

BEFORE THE POLLUTION CONTROL BOARD
OF THE STATE OF ILLINOIS

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STATE OF ILLINOIS
Pollution Control Board

IN THE MATTER OF:

CITGO PETROLEUM CORPORATION,)

Petitioner,)

vs.)

ILLINOIS ENVIRONMENTAL)
PROTECTION AGENCY,)

Respondent.)

No. PCB 07-D10

NOTICE OF FILING

Dorothy M. Gunn, Clerk
Illinois Pollution Control Board
100 West Randolph – Suite 11-500
Chicago, IL 60601

Douglas Scott, Director
Illinois Environmental Protection Agency
1021 N. Grand Avenue East
P.O. Box 19274
Springfield, IL 62794-9274

PLEASE TAKE NOTICE that on August 14, 2006, we filed with the Illinois
Pollution Control Board the attached **Petition for Hearing to Review NPDES Permit
Reissuance**, a copy of which is herewith served upon you.

CITGO PETROLEUM CORPORATION

By: 

One of Its Attorneys

Jeffrey C. Fort
Elizabeth A. Leifel
Sonnenschein Nath & Rosenthal LLP
7800 Sears Tower
233 S. Wacker Drive
Chicago, IL 60606-6404
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limited to those conditions that are new and are contrary to the Environmental Protection Act, 415 ILCS 5/1, *et seq.*, the Clean Water Act, 33 U.S.C. 1251, *et seq.*, and the Board's rules and regulations. In support of its Petition, Citgo states as follows:

1. Citgo's Lemont Refinery produces approximately twenty-five different products are produced at the Refinery, including gasolines, turbine fuels, diesel fuels, furnace oils, petroleum coke and various specialty naphthas which can be manufactured into many intermediate products, including antifreeze, dacron, detergent, industrial alcohols, plastics and synthetic rubber. Ninety percent of the Refinery's output goes into making gasolines, diesel fuels, home heating oils and turbine fuels for use in Illinois and throughout the Midwest. The Refinery draws from and discharges to the Chicago Sanitary & Ship Canal. The Refinery takes approximately 4.0 million gallons of water daily from the Canal, and discharges approximately 3.8 million gallons to the Canal, the difference being cooling tower evaporation and steam losses.

2. In this Petition, Citgo is challenging certain conditions of its NPDES Permit, reissued on July 28, 2006. Citgo is not challenging the permit as a whole since receipt of the permit is critical for Citgo to meet its requirements under a consent decree entered into with U.S. EPA and the States of Illinois, Louisiana, New Jersey, and Georgia to reduce emissions from the Refinery. Citgo is only challenging Special Condition Nos. 17, 18, and 19, Standard Condition No. 14 (a)(4), and the portion of Condition No. 1 that prescribes an effluent limit for hexavalent chromium. Citgo's objections to these permit conditions are based on several factors. First, Special Condition Nos. 17 and 19 are challenged on the basis that they contain requirements that are not "applicable requirements" under federal and state law. Second, Special Condition No. 18 and Standard Condition No. 14(a)(4) are challenged on the basis that they are inconsistent with

requirements already applicable to the Refinery. Finally, Condition No. 1 is challenged on the basis that it is unnecessary due to the lack of hexavalent chromium used at the Refinery. Each of these conditions and bases for appeal is described in further detail below.

3. Special Condition No. 17 is improper and should be removed. Special Condition No. 17 states as follows:

The discharge from outfall 001 shall be subject to the following limitations:

During the months of April through November, the discharge shall not exceed 90°F but shall never exceed 93°F at any time.

Whenever the weekly average temperature of the effluent exceeds 90°F, the permittee shall limit its net thermal discharge to 1,452 mm BTU per day based on a weekly average.

The monthly average and monthly maximum value shall be reported on the DMR. The permittee shall also report the total number of hours the temperature exceeds 90°F.

This condition should be deleted from the Permit.

4. The temperature limits contained in Special Condition No. 17 are based on water quality standards that would be applicable to the Refinery if it discharged to a General Use water, but it does not. The Agency has apparently misconstrued Citgo's commitments regarding temperature standards made in connection with a recent variance proceeding, PCB 05-85, in which Citgo sought a variance from the Board's water quality standards for total dissolved solids ("TDS") (the "Variance Proceeding"). Citgo is installing certain processes, including a wet gas scrubber, that will control emissions from the Refinery. The wet gas scrubber will result in increased levels of TDS in the Refinery's wastewater. In the Variance Proceeding, Citgo agreed to meet a limitation of 90°F or less for wastewater added by the wet gas scrubber; however, as described in the Order entered by the Board in the Variance Proceeding, this limitation was

applicable only to an internal discharge into the refinery's treated water basin. *See Citgo Petroleum Corp. v. Ill. Envtl. Protection Agency*, PCB 05-85 (Variance – Water), Board Order (April 21, 2005) (“Purge water from the wet gas scrubber will then be treated to remove suspended solids and ammonia, and cooled to 90°F. . .”). This is not the same as an agreement to adhere to the water quality temperature standards for General Use waters at the Refinery discharge point.

5. As demonstrated by Citgo's permit application, the maximum temperature of the Refinery effluent meets the standards for Secondary Contact waters (93°F), but will not meet the standards for General Use waters (90°F). The refinery discharges to the Chicago Sanitary & Ship Canal, which is a secondary contact water, and Citgo's commitment was not equivalent to meeting a general use temperature standard at the point of discharge into the Canal. Thus, because Special Condition No. 17 is inconsistent with the Board's order in the Variance Proceeding, it should be removed from the Permit.

6. Petitioner also objects to Special Condition No. 18. Special Condition No. 18 states:

The permittee was granted a variance from the water quality standard for Total Dissolved Solids (TDS) for the discharge at outfall 001 in accordance with Illinois Pollution Control Board PCB 05-85. The permittee shall commence its study of downstream TDS concentrations in accordance with the schedule contained in this order. This permit may be modified to include any final limitations or monitoring requirements which may result. This variance expires on December 15, 2009.

