

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VII
901 NORTH 5TH STREET
KANSAS CITY, KANSAS 66101

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ENVIRONMENTAL PROTECTION
AGENCY-REGION VII
REGIONAL HEARING CLERK

BEFORE THE ADMINISTRATOR

IN THE MATTER OF)	
)	Docket No. CWA-07-2003-0175
Briggs & Stratton Corp.)	
731 Highway 142)	
Poplar Bluff, Missouri 63901)	FINDINGS OF VIOLATION
Respondent)	AND ORDER FOR COMPLIANCE
)	
Proceeding under Section 309(a)(3))	
of the Clean Water Act,)	
33 U.S.C. § 1319(a)(3))	
_____)	

I. STATUTORY AUTHORITY

1. The FINDINGS OF VIOLATION are made and ORDER FOR COMPLIANCE is issued pursuant to the authority vested in the Administrator of the United States Environmental Protection Agency ("EPA"), by Section 309(a)(3) of the Clean Water Act ("CWA or the "Act"), 33 U.S.C. § 1319(a)(3), as delegated by the Administrator to the Regional Administrator, EPA Region VII, and further delegated to the Director, Water, Wetlands and Pesticides Division, EPA Region VII.

2. Section 301(a) of the Act, 33 U.S.C. § 1311 (a), prohibits discharge of pollutants from a point source into navigable waters of the United States, except in compliance with, *inter alia*, Sections 307 and 402 of the Act, 33 U.S.C. § § 1317 and 1342. Section 402 provides that pollutants may be discharged into navigable waters of the United States only in accordance with the terms of a National Pollutant Discharge Elimination System ("NPDES") permit issued pursuant to that section. Section 307 provides for the promulgation of regulations establishing pretreatment standards for introduction of pollutants into publicly owned treatment works ("POTW").

3. Pursuant to Section 307(b) of the Act, 33 U.S.C. § 1317(a), EPA promulgated regulations at 40 C.F.R. Part 403 establishing the General Pretreatment Regulations and at 40 C.F.R. Parts 405 through 471 establishing the Point Source Categorical Standards. These regulations and standards are designed to regulate the introduction of pollutants into publicly owned treatment works which are determined not to be amenable to treatment by such treatment works or which could interfere with the operation of such treatment works.

4. The Missouri Department of Natural Resources (“MDNR”) is the state agency with the authority to administer the federal NPDES program in Missouri pursuant to Section 402 of the Act, 33 U.S.C. § 1342, implementing regulations, and a Memorandum of Understanding dated October 30, 1974. MDNR is also the state agency with the authority to administer the Pretreatment Program in Missouri pursuant to Section 402 of the Act, implementing regulations and a Memorandum of Understanding dated June 3, 1981. As such, MDNR is the Approval Authority as defined by 40 C.F.R. § 403.3 (c) and the Control Authority, as defined by 40 C.F.R. § 403.12(a). EPA maintains concurrent enforcement authority with authorized state NPDES and Pretreatment programs for violations of NPDES permits and Pretreatment Program requirements.

II. Background

5. The City of Poplar Bluff (hereafter “City”) owns and operates a Publicly Owned Treatment Works (“POTW”) in Butler County, Missouri. The wastewater treatment plant is a “point source” that “discharges pollutants” to Pike Creek, which is considered “navigable waters of the United States,” respectively as defined within Section 502 of the Act, 33 U.S.C. § 1362.

6. On or about July 31, 1998, NPDES permit number MO-0043648 was issued to the City by the MDNR pursuant to Section 402 of the Act, 33 U.S.C. § 1342, which contains limitations for discharges of effluent from the POTW to waters of the United States. NPDES permit number MO-0043648 expires on July 30, 2003.

7. Briggs & Stratton Corp. (Respondent), is a “person” within the meaning of Section 502(5) of the Act, 33 U.S.C. § 1362(5), incorporated in the state of Wisconsin, and registered to do business in the state of Missouri. Respondent’s registered agent for service in Missouri is the Corporation Company, 120 South Central Avenue, Clayton, Missouri, 63105.

8. At all times relevant, Respondent owned and operated a facility which casts molten aluminum metal as part of its operation in manufacturing small horsepower gasoline engines. Following casting, Respondent performs surface treatment on the metal parts. These include iron electroplating, zinc electroless plating, and chemical etching and milling.

