Sieu T. Dang
Environmental Engineer
Missouri Department of Natural Resources
Southwest Regional Office
2040 W. Woodland
Springfield, MO 65807
417-891-4300

From: Ken Brady <kbrady@alliancewater.com>
Sent: Thursday, April 7, 2022 3:10 PM
To: Dang, Sieu <Sieu.Dang@dnr.mo.gov>
Subject: Neosho Pretreatment Audit Response

Sieu,
Please find attached our response to your letter of warning regarding our most recent pretreatment audit. If you need any further or have any questions, please let me know and I will address them promptly.

Thank you,

Ken Brady
Local Manager ll
Alliance Water Resources, Inc.
15318 Kentucky Rd.
Neosho, MO. 64850
417-451-8080
kbrady@alliancewater.com

WATER RESOURCES®
Alliance
Professional Water and Wastewater Operations

From:	Blanc, Todd
To:	"Robert Sell"
Cc:	James E. DeGruson; Dang, Sieu
Subject:	RE: Neosho Pretreatment Streamlining Rule Update - follow up needed
Date:	Wednesday, May 25, 2022 2:29:50 PM
Attachments:	image003.png image004.png image005.png

Thanks for the update. Progress!! Yes, I recall our conversation about the ERP.

Todd Blanc,
Pretreatment Program / Compliance & Enforcement Section / Water Protection Program /Missouri Department of Natural Resources / PO Box 176 / Jefferson City, Missouri / 65102
Phone: (314) 416-2064
Fax: (314) 416-2970
Email: Todd.Blanc@dnr.mo.gov
Wastewater Pretreatment | Missouri Department of Natural Resources (mo.gov)
Promoting, Protecting and Enjoying our Natural Resources.
Learn more at dnr.mo.gov.

MISSOURI DEPARTMENT OF NATURAL RESOURCES

From: Robert Sell <Bob.Sell@amce.com>
Sent: Wednesday, May 25, 2022 2:24 PM
To: Blanc, Todd <todd.blanc@dnr.mo.gov>
Cc: James E. DeGruson <Eric.DeGruson@amce.com>; Dang, Sieu <Sieu.Dang@dnr.mo.gov>
Subject: RE: Neosho Pretreatment Streamlining Rule Update - follow up needed

Hi Todd,

The City got back with me today. Their next council meeting is June 7. The discussed plan is for the Council to approve formal submission of the SUO revisions to MDNR at that meeting. Shortly after that, the appropriate documentation for the formal submission will be provided to you.

As for the ERP update, the current submission of the SUO revisions is not planned to include that. I believe we discussed back in November that since the revision of the ERP was not, and still is not, in the works, that we would want to just go ahead and get the SUO revisions approved and do the ERP later.

If you have any further concerns or need anything else from me, please let me know.

Thank you!

Bob Sell, P.E.
Civil Engineer
bob.sell@amce.com | www.amce.com
Main: 417.680.7200 | **Direct**: 417.680.7351 | **Cell**: 417.439.7481

ALLGEIER, MARTIN and ASSOCIATES, INC.
Consulting Engineers

From: Blanc, Todd <todd.blanc@dnr.mo.gov>
Sent: Friday, May 20, 2022 3:28 PM
To: Robert Sell <Bob.Sell@amce.com>
Cc: Dang, Sieu <Sieu.Dang@dnr.mo.gov>; James E. DeGruson <Eric.DeGruson@amce.com>
Subject: RE: Neosho Pretreatment Streamlining Rule Update - follow up needed

.... ---- NOT AN AMCE EMAIL ---- ....

Here it is with the commitment to hire you to finish the Streamlining update which you seem to be unaware of.

All we need is the City to follow up on the formal SUO submission and well the ERP too if needed. We need your scope of work to move forward. Thanks for the quick response. You are always responsive. I appreciate that. We can wait until you talk with the City.

Todd Blanc,
Pretreatment Program / Compliance & Enforcement Section / Water Protection Program /Missouri Department of Natural Resources / PO Box 176 / Jefferson City, Missouri / 65102
Phone: (314) 416-2064
Fax: (314) 416-2970
Email: Todd.Blanc@dnr.mo.gov
Wastewater Pretreatment | Missouri Department of Natural Resources (mo.gov)
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MISSOURI DEPARTMENT OF NATURAL RESOURCES

From: Robert Sell <Bob.Sell@amce.com>
Sent: Friday, May 20, 2022 3:17 PM
To: Blanc, Todd <todd.blanc@dnr.mo.gov>
Cc: Dang, Sieu <Sieu.Dang@dnr.mo.gov>; James E. DeGruson <Eric.DeGruson@amce.com>
Subject: RE: Neosho Pretreatment Streamlining Rule Update - follow up needed

Hi Todd,

We are contracted for the local limit evaluation, but we will also be assisting in finishing up the SUO revisions. Let me follow up with the City on this and get back to you on where things stand. I have not see the April 2022 response letter you are referring to. Would you be able to provide that to me?

Thank you,

Bob Sell, P.E.
Civil Engineer
bob.sell@amce.com | www.amce.com
Main: 417.680.7200 | **Direct**: 417.680.7351 | **Cell**: 417.439.7481

ALLGEIER, MARTIN and ASSOCIATES, INC.
Consulting Engineers

From: Blanc, Todd <todd.blanc@dnr.mo.gov>
Sent: Friday, May 20, 2022 2:12 PM
To: Robert Sell <Bob.Sell@amce.com>
Cc: Dang, Sieu <Sieu.Dang@dnr.mo.gov>
Subject: Neosho Pretreatment Streamlining Rule Update - follow up needed

…. ---- NOT AN AMCE EMAIL ---- ….
Hi Robert,

Recall the recent pretreatment audit inspection Letter for Warning to the city of Neosho related to the 2005 Streamlining Rule. The City responded to the LOW but I saw no timeframe in their response for submission of the Streamlining Rule updates. We need the scope of work and timeline from AM that is approved by the City in order for us to be satisfied they will address this needed update in a timely manner.

I understand their wanting to roll both the local limit update with the Streamlining Rule modification….it is easier for the state too. See the attached. Recall in this email the City did not act after AM addressed all of the state's comments on the draft SUO. ….In addition, their April 2022 response letter says they will need to make change the SUO related to the Streamlining Rule which means they (Ken) don't understand the status of this update…

I think we need a commitment from the City and AM with timeframes. By the way, we need a response from the City is the authority, not Alliance. I am okay with Ken sending reports and draft submissions but in the formal submissions must be done by the City (City Manager, possibly).

You are contracted with the City, correct? Can you assist with this endeavor?

Todd Blanc,
Pretreatment Program / Compliance & Enforcement Section / Water Protection Program /Missouri Department of Natural Resources / PO Box 176 / Jefferson City, Missouri / 65102

Phone: (314) 416-2064
Fax: (314) 416-2970
Email: Todd.Blanc@dnr.mo.gov
Wastewater Pretreatment | Missouri Department of Natural Resources (mo.gov)
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MISSOURI DEPARTMENT OF NATURAL RESOURCES

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From:	Robert Sell
To:	Dang, Sieu; Blanc, Todd
Cc:	James E. DeGruson; Willoughby, Randall
Subject:	RE: Neosho Pretreatment Streamlining Rule Update - follow up needed
Date:	Friday, June 24, 2022 2:48:49 PM
Attachments:	image001.png image002.png image003.png

Hi Sieu,

I know that it didn't end up making it on the June 7 council meeting agenda. Let me ask and see if it was passed for submission to MDNR this past Tuesday, the 21st.

Thanks!

Bob Sell, P.E.
Civil Engineer
bob.sell@amce.com | www.amce.com
Main: 417.680.7200 | **Direct**: 417.680.7351 | **Cell**: 417.439.7481

ALLGEIER, MARTIN and ASSOCIATES, INC.
Consulting Engineers

From: Dang, Sieu <Sieu.Dang@dnr.mo.gov>
Sent: Friday, June 24, 2022 2:45 PM
To: Blanc, Todd <todd.blanc@dnr.mo.gov>; Robert Sell <Bob.Sell@amce.com>
Cc: James E. DeGruson <Eric.DeGruson@amce.com>; Willoughby, Randall <randall.willoughby@dnr.mo.gov>
Subject: RE: Neosho Pretreatment Streamlining Rule Update - follow up needed

Hi Bob,

Could you give us an update regarding the status of the submission?

Thanks,

Sieu

Sieu T. Dang
Environmental Engineer
Missouri Department of Natural Resources
Southwest Regional Office
2040 W. Woodland
Springfield, MO 65807
417-891-4300

From: Blanc, Todd <todd.blanc@dnr.mo.gov>
Sent: Wednesday, May 25, 2022 2:30 PM
To: 'Robert Sell' <Bob.Sell@amce.com>
Cc: James E. DeGruson <Eric.DeGruson@amce.com>; Dang, Sieu <Sieu.Dang@dnr.mo.gov>
Subject: RE: Neosho Pretreatment Streamlining Rule Update - follow up needed

Thanks for the update. Progress!! Yes, I recall our conversation about the ERP.

Todd Blanc,
Pretreatment Program / Compliance & Enforcement Section / Water Protection Program /Missouri Department of Natural Resources / PO Box 176 / Jefferson City, Missouri / 65102
Phone: (314) 416-2064
Fax: (314) 416-2970
Email: Todd.Blanc@dnr.mo.gov
Wastewater Pretreatment | Missouri Department of Natural Resources (mo.gov)
Promoting, Protecting and Enjoying our Natural Resources.
Learn more at dnr.mo.gov.

MISSOURI DEPARTMENT OF NATURAL RESOURCES

From: Robert Sell <Bob.Sell@amce.com>
Sent: Wednesday, May 25, 2022 2:24 PM
To: Blanc, Todd <todd.blanc@dnr.mo.gov>
Cc: James E. DeGruson <Eric.DeGruson@amce.com>; Dang, Sieu <Sieu.Dang@dnr.mo.gov>
Subject: RE: Neosho Pretreatment Streamlining Rule Update - follow up needed

Hi Todd,

The City got back with me today. Their next council meeting is June 7. The discussed plan is for the Council to approve formal submission of the SUO revisions to MDNR at that meeting. Shortly after that, the appropriate documentation for the formal submission will be provided to you.

As for the ERP update, the current submission of the SUO revisions is not planned to include that. I believe we discussed back in November that since the revision of the ERP was not, and still is not, in the works, that we would want to just go ahead and get the SUO revisions approved and do the ERP later.

If you have any further concerns or need anything else from me, please let me know.

Thank you!

Bob Sell, P.E.
Civil Engineer
bob.sell@amce.com | www.amce.com
Main: 417.680.7200 | **Direct**: 417.680.7351 | **Cell**: 417.439.7481

ALLGEIER, MARTIN and ASSOCIATES, INC.
Consulting Engineers

From: Blanc, Todd <todd.blanc@dnr.mo.gov>
Sent: Friday, May 20, 2022 3:28 PM
To: Robert Sell <Bob.Sell@amce.com>
Cc: Dang, Sieu <Sieu.Dang@dnr.mo.gov>; James E. DeGruson <Eric.DeGruson@amce.com>
Subject: RE: Neosho Pretreatment Streamlining Rule Update - follow up needed

.... ---- NOT AN AMCE EMAIL ---- ....
Here it is with the commitment to hire you to finish the Streamlining update which you seem to be unaware of.

All we need is the City to follow up on the formal SUO submission and well the ERP too if needed. We need your scope of work to move forward. Thanks for the quick response. You are always responsive. I appreciate that. We can wait until you talk with the City.

Todd Blanc,
Pretreatment Program / Compliance & Enforcement Section / Water Protection Program /Missouri Department of Natural Resources / PO Box 176 / Jefferson City, Missouri / 65102
Phone: (314) 416-2064
Fax: (314) 416-2970
Email: Todd.Blanc@dnr.mo.gov
Wastewater Pretreatment | Missouri Department of Natural Resources (mo.gov)
Promoting, Protecting and Enjoying our Natural Resources.
Learn more at dnr.mo.gov.

MISSOURI DEPARTMENT OF NATURAL RESOURCES

From: Robert Sell <Bob.Sell@amce.com>
Sent: Friday, May 20, 2022 3:17 PM
To: Blanc, Todd <todd.blanc@dnr.mo.gov>
Cc: Dang, Sieu <Sieu.Dang@dnr.mo.gov>; James E. DeGruson <Eric.DeGruson@amce.com>
Subject: RE: Neosho Pretreatment Streamlining Rule Update - follow up needed

Hi Todd,

We are contracted for the local limit evaluation, but we will also be assisting in finishing up the SUO revisions. Let me follow up with the City on this and get back to you on where things stand. I have not see the April 2022 response letter you are referring to. Would you be able to provide that to me?

Thank you,

Bob Sell, P.E.
Civil Engineer
bob.sell@amce.com | www.amce.com
Main: 417.680.7200 | **Direct**: 417.680.7351 | **Cell**: 417.439.7481

ALLGEIER, MARTIN and ASSOCIATES, INC.
Consulting Engineers

From: Blanc, Todd <todd.blanc@dnr.mo.gov>
Sent: Friday, May 20, 2022 2:12 PM
To: Robert Sell <Bob.Sell@amce.com>
Cc: Dang, Sieu <Sieu.Dang@dnr.mo.gov>
Subject: Neosho Pretreatment Streamlining Rule Update - follow up needed

…. ---- NOT AN AMCE EMAIL ---- ….
Hi Robert,

Recall the recent pretreatment audit inspection Letter for Warning to the city of Neosho related to the 2005 Streamlining Rule. The City responded to the LOW but I saw no timeframe in their response for submission of the Streamlining Rule updates. We need the scope of work and timeline from AM that is approved by the City in order for us to be satisfied they will address this needed update in a timely manner.

