



Jeremiah W. (Jay) Nixon, Governor

Sara Parker Pauley, Director

DEPARTMENT OF NATURAL RESOURCES

dnr.mo.gov

May 19, 2014

CERTIFIED MAIL – 7009 0960 0000 8848 3934
RETURN RECEIPT REQUESTED

Mr. Terry Etter, P.E.
Program Manager
Unisys Corporate Environmental
Affairs
3199 Pilot Knob Road, MS F1B05
Eagan, MN 55121

RE: Missouri Hazardous Waste Management Facility Part I Permit Modification Approval
Eaton Hydraulics, Incorporated (Formerly Vickers), Joplin, Missouri
EPA ID# MOD007155781

Dear Mr. Etter:

The Missouri Department of Natural Resources (DNR) hereby approves Eaton Hydraulics, Incorporated's (Eaton) Class 2 Permit Modification request, dated May 31, 2013, with changes. The request included an updated Sampling and Analysis Plan (SAP) (Version 9). Our decision is based on a thorough technical review of the modification request and applicable federal and state laws and regulations. The following items are covered in this permit modification.

Modification to the Light Non-Aqueous Phase Liquid (LNAPL) Treatment Plant (LTP) Monitoring Program

The DNR agrees with the changes associated with revisions to the State Operating Permit (SOP) MO-0002411, dated July 9, 2012, previously approved by the Water Protection Program. These changes include:

1. Including the make-up water from the LTP in Outfall 003 due to the closure of Outfall 004 on September 30, 2010.
2. Modifying the Final Effluent Limitations for barium, cadmium, lead, nickel, zinc, benzene, carbon tetrachloride, chloroethane, chloroform, ethylbenzene, methylene chloride, tetrachloroethylene, toluene, trichloroethylene, vinyl chloride, xylenes (total), 1,2-cis-dichloroethene, 1,2-dichloroethane, 1,1-dichloroethylene,



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1,2-trans-dichloroethylene, 1,1,1-trichloroethane, 1,1,2-trichloroethane, and 1,1,2,2-tetrachloroethane to “Monitoring requirement only” parameters for Outfall 003.

3. Modifying the Final Effluent Limitations for Total Suspended Solids, Settable Solids, and Oil & Grease at Outfall 002 to “Monitoring requirement only.”
4. Changing the sampling frequency of the LTP from monthly to quarterly.

Multiphase Extraction (MPE) Well Installation

The DNR approves the changes associated with the imposition of Interim Stabilization Measures (ISM) for MPE to increase the volatile organic compound (VOC) mass removal. The MPE extraction and observation wells DR-1, EW-4, EW-5, EW-6, EW-7, EW-8, DD1, DD1obs, DD2obs, DD2v, DD4, DD5, MPE-DW1, MPE-DW2, MPE-DW3, MPE-DW4, MPE-DW6, T1-11obs, and T1-22obs were installed during October and November 2012.

Modifications to the Groundwater Monitoring Network

The DNR approves the abandonment of five monitoring wells, including monitoring wells 6, 410, and 830, and MPE extraction and observation wells T1-11obs and T1-22obs. The HWP previously (February 3, 2010 approval letter for Version 8 of the SAP) requested retaining well 830 and sampling every two years to ensure the edge of the plume remains defined. However, the sampling history in Appendix 29 of the updated SAP indicates the six sampling events conducted at Well 830 since March 2006, indicate non-detect for VOCs, hence this well can now be abandoned.

Analytical Modifications

The DNR approves the change from air sampling EPA Test Method TO-14 to EPA Test Method TO-15 to allow lower detection limits and better detection of polar VOCs (methanol, alcohol, and ketones) for MPE wells and LTP efficiency sampling, as a means to improve the overall evaluation of the MPE/LTP operations.

We are approving the Class 2 Permit Modification request with the following changes:

1. On page 2 of the SAP, please note that due to staff changes, Jalal El-Jayyousi, P.E., is now Chief of the Groundwater Unit- Permits Staff. Mr. R. Bruce Stuart, is now a Senior Technical Advisor for the Hazardous waste Program.

2. In SOPs #5, LNAPL Treatment Plant Sampling, the 6th paragraph on page 15 references Table 7 for the LTP sampling schedule, including frequencies and sampling parameters; however, it should reference Table 8.
3. Appendix 17, Thermometer Calibration SOP, is missing minus signs on page 6, under part F. Correction for emergent stem. The term shows $K[n(T-t)]$, when it should read $K[n(T-t)]$. The example on the bottom of the page should read $n = (102-55) = 47$, and $K[n(T-t) = 0.00016 \times 47 \times (56-22) = 0.00016 \times 1598 = 0.25568$.

Included with this letter is a copy of the Groundwater Sampling and Analysis Plan Checklist completed as part of our review. This checklist outlines the technical requirements typically expected to be included in a good quality SAP.

Eaton conducted the public participation requirements for the Class 2 Permit Modification request, as required by Code of State Regulations 10 CSR 25-7.270(1), incorporating Code of Federal Regulations 40 CFR 270.42 (b). The 60-day public comment period began June 27, 2013, and ran to August 26, 2013. Eaton held a public meeting about the modification request on Wednesday, July 12, 2013. No one attended the meeting, and no written comments were received by the HWP during the public comment period. The DNR mailed a notification letter to everyone on the facility mailing list, and the appropriate units of state and local government, as required by 10 CSR 25-7.270(1), incorporating 40 CFR 270.42(f)(1). The notification letter is included with this letter.

The approved Class 2 Permit Modifications are effective immediately. Please be aware that any parties adversely affected or aggrieved by the Department's decision to approve the Class 2 Permit Modifications may be entitled to pursue an appeal before the Administrative Hearing Commission, according to 10 CSR 25-7.270(1), incorporating 40 CFR 270.42(f)(2). The petition must be filed with the Administrative Hearing Commission by June 18, 2014, according to the procedures outlined in 10 CSR 25-2.020 and Missouri Revised Statutes, Sections 260.395.11 and 621.250, RSMo. If the petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed. If it is sent by any other method, it will be deemed filed on the date it is received by the Administrative Hearing Commission. Appeals must be sent to the Administrative Hearing Commission, Truman State Office Building, Room 640, 301 West High Street, P.O. Box 1557, Jefferson City, MO 65102, or by fax to (573) 751-5018. The DNR also asks that a copy of the petition be provided to Mr. David Lamb, Director, Missouri Department of Natural Resources, Hazardous Waste Program, P.O. Box 176, Jefferson City, MO 65102-0176, or by fax to (573) 751-7869.

If you have questions regarding this letter or the enclosed documents, please contact Mr. Donald L. Dicks, Project Manager, of my staff at the Missouri Department of Natural Resources,

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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 David J. Lamb]

David J. Lamb
Director

DJL:ddm

Enclosures

c: Senator Roy Blunt, U.S. Senate
Senator Claire McCaskill, U.S. Senate
Congressman Billy Long, U.S. House of Representatives
Senator Ron Richard, Missouri Senate
Representative Bill White, Missouri House of Representatives
Mayor Bill Scearce, City of Joplin
Presiding Commissioner John Bartosh, Jasper County
Bill Anthony, Site Manager, Pinnacle Engineering\Joplin
Keith B. Rapp, Pinnacle Engineering, Inc.
Steven F. Fesko, Manager, Regional Support North America, Eaton Corporation
Kenneth Herstowski, P.E., Project Manager, U.S. EPA Region 7
Southwest Regional Office, Missouri Department of Natural Resources

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