

REPORT OF COMPLIANCE EVALUATION INSPECTION

AT

Anderson Farm
652 West Riverdale Drive
Nixa, MO 65714
Christian County

NPDES Permit # MORA20289

ON

November 4, 2024

BY

U.S. ENVIRONMENTAL PROTECTION AGENCY
Region 7
Enforcement and Compliance Assurance Division

INTRODUCTION

I conducted a Compliance Evaluation Inspection (CEI) of the Anderson Farm land disturbance site in Nixa, Missouri on November 4, 2024. This inspection was performed pursuant to Section 308(a) of the Federal Water Pollution Control Act, as amended. This narrative report and attachments present the findings and observations made during the inspection.

PARTICIPANTS

Anderson Farm:

Brad Anderson, owner

cell: 417-986-3478

e-mail: anderson@mowisp.net

Brian Thomas, Staff

Missouri Department of Natural Resources (MoDNR):

Taylor Hudson, Southwest Regional Office, Environmental Specialist

e-mail: taylor.hudson@dnr.mo.gov

U.S. Environmental Protection Agency (EPA):

Suzanne Ward, Physical Scientist

office: 913-551-7251

e-mail: ward.suzanne@epa.gov

FACILITY DESCRIPTION

NPDES permit. This land disturbance site is a topsoil removal operation. Anderson Farm has been covered under two Missouri State Operating Permits, MORA12860 (expired) and MORA20289 (current).

Missouri State Operating Permit MORA12860 was effective September 21, 2019, and expired on February 7, 2022. The permitted area designated by the permittee covers most of Anderson Farm. Image 1 shows land disturbing activity at Anderson Farm in the lower field on March 15, 2019, prior to permit coverage.

Missouri State Operating Permit MORA20289 was effective February 26, 2022, and expires on February 7, 2027. The permitted area drawn by the permitted indicated activity in the upper field. Image 2 shows land disturbing activity at Anderson Farm in the upper field on September 7, 2021.

Figure 1. Timeline of land disturbing activity and permit coverage

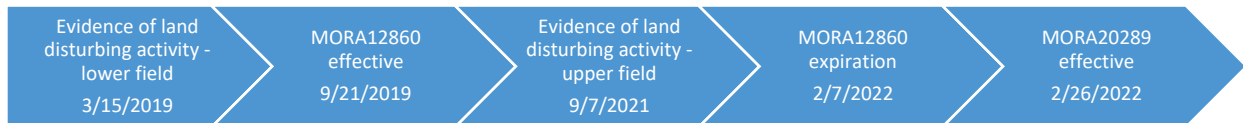


Image 1. Unpermitted land disturbing activity March 15, 2019 (MORA12860 polygon)



Image 2. Land disturbing activity September 7, 2021 (MORA20289 polygon)



Both permits list Brad Anderson as the owner. Both permits set forth requirements and conditions that the permittee must follow for each site.

Location. This topsoil removal operation is in unincorporated portions of Christian County at 652 West Riverdale Drive in Nixa, Missouri. The legal description provided is Section 1, Township 26N, Range 22 W in Christian County. The site is bordered on the north by West Riverdale Drive, on the east by US Highway 160/Missouri Route 13, the south by Finley Creek, and the west by agricultural land. The site is on portions of three parcels owned by Bradley C and Denise L Anderson as listed below in Table 1 and as seen in Image 3.

Table 1 Anderson-owned properties

Parcel ID	Property Address
190102000000003000	652 West Riverdale Rd
1901010000000011000	No address
190101003001026000	No address

Image 3. Anderson-owned properties



Outfalls. The most recent SWPPP map, in Attachment 7, indicates stormwater discharges from one outfall. The SWPPP and map does not specify a location with GPS coordinates. Attachment 4 – Aerial Maps displays the approximate location of the outfall.