7. Special Condition No. 18 is improper as stated and should be removed from the Permit. The result of the sampling required in the Variance Proceeding may not result in further limitations or monitoring, and may instead indicate that no further steps are necessary. Moreover,

TDS standards for General Use waters downstream of the I-55 Bridge may be significantly modified. *See In the Matter of: Revisions to Water Quality Standards for Total Dissolved Solids in the Lower Des Plaines River for ExxonMobil Oil Corporation: Proposed 35 Ill. Adm. Code 303.445, PCB R06-024.* Petitioner has also learned that the Agency will soon propose that the Board eliminate the TDS standards for all General Use waters. Petitioner submits that the same adjustment should be made for discharges into Secondary Contact waters.

8. Petitioner further objects to Special Condition No. 19, which states as follows:

Upon commencement of operation of the FCCU Scrubber System, the discharge from Outfall 001 shall be monitored on a continuous basis for Total Residual Chlorine and subject to a limit of 0.05 mg/l as an instantaneous maximum. The permittee shall notify the agency in writing 30 days (or as soon as practicable) prior to the start of the scrubber operations. From the effective date of this permit until such time that the scrubber become operational, monitoring for Total Residual Chlorine is only required during those times when breakpoint or super chlorination is used for a short term ammonia treatment in the treated water basin. Prior to discharging from the treated water basin following chlorine treatment, the permittee shall take a grab sample from the basin to determine compliance with the TRC limit of 0.05mg/l. The discharge from the basin shall then be sampled once per day using a grab sample, for a period of five days after resuming the discharge. The permittee shall submit an attachment to the DMR explaining the reason for the temporary chlorine treatment, the amount of chlorine use, and length of the temporary cessation of discharge.

9. Special Condition No. 19 is improper, and should be deleted in its entirety or, alternatively, modified to reflect existing applicable requirements. Special Condition No. 19 should be removed in its entirety because its inclusion exceeds the Agency's authority. U.S. EPA has established Best Available Technology (BAT) standards for petroleum refineries. *See 40 C.F.R. Part 419.* U.S. EPA has declined to establish standards for Total Residual Chlorine. Citgo is aware of no authority under which the Agency may establish BAT standards where U.S.

EPA has elected not to do so. In addition, Special Condition No. 19 should be removed because monitoring for Total Residual Chlorine is not required to ensure that the FCCU scrubber system performs as expected. Outfall 001 from the Refinery is already subject to 35 Ill. Admin. Code § 304.213, which requires the discharge to meet limitations for ammonia. As part of these standards, the effluent is already subject to detailed monitoring requirements. Special Condition No. 19 is unnecessarily duplicative and should be deleted.

10. Moreover, the effluent limit for Total Residual Chlorine of 0.05 mg/L is based on a water quality standard for General Use waters. As noted above, the Refinery discharges to the Chicago Sanitary and Ship Canal, which is a Secondary Contact water. Thus, an effluent limit based on a General Use standard is inappropriate, and the Total Residual Chlorine limit should be removed.

11. If the Board determines that removal of Special Condition No. 19 is unwarranted, it should be modified to contain an allowance for maintenance or malfunctions of the required monitoring equipment. Special Condition No. 19 appears to require continuous monitoring; therefore, not recognizing that periodic outages of the monitoring equipment may occur, during maintenance and malfunction, for example, is unreasonable. If Special Condition No. 19 is allowed to remain in the Permit, Citgo requests that such an allowance be added.

12. Petitioner further objects to the limitation imposed for hexavalent chromium contained in Condition No. 1 and the means by which compliance is to be determined. The Refinery formerly used hexavalent chromium in its cooling tower; however, the Refinery has since discontinued the use of hexavalent chromium. Since eliminating the use of hexavalent chromium, hexavalent chromium has not been detected in the Refinery's effluent. Nevertheless,

a mass discharge limit for hexavalent chromium appears in Condition No. 1. Thus, the effluent limit for hexavalent chromium in the Permit is unnecessary and should be removed.

13. Petitioner further objects to Standard Condition No. 14(a)(4), which provides that

“All manufacturing, commercial, mining, and silvicultural dischargers must notify the Agency as soon as they know or have reason to believe . . . [t]hat any activity has occurred or will occur which would result in the discharge of any toxic pollutant identified under Section 307 of the Clean Water Act which is not limited in the permit, if that discharge will exceed the highest of the following notification levels: . . . The level established by the Agency in this permit.”

Standard Condition No. 14(a)(4) is inconsistent with the plain language of Standard Condition 14(a), which excepts from notification requirements those pollutants that are limited by the permit. Moreover, Standard Condition No. 14(a)(4) is inconsistent with other, more specific notification requirements contained elsewhere in the Permit, including Special Condition No. 10(L), which requires annual submission of documentation showing any event, such as a spill or malfunction, that would require an inspection. Therefore, Standard Condition No. 14(a)(4) should be removed as inconsistent with other requirements of Standard Condition No. 14(a) and with other specific notification requirements in the Permit.

WHEREFORE, for all of the foregoing reasons, the Petitioner respectfully requests that the Board review the reissued permit and make a final decision that strikes these contested conditions from the permit and directs the Agency to reissue the final permit without these conditions.

RESPECTFULLY SUBMITTED,
CITGO PETROLEUM CORPORATION

By: 
One of its Attorneys

Dated: August 14, 2006

Jeffrey C. Fort
Elizabeth A. Leifel
Sonnenschein Nath & Rosenthal LLP
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233 S. Wacker Dr.
Chicago, Illinois 60606-6404
312-876-8000

12100071

THIS FILING IS BEING SUBMITTED ON RECYCLED PAPER

Exhibit A

NPDES Permit No. IL0001589

Illinois Environmental Protection Agency

Division of Water Pollution Control

1021 North Grand Avenue East

Post Office Box 19276

Springfield, Illinois 62794-9276

NATIONAL POLLUTANT DISCHARGE ELIMINATION SYSTEM

Reissued (NPDES) Permit

Expiration Date: July 31, 2011

Issue Date: July 28, 2006

Effective Date: August 1, 2006

Name and Address of Permittee:

CITGO Petroleum Corporation
135th and New Avenue
Lemont, Illinois 60439

Facility Name and Address:

CITGO Petroleum Corporation - Lemont Refinery
135th and New Avenue
Lemont, Illinois 60439
(Will County)

Discharge Number and Name:

001 Treated Refinery Wastewater
002 Stormwater Basin Overflow
003 Stormwater
004 Stormwater
005 Stormwater
006 Stormwater
007 Intake Screen Backwash
008 Stormwater

Receiving Waters:

Chicago Sanitary and Ship Canal
Illinois and Michigan Canal
Chicago Sanitary and Ship Canal
Illinois and Michigan Canal

In compliance with the provisions of the Illinois Environmental Protection Act, Title 35 of Ill. Adm. Code, Subtitle C and/or Subtitle D, Chapter 1, and the Clean Water Act (CWA), the above-named permittee is hereby authorized to discharge at the above location to the above-named receiving stream in accordance with the standard conditions and attachments herein.