I understand their wanting to roll both the local limit update with the Streamlining Rule modification….it is easier for the state too. See the attached. Recall in this email the City did not act after AM addressed all of the state's comments on the draft SUO. ….In addition, their April 2022 response letter says they will need to make change the SUO related to the Streamlining Rule which means they (Ken) don't understand the status of this update…

I think we need a commitment from the City and AM with timeframes. By the way, we need a response from the City is the authority, not Alliance. I am okay with Ken sending reports and draft submissions but in the formal submissions must be done by the City (City Manager, possibly).

You are contracted with the City, correct? Can you assist with this endeavor?

Todd Blanc,
Pretreatment Program / Compliance & Enforcement Section / Water Protection Program /Missouri Department of Natural Resources / PO Box 176 / Jefferson City, Missouri / 65102

Phone: (314) 416-2064
Fax: (314) 416-2970
Email: Todd.Blanc@dnr.mo.gov
Wastewater Pretreatment | Missouri Department of Natural Resources (mo.gov)
Promoting, Protecting and Enjoying our Natural Resources.
Learn more at dnr.mo.gov.

MISSOURI DEPARTMENT OF NATURAL RESOURCES

This message has originated from an **External Source**. Please use proper judgment and caution when opening attachments, clicking links, or responding to this email.

This message has originated from an **External Source**. Please use proper judgment and caution when opening attachments, clicking links, or responding to this email.

RECEIVED
03/28/2023
DEQ/SWRO

{City of Neosho}
MO-0104906
PRETREATMENT IMPLEMENTATION ANNUAL REPORT
CALENDAR YEAR 2022

The Environmental Protection Agency's (EPA) pretreatment regulations require approved Publicly-Owned Treatment Works (POTW) pretreatment programs to file an annual report [see 40 CFR 403.12(i)] to the Missouri Department of Natural Resources (Department) to document program status and activities performed during the previous calendar year. Missouri requests information during the previous calendar year from January 1 to December 31. Using the attached table (Part II) please provide a list of all Significant Industrial Users and the other requested information for those facilities regulated by your Pretreatment Program. If any facility was in Significant Noncompliance (SNC) during a six-month reporting period be sure to indicate whether this was for a violation of discharge standards, reporting, or both. If you keep these data in a spreadsheet or database, a printout can be substituted for the table. {***MOCWIS #***} is used for data entry into the Missouri Clean Water Information System (MOCWIS). Please do not delete.
NOTE: Annual report can be used to fulfill requirement under 40 CFR 403.8(f)(6). The pretreatment coordinator may request additional information under this requirement and request a POTW program modification under 40 CFR 403.18 as needed.

NEW: Request for names of Dental Offices in #9 below.

Part I: With respect to the industries regulated under the City's Pretreatment Program, please answer the following questions. Use additional paper if necessary.

1. List by name, those SIUs that did not have a valid control mechanism (indicate: expired or unissued) {***MOCWIS #3***} as of December 31, 2022. Of these industries, indicate those that have been without a control mechanism for greater than 180 days. If your approved Pretreatment program does not require you to issue permits, please indicate.

ALL SIU HAD CURRENT CONTROL MECHANISM

2. List by name those SIUs not sampled by the POTW at least once during calendar year 2022 {***MOCWIS #6***}. ALL SIUs WERE SAMPLED.

3. List by name those SIUs on a compliance schedule {***MOCWIS #8***} as of December 31, 2022, for achieving compliance with discharge standards. Provide the date of projected final compliance. Indicate those facilities currently in violation of any compliance schedule milestones by 90 days or greater.

NO VIOLATION OCCURED

4. List by name those industries for which civil {***MOCWIS #2***} or criminal judicial actions {***MOCWIS #4***} were initiated in the past year. Indicate the amount of any proposed penalties and the amount of penalties collected. NO CIVIL OR CRIMINAL ACTION INITATED

5. List by name those industries for which -
1) written notices of violation (NOV's) {***MOCWIS #12***}, or

2) Administrative orders (AO's) or the equivalent {***MOCWIS #1***}, were issued in response to noncompliance events that occurred in the past calendar year. NO NOV's OR AO's ISSUED

For each industry indicate the total number of each enforcement action type and the amount of penalties collected {***MOCWIS #14***}, if any. NO ACTION OR PENALTIES

6. List by name those industries who were in Significant Noncompliance (SNC) at any time during the calendar year and public noticed in the largest local newspaper {***MOCWIS #9***}. Provide the date of publication. If publication has not yet occurred, please provide the expected date of publication.

NONE

7. Did the POTW have any numerical NPDES violations in 2022? If so, describe.

NO

Were any NPDES violations attributed to interference or pass through?

NO

8. List by name any industry that caused (*see 40 CFR 403.3(k) for the definition of Interference and 40 CFR 403.3(p) for the definition of Pass Through*) in the reporting calendar year from January 1 to December 31{***MOCWIS #15***}: NO INTERFERENCE OCCURED

(a) **interference** within the POTW
(b) **pass through** of pollutants at the wastewater treatment plan
(c) health problems to POTW workers
(d) water quality violations (violation of city's NPDES permit).

For each industry, provide details including information on enforcement actions taken by the city to resolve the violations.

9. List by name the dental offices for which you are regulating under the *40 CFR 441, Dental Office Point Source Category*. List applicable dental offices that remove and replace dental amalgams per 40 CFR 441.10. Indicate those dental offices for which you have received and reviewed a One-Time Compliance Report (OTCR) (Please use separate sheets if needed). Please retain a list and all OTCRs for Department inspection.

DOWNTOWN DENTAL, FAMILY DENTISTRY, FOUR STATE DENTAL
DARRELL HEDRICK DENTAL, HILLSIDE FAMILY DENTAL

I certify, under penalty of law, that the information in this report was prepared under my direction and supervision in accordance with the system designed to ensure that qualified personnel properly gather and evaluation the information. I am aware that there are significant penalties for false certification including the possibility of fine and imprisonment.

Signature

Manager
Title

3/22/23
Date

Duly Authorized--40 CFR 403.12(m). If this report is not signed by a principal executive officer or ranking elected official, then it must be signed by a duly authorized employee.

(City of Neosho) Significant Industrial User List and Summary of Compliance Activities										City of Neosho 203 E. Main Neosho, Missouri				
Industry Name and address	Reduced Reporting or NSCIU	Local Limits	Categorical Stnd	Regulated Process	TMT	Type	Regulated Flow	Total Flow	CWF	Compliance Status for Six Month Period Ending: JUN' '21	DEC '21	JUN' '22	DEC '22	2022 Last Inspection
K&S WIRE 300 NELSON AVE NEOSHO		N	433	Rinse tank	Y	DAF		2,639	N	C	C	C	C	JAN. 2022
LA-Z-BOY MIDWEST 4301 HOWARD BUSH DR NEOSHO		N	433	Rinse Tank	N	N/A		1,182	N	SNC R	SNC R	C	C	Jan. 2022
OPAL FOODS 16194 HIGHWAY 59 NEOSHO		N	N/A	Egg Hatchery	N	N/A		1,838	N	C	C	C	C	JUN. 2022

Blank table 12/30/2022 BPA

2022 Pretreatment Annual Report

I certify under penalty of law that the information in this report was prepared under my direction and supervision in accordance with the system designed to ensure that qualified personnel properly gather and evaluate the information. I am aware that there are significant penalties for false certification including the possibility of fine and imprisonment.

Signature	Title	Date
	Manager	3/22/23

Duly Authorized--40 CFR 403.12(m). If this report is not signed by a principal executive officer or ranking elected official, then it must be signed by a duly authorized employee. This report is required to be submitted as specified in the Missouri.

MISSOURI DEPARTMENT OF NATURAL RESOURCES

Michael L. Parson
Governor

Dru Buntin
Director

August 24, 2023

David Kennedy, City Manager
City of Neosho
203 East Main Street
Neosho, MO 64850

FINDING OF COMPLIANCE

Dear David Kennedy:

On July 19, 2023, a team member from the Missouri Department of Natural Resources conducted a pretreatment compliance inspection of the Neosho Wastewater Treatment Plant, located in Newton County. The entity operates under the authority of Missouri State Operating Permit MO0104906.

Compliance with Missouri Clean Water Law was evaluated. The entity was found to be **in compliance** based upon the observations made at the time of the evaluation.

The enclosed report and checklist (Attachment #1) describes the findings and may provide important recommendations, to ensure continued compliance. Your cooperation in implementing those recommendations will be appreciated.

Fact sheets are available on the Department's website to assist entities with understanding and following environmental requirements.

If you have any questions or would like to schedule a time to meet with a Department team member to discuss compliance requirements, please contact Joshua Grosvenor, EI, by calling 417-891-4300, by email at SWRO@dnr.mo.gov, or via mail at Southwest Regional Office, 2040 W. Woodland, Springfield, Missouri 65807-5912.

Sincerely,

SOUTHWEST REGIONAL OFFICE -

Randall Willoughby, CHMM
Water Pollution Section Chief

RDW/jgr

Enclosures

c: Brad Allen, Pretreatment Coordinator, Water Protection Program
Ken Brady, Local Manager, Alliance Water Resources
Jerry Humphrey, Pretreatment Inspector, Alliance Water Resources

mo0104906-neosho-pretreatment-20230824-insp-pci-newton-cw

Carbon Copy Address Attachment

Include each individual identified in the carbon copy line that is not a MDNR team member in one of the groups below.

Physical Addresses:

Email Addresses: (for those that have indicated this is the preferred method of receipt)

Brad Allen
Exchange Drive

Ken Brady
kbrady@alliancewater.com

Jerry Humphrey
shoalcreek@alliancewater.com

FAX Numbers: (for those that have indicated this is the preferred method of receipt)

Missouri Department of Natural Resources
Southwest Regional Office
Report of Pretreatment Compliance Inspection
Neosho WWTP
Newton County
MO0104906
August 24, 2023

Introduction

On July 19, 2023, a routine pretreatment compliance inspection of the Neosho Wastewater Treatment Plant in Newton County, Missouri was conducted by the Missouri Department of Natural Resources. The purpose of this inspection was to determine compliance with Missouri State Operating Permit (MSOP) MO0104906, the Missouri Clean Water Commission Regulations, and Missouri Clean Water Law. This report presents the findings and observations made during the compliance inspection. Authority for this inspection is provided in Missouri Clean Water Law 644.026.1(21), RSMo. The following participants were present during the inspection:

Neosho WWTP
Ken Brady, Local Manager, Alliance Water Resources
Jerry Humphrey, Pretreatment Inspector, Alliance Water Resources

Missouri Department of Natural Resources
Joshua Grosvenor, EI, Environmental Engineer

Entity Description and History

The wastewater treatment facility is owned by the City of Neosho located at 203 E Main Street. The facility is composed of a flow equalization basin, bar screen, two oxidation ditches, two final clarifiers. Aerobic digesters, sludge holding basins, ultraviolet disinfection. Prior to disinfection flows from the Neosho Crowder WWTP, previously permitted under MO0039926, are combined. The system has a design flow capacity of six million gallons per day. Sludge is land applied. The discharge from this facility flows into Shoal Creek classified as a gaining setting. The discharge is located in the Spring Basin (11070207) HUC 8 watershed. The facility has a design population equivalent of 59,000. The facility is required to have a Class (A) operator. The UTM 83 coordinates for this facility's outfall are E 377523, N 4084102. The MSOP MO0104906 was last issued on May 1, 2017, and expire on April 30, 2022. An application for renewal has been received by the Department and is in the process of being renewed.

The MSOP, MO0104906, sets forth effluent limitations, monitoring requirements, and specific and standard permit conditions.

Special Condition 21 of the MSOP requires the City to implement and enforce their approved pretreatment program in accordance with the requirements of 40 CFR 403 and submit an annual report by March 31st of each year describing their pretreatment activities during the previous calendar, the report was received on March 28, 2023.

Our records indicate that on February 17, 2022 the Department conducted pretreatment compliance audit. The previous audit listed failure to update Sewer Use Ordinances, failure to take appropriate enforcement action and failure to require dental office to submit the one-time compliance reports as violations. A letter of Warning was issued with a response required by April 7, 2022. All violations have been addressed as required.

A review of the facility's DMRs since the last pretreatment compliance audit reflects non-compliance with MSOP limits. The following table includes the effluent limit exceedances that occurred during this period:

REPORT PERIOD	PARAMETER	MSOP LIMIT	REPORTED RESULT
April 2022 (Note 1)	BOD_5, Percent Removal	85% Monthly Average Minimum	77%
	TSS, Percent Removal	85% Monthly Average Minimum	70%
December 2022 (Note 1)	TSS, Percent Removal	85% Monthly Average Minimum	71%
January 2023 (Note 2)	BOD_5	65 mg/L Weekly Average 45 mg/L Monthly Average	111 mg/L

Note 1 – Internal Monitoring Point #IP5
Note 2 – Internal Monitoring Point #IP3

Discussion of Inspection and Observations

The inspection was conducted during normal business hours. I contacted Ken Brady on July 12, 2023 to provide notification of the inspection to ensure timely access to the site. I arrived at the facility at 9:00 am and met with Ken Brady and Jerry Humphrey and outlined the statutory authority, purpose and scope of the inspection. I was granted permission to access the site and was accompanied throughout the inspection.

We first reviewed compliance issues listed in the previous Pretreatment Compliance Audit. The City recently updated the Neosho Code of Ordinance, incorporating the Environmental Protection Agency's required streamlining updates that were not included in the previous ordinances. The City Council approved the updated ordinances on July 19, 2022.

The Department approved the Pretreatment Modifications on December 2, 2022. The City completed the enforcement action La-Z-Boy as required in the Enforcement Response Plan (ERP). The violation was identified for the calendar year 2021 and was posted to the Neosho Daily News on March 4, 2022, the entity is currently in compliance following the enforcement response. The City as identified six (6) dental offices connected to the collection system all have completed and returned the one-time compliance report.