Receiving Water. The site is in the Finley Creek Watershed (HUC 110100020209). Stormwater from the site discharges to Finley Creek and two unnamed tributaries to Finley Creek. MoDNR designated uses for the main unnamed tributary to Finley Creek include warm water habitat, irrigation, livestock and wildlife protection, secondary contact recreation, whole body contact – B, and human health protection. The unnamed tributary is a classified C stream that maintains permanent pools which support aquatic life during dry periods. MoDNR designated uses for Finley Creek in this reach include warm and cool water habitat, cool water habitat, irrigation, livestock and wildlife protection, secondary contact recreation, whole body contact – A, and human health protection. Finley Creek is a classified P stream that maintains permanent flow even in drought periods. There are no known impairments to the designated uses in either receiving stream. MoDNR has not assigned designation uses for the second unnamed tributary.

Compliance history.

The USEPA has not previously inspected Anderson Farm. MoDNR has conducted both routine inspections and inspections or investigations as the result of environmental concerns from the public several times under the previous permit cycle. See Table 2 below for a summary and Attachment 10 for details.

Table 2. Anderson Farm compliance history

Date	Activity	Findings	Summary of observations
September 24, 2019	MORA12860 issued		
November 20, 2019	MoDNR inspection	Finding of Compliance	Recommended completing the SWPPP. The MoDNR inspector informed the facility representative, Brian Thomas, of the need for interim and final stabilization.
August 18, 2020	Environmental concern received		General concerns about water protection
September 3, 2020	MoDNR inspection	Unsatisfactory Findings	Failed to document inspections. Not adequately posting public notification.
January 29, 2021	Environmental concern received		Alleges no barriers to prevent erosion
February 25, 2021	MoDNR inspection	Unsatisfactory Findings	Track out observed. Construction entrance not adequately installed.
March 10, 2021	Environmental concern received		Alleges no BMPs, stormwater runoff causing turbidity
July 2, 2021	Environmental concern received		
October 27, 2021	MoDNR investigation	Finding of Compliance	
December 13, 2021	Compliance assistance		Assistance provided regarding permit renewal
February 7, 2022	MORA12860 expired		
February 26, 2022	MORA20289 issued		

Land Reclamation – Sand and Gravel Excavation. J.M.T. Excavating L.L.C submitted a new industrial minerals mining permit to excavate sand and gravel at Anderson Farm (Attachment 12). The permit application identifies Brad Anderson as the landowner and Jesse Taylor as the contact person. The permit application was submitted to the Missouri Geological Survey in 2024 and the application was completed with the submission of a site map on November 7, 2024. At the time of this report, the permit is currently in the public notification stage. The Division of Environmental Quality (DEQ) and Missouri Geologic Survey (MGS) are both divisions within the Missouri Department of Natural Resources. DEQ issues NPDES permits for land disturbing activity. MGS issues mining permits. DEQ and MGS have a Memorandum of Understanding regarding NPDES land disturbing permits and mining permits. Once the MGS mining permit is effective, DEQ will no longer require an NPDES land disturbance permit for the same area. The proposed excavation site only covers a small portion of the lower field as seen outlined in red in Attachments 12 and 4, but the full upper field and lower field are included in the “mine plan boundary.”

INSPECTION PROCEDURES

On Monday, November 4, 2024, I conducted visual reconnaissance from West Riverdale Drive and US Highway 160/Missouri Route 13 to identify any areas of concern visible from the public right-of-way (Photos 1-2). Following reconnaissance, I contacted Brad Anderson at approximately 10:30 a.m. to schedule an inspection the same day. At approximately 12:30 p.m., I met with Mr. Anderson. I was accompanied by Taylor Hudson of the MoDNR Southwest Regional Office. I started the opening conference with introductions and I presented my EPA inspector credentials. I explained that the purpose of the inspection was to evaluate the facility’s compliance status with the Clean Water Act and Missouri State Operating Permit requirements under the authority of Section 308(a) of the Federal Water Pollution Control Act. I explained that the scope of the inspection would include a records review and visual inspection of the site, which would include the collection of photographs and documents. I provided Mr. Anderson with a printed copy of the U.S. EPA Notice Regarding Propriety/Confidential Business Information (CBI) Information Sheet and Form. I made him aware of his confidentiality rights and informed him that he had 10 business days to return the form signed if they needed to make any claims. He did not raise CBI claims during the inspection and did not return the form. Mr. Anderson provided all information pertaining to the site’s operation.