Permittee is not authorized to discharge after the above expiration date. In order to receive authorization to discharge beyond the expiration date, the permittee shall submit the proper application as required by the Illinois Environmental Protection Agency (IEPA) not later than 180 days prior to the expiration date.



Alan Keller, P.E.
Manager, Permit Section
Division of Water Pollution Control

SAK:DEL:05121401.bah

NPDES Permit No. IL0001589

Effluent Limitations and Monitoring

1. From the effective date of this permit until the expiration date, the effluent of the following discharge(s) shall be monitored and limited at all times as follows:

Outfall(s): 001 - Treated Refinery Wastewater: 5.79 MGD DAF

PARAMETER	LOAD LIMITS lbs/day DAF (DMF)		CONCENTRATION LIMITS mg/l		SAMPLE FREQUENCY	SAMPLE TYPE
	30 DAY AVERAGE	DAILY MAXIMUM	30 DAY AVERAGE	DAILY MAXIMUM		
Contributory Waste Streams:						
1) Process Wastewater			5) Hydrostatic Test Water			
2) Cooling Tower Blowdown			6) Chemical Cleaning			
3) Non-Process Wastewater, Stormwater, Utility Water, Boiler Blowdown			7) Seneca, Chicago Carbon, BOC Process Water			
4) Sanitary Waste Water			8) Scrubber Wastewater			
Flow (MGD)	See Special Condition 1				Daily	Continuous
pH	See Special Condition 2				2/Week	Grab
BOD ₅	1008.80	2472.32			2/Week	Composite
CBOD ₅			20	40	2/Week	Composite
Oil and Grease	536.40	1005.75	15	20	2/Week	Mathematical Composite
Total Suspended Solids	1475.10	2313.23	25	50	2/Week	Composite
Phenols	10.28	42.37	0.3	0.4	2/Week	Composite
Ammonia as N	1005.75	2212.65	9.4	26.0	2/Week	Composite
COD	12873.60	24808.50			2/Week	Composite
Chromium (Total)	11.99	34.51		1.0	2/Week	Composite
Chromium (Hexavalent)	0.99	2.20	0.1	0.3	2/Week	Grab
Sulfide	9.72	21.79			2/Week	Composite
Cyanide	5.04	14.41	0.1	0.2	2/Week	Composite
Fluoride	756.60	2161.70	15	28.6	2/Week	Composite
Sulfate				Monitor Only	2/Week	Composite
Total Dissolved Solids				Monitor Only	2/Week	Composite
Temperature	See Special Condition 17				Continuous	Measure
Total Residual Chlorine	See Special Condition 19			0.05	1/Day	Grab

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Effluent Limitations and Monitoring

1. From the effective date of this permit until the expiration date, the effluent of the following discharge(s) shall be monitored and limited at all times as follows:

Outfall(s): 002 - Stormwater Basin Overflow: Intermittent

PARAMETER	LOAD LIMITS lbs/day DAF (DMF)		CONCENTRATION LIMITS mg/l		SAMPLE FREQUENCY	SAMPLE TYPE
	30 DAY AVERAGE	DAILY MAXIMUM	30 DAY AVERAGE	DAILY MAXIMUM		
Contributory Waste Streams:						
1) Refinery Stormwater		7) Biomass				
2) Treated Process Water (Fire Water)		8) Off Site Stormwater Runoff				
3) Utility Water		9) Exxon Mobil Terminal Stormwater				
4) Boiler Blowdown		10) Chicago Carbon Stormwater				
5) Tank Farm Stormwater		11) Kinder Morgan Stormwater				
6) Hydrostatic Test Water		12) BOC Stormwater				

Flow (MGD)	See Special Condition 1			Estimate When Monitoring		
pH	See Special Condition 2			1/Day	Grab	
BOD ₅			20	40	1/Day	Grab
Total Suspended Solids			25	50	1/Day	Grab
Oil and Grease			15	30	1/Day	Grab
Phenols			0.3	0.6	1/Day	Grab
Chromium (Total)				1.0	1/Day	Grab
Chromium (Hexavalent)			0.1	0.3	1/Day	Grab
Cyanide			0.1	0.2	1/Day	Grab
Fluoride			15	28.6	1/Day	Grab
Ammonia as N			9.4	26.0	1/Day	Grab
COD				Monitor	1/Day	Grab
Sulfide				Monitor	1/Day	Grab

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Effluent Limitations and Monitoring

1. From the effective date of this permit until the expiration date, the effluent of the following discharge(s) shall be monitored and limited at all times as follows:

Outfall(s): 007 - Intake Screen Backwash: 0.027 MGD DAF

PARAMETER	LOAD LIMITS lbs/day DAF (DMF)		CONCENTRATION LIMITS mg/l		SAMPLE FREQUENCY	SAMPLE TYPE
	30 DAY AVERAGE	DAILY MAXIMUM	30 DAY AVERAGE	DAILY MAXIMUM		
Flow (MGD)	See Special Condition 1				1/Week	Estimate
Total Residual Chlorine				0.05	1/Week	Grab

Outfalls: 003, 004, 005, 006, and 008 - Stormwater Runoff: Intermittent

See Special Condition 10

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Special Conditions

SPECIAL CONDITION 1. Flow (in Million Gallons per Day) shall be reported as a monthly average and a daily maximum on the DMR form.

SPECIAL CONDITION 2. The pH shall be in the range 6.0 to 9.0. The monthly minimum and monthly maximum values shall be reported on the DMR form.

SPECIAL CONDITION 3. Samples taken in compliance with the effluent monitoring requirements shall be taken at a point representative of the discharge, but prior to entry into the receiving stream.

