



Jeremiah W. (Jay) Nixon, Governor

Sara Parker Pauley, Director

## DEPARTMENT OF NATURAL RESOURCES

dnr.mo.gov

September 13, 2013

CERTIFIED MAIL – 7009 3410 0001 8933 3832  
RETURN RECEIPT REQUESTED

Lauri J. Gorton, P.E.  
Director of Environmental Programs  
and Senior Strategist  
Greenfield Environmental Trust Group,  
Incorporated  
2116 East Estes Street  
Milwaukee, WI 53207

RE: Class 1 Permit Modification with Prior Director's Approval, Greenfield Environmental Multistate Trust, LLC, at 2800 West High Street Springfield, Missouri  
EPA ID# MOD007129406

Dear Ms. Gorton:

The Missouri Department of Natural Resources (Department) approves Greenfield Environmental Multistate Trust LLC's (Trust) Class 1 Permit Modification request, submitted by GSI Water Solutions, Incorporated, on behalf of the Trust, dated March 6, 2012, with changes. The request was to add 7 constituents of interest to the Groundwater Protection Standards of the Missouri Hazardous Waste Management Facility Part I Permit. Special Permit Condition II. A. 6. and 7., state that any constituents identified as a result of sampling that may be attributed to past operation of the regulated unit(s) shall require a Class 1 Permit Modification with prior director approval, rather than a Class 1 Permit Modification. Additionally, the letter requested that the Class 1 Permit Modification be completed during the permit renewal process. The Trust shall implement the permit modification immediately, rather than waiting for the issuance of the renewed Part I Permit. The current Part I Permit remains in effect until the renewal Part 1 Permit is issued.

The following constituents shall be added to the groundwater monitoring program:

Anthracene  
Benzo(k)fluoranthene  
Dibenzofuran  
Fluorene

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2-Methylnaphthalene  
Phenanthrene  
Pyrene

We have attached a modified Table I of the current Part I Permit with the additional constituents redlined.

The Trust 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). The Trust must send a copy of the notice to the Department.

If you have any questions regarding this letter, please contact Donald L. Dicks, Project Manager, 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 don.dicks@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:ddm

Enclosure

c: Mr. Wray Rohrman, Project Manager, U.S. EPA Region 7  
Mr. Eric Roth, Senior Hydrogeologist, GSI Water Solutions, Incorporated via e-mail  
Mr. Marc Weinreich, Vice President, Greenfield Environmental Multistate Trust, LLC  
via e-mail  
Southwest Regional Office, Missouri Department of Natural Resources

TABLE I - GROUNDWATER PROTECTION STANDARDS

Groundwater Monitoring Constituent	Maximum Concentration Limit (µg/l)	Maximum Detection Limit (µg/l)•
Acenaphthene	1200 (b)	10
Acenaphthylene	10 (d,e)	10
<b>Anthracene</b>	<b>1300 (c1)</b>	<b>10</b>
Benzene	5 (a)	5
Benzo(a)anthracene	10 (d)	10
Benzo(b)fluoranthene	10 (d)	10
<b>Benzo(k)fluoranthene</b>	<b>0.29 (c1,d)</b>	<b>1</b>
Benzo(a)pyrene	10 (d)	10
2-Chlorophenol	10 (d)	10
Chrysene	10 (d)	10
Dibenz(a,h)anthracene	10 (d)	10
<b>Dibenzofuran</b>	<b>5.7 (f)</b>	<b>5</b>
2,4-Dimethylphenol	540 (b)	10
2,4-Dinitrophenol	70 (b)	25
Ethyl Benzene	700 (b)	5
Fluoranthene	300 (b)	10
<b>Fluorene</b>	<b>220 (c1)</b>	<b>10</b>
Indeno(1,2,3-cd)pyrene	10 (d)	10
<b>2-Methylnaphthalene</b>	<b>27 (c1)</b>	<b>10</b>
Naphthalene	10 (d)	10
<b>Phenanthrene</b>	<b>75 (f)</b>	<b>10</b>
Phenol	300 (b)	10
<b>Pyrene</b>	<b>87.0 (c1)</b>	<b>10</b>
Toluene	1,000 (a)	5
Xylene	10,000 (a,b)	5

•The lower of Practical Quantitation Limits (PQLs) contained in the latest version of the EPA publication entitled: Test Methods for Evaluating Solid Waste - Physical/Chemical Methods (SW-846) or method specific detection limits routinely achieved by the Permittee's laboratory.

- (a) Denotes limits derived from state (10 CSR 60 Chapter 4, dated July 31, 2000) and federal public drinking water regulations.
- (b) Denotes limits derived from Missouri Water Quality Standards (10 CSR20-7.031) for protection of groundwater, dated August 31, 2000. **(b1) dated May 31, 2012.**
- (c) Denotes limits derived from risk-based concentration values for tap water as contained in the EPA Region III Risk-Based Concentration Table dated October

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5, 2000.

- (c1) Denotes limits derived from tap water value (ug/L) as contained in the EPA Regional Screening Level Summary Table dated May 2013.
- (d) Health- and/or environmental-based levels are lower than the ability of current analytical technology to routinely attain detection limits at or below such levels. These constituents and their health- and/or environmental-based criteria are listed below.

<u>Groundwater Monitoring Hazardous Constituent</u>	<u>Maximum Concentration Limit (µg/l)</u>	<u>Source</u>
Acenaphthylene	0.0044	(b)
Benzo(a)anthracene	0.0044	(b)
Benzo(b)fluoranthene	0.092	(c)
<b>Benzo(k)fluoranthene</b>	<b>0.0044</b>	<b>(b1)</b>
Benzo(a)pyrene	0.2	(a,b)
Chrysene	0.0044	(b)
Dibenzo(a,h)anthracene	0.0044	(b)
Indeno(1,2,3-cd)pyrene	0.0044	(b)
2-Chlorophenol	0.1	(b)
Naphthalene	6.5	(c)

- (e) Denotes a chemical which is not a hazardous constituent as defined in the Definitions section of this Permit, but is a groundwater monitoring constituent defined in 40 CFR Part 264 Appendix IX. and a chemical compound which is a plume indicator. Maximum concentration limits are defined for these compounds where available.
- (f) **Missouri Risk-Based Corrective Action Technical Guidance, Appendix B, revised March 2010.**