The number of regulated Industrial Users (IU) remained the same at three (3) IUs. The permit for La-Z-Boy expires August 2023, the permits for K&S Wire Products and Opal Foods expire April 2026 and May 2026 respectively.

Onsite records showed the City inspected all of their SIUs in 2022. The city uses a checklist modeled after the EPA Region 7 form. Required sampling is conducted by a contract lab for all industries.

I conducted an exit meeting with Ken Brady and Jerry Humphrey and outlined the preliminary findings. I explained the observations and any associated violations. I also provided recommendations on returning any violations to compliance.

Sampling and Monitoring

Samples were not collected during this pretreatment compliance inspection.

Compliance Determination, Violations, and Required Actions

Based upon observations made at the time of inspection, the facility was found to be in compliance with the Missouri Clean Water Law, its implementing regulations, and MSOP MO0104906.

Signatures

SUBMITTED BY:

Joshua Grosvenor, EI
Environmental Engineer
Southwest Regional Office

REVIEWED BY:

Randall Willoughby, CHMM
Water Pollution Section
Southwest Regional Office

Attachments
Attachment # 1 – Control Authority Pretreatment Inspection Checklist
Attachment #2 – Neosho Public Notice

Highway and Adams Drive. Station two responded.

• 7:03 a.m. – Dispatched and cancelled en route at I-49 MM 30. Station one responded.

• 7:51 a.m. – Assist EMS crew at 1105 Village Road. Station two responded.

• 10:46 a.m. – EMS call at 2816 Bluebell Ave. Station two responded.

• 11:35 a.m. – Assist EMS crew at 303 E. Hickory St. Station one responded.

• 12:05 p.m. – No incident found on arrival at 4350 Price Dr. Station two responded.

• 4:15 p.m. – EMS call at 640 Cedar Ridge Dr. Station two responded.

• 4:54 p.m. – EMS call at 4350 Price Dr. Station two responded.

Business inspections

• Newton County Health Department.

• Tienda El Quetzal.

• Harbor Freight.

• B&B Welding.

• Cedar Ridge Apartments.

PUBLIC NOTICE
INDUSTRIAL PRETREATMENT PROGRAM

LEGAL AUTHORITY

The following findings are made and order issued pursuant to the authority vested in the City under Chapter 700: Wastewater Pretreatment. This public notice is based on findings of significant noncompliance for the industrial users with industrial user permits issued under the City's Pretreatment Ordinance.
This public notice is issued pursuant to the City's Pretreatment Ordinance.

PUBLIC NOTICE

Legal Notice - Public Notice of Significant Noncompliance with Industrial Pretreatment Standards.

The Federal Clean Water Act established the National Pretreatment Program to control the discharge of toxic and/or hazardous waste into sanitary sewer systems operated by Publicly Owned Treatment Works (POTWS). Through the West WWTP NPDES Operating Permit, the City of Neosho has been given the responsibility for applying and enforcing the pretreatment standards for industrial users served by the City of Neosho. Pursuant to the requirements of the National Pretreatment Program, the City of Neosho must annually publish a list of the industrial users within its service area that have either demonstrated a pattern of noncompliance with applicable pretreatment standards or a significant noncompliance over the previous 12 months. Reasons for reportable noncompliance include:

1. Chronic violations of wastewater discharge limits
2. Technical Review Criteria (TRC) violations
3. Any other violation of a Pretreatment Standard or Requirement that the Public Works Director determines has caused, alone or in combination with other discharges, interference or Pass Through
4. Any discharge of a pollutant that has caused imminent endangerment to the public or to the environment
5. Failure to meet, within ninety (90) days of the scheduled date, a compliance schedule milestone
6. Failure to provide within forty-five (45) days after the due date, any required reports
7. Failure to accurately report noncompliance; or
8. Any other violation(s), which may include a violation of Best Management Practices, which the Public Works Director determines will adversely affect the operation or implementation of the local pretreatment program.

This notice has been issued to meet the requirements to inform the public and does not constitute any decision as to the actions, if any, necessary to remedy the the industrial user noncompliance. Specific questions on any of the listed facilities may be directed to the contact listed at the bottom of this notice.

Period covered by the notice is 1/1/2021 thru 12/31/2021

Name of Industrial User - LA Z BOY

Type of noncompliance: #6 Failure to provide within forty-five (45) days after the due date, any required reports

Date of Violation: 1/1/2021 - 12/31/2021

Current Status: Noncompliance

Name of Industrial User:

Type of noncompliance:

Date of Violation:

Current Status:

Neosho Daily News
3/4/22

For further information contact:
Ken Brady
City of Neosho
15318 Kentucky Rd
Neosho, MO 64850

MISSOURI
DEPARTMENT OF
NATURAL RESOURCES

Michael L. Parson
Governor

Dru Buntin
Director

September 7, 2023

David Kennedy, City Manager
City of Neosho
203 East Main Street
Neosho, MO 64850

UNSATISFACTORY FINDINGS
RESPONSE REQUIRED

Dear David Kennedy:

On July 19, 2023, a team member from the Missouri Department of Natural Resources conducted an inspection of the Neosho Wastewater Treatment Plant, located on Old Scenic Drive 0.1 miles north of the Jefferson Avenue intersection, Neosho in Newton County. The entity operates under the authority of Missouri State Operating Permit MO0104906.

Compliance with Missouri Clean Water Law was evaluated. The enclosed report is being issued with Unsatisfactory Findings for the violations identified.

Please refer to the enclosed report for details on the findings and required actions. **A written response documenting actions taken to correct the violations is required by the date specified in the report.**

Fact sheets are available on the Department's website to assist entities with understanding and following environmental requirements.

If you have any questions or would like to schedule a time to meet with a Department team member to discuss compliance requirements, please contact Joshua Grosvenor, EI, by calling 417-891-4300, by email at SWRO@dnr.mo.gov, or via mail at Southwest Regional Office, 2040 W. Woodland, Springfield, Missouri 65807-5912.

Sincerely,

SOUTHWEST REGIONAL OFFICE -

Randall Willoughby, CHMM
Water Pollution Section Chief

RDW/jgn

Enclosure

c: Ken Brady, Local Manager, Alliance Water Resources
Jerry Humphrey, Pretreatment Inspector, Alliance Water Resources

mo0104906-neosho-wwtp-20230907-insp-uf-newton-cw

Carbon Copy Address Attachment
Include each individual identified in the carbon copy line that is not a
MDNR team member in one of the groups below.

Physical Addresses:

Email Addresses: (for those that have indicated this is the preferred method of receipt)

Ken Brady
kbrady@alliancewater.com

Jerry Humphrey
shoalcreek@alliancewater.com

FAX Numbers: (for those that have indicated this is the preferred method of receipt)

Compliance Summary

Facility Name: Neosho WWTP
Permit Number: MO0104906
Inspection Date: July 19, 2023

This summary is intended to direct your attention to violations noted during the inspection of your facility.

Violations noted during the inspection:

1. A review of the Discharge Monitoring Reports (DMRs) from July 2021 to July 2023 shows violations of permitted limitations. Failure to comply with the effluent limits is a violation of the MSOP, MSOP MO0104906, Missouri Clean Water Law Sections 644.051.1(3) and 644.076.1, RSMo and Missouri Clean Water Commission Regulation 10 CSR 20-7.015.

2. An effluent sample collected by a Department team member on January 11, 2023, revealed a violation of permitted effluent limits as shown in the table in the Sampling and Monitoring Section of the Report. Failure to comply with permitted effluent limits is a violation of Missouri Clean Water Law Sections 644.051.1(3) and 644.076.1, RSMo, and Missouri Clean Water Commission Regulation 10 CSR 20-7.015.

Actions necessary to return to compliance:

1. You have provided a comment during the submittal of the eDMR for the exceedances that addressed the required response.

2. Submit a written response detailing actions to prevent any future occurrences.

Refer to the Unsatisfactory Findings section on pages 4 through 5 of the enclosed report for detailed information about these violations and how to correct them so your facility may be returned to compliance.

We appreciate your prompt attention to these issues. If you have any questions, or if you would like to meet to discuss these violations further, please contact Joshua Grosvenor, EI, at our Southwest Regional Office at (417)891-4300 or at swro@dnr.mo.gov.

Missouri Department of Natural Resources
Southwest Regional Office
Report of Inspection
Neosho WWTP
Newton County
MO0104906
September 7, 2023

Introduction

On July 19, 2023, a routine compliance inspection of the Neosho WWTP in Newton County, Missouri was conducted by the Missouri Department of Natural Resources. The purpose of this inspection was to determine compliance with the Missouri State Operating Permit (MSOP) MO0104906, the Missouri Clean Water Commission Regulations, and the Missouri Clean Water Law. This report presents the findings and observations made during the compliance inspection. Authority for this inspection is provided in Missouri Clean Water Law 644.026.1(21), RSMo. The following participants were present during the inspection:

Neosho WWTP
Ken Brady, Local Manager, Alliance Water Resources
Jerry Humphrey, Pretreatment Inspector, Alliance Water Resources

Missouri Department of Natural Resources
Joshua Grosvenor, EI, Environmental Engineer

Entity Description and History

The wastewater treatment facility is owned by the City of Neosho, located at 203 East Main Street. The City contracts with Alliance Water Resources, Inc., to operate the WWTP. The facility is composed of two separate facilities that were previously permitted separately, Neosho Crowder WWTP and Neosho Shoal Creek WWTP. All effluent from the Neosho Crowder WWTP is sent to the Neosho Shoal Creek WWTP, where flows are combined prior to ultraviolet disinfection. The Neosho Crowder WWTP consists of flow equalization, bar screen, pre-aeration basins, primary clarifiers, trickling filters, recirculation basin, secondary clarification, and aerobic sludge digesters. The Neosho Shoal Creek WWTP consists of flow equalization, bar screen, oxidation ditches, aerobic sludge digesters, aerated sludge holding, and ultraviolet disinfection. The system has a design flow capacity of six million gallons per day. Sludge is land applied. The collection system is composed of approximately six miles of force main, 120 miles of gravity mains, six lift stations, and 2,500 manholes. The discharge from this facility flows into Shoal Creek classified as a gaining setting. The discharge is located in the Spring Basin (11070207) HUC 8 watershed. The facility has a design population equivalent of 59,000. The facility is required to have a Class (A) operator. The UTM 83 coordinates for this facility's outfall are E 377523, N 4084102. The MSOP MO0104906 was last issued on May 1, 2017, and expired on April 30, 2022. An application for renewal has been received by the Department and is in the process of being renewed.

Our records indicate that the Department conducted the previous inspection of this facility on August 21, 2019. The previous inspection listed effluent limitation violations, failure to provide proper notification of violations, missing limit parameters, failure to provide properly signed I&I and sludge reports, operation and maintenance issues, failure to implement a Stormwater Pollution Prevention Plan, and failure to conform to required analytical and sampling methods failure to report a bypass. A Letter of Warning (LOW) was issued for the documented violations.

Sufficient responses were received on September 30 and October 10, 2019, and the facility was returned to compliance on November 25, 2019.

During the office portion of the inspection, I reviewed the facility's file and Department records. The facility is current on their annual permit fee. I reviewed the facility's Form S Annual Sludge Report and Discharge Monitoring Reports (DMRs). The previous year's Annual Sludge Report was received by the Department on February 1, 2023, prior to the February 19th deadline.

I conducted a review of the facility's DMRs submitted to this office from July 2021 to July 2023 reflect overall compliance with MSOP limits and reporting requirements. The facility submits DMRs through the Department's Electronic Discharge Monitoring Report (eDMR) system. The following tables include the effluent limit exceedances that occurred during this period:

Outfall #001			
REPORT PERIOD	PARAMETER	MSOP LIMIT	REPORTED RESULT
December 2021	Cadmium, Total Recoverable	0.6 µg/L Daily Maximum 0.3 µg/L Monthly Average	0.41 µg/L
	Ammonia as N	11.9 mg/L Daily Maximum 2.2 mg/L Monthly Average	7.3 mg/L

Internal Monitoring Point #IP5			
REPORT PERIOD	PARAMETER	MSOP LIMIT	REPORTED RESULT
April 2022	BOD_5, Percent Removal	85% Monthly Average Minimum	77%
	TSS, Percent Removal	85% Monthly Average Minimum	70%
December 2022	TSS, Percent Removal	85% Monthly Average Minimum	71%

Internal Monitoring Point #IP3			
REPORT PERIOD	PARAMETER	MSOP LIMIT	REPORTED RESULT
January 2023	BOD_5	65 mg/L Weekly Average 45 mg/L Monthly Average	111 mg/L

Discussion of Inspection and Observations

The inspection was conducted during normal business hours. I contacted Ken Brady on July 11, 2023, to provide notification of the inspection to ensure timely access to the site.

I arrived at the facility at approximately 9:00 a.m., and met with Ken Brady and Jerry Humphrey, and outlined the statutory authority, purpose, and scope of the inspection. I was granted permission to access the site and was accompanied throughout the tour of the facility.

The laboratory procedures and operational tests were reviewed. The City had a quality assurance and quality control (QA/QC) program for the laboratory and applicable equipment is recertified annually.

We discussed any sanitary sewer overflows (SSO) in the collection system and bypasses at the treatment facility for the last two years. The City has reported three (3) SSOs in 2023, four (4) SSOs in 2022, and three (3) SSOs in 2021. The City had no reported bypasses at the treatment facility during the reviewed time period. The occurrences were all attributed to heavy rainfall events.

A review of the submitted annual inflow and infiltration (I&I) report, for the year 2022, indicated the City observed a total of 206 manholes and rehabbed one (1) brick manhole. A total of 2,100 feet of collection line was smoke tested, 7,599 feet were inspected by Closed-Circuit Television (CCTV) with 43,880 feet cleaned. The City has adopted a program for the maintenance and repair of the collection system as required.