SPECIAL CONDITION 4. If an applicable effluent standard or limitation is promulgated under Sections 301(b)(2)(C) and (D), 304(b)(2), and 307(a)(2) of the Clean Water Act and that effluent standard or limitation is more stringent than any effluent limitation in the permit or controls a pollutant not limited in the NPDES Permit, the Agency shall revise or modify the permit in accordance with the more stringent standard or prohibition and shall so notify the permittee.

SPECIAL CONDITION 5. This permit may be modified to include different final effluent limitations or requirements which are consistent with applicable laws, regulations, or judicial orders. The Agency will public notice the permit modification.

SPECIAL CONDITION 6. Mathematical composites for oil, fats and greases shall consist of a series of grab samples collected over any 24-hour consecutive period. Each sample shall be analyzed separately and the arithmetic mean of all grab samples collected during a 24-hour period shall constitute a mathematical composite. No single grab sample shall exceed a concentration of 75 mg/l.

SPECIAL CONDITION 7. For the purpose of this permit discharges from outfalls 003, 004, 005, 006, and 008 are limited to stormwater, free from process and other wastewater discharges.

SPECIAL CONDITION 8. Stormwater discharges identified as outfalls 003, 004, 005, 006, and 008 may be rerouted to the facility's WWTP and discharged via outfall 001, subject to the limitations of this permit. If these stormwater discharges are routed to the WWTP then they shall no longer be subject to the requirements of Special Condition 10, but instead shall meet the requirements of Special Condition 9.

SPECIAL CONDITION 9. (Outfalls 001 and 002) The Agency has determined that the effluent limitations in this permit constitute BAT/BCT for storm water which is treated in the existing treatment facilities for purposes of this permit reissuance, and no pollution prevention plan will be required for such storm water. In addition to the chemical specific monitoring required elsewhere in this permit, the permittee shall conduct an annual inspection of the facility site to identify areas contributing to a storm water discharge associated with industrial activity, and determine whether any facility modifications have occurred which result in previously-treated storm water discharges no longer receiving treatment. If any such discharges are identified the permittee shall request a modification of this permit within 30 days after the inspection. Records of the annual inspection shall be retained by the permittee for the term of this permit and be made available to the Agency on request.

SPECIAL CONDITION 10.

STORM WATER POLLUTION PREVENTION PLAN (SWPPP)

- A. A storm water pollution prevention plan shall be developed by the permittee for the storm water associated with industrial activity at this facility. The plan shall identify potential sources of pollution which may be expected to affect the quality of storm water discharges associated with the industrial activity at the facility. In addition, the plan shall describe and ensure the implementation of practices which are to be used to reduce the pollutants in storm water discharges associated with industrial activity at the facility and to assure compliance with the terms and conditions of this permit.
- B. The plan shall be completed within 180 days of the effective date of this permit. Plans shall provide for compliance with the terms of the plan within 365 days of the effective date of this permit. The owner or operator of the facility shall make a copy of the plan available to the Agency at any reasonable time upon request. [Note: If the plan has already been developed and implemented it shall be maintained in accordance with all requirements of this special condition.]
- C. The permittee may be notified by the Agency at any time that the plan does not meet the requirements of this condition. After such notification, the permittee shall make changes to the plan and shall submit a written certification that the requested changes have been made. Unless otherwise provided, the permittee shall have 30 days after such notification to make the changes.

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Special Conditions

- D. The discharger shall amend the plan whenever there is a change in construction, operation, or maintenance which may affect the discharge of significant quantities of pollutants to the waters of the State or if a facility inspection required by paragraph G of this condition indicates that an amendment is needed. The plan should also be amended if the discharger is in violation of any conditions of this permit, or has not achieved the general objective of controlling pollutants in storm water discharges. Amendments to the plan shall be made within the shortest reasonable period of time, and shall be provided to the Agency for review upon request.
- E. The plan shall provide a description of potential sources which may be expected to add significant quantities of pollutants to storm water discharges, or which may result in non-storm water discharges from storm water outfalls at the facility. The plan shall include, at a minimum, the following items:
1. A topographic map extending one-quarter mile beyond the property boundaries of the facility, showing: the facility, surface water bodies, wells (including injection wells), seepage pits, infiltration ponds, and the discharge points where the facility's storm water discharges to a municipal storm drain system or other water body. The requirements of this paragraph may be included on the site map if appropriate.
 2. A site map showing:
 - I. The storm water conveyance and discharge structures;
 - ii. An outline of the storm water drainage areas for each storm water discharge point;
 - iii. Paved areas and buildings;
 - iv. Areas used for outdoor manufacturing, storage, or disposal of significant materials, including activities that generate significant quantities of dust or particulates.
 - V. Location of existing storm water structural control measures (dikes, coverings, detention facilities, etc.);
 - Vi. Surface water locations and/or municipal storm drain locations
 - Vii. Areas of existing and potential soil erosion;
 - Viii. Vehicle service areas;
 - ix. Material loading, unloading, and access areas.
 3. A narrative description of the following:
 - I. The nature of the industrial activities conducted at the site, including a description of significant materials that are treated, stored or disposed of in a manner to allow exposure to storm water;
 - ii. Materials, equipment, and vehicle management practices employed to minimize contact of significant materials with storm water discharges;
 - iii. Existing structural and non-structural control measures to reduce pollutants in storm water discharges;
 - iv. Industrial storm water discharge treatment facilities;
 - V. Methods of onsite storage and disposal of significant materials;
 4. A list of the types of pollutants that have a reasonable potential to be present in storm water discharges in significant quantities.
 5. An estimate of the size of the facility in acres or square feet, and the percent of the facility that has impervious areas such as pavement or buildings.