On Tuesday, November 5, 2024, I met Mr. Anderson to return documents and issue a Notice of Preliminary Findings, which he signed in acknowledgement of receipt (Attachment 11).

I took 97 photographs in total: 69 of the visual inspection, 27 of documents for review, and one of the signed Notice of Preliminary Findings. Visual images of 55 photographs are displayed in Attachment 1 – Photographs. Descriptions of all photos taken are in Attachment 2 – Photograph Log. Visual images of eight photographs are displayed in Attachment 3 – Stream Characterization and Water Nexus Form. I reviewed site inspections at Anderson Farm and received the remaining documents by email from Denise Anderson for review following the on-site inspection.

FINDINGS AND OBSERVATIONS

Records Review

I reviewed documents provided by Anderson Farm and MoDNR to evaluate compliance. Denise Anderson of Anderson Farm provided the 2019 and 2022 SWPPPs (Attachment 7) and self-

inspection forms (Attachment 8, 9) for review. MoDNR provided Missouri State Operating Permits MORA12860 and MORA20289 (Attachment 5, 6) as well as past inspection reports, environmental concern investigations, and compliance findings for Anderson Farm (Attachment 10).

Stormwater Pollution Prevention Plan (SWPPP). Permit condition IV.1. requires a SWPPP to be developed prior to land disturbing activities. I evaluated the SWPPP created in 2022 for MORA20289. I was unable to determine if it was developed prior to land disturbing activities because it does not identify the author or specify the date created.

Permit condition IV.3. requires the SWPPP to list and describe the location of all outfalls and to discuss whether discharges are in the watershed of Outstanding National or State Resource Water or in the watershed of a water impaired for sediment. The SWPPP identified one outfall but did not describe the location; however, the location is marked on the site map. The SWPPP did not discuss evaluation of Outstanding Waters or impairments. I reviewed MoDNR's Missouri Accessible Permitting Information Tool¹ (MAPiT). This site does not discharge to either category of waters.

Permit condition V.4. requires the SWPPP to include descriptions of structural and non-structural BMPs and V.7 requires the SWPPP to describe riparian buffers or structural equivalents when surface waters are located on or adjacent to the site. Permit Condition V.10. requires BMPs for pollution prevention to be in the SWPPP. The SWPPP only includes information for temporary silt socks, which are no longer used on site. The SWPPP does not discuss measures to be taken to prevent spillage of equipment maintenance fluids for equipment repair and maintenance conducted at the barn, does not include plans for stabilization, and does not include other implemented BMPs discussed during the inspection such as preservation of stream banks around receiving waters and vegetative buffers around stockpiles (**Finding 1**).

Permit condition IV.7. requires the SWPPP to contain a legible site map(s) which includes certain features listed below. The map provided in the SWPPP titled "site map #1" is the DNR_Landscape map that is automatically generated during permit issuance. The permittee added handwritten features to the DNR_Landscape map. The DNR_Landscape map automatically includes boundaries of property as drawn by the permitted in e-Permitting and locations of receiving waters. Handwritten features include: one outfall, one BMP identified in the SWPPP, and the direction of stormwater flow. The following map features were not included (**Finding 2**):

- areas of soil disturbance and areas that will not be disturbed,
- approximate slopes before and after grading,
- locations where stabilization practices are expected to occur,
- locations of on-site and off-site material, waste, borrow or equipment storage areas and stockpiles,
- locations of designated exits, and
- locations of stormwater inlets and conveyances.