9. Respondent discharges wastewater from its manufacturing facility into the City’s POTW, and is therefore an “Industrial User” as defined at 40 C.F.R. § 403.3(t).

10. Respondent is subject to the General Pretreatment Regulations at 40 C.F.R. Part 403.

11. Aluminum casting, electroplating, electroless plating, and chemical etching and milling are regulated processes under the federal Categorical Standards as defined by the General Pretreatment Regulations at 40 C.F.R. Part 403.6.

12. Respondent is subject to the 40 C.F.R. Part 464.15, Metal Molding and Casting Point Source Category and 40 C.F.R. Part 433, Metal Finishing Point Source Category.

13. On or about January 8, 2003 EPA performed an inspection of Briggs & Stratton Corp. and identified violations of the General Pretreatment Regulations, 40 C.F.R. Part 403, the Metal Molding and Casting categorical standards 40 C.F.R. Part 464, and the Metal Finishing categorical standards, 40 C.F.R. Part 433.

III. Findings of Violation

14. The facts stated in paragraphs 5 through 13 above are incorporated herein by reference.

15. Respondent violated the General Pretreatment Regulations, 40 CFR Part 403 by failing to properly apply the Combined Wastestream Formula of 403.6(e) to its wastestreams regulated by categorical standards.

16. Respondent violated 40 C.F.R Part 464 Metal Molding and Casting regulations on at least the following occasions:

Date	Pollutant	Violation Type	Discharge level, mg/l	Limit, mg/l
Mar 05, 2002	Phenol	Daily Max	0.053	0.02
Apr 03, 2002	Phenol	Daily Max	0.026	0.02
Jun 05, 2002	Phenol	Daily Max	0.039	0.02
Jul 17, 2002	Phenol	Daily Max	0.063	0.02
Sep 11, 2002	Phenol	Daily Max	0.050	0.02
Nov 08, 2002	Phenol	Daily Max	0.027	0.02

17. Respondent violated the combined 40 C.F.R. Part 464 Metal Molding and Casting standard and the 40 C.F.R. Part 433 Metal Finishing Standard on the following occasion:

Date	Pollutant	Violation Type	Discharge level, mg/l	Limit, mg/l
Apr 03, 2002	Zinc	Daily Max	3.22	2.46

IV. Order for Compliance

18. Effluent Limitations

a. Samples for those pollutants listed below shall be taken at the following location:

1. Outfall 001: at the Palmer-Bolus flume in the first manhole following wastewater treatment.

b. The Respondent is authorized to discharge process wastewater from the above outfall to the City of Poplar Bluff but such discharges shall not exceed the following effluent limitations (all limits are expressed as totals). These limitations were determined using the Combined Wastestream Formula of 40 C.F.R. 403.6(e).

Pollutant	Daily Maximum mg/l	Monthly Average mg/l
Cadmium	0.11	0.07
Chromium	2.77	1.71
Copper	3.10	1.89
Cyanide	1.2	0.65
Lead	0.71	0.43
Nickel	3.98	2.38
Silver	0.43	0.24
Zinc	2.46	1.37
TTO	1.19	0.47
Total Phenols	1.0	0.4

19. Monitoring Requirements

a. Respondent shall monitor Outfall 001 for the following parameters at the indicated frequency:

Pollutant	Frequency	Method
Flow (gpd)	Continuous	Meter
Cadmium	Once per 6 months	24-hr Composite
Chromium	Once per month	24-hr Composite
Copper	Once per month	24-hr Composite
Cyanide	Once per 6 months	24-hr Composite
Lead	Once per month	24-hr Composite
Nickel	Once per 6 months	24-hr Composite
Silver	Once per 6 months	24-hr Composite
Zinc	Once per month	24-hr Composite
total phenols	Once per month	24-hr Composite
TTO	Once per 6 months	Grab

- b. All handling and preservation of collected samples and laboratory analyses of samples shall be performed in accordance with 40 C.F.R. Part 136 and amendments thereto unless specified otherwise in monitoring conditions of this order. Total phenols shall be determined using distillation followed by colorimetric - 4AAP.
- c. The 24-hour composite sample shall be taken only during the time that the facility is discharging process water or treated wastewater to the District's sewer system.
- d. In lieu of sampling for TTOs, Briggs & Stratton can use the certification statement of 40 C.F.R. Part 433.12 provided that an adequate Solvent Management Plan has been developed and submitted to MDNR.