I reviewed copies of their laboratory analysis records and compared those records to the data submitted by the facility to the Department. I did not observe any discrepancies in the records.

We conducted a tour of the Neosho WWTP. We began at the receiving station for hauled wastewater (Photo 1), all wastes that are hauled to the facility enter at this point. I observed the sludge/wastewater holding tank (Photo 2). Flow then passes through the bar screen (Photo 3). The rotors in the oxidation ditches were operational and appeared to be providing adequate mixing (Photos 4 & 5). One of the two final clarifiers was in operation (Photos 6 & 7), and the second final clarifier was drained and awaiting routine maintenance (Photos 8 & 9). Flow is measured with a Parshall flume and flow transducer (Photo 10). The combined flows are treated with ultraviolet disinfection (Photo 11), and the treatment banks were operational at the time of inspection.

The sludge holding tanks are located west of the treatment facility (Photo 12). Pump trucks connect and pull from a transfer structure (Photo 13). The outfall is marked as required (Photo 14). The receiving stream (Photo 15), did not appear to be impacted from the discharge.

I then observed the eight million gallon peak flow basin (Photos 16 & 17). Water from this basin is pumped to the treatment facility via a connected pump station (Photo 18). The peak flow pump station has a generator backup that is exercised regularly (Photo 19).

I observed the Jay Drive lift station (Photos 20 - 22), the lift station is surrounded by a security fence and has an audio/visual alarm system. The Jay Drive lift station appeared to have an accumulation of debris that needs to be removed. I then observed the Quince Road lift station (Photos 23-25), the lift station is surrounded by a security fence and has an audio/visual alarm

system. All lift stations in the collection system are visually inspected daily and a log is kept at each lift station (Photo 26). I then observed a manhole located near the intersection of S Neosho Boulevard and W South Street (Photos 27 & 28), this manhole has the most SSO issues. Since 2021 there have been five (5) reported SSOs at this manhole location. It was stated that the interceptor line downstream of this manhole will fill during high rainfall events and cause flows to back up and overflow. The City is currently in the process of correcting this issue. It was stated that the collection system downstream of the manhole will have a higher flow during times of high I&I and cause the system to back up out of this manhole.

I conducted an exit meeting with Ken Brady and Jerry Humphrey and outlined the preliminary findings. I explained the observations and any associated violations. I also provided recommendations on returning any violations to compliance. The recommendations are in the section below. I thanked Brady and Humphrey for their time and cooperation and departed the facility at 2:00 p.m.

Sampling and Monitoring

The Department's Environmental Services Program (ESP) team members conducted compliance sampling at the WWTF on January 10-11, 2023. The attached sample results reflect non-compliance with the effluent limits set forth in the MSOP, MO0104906. The following table includes the effluent limit exceedances that occurred during this sampling event:

Internal Monitoring Point #IP3		
PARAMETER	MSOP LIMIT	REPORTED RESULT
BOD_5	65 mg/L Weekly Average 45 mg/L Monthly Average	164 mg/L

Compliance Determination, Violations, and Required Actions

Based on observations made at the time of the inspection, the facility was found to be out of compliance with the Missouri Clean Water Law, its implementing regulations, and MSOP MO0104906.

Unsatisfactory Findings

Please submit your responses to the following violations **by October 10, 2023,** to the Southwest Regional Office, 2040 W. Woodland, Springfield, MO 65807.

1. A review of the Discharge Monitoring Reports (DMRs) from July 2021 to July 2023 shows violations of permitted limitations. Failure to comply with the effluent limits is a violation of the MSOP, MSOP MO0104906, Missouri Clean Water Law Sections 644.051.1(3) and 644.076.1, RSMo and Missouri Clean Water Commission Regulation 10 CSR 20-7.015.

REQUIRED ACTION: You have provided a comment during the submittal of the eDMR that addressed the required response.

2. An effluent sample collected by a Department team member on January 11, 2023, revealed a violation of permitted effluent limits as shown in the table in the Sampling and Monitoring Section of the Report. Failure to comply with permitted effluent limits is a violation of Missouri Clean Water Law Sections 644.051.1(3) and 644.076.1, RSMo, and Missouri Clean Water Commission Regulation 10 CSR 20-7.015.

REQUIRED ACTION: Submit a written response detailing actions to prevent any future occurrences.

Recommendations

Please continue to evaluate and repair the collection system to reduce the inflow and infiltration.

The city is reminded to notify the department of all SSOs and bypasses within 24 hours and submit a written report within five (5) business days of the time the city becomes aware of an SSO or bypass as required in MSOP, MO0094854, Special Condition 12 and Standard Condition Part I, Section B. Bypasses and SSOs are to be reported to the department's Southwest Regional Office during normal business hours or by using the online SSOs and Bypass website at http://dnr.mo.gov/modnrcag/ or the Environmental Emergency Response hotline at 573-634-2436 outside of normal business hours.

Signatures

SUBMITTED BY:

Joshua Grosvenor, EI
Environmental Engineer
Southwest Regional Office

REVIEWED BY:

Randall Willoughby, CHMM
Water Pollution Section
Southwest Regional Office

Attachments

Attachment # 1 - Photos 1 - 28
Attachment # 2 – Aerial Maps
Attachment # 3 – Results of Sample Analysis

Attachment 1 – Photos
Neosho WWTP
September 7, 2023
Page 1

	Photo #: 1 Taken by: Joshua Grosvenor Entity: Neosho WWTP Permit: MO0104906 Location: Neosho Shoal Creek Description: Receiving station for hauled wastewater. Date Taken: July 19, 2023 Media: WPCB
	Photo #: 2 Taken by: Joshua Grosvenor Entity: Neosho WWTP Permit: MO0104906 Location: Neosho Shoal Creek Description: Sludge/ wastewater holding tank. Date Taken: July 19, 2023 Media: WPCB
	Photo #: 3 Taken by: Joshua Grosvenor Entity: Neosho WWTP Permit: MO0104906 Location: Neosho Shoal Creek Description: Bar screen. Date Taken: July 19, 2023 Media: WPCB

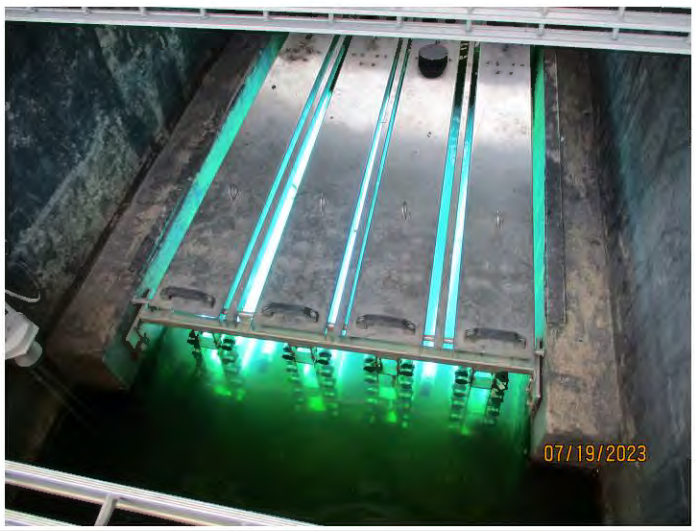
Attachment 1 – Photos
Neosho WWTP
September 7, 2023

	Photo #: 4 Taken by: Joshua Grosvenor Entity: Neosho WWTP Permit: MO0104906 Location: Neosho Shoal Creek Description: Oxidation Ditch Date Taken: July 19, 2023 Media: WPCB
	Photo #: 5 Taken by: Joshua Grosvenor Entity: Neosho WWTP Permit: MO0104906 Location: Neosho Shoal Creek Description: Oxidation ditch, rotors providing aeration. Date Taken: July 19, 2023 Media: WPCB
	Photo #: 6 Taken by: Joshua Grosvenor Entity: Neosho WWTP Permit: MO0104906 Location: Neosho Shoal Creek Description: Operational clarifier. Date Taken: July 19, 2023 Media: WPCB

Attachment 1 – Photos
Neosho WWTP
September 7, 2023
Page 3

	Photo #: 7 Taken by: Joshua Grosvenor Entity: Neosho WWTP Permit: MO0104906 Location: Neosho Shoal Creek Description: Operational clarifier. Date Taken: July 19, 2023 Media: WPCB
	Photo #: 8 Taken by: Joshua Grosvenor Entity: Neosho WWTP Permit: MO0104906 Location: Neosho Shoal Creek Description: Clarifier, currently under repairs. Date Taken: July 19, 2023 Media: WPCB
	Photo #: 9 Taken by: Joshua Grosvenor Entity: Neosho WWTP Permit: MO0104906 Location: Neosho Shoal Creek Description: Clarifier, currently under repairs. Date Taken: July 19, 2023 Media: WPCB

Attachment 1 – Photos
Neosho WWTP
September 7, 2023
Page 4

	Photo #: 10 Taken by: Joshua Grosvenor Entity: Neosho WWTP Permit: MO0104906 Location: Neosho Shoal Creek Description: Parshall flume flow measurement. Date Taken: July 19, 2023 Media: WPCB
	Photo #: 11 Taken by: Joshua Grosvenor Entity: Neosho WWTP Permit: MO0104906 Location: Neosho Shoal Creek Description: Ultraviolet disinfection unit, functioning. Date Taken: July 19, 2023 Media: WPCB
	Photo #: 12 Taken by: Joshua Grosvenor Entity: Neosho WWTP Permit: MO0104906 Location: Neosho Shoal Creek Description: Sludge holding tank. Date Taken: July 19, 2023 Media: WPCB

Attachment 1 – Photos
Neosho WWTP
September 7, 2023

	Photo #: 13 Taken by: Joshua Grosvenor Entity: Neosho WWTP Permit: MO0104906 Location: Neosho Shoal Creek Description: Hook up for sludge hauling trucks to load sludge. Date Taken: July 19, 2023 Media: WPCB
	Photo #: 14 Taken by: Joshua Grosvenor Entity: Neosho WWTP Permit: MO0104906 Location: Neosho Shoal Creek Description: Outfall sign. Date Taken: July 19, 2023 Media: WPCB
	Photo #: 15 Taken by: Joshua Grosvenor Entity: Neosho WWTP Permit: MO0104906 Location: Neosho Shoal Creek Description: Receiving stream, no observable impact from the discharge. Date Taken: July 19, 2023 Media: WPCB

Attachment 1 – Photos
Neosho WWTP
September 7, 2023

	Photo #: 16 Taken by: Joshua Grosvenor Entity: Neosho WWTP Permit: MO0104906 Location: Peak flow basin Description: Peak flow basin, eight million gallons. Date Taken: July 19, 2023 Media: WPCB
	Photo #: 17 Taken by: Joshua Grosvenor Entity: Neosho WWTP Permit: MO0104906 Location: Peak flow basin Description: Peak flow basin, eight million gallons. Date Taken: July 19, 2023 Media: WPCB
	Photo #: 18 Taken by: Joshua Grosvenor Entity: Neosho WWTP Permit: MO0104906 Location: Peak flow basin Description: Peak flow basin lift station. Date Taken: July 19, 2023 Media: WPCB

Attachment 1 – Photos
Neosho WWTP
September 7, 2023
Page 7

	Photo #: 19 Taken by: Joshua Grosvenor Entity: Neosho WWTP Permit: MO0104906 Location: Peak flow basin Description: Peak flow basin backup generators, exercised regularly. Date Taken: July 19, 2023 Media: WPCB
	Photo #: 20 Taken by: Joshua Grosvenor Entity: Neosho WWTP Permit: MO0104906 Location: Jay Drive Lift Station Description: Lift station surrounded by security fence. Date Taken: July 19, 2023 Media: WPCB
	Photo #: 21 Taken by: Joshua Grosvenor Entity: Neosho WWTP Permit: MO0104906 Location: Jay Drive Lift Station Description: Lift station control panel with inspection log visible. Date Taken: July 19, 2023 Media: WPCB

Attachment 1 – Photos
Neosho WWTP
September 7, 2023

	Photo #: 22 Taken by: Joshua Grosvenor Entity: Neosho WWTP Permit: MO0104906 Location: Jay Drive Lift Station Description: Lift station wet well. Date Taken: July 19, 2023 Media: WPCB
	Photo #: 23 Taken by: Joshua Grosvenor Entity: Neosho WWTP Permit: MO0104906 Location: Quince Road Lift Station Description: Lift station surrounded by a security fence. Date Taken: July 19, 2023 Media: WPCB
	Photo #: 24 Taken by: Joshua Grosvenor Entity: Neosho WWTP Permit: MO0104906 Location: Quince Road Lift Station Description: Control panel. Date Taken: July 19, 2023 Media: WPCB