¹ MAPiT <https://modnr.maps.arcgis.com/apps/webappviewer/index.html?id=87ebef4af15d438ca658ce0b2bbc862e>

Permit condition IV.8. requires a knowledgeable person to be designated as the environmental lead and as the inspector. The 2022 SWPPP designates either Brad Anderson or Brian Thomas to conduct inspections. The SWPPP did not include discussion of qualifications nor a record of training in erosion, sediment, and stormwater control principals for either designated inspector.

Site inspections. I reviewed self-inspection forms for August 1, 2022, to November 10, 2024 (Attachments 8, 9). Permit condition IV.11. requires the permittee to conduct inspections on a regular basis. The self-inspection forms indicate that inspections will be done at least once every 7 calendar days and within 48 hours after a 2-year, 24-hour storm or within 72 hours if the rain event ceases on a non-workday in accordance with the permit.

For the period reviewed, there were 12 instances when the permittee did not conduct inspections within 7 calendar days of the previous inspection (**Finding 3**). Dates include December 19, 2022, February 13, 2023, May 7, 2023, October 2, 2023, October 15, 2023, November 19, 2023, December 24, 2023, April 7, 2024, April 21, 2024, May 19, 2024, August 18, 2024, and October 5, 2024.

The self-inspection forms identified the 2-year, 24-hour event as 3.61 inches, although the weather station was not specified. I used the National Oceanic and Atmospheric Administration (NOAA) Atlas 14 Point Precipitation Frequency Estimate² tool as directed in the permit to verify the 2-year, 24-hour storm for this site (36.9842°, -93.3029°) and found it to be 3.62 inches (Attachment 13). Using NOAA Climate Data Online, I reviewed Ozark and Nixa, Missouri weather station data between February 26, 2022, and November 10, 2024 (Attachment 14) to determine if any of these events occurred. Precipitation exceeded the 2-year, 24-hour event on one instance. On Saturday, July 30, 2022, this weather station recorded 5.39 inches of precipitation. The permittee conducted the next self-inspection on August 1, 2022, within 48 hours.

Permit condition IV.10. requires inspection of all BMPs including perimeter BMPs, stabilized areas, material/waste/borrow/equipment storage areas, stormwater flow, outfalls, and receiving streams. In the self-inspection forms between November 14, 2022, and July 2, 2023, the permittee lists the BMPs on site as the “natural berms” on the south and west sides and three silt socks. In the self-inspection forms between July 9, 2023, and November 10, 2024, the permittee lists “natural berms” on all sides as the only BMPs. The inspections did not include storage areas, outfalls, and receiving streams (**Finding 4**).

Permit condition IV.9. requires the permittee to update the SWPPP in certain circumstances required by the permit. The permittee did not update the SWPPP to reflect changes in the BMPs that are documented in the self-inspection forms as listed above (**Finding 5**).

Permit condition IV.12. requires inspection reports to include the name and title of inspector, date and time of inspection, observations relative to the effectiveness of BMPs, any corrective actions taken, and areas where activity has ceased. Many of the self-inspection forms did not meet these permit requirements (**Finding 6**). All forms reviewed list Mr. Anderson and Mr.

² Part VI – Rainfall Values for Missouri & Surface Water Buffer Zones of Missouri State Operating Permit MOR100 Fact Sheet, site-specific 2-year, 24-hour storm event information, NOAA Atlas 14 https://hdsc.nws.noaa.gov/hdsc/pfds/pfds_map_cont.html

Thomas as inspectors, but none of the inspection forms I reviewed indicated which individual conducted the inspection. Mr. Anderson and Mr. Thomas had not signed any of the self-inspection forms. The reports do not include the titles of the inspectors. I reviewed three inspections with no dates listed. For the period reviewed, none of the reports included the time of day. For inspections conducted on November 14, 2022, and November 21, 2022, the permittee's inspector did not fill out the "Maintenance Needed?" and "Corrective Action Required?" fields for the listed BMPs. They had ceased land disturbing activity in areas of the upper field, but the inspector did not report it on any self-inspection forms.