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Special Conditions

6. A summary of existing sampling data describing pollutants in storm water discharges.
- F. The plan shall describe the storm water management controls which will be implemented by the facility. The appropriate controls shall reflect identified existing and potential sources of pollutants at the facility. The description of the storm water management controls shall include:
1. Storm Water Pollution Prevention Personnel - Identification by job titles of the individuals who are responsible for developing, implementing, and revising the plan.
 2. Preventive Maintenance - Procedures for inspection and maintenance of storm water conveyance system devices such as oil/water separators, catch basins, etc., and inspection and testing of plant equipment and systems that could fail and result in discharges of pollutants to storm water.
 3. Good Housekeeping - Good housekeeping requires the maintenance of clean, orderly facility areas that discharge storm water. Material handling areas shall be inspected and cleaned to reduce the potential for pollutants to enter the storm water conveyance system.
 4. Spill Prevention and Response - Identification of areas where significant materials can spill into or otherwise enter the storm water conveyance systems and their accompanying drainage points. Specific material handling procedures, storage requirements, spill clean up equipment and procedures should be identified, as appropriate. Internal notification procedures for spills of significant materials should be established.
 5. Storm Water Management Practices - Storm water management practices are practices other than those which control the source of pollutants. They include measures such as installing oil and grit separators, diverting storm water into retention basins, etc. Based on assessment of the potential of various sources to contribute pollutants, measures to remove pollutants from storm water discharge shall be implemented. In developing the plan, the following management practices shall be considered:
 - I. Containment - Storage within berms or other secondary containment devices to prevent leaks and spills from entering storm water runoff;
 - ii. Oil & Grease Separation - Oil/water separators, booms, skimmers or other methods to minimize oil contaminated storm water discharges;
 - iii. Debris & Sediment Control - Screens, booms, sediment ponds or other methods to reduce debris and sediment in storm water discharges;
 - iv. Waste Chemical Disposal - Waste chemicals such as antifreeze, degreasers and used oils shall be recycled or disposed of in an approved manner and in a way which prevents them from entering storm water discharges.
 - V. Storm Water Diversion - Storm water diversion away from materials manufacturing, storage and other areas of potential storm water contamination;
 - vi. Covered Storage or Manufacturing Areas - Covered fueling operations, materials manufacturing and storage areas to prevent contact with storm water.
 6. Sediment and Erosion Prevention - The plan shall identify areas which due to topography, activities, or other factors, have a high potential for significant soil erosion and describe measures to limit erosion.
 7. Employee Training - Employee training programs shall inform personnel at all levels of responsibility of the components and goals of the storm water pollution control plan. Training should address topics such as spill response, good housekeeping and material management practices. The plan shall identify periodic dates for such training.
 8. Inspection Procedures - Qualified plant personnel shall be identified to inspect designated equipment and plant areas. A tracking or follow-up procedure shall be used to ensure appropriate response has been taken in response to an inspection. Inspections and maintenance activities shall be documented and recorded.

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Special Conditions

- G. The permittee shall conduct an annual facility inspection to verify that all elements of the plan, including the site map, potential pollutant sources, and structural and non-structural controls to reduce pollutants in industrial storm water discharges are accurate. Observations that require a response and the appropriate response to the observation shall be retained as part of the plan. Records documenting significant observations made during the site inspection shall be submitted to the Agency in accordance with the reporting requirements of this permit.
- H. This plan should briefly describe the appropriate elements of other program requirements, including Spill Prevention Control and Countermeasures (SPCC) plans required under Section 311 of the CWA and the regulations promulgated thereunder, and Best Management Programs under 40 CFR 125.100.
- I. The plan is considered a report that shall be available to the public under Section 308(b) of the CWA. The permittee may claim portions of the plan as confidential business information, including any portion describing facility security measures.
- J. The plan shall include the signature and title of the person responsible for preparation of the plan and include the date of initial preparation and each amendment thereto.

Construction Authorization

- K. Authorization is hereby granted to construct treatment works and related equipment that may be required by the Storm Water Pollution Prevention Plan developed pursuant to this permit.

This Authorization is issued subject to the following condition(s).

- 1. If any statement or representation is found to be incorrect, this authorization may be revoked and the permittee there upon waives all rights thereunder.
- 2. The issuance of this authorization (a) does not release the permittee from any liability for damage to persons or property caused by or resulting from the installation, maintenance or operation of the proposed facilities; (b) does not take into consideration the structural stability of any units or part of this project; and (c) does not release the permittee from compliance with other applicable statutes of the State of Illinois, or other applicable local law, regulations or ordinances.
- 3. Plans and specifications of all treatment equipment being included as part of the stormwater management practice shall be included in the SWPPP.
- 4. Construction activities which result from treatment equipment installation, including clearing, grading and excavation activities which result in the disturbance of one acre or more of land area, are not covered by this authorization. The permittee shall contact the IEPA regarding the required permit(s).

REPORTING

- L. The facility shall submit an annual inspection report to the Illinois Environmental Protection Agency. The report shall include results of the annual facility inspection which is required by Part G of the Storm Water Pollution Prevention Plan of this permit. The report shall also include documentation of any event (spill, treatment unit malfunction, etc.) Which would require an inspection, results of the inspection, and any subsequent corrective maintenance activity. The report shall be completed and signed by the authorized facility employee(s) who conducted the inspection(s).
- M. The first report shall contain information gathered during the one year time period beginning with the effective date of coverage under this permit and shall be submitted no later than 60 days after this one year period has expired. Each subsequent report shall contain the previous year's information and shall be submitted no later than one year after the previous year's report was due.

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Special Conditions

N. Annual inspection reports shall be mailed to the following address:

Illinois Environmental Protection Agency
Bureau of Water
Compliance Assurance Section
Annual Inspection Report
1021 North Grand Avenue East
Post Office Box 19276
Springfield, Illinois 62794-9276

O. If the facility performs inspections more frequently than required by this permit, the results shall be included as additional information in the annual report.

SPECIAL CONDITION 11. The Permittee shall record monitoring results on Discharge Monitoring Report (DMR) Forms using one such form for each outfall each month.

In the event that an outfall does not discharge during a monthly reporting period, the DMR Form shall be submitted with no discharge indicated.

The Permittee may choose to submit electronic DMRs (eDMRs) instead of mailing paper DMRs to the IEPA. More information, including registration information for the eDMR program, can be obtained on the IEPA website, <http://www.epa.state.il.us/water/edmr/index.html>.

The completed Discharge Monitoring Report forms shall be submitted to IEPA no later than the 15th day of the following month, unless otherwise specified by the permitting authority.

Permittees not using eDMRs shall mail Discharge Monitoring Reports with an original signature to the IEPA at the following address:

Illinois Environmental Protection Agency
Division of Water Pollution Control
1021 North Grand Avenue East
Post Office Box 19276
Springfield, Illinois 62794-9276

Attention: Compliance Assurance Section, Mail Code # 19

SPECIAL CONDITION 12. For the purpose of this permit, discharges from outfall 002 are limited to overflow from the stormwater retention basin, free from additional process or other discharges.