Attachment 1 – Photos
Neosho WWTP
September 7, 2023
Page 9

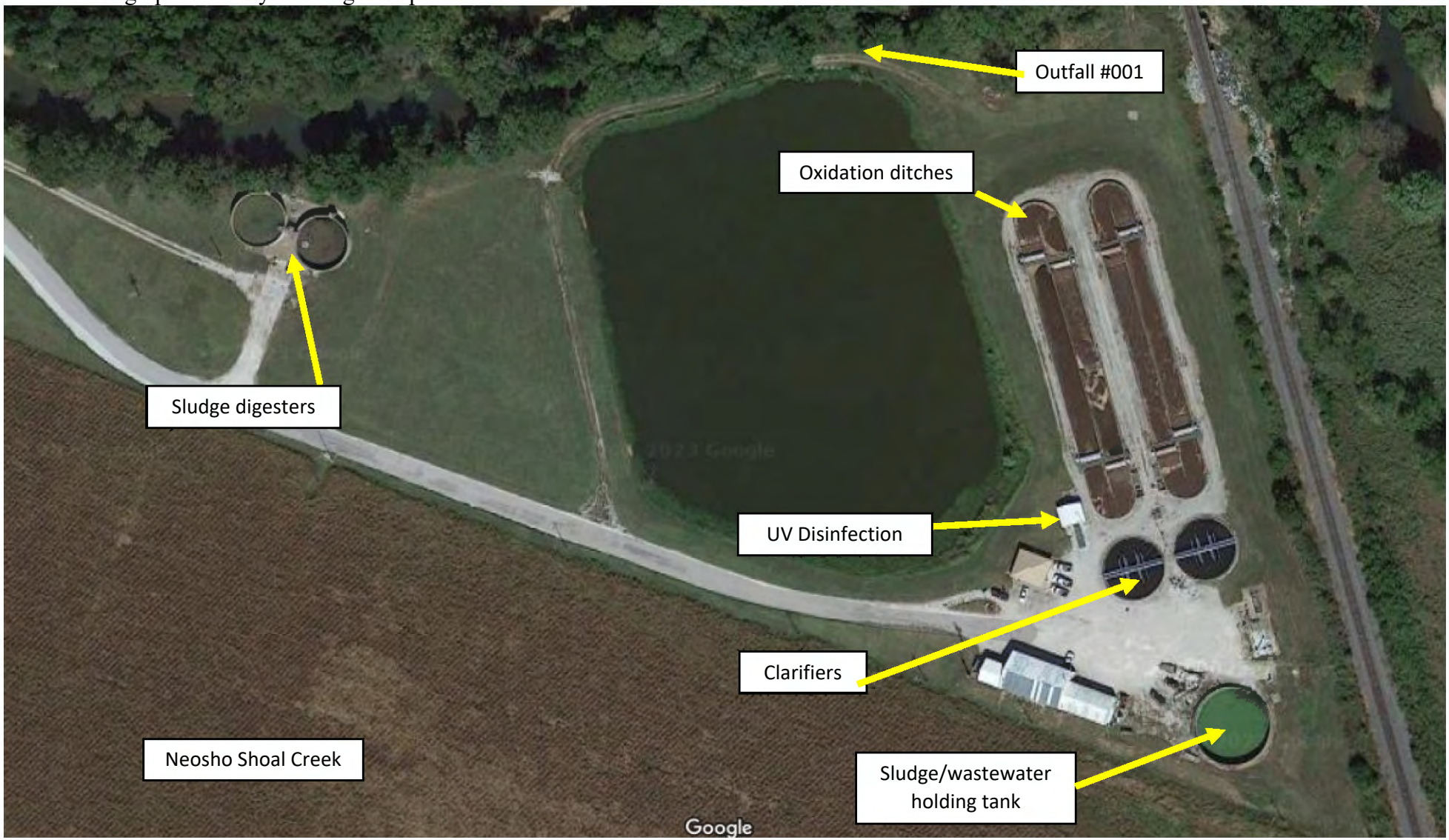
	Photo #: 25 Taken by: Joshua Grosvenor Entity: Neosho WWTP Permit: MO0104906 Location: Quince Road Lift Station Description: Lift station wet well. Date Taken: July 19, 2023 Media: WPCB
	Photo #: 26 Taken by: Joshua Grosvenor Entity: Neosho WWTP Permit: MO0104906 Location: Quince Road Lift Station Description: Example of the daily inspection log kept at each lift station. Date Taken: July 19, 2023 Media: WPCB
	Photo #: 27 Taken by: Joshua Grosvenor Entity: Neosho WWTP Permit: MO0104906 Location: S Neosho Boulevard and W South Street Description: Manhole with the greatest frequency of overflows, during high flow events. Date Taken: July 19, 2023 Media: WPCB

Attachment 1 – Photos
Neosho WWTP
September 7, 2023
Page 10

	Photo #: 28 Taken by: Joshua Grosvenor Entity: Neosho WWTP Permit: MO0104906 Location: S Neosho Boulevard and W South Street Description: Manhole with the greatest frequency of overflows, during high flow events. Date Taken: July 19, 2023 Media: WPCB

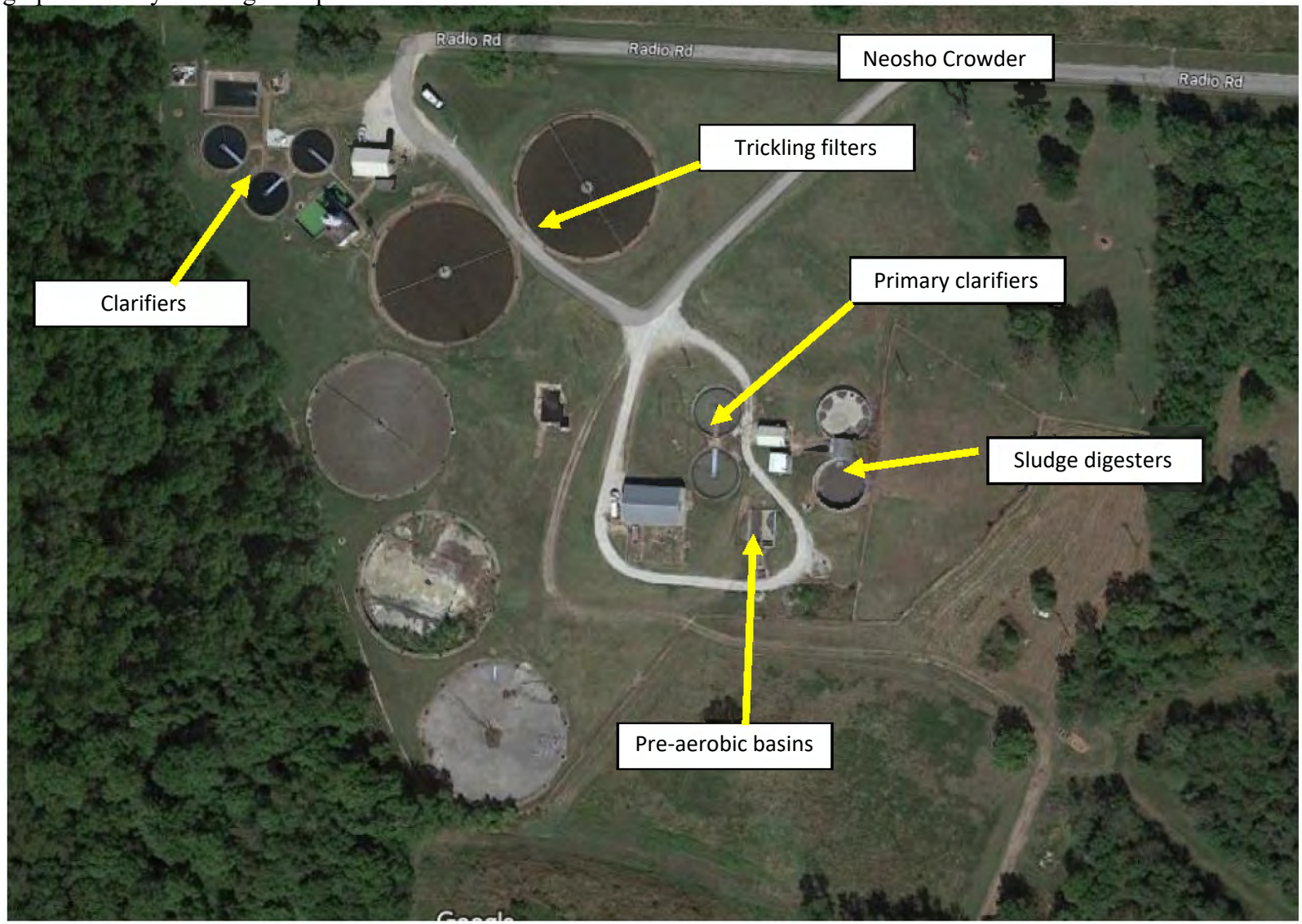
Attachment 2 – Aerial Map
Neosho WWTP
September 7, 2023
Page 1

Aerial Photograph Courtesy of Google Maps.



Attachment 2 – Aerial Map
Neosho WWTP
September 7, 2023
Page 2

Aerial Photograph Courtesy of Google Maps.



RECEIVED
October 10, 2023
DEQ/SWRO

October 2,2023

Joshua Grosvenor, EI

Mo. DNR, Southwest Regional Office

2040 W. Woodland

Springfield, Mo 65807

Unsatisfactory Findings Response

Dear Mr. Grosvenor,

This letter is in response to your letter of Unsatisfactory Findings for the City of Neosho (MOSOP# 0104906) WWTP inspection, dated September 7, 2023.

In reference to violation #2 (response required), "An effluent sample collected by a Department team member on January 11, 2023, revealed a violation of permitted effluent limits as shown in the table in the Sampling and Monitoring Section of the Report. Failure to comply with permitted effluent limits is a violation of Missouri Clean Water Law Sections 644.051.1(3) and 644.076.1,RSMo, and Missouri Clean Water Commission Regulation 10 CSR 20-7.015.

Date of occurrence: January 11, 2023

- The Crowder WWTP has three trickling filters in service. During normal flow, typically 2 filters are in operation, and one is kept on standby. At the time this sample was taken, a trickling filter had been taken down for maintenance and the filter in standby had been placed in service. As a result (also due to temps and time of year), there was little to no zoogleal growth in the filter that had been in standby, causing reduced treatment.

Prevention of further occurrences:

- To avoid this occurring in the future, when this type of maintenance occurs, the effluent from Crowder WWTP will be combined with the influent at the Shoal Creek WWTP to receive additional treatment. It is our position and

belief that this will be more than adequate to address this situation and prevent future occurrences.

In closing, it is our hope that the actions outlined above will satisfactorily address the required actions in the Report of Unsatisfactory Findings. If you have any further questions or concerns, please feel free to contact me at (417) 451-8080 or by email at kbrady@alliancewater.com.

Sincerely,

Ken Brady

Local Manager

Alliance Water Resources

Neosho, Mo. 64850

MISSOURI
DEPARTMENT OF
NATURAL RESOURCES

Michael L. Parson
Governor

Dru Buntin
Director

November 22, 2023

David Kennedy, City Manager
City of Neosho
203 East Main Street
Neosho, MO 64850

COMPLIANCE STATUS UPDATE

Dear David Kennedy:

On July 19, 2023, a team member from the Missouri Department of Natural Resources conducted an inspection of the Neosho Wastewater Treatment Plant, located on Old Scenic Drive 0.1 miles north of the Jefferson Avenue intersection, Neosho in Newton County. The entity operates under the authority of Missouri State Operating Permit MO0104906.

On October 10, 2023, a sufficient response was received to the required actions in the September 7, 2023 report. No further response is required to address the findings documented in this report. Please note, this letter only addresses the completion of the required actions documented in the September 7, 2023 inspection report.

The response shows that you recognize our mutual goal in providing a quality life for Missouri citizens through environmental compliance. The department appreciates your voluntary efforts to comply with the laws of Missouri and your continued efforts to work with us to improve protection of Missouri citizens and our natural resources.

If you have any questions or would like to schedule a time to meet with department team member to discuss compliance requirements, please contact Joshua Grosvenor, EI, by calling 417-891-4300, by email at SWRO@dnr.mo.gov, or via mail at Southwest Regional Office, 2040 W. Woodland, Springfield, Missouri 65807-5912.

Sincerely,

SOUTHWEST REGIONAL OFFICE

Randall Willoughby, CHMM
Water Pollution Section Chief

RDW/jgb

c: Ken Brady, Local Manager, Alliance Water Resources
Jerry Humphrey, Pretreatment Inspector, Alliance Water Resources

mo0104906-neosho-wwtp-20231122-csu-newton-cw

Carbon Copy Address Attachment

Include each individual identified in the carbon copy line that is not a MDNR staff member in one of the groups below.

Physical Addresses:

Email Addresses: (for those that have indicated this is the preferred method of receipt)

Ken Brady
kbrady@alliancewater.com

Jerry Humphrey
shoalcreek@alliancewater.com

FAX Numbers: (for those that have indicated this is the preferred method of receipt

MISSOURI
DEPARTMENT OF
NATURAL RESOURCES

Michael L. Parson
Governor

Dru Buntin
Director

December 6, 2023

CITY OF NEOSHO
203 E MAIN ST
NEOSHO, MO 64850

RE: Updates to 10 CSR 20-7.015 Effluent Regulations
NEOSHO WWTP - MO0104906

Dear Permittee:

Your wastewater treatment facility has been identified as a facility that may be impacted by recent revisions to 10 CSR 20-7.015 Effluent Regulations which became effective October 30, 2023. This rule applies to all domestic point sources with a design flow greater than or equal to 1 million gallons per day (MGD) and all industrial facilities categorized as major that typically discharge phosphorus in their industrial wastewater, except for facilities subject to provisions in 10 CSR 20-7.015(3)(E), (3)(F), (9)(A)4., and (9)(A)5., or where more stringent phosphorus limits have been established. Target reduction levels are as follows:

1. Total phosphorus target level of 1.0 milligrams per liter (mg/L), as an annual average;
2. Total phosphorus annual mass loading target level equal to 1.0 mg/L based on design flow;
3. An overall reduction of total phosphorus from influent to effluent by 75 percent; or
4. An overall reduction of annual load of total phosphorus discharged by 75 percent.

In the absence of a department approved alternative implementation date, total phosphorus target reduction levels must be implemented no later than:

1. January 1, 2029, for domestic point sources with facility design flows greater than 15 MGD.
2. January 1, 2033, for domestic point sources with facility design flows greater than or equal to 1 MGD but less than 15 MGD.
3. January 1, 2034, for industrial facilities.

The Water Protection Program thanks its stakeholders for the robust discussion and feedback provided during the development of this rule. If you have questions or would like to discuss, please contact Ashley Grupe, of my team, by email at Ashley.Grupe@dnr.mo.gov or by phone at 573-751-1419.