20. Reporting Requirements

- a. Monitoring results obtained shall be summarized and reported every six months. The reports are to be postmarked no later than 20 days following the end of the six-month reporting period. The year is divided into two reporting periods, the first is from January 1 to June 30, the second is from July 1 through December 31. The report shall indicate the nature and concentration of all pollutants in the effluent for which sampling and analyses were performed during each calendar month of the respective reporting period. The report shall include a presentation

of the measured maximum and average daily flows.

b. If the results of the Respondent's wastewater analysis indicate that a violation of this order has occurred, the Respondent shall:

1. Inform MDNR of the violation within 24 hours; and
2. Repeat the sampling and pollutant analysis and submit, in writing, the results of this second analysis within 30 days of the first violation.

c. All reports required by this order for compliance shall be submitted to MDNR at the following addresses:

Rick Kuntz, P.E.
Missouri Department of Natural Resources
P.O. Box 176
Jefferson City, Missouri 65102
Phone: 573-751-6996

21. Respondent shall comply with the Standard Conditions contained in Attachment I to this Order.

V. General Provisions

Effect of Compliance with the Terms of This Order for Compliance

22. Compliance with the terms of this Order for Compliance shall not relieve Respondent of liability for, or preclude EPA from initiating, an administrative enforcement action to recover penalties for any violations of the CWA, or to seek additional injunctive relief, pursuant to Section 309 of the CWA, 33 U.S.C. § 1319.

23. Respondent shall comply with all other applicable laws, regulations, standards, and requirements contained in any applicable local, State and Federal pretreatment laws, regulations, standards, and requirements including any such laws, regulations, standards, or requirements that may become effective during the term of this Order.

24. This Order does not constitute a waiver or a modification of any requirements of the Clean Water Act, 33 U.S.C. § 1251 et. seq., all of which remain in full force and effect. The EPA retains the right to seek any and all remedies available under Section 309 of the Act, 33 U.S.C. § 1319, for any violation cited in this Order. Issuance of this Order shall not be deemed an election by EPA to forgo any civil or criminal action to seek penalties, fines, or other appropriate relief under the Act for any violation whatsoever.

Access and Requests for Information

25. Nothing in this Order shall limit EPA's right to obtain access to, and/or to inspect Respondent's facility, and/or to request additional information from Respondent, pursuant to the authority of Section 308 of the CWA, 33 U.S.C. § 1318 and/or any other authority.

Severability

26. If any provision or authority of this Order, or the application of this Order to Respondent, is held by federal judicial authority to be invalid, the application to Respondent of the remainder of this Order shall remain in full force and effect and shall not be affected by such a holding.

Effective Date

27. The terms of this Order shall be effective and enforceable against Respondent upon its receipt of an executed copy of the Order.

Termination

28. This Order shall remain in effect until a written notice of termination is issued by an authorized representative of the U.S. Environmental Protection Agency. Such notice shall not be given until all of the requirements of this Order have been met.

Issued this 6 day of June, 2003.



Leo J. Alderman, Director
Water, Wetlands, and Pesticides Division
U.S. Environmental Protection Agency
Region VII
901 N. 5th Street
Kansas City, Kansas 66101



Kristina M.G. Kemp
Assistant Regional Counsel
U.S. Environmental Protection Agency
Region VII
901 N. 5th Street
Kansas City, Kansas 66101

ORDER FOR COMPLIANCE
ATTACHMENT I

STANDARD CONDITIONS FOR COMPLIANCE, Briggs & Stratton Corp.,
Poplar Bluff, MO.

SECTION A. GENERAL CONDITIONS AND DEFINITIONS

1. Duty to Mitigate

Briggs & Stratton Corp. shall take all reasonable steps to minimize or correct any adverse impact to the publicly owned treatment works (POTW) or the environment resulting from noncompliance with this Order, including such accelerated or additional monitoring as necessary to determine the nature and impact of the noncomplying discharge.