SPECIAL CONDITION 13. The permittee shall monitor the nitrogen concentration of its oil feed stocks and report the concentrations to the Agency on an annual basis. Reports shall be submitted no later than 60 days after the end of the calendar year.

SPECIAL CONDITION 14. The permittee may use the upset provision as an affirmative defense provided all the requirements of 40 CFR 122.41(n) are met.

SPECIAL CONDITION 15. Discharge from this facility shall be in accordance with 35 Ill. Adm. Code Section 304.213 for ammonia nitrogen. This section requires that the discharge meet BAT limitations pursuant to 40 CFR 419.23, as well as ammonia nitrogen concentration limits of 9.4 mg/l as a monthly average and 26.0 mg/l as a daily maximum.

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Special Conditions

SPECIAL CONDITION 16. Storm Water Credit for Outfall 001:

An additional stormwater credit for the following parameters shall be calculated based on 100% of the stormwater flow as defined below.

<u>Parameter</u>	<u>Pounds per 1000 gallons of stormwater</u>	
	<u>Average</u>	<u>Maximum</u>
BOD	0.22	0.40
Total Suspended Solids	0.18	0.28
COD	1.5	3.0
Oil and Grease	0.067	0.13
Phenol	0.0014	0.0029
Cr (tot)	0.0018	0.0050
Cr (+6)	0.00023	0.00052

Dry Weather Flow -- The average flow from the waste water treatment facility for the last three consecutive zero precipitation days. Previously collected storm water shall not be included.

Stormwater Flows -- The stormwater runoff which is treated in the waste water treatment facility shall be defined as that portion of the flow greater than the dry weather flow.

In computing monthly average permit limits to include stormwater credit, the pound credit calculated above shall be averaged along with process pound limits over the 30 day period. Explanatory calculations and flow data shall be submitted together with discharge monitoring reports.

The stormwater credit does not authorize the permittee to exceed the concentration limits contained in effluent Limitations and Monitoring, Page 2.

SPECIAL CONDITION 17. The discharge from outfall 001 shall be subject to the following limitations:

During the months of April through November, the discharge shall not exceed 90° F, except that one percent of the hours in any 12 month period may exceed 90° F but shall never exceed 93° F at any time.

Whenever the weekly average temperature of the effluent exceeds 90° F, the permittee shall limit it's net thermal discharge to 1,452 mm BTU per day based on a weekly average.

The monthly average and monthly maximum value shall be reported on the DMR. The permittee shall also report the total number hours the temperature exceeds 90° F.

SPECIAL CONDITION 18. The permittee was granted a variance from the water quality standard for Total Dissolved Solids (TDS) for the discharge at outfall 001 in accordance with Illinois Pollution Control Board Order PCB 05-85. The permittee shall commence its study of downstream TDS concentrations in accordance with the schedule contained in this order. This permit may be modified to include any final limitations or monitoring requirements which may result. This variance expires on December 15, 2009.

SPECIAL CONDITION 19. Upon commencement of operation of the FCCU Scrubber System, the discharge from Outfall 001 shall be monitored on a continuous basis for Total Residual Chlorine and subject to a limit of 0.05 mg/l as an instantaneous maximum. The permittee shall notify the Agency in writing 30 days (or as soon as practicable) prior to the start of scrubber operations. From the effective date of this permit until such time that the scrubber becomes operational, monitoring for Total Residual Chlorine is only required during those times when breakpoint or super chlorination is used for short term ammonia treatment in the treated water basin. Prior to discharging from the treated water basin following chlorine treatment, the permittee shall take a grab sample from the basin to determine compliance with the TRC limit of 0.05 mg/l. The discharge from the basin shall then be sampled once per day using a grab sample, for a period of five days after resuming the discharge. The permittee shall submit an attachment to the DMR explaining the reason for the temporary chlorine treatment, the amount of chlorine use, and length of the temporary cessation of discharge.

ATTACHMENT H

Standard Conditions

Definitions

Act means the Illinois Environmental Protection Act, Ch. 111-1/2 Ill. Rev. Stat., Sec. 1001-1052 as Amended.

Agency means the Illinois Environmental Protection Agency.

Board means the Illinois Pollution Control Board.

Clean Water Act (formerly referred to as the Federal Water Pollution Control Act) means Pub. L. 92-500, as amended, 33 U.S.C. 1251 et seq.

NPDES (National Pollutant Discharge Elimination System) means the national program for issuing, modifying, revoking and reissuing, terminating, monitoring and enforcing permits, and imposing and enforcing pretreatment requirements, under Sections 307, 402, 318 and 405 of the Clean Water Act.

USEPA means the United States Environmental Protection Agency.

Daily Discharge means the discharge of a pollutant measured during a calendar day or any 24-hour period that reasonably represents the calendar day for purposes of sampling. For pollutants with limitations expressed in units of mass, the "daily discharge" is calculated as the total mass of the pollutant discharged over the day. For pollutants with limitations expressed in other units of measurements, the "daily discharge" is calculated as the average measurement of the pollutant over the day.

Maximum Daily Discharge Limitation (daily maximum) means the highest allowable daily discharge.

Average Monthly Discharge Limitation (30 day average) means the highest allowable average of daily 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.

Average Weekly Discharge Limitation (7 day average) means the highest allowable average of daily discharges over a calendar week, calculated as the sum of all daily discharges measured during a calendar week divided by the number of daily discharges measured during that week.

Best Management Practices (BMPs) means schedules of activities, prohibitions of practices, maintenance procedures, and other management practices to prevent or reduce the pollution of waters of the State. BMPs also include treatment requirements, operating procedures, and practices to control plant site runoff, spillage or leaks, sludge or waste disposal, or drainage from raw material storage.

Aliquot means a sample of specified volume used to make up a total composite sample.

Grab Sample means an individual sample of at least 100 milliliters collected at a randomly-selected time over a period not exceeding 15 minutes.

24 Hour Composite Sample means a combination of at least 8 sample aliquots of at least 100 milliliters, collected at periodic intervals during the operating hours of a facility over a 24-hour period.

8 Hour Composite Sample means a combination of at least 3 sample aliquots of at least 100 milliliters, collected at periodic intervals during the operating hours of a facility over an 8-hour period.