Sincerely,

WATER PROTECTION PROGRAM

John Hoke
Director

JH:agt

MISSOURI DEPARTMENT OF NATURAL RESOURCES

Michael L. Parson
Governor

Dru Buntin
Director

May 2, 2024

David Kennedy, City Manager
City of Neosho
203 East Main Street
Neosho, MO 64850

FINDING OF COMPLIANCE

Dear David Kennedy:

On July 19, 2023, a team member from the Missouri Department of Natural Resources conducted a pretreatment compliance inspection of the Neosho Wastewater Treatment Plant, located in Newton County. The entity operates under the authority of Missouri State Operating Permit MO0104906.

The enclosed report and checklist describes the findings and may provide important recommendations, to ensure continued compliance. Your cooperation in implementing those recommendations will be appreciated.

Fact sheets are available on the Department's website to assist entities with understanding and following environmental requirements.

If you have any questions or would like to schedule a time to meet with a Department team member to discuss compliance requirements, please contact Joshua Grosvenor, EI, by calling 417-891-4300, by email at SWRO@dnr.mo.gov, or via mail at Southwest Regional Office, 2040 W. Woodland, Springfield, Missouri 65807-5912.

Sincerely,

SOUTHWEST REGIONAL OFFICE -

Randall Willoughby, CHMM
Water Pollution Section Chief

RDW/jgr

Enclosure: Control Authority Pretreatment Inspection Checklist

c: Brad Allen, Pretreatment Coordinator, Water Protection Program
Ken Brady, Local Manager, Alliance Water Resources
Jerry Humphrey, Pretreatment Inspector, Alliance Water Resources

mo0104906-neosho-pretreatment-20240502-pci-fc-newton-cw

Carbon Copy Address Attachment

Include each individual identified in the carbon copy line that is not a MDNR team member in one of the groups below.

Physical Addresses:

Email Addresses: (for those that have indicated this is the preferred method of receipt)

Brad Allen
Exchange Drive

Ken Brady
kbrady@alliancewater.com

Jerry Humphrey
shoalcreek@alliancewater.com

FAX Numbers: (for those that have indicated this is the preferred method of receipt)

Missouri Department of Natural Resources
Southwest Regional Office
Report of Pretreatment Compliance Inspection
Neosho WWTP
Newton County
MO0104906
May 2, 2024

Introduction

On April 25, 2024, a routine pretreatment compliance inspection of the Neosho Wastewater Treatment Plant in Newton County, Missouri was conducted by the Missouri Department of Natural Resources. The purpose of this inspection was to determine compliance with Missouri State Operating Permit (MSOP) MO0104906, the Missouri Clean Water Commission Regulations, and Missouri Clean Water Law. This report presents the findings and observations made during the compliance inspection. Authority for this inspection is provided in Missouri Clean Water Law 644.026.1(21), RSMo. The following participants were present during the inspection:

Neosho WWTP
Ken Brady, Local Manager, Alliance Water Resources
Jerry Humphrey, Pretreatment Inspector, Alliance Water Resources

Missouri Department of Natural Resources
Joshua Grosvenor, EI, Environmental Engineer

Entity Description and History

The wastewater treatment facility is owned by the City of Neosho located at 203 East Main St. The facility is composed of a flow equalization basin, bar screen, two oxidation ditches, two final clarifiers. Aerobic digesters, sludge holding basins, ultraviolet disinfection. Prior to disinfection flows from the Neosho Crowder WWTP, previously permitted under MO0039926, are combined. The system has a design flow capacity of six million gallons per day. Sludge is land applied. The discharge from this facility flows into Shoal Creek classified as a gaining setting. The discharge is located in the Spring Basin (11070207) HUC 8 watershed. The facility has a design population equivalent of 59,000. The facility is required to have a Class (A) operator. The UTM 83 coordinates for this facility's outfall are E 377523, N 4084102. The MSOP MO0104906 was last issued on May 1, 2017, and expire on April 30, 2022. An application for renewal has been received by the Department and is in the process of being renewed.

The MSOP, MO0104906, sets forth effluent limitations, monitoring requirements, and specific and standard permit conditions. Special Condition 21 of the MSOP requires the City to implement and enforce their approved pretreatment program in accordance with the requirements of 40 CFR 403 and submit an annual report by March 31st of each year describing their pretreatment activities during the previous calendar year.

Our records indicate that on July 19, 2023 the department conducted pretreatment compliance inspection. The previous inspection found the facility to be in compliance.

A review of the facility's DMRs since the last pretreatment compliance inspection reflects compliance with MSOP limits.

Discussion of Inspection and Observations

The inspection was conducted during normal business hours. I contacted Ken Brady on April 18, 2024 to provide notification of the inspection to ensure timely access to the site. I arrived at the facility at 10:00 am and met with Ken Brady and Jerry Humphrey and outlined the statutory authority, purpose and scope of the inspection. I was granted permission to access the site and was accompanied throughout the inspection.

We first reviewed the previous inspection and checklist, noting that there had been no changes to the control mechanisms since. All of the Industrial Users have been in 100% compliance since the last inspection. The City as identified six (6) dental offices connected to the collection system all have completed and returned the one-time compliance report.

The number of regulated Industrial Users (IU) remained the same at three (3) IUs. The permit for La-Z-Boy expires August 2023, the permits for K&S Wire Products and Opal Foods expire April 2026 and May 2026 respectively.

Onsite records showed the City inspected all of their SIUs in 2023. The city uses a checklist modeled after the EPA Region 7 form. Required sampling is conducted by a contract lab for all industries.

I conducted an exit meeting with Ken Brady and Jerry Humphrey and outlined the preliminary findings. I explained the observations and any associated violations. I also provided recommendations on returning any violations to compliance.

Sampling and Monitoring

Samples were not collected during this pretreatment compliance inspection.

Compliance Determination, Violations, and Required Actions

Based upon observations made at the time of inspection, the facility was found to be in compliance with the Missouri Clean Water Law, its implementing regulations, and MSOP MO0104906.

Signatures

SUBMITTED BY:

Joshua Grosvenor, EI
Environmental Engineer
Southwest Regional Office

REVIEWED BY:

Randall Willoughby, CHMM
Water Pollution Section
Southwest Regional Office

Attachments

Attachment # 1 – Control Authority Pretreatment Inspection Checklist

CONTROL AUTHORITY PRETREATMENT INSPECTION CHECKLIST

PRETREATMENT INSPECTION (PCI) CONTENTS

Control Authority (CA) name and address	Date(s) of Inspection
City of Neosho 200 Nelson Ave. Neosho, MO 64850	**April 25, 2024**

Treatment Plant Name	NPDES Permit Number	Effective Date	Expiration Date	Permit Reviewed?
Neosho WWTF	**MO0104906**	**05/01/2017**	**04/30/2022**	**Yes**

INSPECTOR(S)

Name	Title/Affiliation	Telephone Number	Email Address
Joshua Grosvenor, EI	**Environmental Engineer, MoDNR**	**417-891-4300**	**joshua.grosvenor@dnr.mo.gov**

CA REPRESENTATIVE(S)

Name	Title/Affiliation	Telephone Number	Email Address
Ken Brady	**Local Manager***	**417-451-8080**	**kbrady@alliancewater.com**
Jerry Humphrey	**Pretreatment Inspector**	**417-451-8075**	**shoalcreek@alliancewater.com**

*Identified program contact

ACRONYM AND ABBREVIATION LIST

Acronym/Abbreviation	Term
AO	Administrative Order
BMP	Best management practices
BMR	Baseline Monitoring Report
CA	Control Authority
CERCLA	Comprehensive Environmental Remediation, Compensation and Liability Act
CFR	*Code of Federal Regulations*
CIU	Categorical Industrial User
CSO	Combined sewer overflow
CWA	Clean Water Act
CWF	Combined Wastestream Formula
DMR	Discharge Monitoring Report
DSS	Domestic Sewage Study
EP	Extraction Procedure
EPA	U.S. Environmental Protection Agency
ERP	Enforcement Response Plan
FDF	Fundamentally different factors
FTE	Full-time equivalent
FWA	Flow-Weighted Average
gpd	Gallons per day
ICIS	Integrated Compliance Information System
IU	Industrial User
IWS	Industrial Waste Survey
mgd	Million gallons per day
MSW	Municipal solid waste
N/A	Not applicable
ND	Not determined
NOV	Notice of Violation
NPDES	National Pollutant Discharge Elimination System
NSCIU	Nonsignificant Categorical Industrial User
O&G	Oil and grease
PCA	Pretreatment Compliance Audit
PCI	Pretreatment Compliance Inspection
PCS	Permit Compliance System
PIRT	Pretreatment Implementation Review Task Force
POTW	Publicly owned treatment works
QA/QC	Quality assurance/quality control
RCRA	Resource Conservation and Recovery Act
RIDE	Required ICIS Data Element
RNC	Reportable Noncompliance

ACRONYM AND ABBREVIATION LIST (CONTINUED)

Acronym/Abbreviation	Term
SIU	Significant Industrial User
SNC	Significant Noncompliance
SUO	Sewer Use Ordinance
TCLP	Toxicity Characteristic Leachate Procedure
TMDL	Total maximum daily load
TOMP	Toxic Organic Management Plan
TRC	Technical Review Criteria
TRE	Technical Review Evaluation
TRIS	Toxics Release Inventory System
TSDF	Treatment, Storage, and Disposal Facility
TTO	Total toxic organics
UST	Underground Storage Tank
WENDB	Water Enforcement National Data Base
Y/N	Yes or no

GENERAL INSTRUCTIONS

1. As noted in the Introduction, the inspector should review a representative number of SIU files. Section II of this checklist provides space to document several IU files. This should not be construed to mean that is an adequate representation of files to review. The inspector should make as many copies of Section I as needed to document a representative number of files according to the discussion in the Introduction.

2. The inspector should ensure that during the inspection, he or she follows up on any and all violations noted in the previous inspection, annual report, or during the course of the inspection.

3. Throughout the course of the evaluation, the inspector should look for areas in which the CA should improve the effectiveness and quality of its program.

4. Inspection findings should clearly distinguish between violations, deficiencies, and effectiveness issues.

SECTION I: DATA REVIEW

INSTRUCTIONS: Complete this section on the basis of CA activities to implement its pretreatment program. Answers to these questions could be obtained from a combination of sources including discussions with CA personnel, review of general and specific IU files, IU site visits, review of POTW treatment plants, among others. Attach documentation where appropriate. Specific data might be required in some cases.

- Write ND (Not Determined) beside the questions or items that were not evaluated during the inspection.
- Use N/A (Not Applicable) where appropriate.

A. CA PRETREATMENT PROGRAM MODIFICATION [403.18]

1. a. Has the CA made any substantial changes to the pretreatment program that were not reported to the Approval Authority (e.g., legal authority, less stringent limits, multijurisdictional situation)?

Yes	No
	X

If yes, discuss.

b. Is the CA in the process of making any substantial modifications to any pretreatment program component (including legal authority, less stringent local limits, the required pretreatment provisions from the 2005 revisions to the General Pretreatment Regulations, multijurisdictional situation, and others)?

Yes	No
	X

.

If yes, describe

c. Has the CA amended its pretreatment program to include components required under the 2005 amendments to the General Pretreatment Regulations.

Yes	No
X	

Note: If not sure, obtain a copy of the latest ordinance, or verify that one is available for later review.

2. a. Are there any planned changes to the POTW's treatment plant(s)?

Yes	No
	X

If yes, describe.

B. LEGAL AUTHORITY [403.8(f)(1)]

	Yes	No
1. a. Are there any contributing jurisdictions discharging wastewater to the POTW? If yes, complete questions b–e.		**X**

b. List the contributing jurisdictions.

	Yes	No
c. Does the CA have an agreement in place that addresses pretreatment program responsibilities?		**X**

d. Is the CA or the contributing jurisdiction responsible for the following:

	CA Responsibility	Contributing Jurisdiction Responsibility
Updating the IWS	**N/A**	**N/A**
Notifying IUs of requirements	**N/A**	**N/A**
Issuance of control mechanisms	**N/A**	**N/A**
Receiving and reviewing IU reports	**N/A**	**N/A**
Conducting inspections	**N/A**	**N/A**
Conducting compliance monitoring	**N/A**	**N/A**
Enforcement of Pretreatment Standards and Requirements	**N/A**	**N/A**

	Yes	No
e. Has the CA had any problems with implementation of its pretreatment program within the contributing jurisdictions?		**X**

If yes, explain.

	Yes	No
2. a. Has the CA updated its legal authority to reflect the 2005 General Pretreatment Regulation changes?	**X**	
b. Did all contributing jurisdictions update their SUOs to be as stringent as the receiving POTW?		**N/A**
c. Did the CA update its procedures and ERP to implement the changes in its SUO?	**X**	

Explain

SECTION I: DATA REVIEW (CONTINUED)

C. IU CHARACTERIZATION [403.8(f)(2)(i)&(ii)]

1. a. How does the CA define SIU? (Is it the same in contributing jurisdictions? Is it different from the federal definition at 40 CFR 403.3(v)?)

Defined in City Ordinance Section 705.020, matches 40 CFR 403.3(v).

b. If the CA has implemented the middle-tier CIU provisions, how does the CA define *middle-tier CIU?*

N/A

c. If the CA has implemented the NSCIU provisions, how does the CA define *NSCIU*?

N/A

2. How are SIUs identified and categorized (including those in contributing jurisdictions)?

Primarily for new customers. A pre application for a permit is given for completion and evaluation prior to issuing a discharge permit. Building permits are used to identify new industries.

Discuss any problems.

3. a. How and when does the CA update its IWS to identify new IUs (including those in contributing jurisdictions)?

Updated at least annually using billing software.

