



Jeremiah W. (Jay) Nixon, Governor

Sara Parker Pauley, Director

DEPARTMENT OF NATURAL RESOURCES

dnr.mo.gov

July 24, 2012

CERTIFIED MAIL – 7009 3410 0001 9259 1007
RETURN RECEIPT REQUESTED

Mr. Robert Meenen
Safety and Environmental Director
Missouri Pressed Metals, Incorporated
1200 East Boonville Road
Sedalia, MO 65301

RE: Class 1 Permit Modification with Prior Director's Approval
Missouri Pressed Metals, Incorporated, Sedalia, Missouri
EPA ID# MOD073029936

Dear Mr. Meenen:

The Missouri Department of Natural Resources (Department), in coordination with the U.S. Environmental Protection Agency Region 7 (EPA), has reviewed Missouri Pressed Metals, Incorporated's (MPM) May 3, 2012, Response to the Department's March 29, 2012, Request for Additional Information regarding MPM's original Class 1 Permit Modification Request of September 14, 2011. MPM had requested:

- Reduction in the Frequency of Groundwater and Surface Water Monitoring from Semiannual to Annual.
- Reduction in the Frequency of Groundwater and Surface Water Reporting from Semiannual to Annual.
- Reduction in the Frequency of Non-Aqueous Phase Liquid Thickness Field Measurements.
- Reduction in the Frequency of 1,4-Dioxane Analysis.
- Reduction in the amount of Financial Assurance.



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The Department hereby approves the Class 1 Permit Modification as follows:

- MPM shall annually sample monitoring wells MW-10, MW-11A, and MW-12 (except as noted below for 1,4-dioxane), surface locations S-1 and S-2, and the trench sump. MPM shall sample monitoring wells MW-9 and MW-13B semiannually. The semiannual sampling (MW-9 and MW-13B) shall be conducted in the fall and the annual sampling (all sampling locations) shall be conducted in the spring.
- MPM shall continue to submit an Annual Groundwater Corrective Action Report as specified in Special Permit Condition III.F. of MPM's Missouri Hazardous Waste Management Facility Part I Permit. The semiannual sampling shall be conducted in the fall and the annual sampling shall be conducted in the Spring; therefore, MPM shall include all the information of the sampling events (semiannual and annual) in one report and submit it to the Department by March 1 of each calendar year for the preceding calendar year.
- MPM shall collect field measurements for Non-Aqueous Phase Liquids once every five years during the Appendix IX sampling.
- The frequency of 1,4-dioxane analysis shall be reduced per the following comments and conditions.

The results of groundwater analyses for 1,4-dioxane in 2004 and 2008 were reviewed in considering MPM's proposed modifications. In each year, 1,4-dioxane was not detected in monitoring wells MW-10, MW-11 and MW-12. The method detection limits (MDLs) for 1,4-dioxane were 0.9, 1.0 and 5.0 µg/L, respectively, in these wells. The current EPA Regional Screening Level for 1,4-dioxane in tap water is 0.67 µg/L. In 2008, the facility's contract laboratory MDL was 5.0 µg/L. Regarding 1,4-dioxane, it was not detected above that MDL.

Based on the foregoing, MPM shall sample monitoring wells MW-10, MW-11A, and MW-12 semiannually for the next year to assess the presence/absence of 1,4-dioxane in these wells. The contract laboratory method used in the 1,4-dioxane analysis should have a MDL that is low enough to determine if the above-referenced tap water screening value is being exceeded, or in the alternative, the lowest MDL that the method/instruments can achieve. The analytical results obtained from the next two semiannual sampling events should then be reviewed in consultation with the Department and the EPA to determine if semiannual sampling should continue or if a change in the sampling frequency for 1,4-dioxane in these wells is warranted.

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- MPM shall not reduce the amount of financial assurance contained in the existing letter of credit at this time. The Department anticipates reevaluating the financial assurance issue and related cost estimates in coordination with MPM at the time of permit reissuance in light of the clean-up progress and the post-closure and corrective action (remedy) operation, maintenance and monitoring requirements contained in the reissued permit. Any necessary adjustments to financial assurance amounts (beyond the inflation adjustments currently required by Special Permit Condition XIV.B. of MPM's Missouri Hazardous Waste Management Facility Part I Permit) would be made at that time.

MPM must send a notice of the modification to everyone on their facility mailing list and the appropriate units of state and local government within 90 calendar days after the date of this letter, as outlined in Code of Federal Regulations 40 CFR 270.42(a)(1)(ii), incorporated by reference in Code of State Regulations 10 CSR 25-7.270(1). MPM must send a copy of the notice to the Department.

If you have questions regarding this letter, please contact Sushmita Sharma, E.I.T., of my staff at the Missouri Department of Natural Resources, Hazardous Waste Program, P.O. Box 176, Jefferson City, MO 65102-0176, by telephone at (573) 751-3553 or 1-800-361-4827, or by e-mail at sushmita.sharma@dnr.mo.gov. Thank you.

Sincerely,

HAZARDOUS WASTE PROGRAM

[Original signed by Richard A. Nussbaum]

Richard A. Nussbaum, P.E., R.G.
Chief, Permits Section

RAN:sss

c: Ms. Andrea Stone, Project Manager, U.S. EPA Region 7
Kansas City Regional Office, Missouri Department of Natural Resources