Permit condition IV.13. requires deficiencies to be documented and corrected as soon as possible or within seven (7) days. For the December 5, 2022, the permittee's inspector marked the "Corrective Action Required?" field both yes and no for silt sock #3, but they did not specify the action needed in the "Notes" section and no follow up was noted. On an undated inspection report (Page 111-112 of Attachment 8), the inspector marked the "Corrective Action Required?" field both yes and no for natural berms along south and west sides, but they did not specify the action needed and no follow up was noted.

Visual Inspection

General. On the first day of the inspection, Monday, November 4, 2024, the temperature was between 65-70°F. It was not raining at 12:30 p.m. when the inspection started, but it began raining during the inspection around 1:45 p.m. I conducted visual inspections to evaluate compliance in the equipment maintenance area, material, waste, borrow, and equipment storage areas, upper and lower fields/disturbed areas, downgradient boundaries, ingress and egress points, the east unnamed tributary to Finley Creek, the main unnamed tributary to Finley Creek, and Finley Creek. I was unable to walk the upper field due to heavy rain and thunder, but I was able to view it from other areas. See Attachment 4 for aerial maps with photo locations and site features.

I visually inspected West Riverdale Drive at the ingress and egress point. Permit condition III.7. requires minimization of sediment track out. Sediment track-out was not present at the time of the inspection. Permit condition III.1. requires the permittee to post a public notification sign with the permit number. The permittee posted the permit certificate page, sign, and map on the barn at the entrance to Anderson Farm (Photo 5, 62). A copy of the SWPPP and the self-inspection reports are kept in the mailbox beside the permit documents.

Section III. of the permit requires good housekeeping practices, storage of petroleum products so they are not exposed to stormwater, and measures intended to prevent spillage or loss of fluids from vehicles and equipment. The permittee uses the barn at the Anderson Farm entrance to store used oil and other fluids from equipment maintenance (Photos 9, 10). They keep a bucket of oil dry in the barn for spills (Photo 12). I asked for used oil disposal records, but they were not available. Mrs. Anderson told me that they either have a company dispose of the used oil or local residents take it to burn in their oil burning heaters. I told her they should start keeping record of used oil disposal. I saw a tractor parked outside of the barn that was undergoing repairs (Photo 11). Mr. Anderson confirmed that equipment maintenance conducted at the site occurs outside and includes anything from routine oil changes to extensive repair work on tractors and other excavation equipment.

The area immediately south of the barn is used for outdoor equipment and material storage. Permit condition V.9. requires stabilization and diversion of surface flows around stockpiles to prevent erosion. I observed several stockpiles of clay and other materials removed from the upper and lower fields (Photos 13-17). The permittee had not installed BMPs to divert surface flows. Mr. Anderson said they consider the grassy field down gradient of the storage area to act as a buffer. The permittee did not document this as a BMP in the SWPPP (**Finding 1**).

After inspecting the entrance, barn, and storage area, I inspected the disturbed areas. Mr. Anderson said topsoil removal was complete in the upper and lower fields and they had not removed topsoil in about a year. The permittee had not implemented stabilization since completion of topsoil removal. He said they recently resumed work in the upper field, re-grading and removing clay to sell. I asked how often they worked on the upper field and he said they had worked on it every day the week before the inspection. Mr. Anderson said they had planned to reseed the upper field in fall 2024, but thought it was too dry.

We used a dirt access road to drive to the lower field. The access road crosses over the main unnamed tributary to Finley Creek, which was conveyed under the access road by a culvert (Photos 18-20). The main unnamed tributary is accessible on the north side by pastured cattle. The permitted area is south of the main unnamed tributary. Upon entering the lower field, most of the area was muddy and had no stabilization implemented (Photos 26, 27). I saw an area to the west of the access road where water collects and vegetation grows (Photo 25). Mr. Anderson identified it as a kind of sediment basin, but it was not engineered. The north boundary of the basin is the stream bank of the main unnamed tributary (Photo 24). I inspected the area and did not see any discharge pipes.