2. Definitions

- a) Daily Maximum - The maximum allowable discharge of pollutant during a calendar day. Where daily maximum limitations are expressed in units of mass, the daily discharge is the total mass discharged over the course of the day. Where daily maximum limitations are expressed in terms of a concentration, the daily discharge is the arithmetic average measurement of the pollutant concentration derived from all measurements taken that day.
- b) Composite Sample - A sample that is collected over time, formed either by continuous sampling or by mixing discrete samples. The sample may be composited either as a time composite sample: composed of discrete sample aliquots collected in one container at constant time intervals providing representative samples irrespective of stream flow; or as a flow proportional composite sample: collected either as a constant sample volume at time intervals proportional to stream flow, or collected by increasing the volume of each aliquot as the flow increases while maintaining a constant time interval between the aliquots.
- c) Grab Sample - An individual sample collected in less than 15 minutes, without regard for flow or time.
- d) Instantaneous Maximum Concentration - The maximum concentration allowed in any single grab sample.
- e) Cooling Water -
 - (1) Uncontaminated: Water used for cooling purposes only which has no direct contact with any raw material, intermediate, or final product and which does not contain a level of contaminants detectably higher than that of the intake water.
 - (2) Contaminated: Water used for cooling purposes only which may become contaminated either through the use of water treatment chemicals used for corrosion inhibitors or biocides, or by direct contact with process materials and/or wastewater.
- f) Monthly Average - The arithmetic mean of the values for effluent samples collected during a calendar month or specified 30 day period (as opposed to a rolling 30 day window).
- g) Weekly Average - The arithmetic mean of the values for effluent samples collected over a period of seven consecutive days.
- h) Bi-Weekly - Once every other week.

- i) Bi-Monthly - Once every other month.
- j) Upset - Means an exceptional incident in which there is unintentional and temporary noncompliance with technology-based effluent limitations because of factors beyond the reasonable control of Briggs & Stratton Corp., excluding such factors as operational error, improperly designed or inadequate treatment facilities, or improper operation and maintenance or lack thereof.
- k) Bypass - Means the intentional diversion of wastes from any portion of a treatment facility.

3. General Prohibitive Standards

Briggs & Stratton Corp. shall not discharge wastewater to the sewer system:

- a) Having a temperature higher than 104 degrees F (40 degrees C);
- b) Containing more than 100 ppm by weight of fats, oils, and grease;
- c) Containing any gasoline, benzene, naphtha, fuel oil or other flammable or explosive liquids, solids or gases; and in no case pollutants with a closed cup flashpoint of less than one hundred forty (140) degrees Fahrenheit (60° C), or pollutants which cause an exceedance of 10 percent of the Lower Explosive Limit (LEL) at any point within the POTW.
- d) Having a pH lower than 5.0 or having any other corrosive property capable of causing damage or hazards to structures, equipment or personnel of the sewer system;
- e) Containing toxic or poisonous substances in sufficient quantity to injure or interfere with any wastewater treatment process, to constitute hazards to humans or animals, or to create any hazard in waters which receive treated effluent from the sewer system treatment plant. Toxic wastes shall include, but are not limited to wastes containing cyanide, chromium, cadmium, mercury, copper, and nickel ions;
- f) Containing noxious or malodorous gases or substances capable of creating a public nuisance; including pollutants which result in the presence of toxic gases, vapors, or fumes;
- g) Containing solids of such character and quantity that special and unusual attention is required for their handling;
- h) Containing any substance which may affect the treatment plant's effluent and cause violation of the NPDES permit requirements;
- i) Containing any substance which would cause the treatment plant to be in noncompliance with sludge use, recycle or disposal criteria pursuant to guidelines or regulations developed under section 405 of the Federal Act, the Solid Waste Disposal Act, the Clean Air Act, the Toxic Substances Control Act or other regulations or criteria for sludge management and disposal as required by the State;
- j) Containing color which is not removed in the treatment processes;
- k) Containing any radioactive wastes or isotopes; or
- l) Containing any pollutant, including BOD pollutants, released at a flow rate and/or pollutant concentration which would cause interference with the treatment plant.