Flow Proportional Composite Sample means a combination of sample aliquots of at least 100 milliliters collected at periodic intervals such that either the time interval between each aliquot or the volume of each aliquot is proportional to either the stream flow at the time of sampling or the total stream flow since the collection of the previous aliquot.

- (1) **Duty to comply.** The permittee must comply with all conditions of this permit. Any permit noncompliance constitutes a violation of the Act and is grounds for enforcement action, permit termination, revocation and reissuance, modification, or for denial of a permit renewal application. The permittee shall comply with effluent standards or prohibitions established under Section 307(a) of the Clean Water Act for toxic pollutants within the time provided in the regulations that establish these standards or prohibitions, even if the permit has not yet been modified to incorporate the requirement.
- (2) **Duty to reapply.** If the permittee wishes to continue an activity regulated by this permit after the expiration date of this permit, the permittee must apply for and obtain a new permit. If the permittee submits a proper application as required by the Agency no later than 180 days prior to the expiration date, this permit shall continue in full force and effect until the final Agency decision on the application has been made.
- (3) **Need to halt or reduce activity not a defense.** It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit.
- (4) **Duty to mitigate.** The permittee shall take all reasonable steps to minimize or prevent any discharge in violation of this permit which has a reasonable likelihood of adversely affecting human health or the environment.
- (5) **Proper operation and maintenance.** The permittee shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used by the permittee to achieve compliance with the conditions of this permit. Proper operation and maintenance includes effective performance, adequate funding, adequate operator staffing and training, and adequate laboratory and process controls, including appropriate quality assurance procedures. This provision requires the operation of back-up, or auxiliary facilities, or similar systems only when necessary to achieve compliance with the conditions of the permit.

- (6) **Permit actions.** This permit may be modified, revoked and reissued, or terminated for cause by the Agency pursuant to 40 CFR 122.62. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or a notification of planned changes or anticipated noncompliance, does not stay any permit condition.
- (7) **Property rights.** This permit does not convey any property rights of any sort, or any exclusive privilege.
- (8) **Duty to provide information.** The permittee shall furnish to the Agency within a reasonable time, any information which the Agency may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this permit, or to determine compliance with the permit. The permittee shall also furnish to the Agency, upon request, copies of records required to be kept by this permit.
- (9) **Inspection and entry.** The permittee shall allow an authorized representative of the Agency, upon the presentation of credentials and other documents as may be required by law, to:
 - (a) Enter upon the permittee's premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this permit;
 - (b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - (c) Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this permit; and
 - (d) Sample or monitor at reasonable times, for the purpose of assuring permit compliance, or as otherwise authorized by the Act, any substances or parameters at any location.
- (10) **Monitoring and records.**
 - (a) Samples and measurements taken for the purpose of monitoring shall be representative of the monitored activity.
 - (b) The permittee shall retain records of all monitoring information, including all calibration and maintenance records, and all original strip chart recordings for continuous monitoring instrumentation, copies of all reports required by this permit, and records of all data used to complete the application for this permit, for a period of at least 3 years from the date of this permit, measurement, report or application. This period may be extended by request of the Agency at any time.
 - (c) Records of monitoring information shall include:
 - (1) The date, exact place, and time of sampling or measurements;
 - (2) The individual(s) who performed the sampling or measurements;
 - (3) The date(s) analyses were performed;
 - (4) The individual(s) who performed the analyses;
 - (5) The analytical techniques or methods used; and
 - (6) The results of such analyses.
 - (d) Monitoring must be conducted according to test procedures approved under 40 CFR Part 136, unless other test procedures have been specified in this permit. Where no test procedure under 40 CFR Part 136 has been approved, the permittee must submit to the Agency a test method for approval. The permittee shall calibrate and perform maintenance procedures on all monitoring and analytical instrumentation at intervals to ensure accuracy of measurements.
- (11) **Signatory requirement.** All applications, reports or information submitted to the Agency shall be signed and certified.
 - (a) **Application.** All permit applications shall be signed as follows:
 - (1) For a corporation: by a principal executive officer of at least the level of vice president or a person or position having overall responsibility for environmental matters for the corporation;
 - (2) For a partnership or sole proprietorship: by a general partner or the proprietor, respectively; or
 - (3) For a municipality, State, Federal, or other public agency: by either a principal executive officer or ranking elected official.
 - (b) **Reports.** All reports required by permits, or other information requested by the Agency shall be signed by a person described in paragraph (a) or by a duly authorized representative of that person. A person is a duly authorized representative only if:
 - (1) The authorization is made in writing by a person described in paragraph (a); and
 - (2) The authorization specifies either an individual or a position responsible for the overall operation of the facility, from which the discharge originates, such as a plant manager, superintendent or person of equivalent responsibility; and
 - (3) The written authorization is submitted to the Agency.