Permit conditions III.5. and V.6. require installation of erosion and sediment control BMPs along downgradient project boundaries. I visually inspected the boundaries between disturbed areas in the lower field and the main unnamed tributary to Finley Creek and Finley Creek. The permittee left the stream bank in place and removed sediment several feet down on the field side (Photo 21-23, 28, 29, 60). This is the feature known as the “natural berm” in the self-inspection forms. The undisturbed stream bank was intended to function as a stormwater control and left the lower field similar to a bowl. I visually inspected the “natural berm” along the lower field and did not see any breaks or discharge pipes that would allow stormwater to discharge to the unnamed tributary to Finley Creek or Finley Creek. The permittee did not leave a “natural berm” along the east unnamed tributary to Finley Creek in the lower field. The permittee did not include preservation of stream banks or “natural berms” as a control in the SWPPP (**Finding 5**).

In addition to the muddy areas of the lower field, there were areas of voluntary vegetation (Photos 31, 34, 35). Mr. Anderson said that Finley Creek floods into the lower field during heavy rain, which deposits new sediment and weedy vegetation. I also saw piles of gravel and exposed gravel next to pooling water in the east end of the lower field (Photo 34, 36, 37). Mr. Anderson said another business owner is pursuing a gravel mining permit from the Land Reclamation (MoDNR).

The lower and upper fields are separated by a depression on the east end of the site (Photos 38, 39) and by an elevated area (Photo 42) adjacent to the east unnamed tributary. I visually inspected the upper field from the elevated area. I saw bare ground in the northern portion of the upper field (Photos 64, 66-67). I saw standing water and voluntary vegetation in the southern

portion of the upper field and (Photos 40, 41). Permit condition V.12. requires stabilization to be initiated immediately when soil disturbing activities have ceased and will not resume for over 14 calendar days. Growth of voluntary vegetation indicates it had been longer than 14 calendar days since soil disturbing activities had occurred. The permittee had not implemented interim and final stabilization in these areas (**Finding 7**).

I walked along the east unnamed tributary from east to west and saw brown, sediment laden water in the tributary (Photos 42, 45, 46, 47, 48, 49, 50). At the west end of the east tributary, the permittee had constructed a dirt road to access the upper field from the lower field (Photo 51). A culvert conveys the east unnamed tributary from east to west under the access road (Photos 52, 53, 55, 56). The east unnamed tributary joins the main unnamed tributary approximately 300 feet downstream of the access road (Photos 54, 57-59). Permit Condition III.3. requires the design, installation, and maintenance of effective erosion and sediment controls to minimize the discharge of pollutants. There were no BMPs installed around the east unnamed tributary, resulting in a discharge of pollutants (sediment) (**Finding 9**).

Permit condition V.11. requires a sediment basin for each drainage area with 10 or more acres disturbed at one time. The SWPPP written for MORA20289 lists the permitted area as 41 acres. At the time of the inspection, I saw that vegetation was removed and the soil was bare in the entire upper field (Photo 1, 2, 64, 66, 67). I advised Mr. Anderson that based on the amount of disturbed area, a sedimentation basin should be utilized or if it is infeasible, they should discuss it in the SWPPP (**Finding 10**). I advised Mr. Anderson to read MORA20289 for all requirements related to the sediment basin.

SUMMARY

I provided Mr. Anderson a Notice of Preliminary Findings during the closing conference on November 5, 2024. Anderson Farm provided a response via email on November 18, 2024. I summarized the findings and the response below (Attachment 11).