4. How many IUs are identified by the CA in each of the following groups?

a.	**3**		SIUs (as defined by the CA) [WENDB – SIUS, RIDE – SIUs]
		2	CIUs, excluding middle-tier CIUs and NSCIUs [WENDB – CIUS, RIDE - CIUs]
			Middle-tier CIUs** (specify below)
		1	Noncategorical SIUs
b.			Other regulated nonsignificant IUs (specify)
			Noncategorical nonsignificant IUs
			NSCIUs**, excluding zero-discharging CIUs [as defined by 40 CFR 403.3(v)(2)] (specify below)
			Zero-discharging CIUs** (specify below)
c.	**3**		TOTAL

**** The following section is to be completed only if the POTW has adopted middle-tier permitting [40 CFR 403.3(v), 403.8(f)(2)(v)(C), 403.12(e)(3)], general control mechanisms [40 CFR 403.8(f)(1)(iii)(A)], or NSCIUs [40 CFR 403.3(v)(2), 403.8(f)(2)(v)]. In addition the POTW's program must be revised and approved for these classifications before they can be used.**

List of NSCIUs and zero-discharging CIUs:

N/A

List of Middle-Tier CIUs :

N/A

If middle-tier CIU classification is used, what is 0.01% of the POTW's dry-weather capacity? _____

List of SIUs with general control mechanisms, and the category of general control mechanism:

N/A

SECTION I: DATA REVIEW (CONTINUED)

D. CONTROL MECHANISM EVALUATION [403.8(f)(1)(iii)]

1. a. How many and what percent of the total SIUs are not covered by an existing unexpired permit, or other individual control mechanism? [WENDB – NOCM, RIDE – SIUs without Control Mechanisms] [RNC – II]	**0**	**0**	%
b. How many control mechanisms were not issued within 180 days of the expiration date of the previous control mechanism or extended beyond 5 years? [RNC – II]	**0**		

If any, explain.

	Yes	No
2. a. Does the CA accept any waste by truck, rail, or dedicated pipe (including septage)?	**X**	
b. Is any of the waste hazardous as defined by RCRA?		**X**
c. Does any waste accepted via truck, rail, or dedicated pipe meet the CA's SIU definition?		**X**

The city accepts domestic wastes only. Haulers have to leave samples and declare the type of waste and the source. pH is checked for each load. The City requires all haulers to obtain a permit.

3. Describe the CA's program to control hauled wastes including a designated discharge point (e.g., number of points, control/security procedures). [403.5(b)(8)]

The Shoal Creek WWTF has a designated location to accept hauled wastes.

SECTION I: DATA REVIEW (CONTINUED)

E. APPLICATION OF PRETREATMENT STANDARDS AND REQUIREMENTS

1. What limits (categorical, local, other) does the CA apply to wastes that are hauled to the POTW (directly to the treatment plant or within the collection system, including contributing jurisdictions)? [403.1(b)(1)]

Local limits.

2. How does the CA keep abreast of current regulations to ensure proper implementation of standards? [403.8(f)(2)(iii)]

Communications with consultants and DNR staff.

3. Local limits evaluation: [403.8(f)(4); 40 CFR 122.44(j)(2)(ii)]

a. For what pollutants have local limits been set?

Arsenic, Cadmium, Copper, Chromium, Cyanide, Lead, Mercury, Nickel, Phenols, Silver Zinc, Sulfate, pH, Oil & Grease, and Total Toxic Organic (TTO). The City also has surcharges for BOD and TSS when they exceed 250 mg/L.

b. When was the CA's last local limits evaluation? What was the approval date?

Mid 2022, Approved December 2, 2022

c. Has the CA identified any pollutants of concern beyond those in its local limits? If yes, how has this been addressed?

Yes	No
	X

Dental Amalgam Rule Pretreatment Standards -- 40 CFR 441

4. Has the CA identified Dental Offices discharging to the POTW, and sent and received one-time compliance reports?

Yes	No
X	

If yes, how many were identified, files retained, and reviewed for compliance?

The City has identified and reviewed for compliance six (6) dental offices that place and remove dental amalgam. Files for the identified dental offices are retained.

SECTION I: DATA REVIEW (CONTINUED)

F. COMPLIANCE MONITORING

1. a. How does the CA determine adequate IU monitoring (sampling, inspecting, and reporting) frequencies?

Based on Federal Minimum Requirements and compliance history.

b. Is the IU monitoring frequency established in control mechanisms more, less, or the same as required by rule? Explain any difference.

The established monitoring frequency in the control mechanism is as stringent as the rule requires.

c. Does the CA perform IU monitoring in lieu of requiring IUs to conduct self-monitoring? If yes, list IUs.

No

2. In the past complete 12-month calendar year, how many, and what percentage of, SIUs were: [403.8(f)(2)(v)] [RNC - II]
(Define the 12-month period **January 2023** to **December 2023**.)

a. Not sampled or not inspected at least once [WENDB – NOIN]	**0**	**0**	%
b. Not sampled at least once [RIDE – SIUs Not Sampled]	**0**	**0**	%
c. Not inspected at least once (all parameters)? [RIDE – SIUs Not Inspected]	**0**	**0**	%

If any, explain. Indicate how the percentage was determined (e.g., actual, estimated).

SECTION I: DATA REVIEW (CONTINUED)

F. COMPLIANCE MONITORING (continued)

3. a. Indicate the number and percent of SIUs that were identified as being in SNC* with the following requirements as listed in the CA's last pretreatment program report: [WENDB, RIDE] [RNC – II]

SNC Evaluation Period: **January 2023 – December 2023**

0	**0**	%	Applicable Pretreatment Standards and reporting requirements
0	**0**	%	Self-monitoring requirements
0	**0**	%	Pretreatment compliance schedule(s)

*SNC defined by:

POTW	**X**
EPA	

b. Are any of the SIUs that were listed as being in SNC in the most recent pretreatment report still in SNC status? If yes, list SIUs.

All SNC resolved.

c. Indicate the number of SIUs that have been in 100% compliance with all Pretreatment Standards and Requirements.

Evaluation Period: **January 2023 – December 2023**

Number of SIUs: **Three (3)**

Names of SIUs:

K&S Wire

La-Z-Boy Midwest

Opal Foods

4. What does the CA's basic inspection include? (process areas, pretreatment facilities, chemical and hazardous waste storage areas, chemical spill prevention areas, hazardous-waste handling procedures, sampling procedures, laboratory procedures, and monitoring records) [403.8(f)(2)(v)&(vii)]

Production areas, pretreatment process, water flows, any upgrades, floor drains, potential slug flow areas, chemical storage, and hazardous storage.

Request a copy of the CA's inspection form, if applicable.

EPA Region 7 inspection form used.

SECTION I: DATA REVIEW (CONTINUED)

F. COMPLIANCE MONITORING (continued)

5. What QA/QC techniques does the CA use for sampling and analysis (e.g., splits, blanks, spikes), including verification of contract laboratory procedures and appropriate analytical methods? [403.8(f)(2)(vii)]

Check all that are applicable.

QA/QC for Sampling	✓	QA/QC for Analysis	✓
Gloves	**ND**	Sample Splits	**ND**
Chain-of-custody forms	**X**	Sample Blanks	**ND**
New Sampling Tubes	**ND**	Sample Spikes	**ND**
Field Blanks	**ND**	Other:	
Other:			

Samples are collected by a contract lab and not by the City.

6. a. Did any IUs notify the CA of a hazardous waste discharge since the last PCI or PCA? [403.12(j)&(p)]

Yes	No
	X

If yes, summarize.

b. How does the CA notify its users of the hazardous-waste reporting requirement? [403.12(p)]
When was the last time the CA notified its IUs?

ND

7. a. How and when does the CA evaluate/reevaluate SIUs for the need for a slug discharge control plan? [403.8(f)(2)(vi)]

The need for a slug control plan is evaluated during the inspection.

List SIUs required to have a slug discharge control plan:

All SIUs are required to have a Slug Control Plan.

b. For all existing SIUs identified as significant before November 14, 2005, or within a year of becoming an SIU (whichever is later), has the POTW performed the evaluation to determine whether each SIU needs a plan or action to control slug discharges?

Yes	No
X	

If not, which SIUs have not been evaluated?

SECTION I: DATA REVIEW (CONTINUED)

G. ENFORCEMENT

1. What is the CA's definition of SNC? [403.8(f)(2)(viii)]

Defined in ordinance 705.170. Same as the prior federal regulation.

2. ERP implementation: [403.8(f)(5)]

a. Has the ERP been adopted by the POTW?

Yes

b. Has the ERP been approved by the Approval Authority?

Yes

Note: If not sure if the Enforcement Response Plan has been approved, obtain a copy of the latest ERP, or verify that one is available for later review.

c. Is the ERP effective, and does it lead to timely compliance? Provide examples if any are available.

Yes

	Yes	No
3. a. Does the CA use compliance schedules? [403.8(f)(1)(iv)(A)]	X	
b. If yes, are they appropriate?	X	

Provide a list of SIUs on compliance schedules

4. Did the CA publish a list of all SIUs in SNC in a daily newspaper of general circulation that provides meaningful public notice within the jurisdiction served by the POTW in the previous year? [403.8(f)(2)(viii)]	Yes	No
		X

If yes, attach a copy.

If no, explain.

There were no SIUs in SNC during calendar year 2023.

SECTION I: DATA REVIEW (CONTINUED)

G. ENFORCEMENT (continued)

5. a. How many SIUs are in SNC with self-monitoring requirements and were not inspected (in the four most recent full quarters)?	**0**
b. How many SIUs are in SNC with self-monitoring requirements and were not sampled (in the four most recent full quarters)?	**0**

6. a. Did the CA experience any of the following caused by industrial discharges?

	Yes	No	Unknown	Explain
• Interference		**X**		
• Pass through		**X**		
• Fire or explosions (flashpoint, and such)		**X**		
• Corrosive structural damage		**X**		
• Flow obstruction		**X**		
• Excessive flow rates		**X**		
• Excessive pollutant concentrations		**X**		
• Heat problems		**X**		
• Interference due to oil and grease (O&G)		**X**		
• Toxic fumes		**X**		
• Illicit dumping of hauled wastes		**X**		
• Worker health and safety		**X**		
• Other (specify)				

Explain:

	Yes	No
b. If yes, did the CA take enforcement action against the IUs causing or contributing to pass through or interference? [RNC - I]		**X**

	Yes	No
7. a. Did any industrial user contribute to sanitary sewer overflows in the POTW's collection system since your last Audit or Inspection?		**X**

Discuss response:

SECTION I COMPLETED BY:	DATE: April 30, 2024
Joshua Grosvenor, EI	
TITLE: Environmental Engineer	TELEPHONE: 417-891-4300

SECTION II: IU FILE EVALUATION

INSTRUCTIONS: Select a representative number of SIU files to review. Provide relevant details on each file reviewed. Comment on all problems identified and any other areas of interest. Where possible, all CIUs (and SIUs) added since the last PCI or PCA should be evaluated. Make copies of this section to review additional files as necessary.

IU IDENTIFICATION

FILE 1 Industry name and address **K&S Wire Products** **300 Nelson Ave** **Neosho, MO 64850**	Type of industry **Manufacturing** SIC Code: **5051** NAICS Code:	
[**X**] CIU 40 CFR **433** Category(ies): **433 Metal Finishing**	Average total flow (gpd) **3,000 one to two days/week**	Average process flow **3,000 one to two days/week**
[ ] Other SIU [ ] Non-SIU [ ] NSCIU	Industry visited during inspection	Yes [ ] No [**X**]
Comments		

FILE 2 Industry name and address **LA-Z-Boy** **4301 Howard Bush Dr.** **Neosho, MO 64850**	Type of industry **Manufacturing** SIC Code: **3999** NAICS Code:	
[**X**] CIU 40 CFR **433** Category(ies): **433 Metal Finishing**	Average total flow (gpd) **1,400**	Average process flow **1,400**
[ ] Other SIU [ ] Non-SIU [ ] NSCIU	Industry visited during inspection	Yes [ ] No [**X**]
Comments Daily flows calculated from the monthly average water usage data from 2023.		

SECTION II: IU FILE EVALUATION (CONTINUED)

IU IDENTIFICATION (continued)		
FILE 3 Industry name and address **Opal Foods** **1619 Highway 59** **Neosho, MO 64850**	Type of industry **Food Processing** SIC Code: NAICS Code:	
[ ] CIU 40 CFR Category(ies): [**X**] Other SIU [ ] Non-SIU [ ] NSCIU	Average total flow (gpd) **1,605** Industry visited during inspection	Average process flow **1,605** Yes [ ] No [**X**]
Comments		
FILE 4 Industry name and address	Type of industry SIC Code: NAICS Code:	
[ ] CIU 40 CFR Category(ies): [ ] Other SIU [ ] Non-SIU [ ] NSCIU	Average total flow (gpd) Industry visited during inspection	Average process flow Yes [ ] No [ ]
Comments		

SECTION II: IU EVALUATION (CONTINUED)