- (c) **Changes of Authorization.** If an authorization under (b) is no longer accurate because a different individual or position has responsibility for the overall operation of the facility, a new authorization satisfying the requirements of (b) must be submitted to the Agency prior to or together with any reports, information, or applications to be signed by an authorized representative.
- (12) **Reporting requirements.**
- (a) **Planned changes.** The permittee shall give notice to the Agency as soon as possible of any planned physical alterations or additions to the permitted facility.
- (b) **Anticipated noncompliance.** The permittee shall give advance notice to the Agency of any planned changes in the permitted facility or activity which may result in noncompliance with permit requirements.
- (c) **Compliance schedules.** Reports of compliance or noncompliance with, or any progress reports on, interim and final requirements contained in any compliance schedule of this permit shall be submitted no later than 14 days following each schedule date.
- (d) **Monitoring reports.** Monitoring results shall be reported at the intervals specified elsewhere in this permit.
- (1) Monitoring results must be reported on a Discharge Monitoring Report (DMR).
- (2) If the permittee monitors any pollutant more frequently than required by the permit, using test procedures approved under 40 CFR 136 or as specified in the permit, the results of this monitoring shall be included in the calculation and reporting of the data submitted in the DMR.
- (3) Calculations for all limitations which require averaging of measurements shall utilize an arithmetic mean unless otherwise specified by the Agency in the permit.
- (e) **Twenty-four hour reporting.** The permittee shall report any noncompliance which may endanger health or the environment. Any information shall be provided orally within 24 hours from the time the permittee becomes aware of the circumstances. A written submission shall also be provided within 5 days of the time the permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance and its cause; the period of noncompliance, including exact dates and times; and if the noncompliance has not been corrected, the anticipated time it is expected to continue; and steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance. The following shall be included as information which must be reported within 24 hours:
- (1) Any unanticipated bypass which exceeds any effluent limitation in the permit;
- (2) Violation of a maximum daily discharge limitation for any of the pollutants listed by the Agency in the permit to be reported within 24 hours;
- The Agency may waive the written report on a case-by-case basis if the oral report has been received within 24 hours.
- (f) **Other noncompliance.** The permittee shall report all instances of noncompliance not reported under paragraphs (12)(c), (d), or (e), at the time monitoring reports are submitted. The reports shall contain the information listed in paragraph (12)(e).
- (g) **Other information.** Where the permittee becomes aware that it failed to submit any relevant facts in a permit application, or submitted incorrect information in a permit application, or in any report to the Agency, it shall promptly submit such facts or information.
- (13) **Transfer of permits.** A permit may be automatically transferred to a new permittee if:
- (a) The current permittee notifies the Agency at least 30 days in advance of the proposed transfer date;
- (b) The notice includes a written agreement between the existing and new permittees containing a specific date for transfer of permit responsibility, coverage and liability between the current and new permittees; and
- (c) The Agency does not notify the existing permittee and the proposed new permittee of its intent to modify or revoke and reissue the permit. If this notice is not received, the transfer is effective on the date specified in the agreement.
- (14) All manufacturing, commercial, mining, and silvicultural dischargers must notify the Agency as soon as they know or have reason to believe:
- (a) That any activity has occurred or will occur which would result in the discharge of any toxic pollutant identified under Section 307 of the Clean Water Act which is not limited in the permit, if that discharge will exceed the highest of the following notification levels:
- (1) One hundred micrograms per liter (100 ug/l);
- (2) Two hundred micrograms per liter (200 ug/l) for acrolein and acrylonitrile; five hundred micrograms per liter (500 ug/l) for 2,4-dinitrophenol and for 2-methyl-4,6-dinitrophenol; and one milligram per liter (1 mg/l) for antimony;
- (3) Five (5) times the maximum concentration value reported for that pollutant in the NPDES permit application; or
- (4) The level established by the Agency in this permit.
- (b) That they have begun or expect to begin to use or manufacture as an intermediate or final product or byproduct any toxic pollutant which was not reported in the NPDES permit application.
- (15) All Publicly Owned Treatment Works (POTWs) must provide adequate notice to the Agency of the following:
- (a) Any new introduction of pollutants into that POTW from an indirect discharger which would be subject to Sections 301 or 306 of the Clean Water Act if it were directly discharging those pollutants; and
- (b) Any substantial change in the volume or character of pollutants being introduced into that POTW by a source introducing pollutants into the POTW at the time of issuance of the permit.
- (c) For purposes of this paragraph, adequate notice shall include information on (i) the quality and quantity of effluent introduced into the POTW, and (ii) any anticipated impact of the change on the quantity or quality of effluent to be discharged from the POTW.
- (16) If the permit is issued to a publicly owned or publicly regulated treatment works, the permittee shall require any industrial user of such treatment works to comply with federal requirements concerning:
- (1) User charges pursuant to Section 204(b) of the Clean Water Act, and applicable regulations appearing in 40 CFR 35;
- (2) Toxic pollutant effluent standards and pretreatment standards pursuant to Section 307 of the Clean Water Act; and
- (3) Inspection, monitoring and entry pursuant to Section 308 of the Clean Water Act.
- (17) If an applicable standard or limitation is promulgated under Section 301(b)(2)(C) and (D), 304(b)(2), or 307(a)(2) and that effluent standard or limitation is more stringent than any effluent limitation in the permit, or controls a pollutant not limited in the permit, the permit shall be promptly modified or revoked, and reissued to conform to that effluent standard or limitation.
- (18) Any authorization to construct issued to the permittee pursuant to 35 Ill. Adm. Code 309.164 is hereby incorporated by reference as a condition of this permit.
- (19) The permittee shall not make any false statement, representation or certification in any application, record, report, plan or other document submitted to the Agency or the USEPA, or required to be maintained under this permit.
- (20) The Clean Water Act provides that any person who violates a permit condition implementing Sections 301, 302, 306, 307, 308, 318, or 405 of the Clean Water Act is subject to a civil penalty not to exceed \$10,000 per day of such violation. Any person who willfully or negligently violates permit conditions implementing Sections 301, 302, 306, 307, or 308 of the Clean Water Act is subject to a fine of not less than \$2,500, nor more than \$25,000 per day of violation, or by imprisonment for not more than one year, or both.
- (21) The Clean Water Act provides that any person who falsifies, tampers with, or knowingly renders inaccurate any monitoring device or method required to be maintained under permit shall, upon conviction, be punished by a fine of not more than \$10,000 per violation, or by imprisonment for not more than 6 months per violation, or by both.
- (22) The Clean Water Act provides that any person who knowingly makes any false statement, representation, or certification in any record or other document submitted or required to be maintained under this permit shall, including monitoring reports or reports of compliance or non-compliance shall, upon conviction, be punished by a fine of not more than \$10,000 per violation, or by imprisonment for not more than 6 months per violation, or by both.
- (23) Collected screening, slurries, sludges, and other solids shall be disposed of in such a manner as to prevent entry of those wastes (or runoff from the wastes) into waters of the State. The proper authorization for such disposal shall be obtained from the Agency and is incorporated as part hereof by reference.
- (24) In case of conflict between these standard conditions and any other condition(s) included in this permit, the other condition(s) shall govern.
- (25) The permittee shall comply with, in addition to the requirements of the permit, all applicable provisions of 35 Ill. Adm. Code, Subtitle C, Subtitle D, Subtitle E, and all applicable orders of the Board.
- (26) The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit is held invalid, the remaining provisions of this permit shall continue in full force and effect.

CERTIFICATE OF SERVICE

The undersigned, an attorney, certify that I have served upon the individuals named on the attached Notice of Filing true and correct copies of the PETITION FOR HEARING TO REVIEW NPDES PERMIT REISSUANCE, by First Class Mail, postage prepaid on August 14, 2006.

A handwritten signature in cursive script, reading "Elizabeth Heigel", written over a horizontal line.