4. Compliance with Applicable Pretreatment Standards and Requirements

Compliance with this Order does not relieve Briggs & Stratton Corp. from its obligations regarding compliance with any and all applicable local, State and Federal pretreatment standards and requirements including any such standards or requirements that may become effective during the term of this Order.

SECTION B. OPERATION AND MAINTENANCE OF POLLUTION CONTROLS

1. Proper Operation and Maintenance

Briggs & Stratton Corp. shall at all times properly operate and maintain all facilities and systems of treatment and control (and related appurtenances) which are installed or used to achieve compliance with the conditions of this Order. Proper operation and maintenance includes but is not limited to: 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 Order.

2. Duty to Halt or Reduce Activity

Upon reduction of efficiency of operation, or loss or failure of all or part of the treatment facility, Briggs & Stratton Corp. shall, to the extent necessary to maintain compliance with this Order, control its production or discharges (or both) until operation of the treatment facility is restored or an alternative method of treatment is provided. This requirement applies, for example, when the primary source of power of the treatment facility fails or is reduced. It shall not be a defense in an enforcement action that it would have been necessary to halt or reduce the regulated activity in order to maintain compliance with the conditions of this Order.

3. Bypass of Treatment Facilities

- a) Bypass is prohibited unless it is unavoidable to prevent loss of life, personal injury, or severe property damage or no feasible alternatives exist.
- b) Briggs & Stratton Corp. may allow bypass to occur which does not cause effluent limitations to be exceeded, but only if it is also for essential maintenance to assure efficient operation.
- c) Notification of bypass:
 - (1) Anticipated bypass. If Briggs & Stratton Corp. knows in advance of the need for a bypass, it shall submit prior written notice, at least ten days before the date of the bypass, to the MDNR
 - (2) Unanticipated bypass. Briggs & Stratton Corp. shall immediately notify the MDNR and submit a written notice to the POTW within 5 days. This report shall specify:
 - (i) A description of the bypass, and its cause, including its duration;
 - (ii) Whether the bypass has been corrected; and
 - (iii) The steps being taken or to be taken to reduce, eliminate and prevent a reoccurrence of the bypass.

4. Removed Substances

Solids, sludges, filter backwash, or other pollutants removed in the course of treatment or control of wastewaters shall be disposed of in accordance with section 405 of the Clean Water Act and Subtitles C and D of the Resource Conservation and Recovery Act.

SECTION C. MONITORING AND RECORDS

1. Representative Sampling

Samples and measurements taken as required herein shall be representative of the volume and nature of the monitored discharge. All samples shall be taken at the monitoring points specified in this Order and, unless otherwise specified, before the effluent joins or is diluted by any other wastestream, body of water or substance. All equipment used for sampling and analysis must be routinely calibrated, inspected and maintained to ensure their accuracy.

2. Flow Measurements

If flow measurement is required by this Order, the appropriate flow measurement devices and methods consistent with approved scientific practices shall be selected and used to ensure the accuracy and reliability of measurements of the volume of monitored discharges. The devices shall be installed, calibrated, and maintained to ensure that the accuracy of the measurements are consistent with the accepted capability of that type of device. Devices selected shall be capable of measuring flows with a maximum deviation of less than 10 percent from true discharge rates throughout the range of expected discharge volumes.

3. Analytical Methods to Demonstrate Continued Compliance

All sampling and analysis required by this Order shall be performed in accordance with the techniques prescribed in 40 CFR Part 136 and amendments thereto, otherwise approved by EPA, or as specified in this Order.

4. Additional Monitoring by Briggs & Stratton Corp.

If Briggs & Stratton Corp. monitors any pollutant more frequently than required by this Order, using test procedures identified in Section C.3, the results of this monitoring shall be included in the self-monitoring reports.

5. Inspection and Entry

Briggs & Stratton Corp. shall allow the EPA or MDNR upon the presentation of credentials and other documents as may be required by law, to:

- a) Enter upon Briggs & Stratton Corp.'s premises where a regulated facility or activity is located or conducted, or where records must be kept under the conditions of this Order;
- b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this Order;
- c) Inspect at reasonable times any facilities, equipment (including monitoring and control equipment), practices, or operations regulated or required under this Order;
- d) Sample or monitor, for the purposes of assuring compliance, any substances or parameters at any location; and
- e) Inspect any production, manufacturing, fabricating, or storage area where pollutants, regulated under the Order, could originate, be stored, or be discharged to the sewer system.