Industry Name						
K&S Wire Products	**La-Z-Boy**	**Opal Foods**			**INSTRUCTIONS**: Evaluate the contents of selected IU files; place an emphasis on SIU files. Use N/A (Not Applicable) where necessary. Use ND (Not Determined) where there is insufficient information to evaluate/determine implementation status. Provide comments in the comment area at the bottom of the page for all violations, deficiencies, and/or other problems as well as for any areas of concern or interest noted. Enter a comment number in box and in the comment area at the bottom of the page, followed by the comment. Comments should delineate the extent of the violation, deficiency, and/or problem. Attach relevant copies of IU file information for documentation. Where no comment is needed, or if the item was found to be satisfactory, enter ✓ (check) to indicate area was reviewed. The evaluation should emphasize any areas where improvements in quality and effectiveness can be made.		
File 1	File 2	File 3	File 4		**IU FILE REVIEW**	**Reg. Cite**
					A. ISSUANCE OF IU CONTROL MECHANISM	
					1. Issuance or reissuance of control mechanism	403.8(f)(1)(iii)
X	**X**	**X**			a. Individual control mechanism	
N/A	**N/A**	**N/A**			b. General control mechanism	403.8(f)(1)(iii)(A)
					2. Control mechanism contents	403.8(f)(1)(iii)(B)
X	**X**	**X**			a. Statement of duration (≤ 5 years)	403.8(f)(1)(iii)(B)(1)
X	**X**	**X**			b. Statement of nontransferability w/o prior notification/approval	403.8(f)(1)(iii)(B)(2)
X	**X**	**X**			c. Applicable effluent limits (local limits, categorical standards, BMPs	403.8(f)(1)(iii)(B)(3)
					d. Self-monitoring requirements:	403.8(f)(1)(iii)(B)(4)
X	**X**	**X**			• Identification of pollutants to be monitored	
N	**N**	**N/A**			• Process for seeking a waiver for pollutant not present or expected to be present (CIUs only)	
Y	**Y**	**Y**			• Is the monitoring waiver certification language included in the control mechanism? (Y/N)	403.12(e)(2)(v)
N	**N**	**N**			• Are conditions for reinstating monitoring requirements if pollutants not present are detected in the future included in the permit? (Y/N)	403.12(e)(2)(vi)
					• Sampling frequency	
N	**N**	**N**			- Has the POTW reduced the IU's monitoring requirements for pollutants not present or expected to not to be present? (Y/N)	
X	**X**	**X**			• Sampling locations/discharge points	
X	**X**	**X**			• Sample types (grab or composite)	
X	**X**	**X**			• Reporting requirements (including all monitoring results)	
X	**X**	**X**			• Record-keeping requirements	

Comments:

SECTION II: IU EVALUATION (CONTINUED)

File 1	File 2	File 3	File 4		IU FILE REVIEW	Reg. Cite
					A. ISSUANCE OF IU CONTROL MECHANISM (continued)	
X	**X**	**X**			e. Statement of applicable civil and criminal penalties	403.8(f)(1)(iii)(B)(5)
Y	**Y**	**Y**			f. Compliance schedules/progress reports (if applicable)	403.8(f)(1)(iv)
N	**N**	**N**			g. Notice of slug loadings	403.12(f)
X	**X**	**X**			h. Notification of spills, bypasses, upsets, etc .	403.16, 403.17
X	**X**	**X**			i. Notification of significant change in discharge	403.12(j)
N	**N**	**N**			j. Notification of change affecting the potential for a slug discharge	403.8(f)(2)(vi)
X	**X**	**X**			k. 24-hour notification of violation/resample requirement	403.12(g)(2)
1	**1**	**1**			l. Slug discharge control plan conditions, if determined by the POTW to be necessary	403.8(f)(1)(iii)(B)(6), 403.8(f)(2)(vi)

Comments

1. The slug control plan requirement is not specified in the permit. The city has received a slug control plan from all of the regulated industries.

SECTION II: IU EVALUATION (CONTINUED)

File 1	File 2	File 3	File 4		IU FILE REVIEW	Reg. Cite
					B. CA APPLICATION OF IU PRETREATMENT STANDARDS	
Y	**Y**	**Y**			1. IU categorization	403.8(f)(1)(ii)
X	**X**	**N/A**			2. Calculation and application of categorical standards	403.8(f)(1)(ii)
1	**1**	**N/A**			a. Classification by category/subcategory	
1	**1**	**N/A**			b. Classification as new/existing source	
1	**1**	**N/A**			c. Application of limits for all regulated pollutants	
N/A	**N/A**	**N/A**			d. Classification as an NSCIU	403.3(v)(2)
N/A	**N/A**	**N/A**			e. Documentation for the qualification to be classified as NSCIU	
N/A	**N/A**	**N/A**			f. Documentation of reasons for supporting sampling wavier for pollutant not present	403.12(2)(iv)
X	**X**	**X**			3. Application of local limits	403.5(c)&(d)& 403.8(f)(1)(ii)
N/A	**N/A**	**N/A**			4. Application of BMPs	403.8(f)(1)(iii)(B)(3)
N/A	**N/A**	**N/A**			5. Calculation and application of production-based standards	403.6(c)

Comments

1. Limits from 40 CFR 433.15 were incorporated into the local limits.

SECTION II: IU EVALUATION (CONTINUED)

File 1	File 2	File 3	File 4		IU FILE REVIEW	Reg. Cite
					B. CA APPLICATION OF IU PRETREATMENT STANDARDS (continued)	
					6. Calculation of equivalent mass limits for concentration limits	403.6(c)(5)
N	**N**	**N**			a. IU has demonstrated or will demonstrate substantially reduced water usage	403.6(c)(5)(i)(A)
N	**N**	**N**			b. IU uses control and technologies adequate to achieve compliance	403.6(c)(5)(i)(B)
1	**1**	**1**			c. IU has provided information regarding actual average daily flow	403.6(c)(5)(i)(C)
X	**X**	**X**			d. IU does not have variable flow rates, production levels, or pollutant levels	403.6(c)(5)(i)(D)
X	**X**	**X**			e. IU has consistently complied with applicable categorical requirements	403.6(c)(5)(i)(E)
Y	**Y**	**Y**			f. Did the CA use appropriate flow rates when developing limits? (Y/N)	406.3(c)(5)(iii)(A)
X	**X**	**N/A**			g. Did the CA use the correct concentration-based limits for the applicable categorical standards? (Y/N)	403.6(c)(5)(iii)(B)
N/A	**N/A**	**N/A**			h. Upon notification of revised production rate, did the CA reassess the mass limits? (Y/N)	
					7. Calculation of equivalent concentration limits for flow-based standards	403.6(c)(6)
N	**N**	**N**			a. Is the IU subject to 40 CFR Part 414, 419, or 455? (Y/N)	
N	**N**	**N**			b. Documentation that dilution is not being used as treatment? (Y/N)	
N/A	**N/A**	**N/A**			8. Calculation and application of CWF or FWA	403.6(d)&(e)
Y	**Y**	**Y**			9. Application of most stringent limit	403.8(f)(1)(ii)

Comments

1. **All industries use city water usage for average flows.**

SECTION II: IU EVALUATION (CONTINUED)

File 1	File 2	File 3	File 4		IU FILE REVIEW	Reg. Cite
					C. CA COMPLIANCE MONITORING	
X	**X**	**X**			1. Inspection (at least once a year, except as otherwise specified)	403.8(f)(2)(v)
N/A	**N/A**	**N/A**			a. If the CA has determined a discharger to be an NSCIU	403.8(f)(2)(v)(B)
					• Evaluation of discharger with the definition of NSCIU once per year	
N/A	**N/A**	**N/A**			b. If the CA has reduced an IU's reporting requirements	403.8(f)(2)(v)(C)
					• Inspect at least once every 2 years	
X	**X**	**X**			2. Inspection at frequency specified in approved program	403.8(c)
X	**X**	**X**			3. Documentation of inspection activities	403.8(f)(2)(v)
Y	**Y**	**Y**			4. Evaluation of need for slug discharge control plan (reevaluation of existing plan)	403.8(f)(2)(vi)
X	**X**	**X**			5. Sampling (at least once a year, except as otherwise specified)	403.8(f)(2)(v)
					a. If the CA has waived monitoring for a CIU	403.8(f)(2)(v)(A)
N/A	**N/A**	**N/A**			• Sample waived pollutant(s) at least once during the term of the control mechanism	
					b. If the CA has reduced an IU's reporting requirements	403.8(f)(2)(v)(C)
N/A	**N/A**	**N/A**			• Sample and analyze IU discharge at least once every 2 years	
X	**X**	**X**			6. Sampling at the frequency specified in approved program	403.8(c)
X	**X**	**X**			7. Documentation of sampling activities (chain-of-custody; QA/QC)	403.8(f)(2)(vii)
X	**X**	**X**			8. Analysis for all regulated parameters	403.12(g)(1)
ND	**ND**	**ND**			9. Appropriate analytical methods (40 CFR Part 136)	403.8(f)(2)(vii)

Comments

SECTION II: IU EVALUATION (CONTINUED)

File 1	File 2	File 3	File 4		IU FILE REVIEW	Reg. Cite
					D. CA ENFORCEMENT ACTIVITIES	
N/A	**N/A**	**N/A**			1. Identification of violations	403.8(f)(2)(vii)
N/A	**N/A**	**N/A**			a. Discharge violations	
N/A	**N/A**	**N/A**			• IU self-monitoring	
N/A	**N/A**	**N/A**			• CA compliance monitoring	
N/A	**N/A**	**N/A**			b. Monitoring/reporting violations	
N/A	**N/A**	**N/A**			• IU self-monitoring	
N/A	**N/A**	**N/A**			– Reporting (e.g., frequency, content)	
N/A	**N/A**	**N/A**			– Sampling (e.g., frequency, pollutants)	
N/A	**N/A**	**N/A**			– Record-keeping	
N/A	**N/A**	**N/A**			• Notification (e.g., slug, spill, changed discharge, 24-hour notice of violation)	
N/A	**N/A**	**N/A**			• Slug discharge control plan	
N/A	**N/A**	**N/A**			• Compliance schedule/reports	
N/A	**N/A**	**N/A**			c. Compliance schedule violations	
N/A	**N/A**	**N/A**			• Start-up/final compliance	
N/A	**N/A**	**N/A**			• Interim dates	

Comments

No violations noted in most recent inspection.

SECTION II: IU EVALUATION (CONTINUED)

File 1	File 2	File 3	File 4		IU FILE REVIEW	Reg. Cite
					D. CA ENFORCEMENT ACTIVITIES (continued)	
N/A	**N/A**	**N/A**			2. Determination of SNC	403.8(f)(2)(viii)
					a. Chronic	
					b. TRC (Technical Review Criteria)	
					c. Pass through/interference	
					d. Spill/slug reporting load	
					e. Reporting	
					f. Compliance schedule	
					g. Other violations (e.g., BMPs requirements)	
N/A	**N/A**	**N/A**			3. Response to violation	
N/A	**N/A**	**N/A**			4. Adherence to approved ERP	403.8(f)(5)
N/A	**N/A**	**N/A**			5. Return to compliance	
					a. Within 90 days	
					b. Within time specified	
					c. Through compliance schedule	
N/A	**N/A**	**N/A**			6. Escalation of enforcement	403.8(f)(5)(ii)
N/A	**N/A**	**N/A**			7. Publication for SNC	403.8(f)(2)(viii)

Comments

SECTION II: IU EVALUATION (CONTINUED)

File 1	File 2	File 3	File 4		IU FILE REVIEW	Reg. Cite
					E. IU COMPLIANCE STATUS	
X	**X**	**X**			1. Self-monitoring and reporting	
X	**X**	**X**			a. Sampling at frequency specified in control mechanism/regulation	403.12(e)&(h)
X	**X**	**X**			b. Analysis of all required pollutants	403.12(g)(1)&(h)
ND	**ND**	**ND**			c. Appropriate analytical methods (40 CFR Part 136)	
X	**X**	**X**			d. Appropriate sample collection methods	
ND	**ND**	**ND**			e. Compliance with sample collection holding times	
N/A	**N/A**	**N/A**			f. Submission of BMR/90-day report	403.12(b) &(d)
X	**X**	**X**			g. Periodic self monitoring reports	403.12(e)&(h)
X	**X**	**X**			h. Reporting all required pollutants	403.12(g)(1)&(h)
Y	**Y**	**Y**			i. Signatory/certification of reports	403.12(l)
N/A	**N/A**	**N/A**			j. Annual certification by NSCIUs	403.12(q)
N/A	**N/A**	**N/A**			k. Submission of compliance schedule reports by required dates	403.12(c)
					l. Notification within 24 hours of becoming aware of violations	403.12(g)(2)
X	**X**	**X**			• Discharge violation	
X	**X**	**X**			• Slug load	
X	**X**	**X**			• Accidental spill	
N/A	**N/A**	**N/A**			m. Resampling/reporting within 30 days of knowledge of violation	403.12(g)(2)
ND	**ND**	**ND**			n. Notification of hazardous waste discharge	403.12(j)&(p)
Y	**Y**	**Y**			o. Submission/implementation of slug discharge control plan	403.8(f)(2)(vii)
ND	**ND**	**ND**			p. Notification of significant changes	403.12(j)

Comments

SECTION II: IU EVALUATION (CONTINUED)

File 1	File 2	File 3	File 4		IU FILE REVIEW	Reg. Cite
					E. IU COMPLIANCE STATUS (continued)	
N/A	**N/A**	**N/A**			2. Compliance with all general control mechanism requirements	
N/A	**N/A**	**N/A**			3. If the CA has classified the discharger as a middle-tier CIU	403.12(e)(3)
					• Categorical flow does not exceed 0.01% of the design dry-weather hydraulic capacity or 5,000 gpd (whichever is smaller)	
					• Categorical flow does not exceed 0.01% of the design dry weather organic treatment capacity of the POTW	
					• Categorical flow does not exceed 0.01% of the maximum allowable headworks loading for any regulated categorical pollutant	
N/A	**N/A**	**N/A**			4. If the CA has granted the discharger a monitoring waiver	403.12(e)(2)
					• Certification statements with each compliance report	
N/A	**N/A**	**N/A**			5. Compliance with BMR requirements, if applicable (Y/N)	
N/A	**N/A**	**N/A**			6. If the CA has classified the discharger as an NSCIU	403.3(v)(2)
					• IU discharges less than 100 gpd of total categorical wastewater	
					• Annual certification statements from the IU	
N/A	**N/A**	**N/A**			7. If the CA has established equivalent mass limits for a CIU	403.6(c)(5)(ii)
					• IU is effectively operating treatment technologies to achieve compliance	
					• IU is recording the facility's flow rates	
					• IU is recording the facility's production rates	
					• IU has notified the CA whenever production rates vary	
					• IU continues to employ water conservation methods/technologies	

Comments

SECTION II COMPLETED BY:	**Joshua Grosvenor, EI**	DATE:	**April 30, 2024**
TITLE:	**Environmental Engineer**	TELEPHONE:	**417-891-4300**