- (IV. SWPPP Management Requirements) Missing SWPPP requirements such as list of outfalls, responsible person, inaccurate acreage, and no map.
Facility response: They will update the SWPPP based on the permit requirements. They provided a copy of the SWPPP map.
- (IV.10. Site Inspections) Site inspections not conducted since November 2022.
Facility response: They provided the missing self-inspection forms.
- (V.9. Stockpiles) No BMPs at stockpiles.
Facility response: MoDNR previously said stockpiles did not require BMPs because vegetative buffer was sufficient due to distance from waterway.
- (V. Stabilization) No interim stabilization on lower field.
Facility response: The area will be leased and mined for creek gravel.

At the time of this inspection report, the permittee had not provided an updated SWPPP referenced in their response. I reviewed the missing self-inspections and SWPPP map as part of my record review. BMPs around the stockpiles and stabilization in the entire site are addressed in my findings for this report. Following completion of the record review, additional findings include:

Finding 1 –The permittee did not include plans for stabilization or other BMPs discussed during the inspection including preservation of stream banks or “natural berms” around receiving waters and vegetative buffers around stockpiles in the SWPPP, as required by Permit Conditions V.4. and V.7.

Finding 2 – The permittee did not include all permit requirements in the SWPPP site map including the depiction of areas of soil disturbance and areas that will not be disturbed, approximate slopes before and after grading, locations where stabilization practices are expected to occur, locations of material, waste, borrow, and equipment storage areas and stockpiles, locations of designated exits, and locations of stormwater inlets and conveyances, as required by Permit Condition IV.7.

Finding 3 – There were 12 instances when the permittee did not conduct self-inspections within seven (7) calendar days of the previous inspection, as required by Permit Condition IV.11.

Finding 4 – The permittee did not include visual inspection of storage areas, outfalls, and receiving streams in self-inspections, as required by Permit Condition IV.10.

Finding 5 – The permittee did not update the SWPPP to reflect changes in the BMPs that are documented in the self-inspection forms, as required by Permit Condition IV.9.

Finding 6 – The permittee did not include the name and title of inspectors, signatures of inspectors, dates and times of inspections, corrective actions taken, and areas where activity has ceased in inspection reports, as required by Permit Condition IV.12.

Finding 7 – The permittee did not initiate stabilization immediately when soil disturbing activities ceased and did not resume for over 14 calendar days, as required by Permit Condition V.12.

Finding 8 – The permittee did not install BMPs around the east unnamed tributary to minimize the discharge of pollutants, as required by Permit Condition III.3.

Finding 9 – The permittee did not utilize a sediment basin for each drainage area with ten or more acres disturbed at one time and did not discuss infeasibility in the SWPPP, as required by Permit Condition V.11.

SUZANNE
WARD



Digitally signed by
SUZANNE WARD
Date: 2025.01.02 08:26:47
-06'00'

Suzanne Ward
Physical Scientist

NICOLE
MORAN



Digitally signed by
NICOLE MORAN
Date: 2025.01.02 10:17:26
-06'00'

Nicole Moran
Action Branch Supervisor

APPENDICES:

Attachment 1 – Photographs (19 pages)

Attachment 2 – Photograph Log (4 pages)

Attachment 3 – Stream Characterization and Water Nexus Form (5 pages)

Attachment 4 – Aerial Maps (4 pages)
Attachment 5 – Permit MORA20289 (current) (31 pages)
Attachment 6 – Permit MORA12860 (25 pages)
Attachment 7 – SWPPP (2019 and 2022) (5 pages)
Attachment 8 – Site Inspection Reports November 2022 to November 2024 (184 pages)
Attachment 9 – Site Inspection Reports (images) (27 pages)
Attachment 10 – MoDNR Inspection Reports and Concern Investigations (72 pages)
Attachment 11 – NOPF and Facility Response (6 pages)
Attachment 12 – Land Reclamation Permit Application and Attachments (11 pages)
Attachment 13 – NOAA Atlas 14 Results (4 pages)
Attachment 14 – NOAA Climate Data (13 pages)