6. Retention of Records

- a) Briggs & Stratton Corp. 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 Order, and records of all data used to complete the application for this Order, for a period of at least three years from the date of the sample, measurement, report or application.

This period may be extended by request of MDNR or EPA at any time.

- b) All records that pertain to matters that are the subject of special orders or any other enforcement or litigation activities brought by the MDNR or EPA shall be retained and preserved by Briggs & Stratton Corp. until all enforcement activities have concluded and all periods of limitation with respect to any and all appeals have expired.

7. Record Contents

Records of sampling and analyses shall include:

- a) The date, exact place, time, and methods of sampling or measurements, and sample preservation techniques or procedures;
- b) Who performed the sampling or measurements;
- c) The date(s) analyses were performed;
- d) Who performed the analyses;
- e) The analytical techniques or methods used; and
- f) The results of such analyses.

8. Falsifying Information

Knowingly making any false statement on any report or other document required by this Order or knowingly rendering any monitoring device or method inaccurate, is a crime and may result in the imposition of criminal sanctions and/or civil penalties.

SECTION D. ADDITIONAL REPORTING REQUIREMENTS

1. Planned Changes

Briggs & Stratton Corp. shall give notice to the MDNR 90 days prior to any facility expansion, production increase, or process modifications which results in new or substantially increased discharges or a change in the nature of the discharge.

2. Anticipated Noncompliance

Briggs & Stratton Corp. shall give advance notice to the MDNR of any planned changes in the regulated facility or activity which may result in noncompliance with the requirements or this Order.

3. Duty to Provide Information

Briggs & Stratton Corp. shall furnish to EPA, with any information which they may request to determine whether cause exists for modifying, revoking and reissuing, or terminating this Order, or to determine compliance with this Order. Briggs & Stratton Corp. shall also, upon request, furnish to EPA within 20 days copies of any records required to be kept by this Order.

4. Signatory Requirements

All applications, reports, or information submitted to the MDNR or EPA must contain the following certification statement:

"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, or;
 - (ii) the manager of one or more manufacturing, production, or operation facilities employing more than 250 persons or having gross annual sales or expenditures exceeding \$25 million (in second-quarter 1980 dollars), if authority to sign documents has been assigned or delegated to the manager in accordance with corporate procedures.
- b) By a general partner or proprietor if the Industrial User submitting the reports is a partnership or sole proprietorship respectively.
- c) The principal executive officer or director having responsibility for the overall operation of the discharging facility if the Industrial User submitting the reports is a Federal, State, or local governmental entity, or their agents.
- d) By a duly authorized representative of the individual designated in paragraph (a), (b), or (c) of this section if:
 - (i) the authorization is made in writing by the individual described in paragraph (a), (b), or (c);
 - (ii) the authorization specifies either an individual or a position having responsibility for the overall operation of the facility from which the Industrial Discharge originates, such as the position of plant manager, operator of a well, or a well field superintendent, or a position of equivalent responsibility, or having overall responsibility for environmental matters for the company; and
 - (iii) the written authorization is submitted to the MDNR.
- e) If an authorization under paragraph (d) of this section is no longer accurate because a different individual or position has responsibility for the overall operation of the facility, or overall responsibility for the environmental matters for the company, a new authorization satisfying the requirements of paragraph (d) of this section must be submitted to the MDNR. prior to or together with any reports to be signed by an authorized representative.

5. Civil and Criminal Liability

Nothing in this Order shall be construed to relieve Briggs & Stratton Corp. from civil and/or criminal penalties for noncompliance under local, State or Federal laws or regulations.

The Corporation Company
120 South Central Avenue
Clayton, MO 63105

Don Pucci
Briggs & Stratton
Environmental Manager
731 Hwy 142
Poplar Bluff, MO 63901

Scott B. Totten
Water Protection and Soil Conservation Division
Missouri Department of Natural Resources
P.O. Box 176
Jefferson City, Missouri 65102-0176

6/10/3
Date

Debby White