



Jeremiah W. (Jay) Nixon, Governor

Sara Parker Pauley, Director

DEPARTMENT OF NATURAL RESOURCES

dnr.mo.gov

June 13, 2012

Ms. Rebecca Trujillo
West Region EHS Manager
Geocycle, LLC
6211 Ann Arbor Road
Dundee, MI 48131

RE: Class 1 Permit Modification Approval
Holcim (US) Incorporated/Geocycle, LLC, Clarksville, Missouri
EPA ID# MOD029729688

Dear Ms. Trujillo:

The Missouri Department of Natural Resources (Department) approves Holcim (US) Incorporated/Geocycle, LLC's (Geocycle) Closure Plan Modification request, dated June 12, 2012, with changes. The request, which is a revision of the original request, dated October 24, 2011, was to submit an amended closure plan to delete two constituents from certain sampling protocols and to accommodate Department concerns on other issues.

We are approving the Closure Plan Modification request with the following conditions:

1. Clean closure conditions based on rinsate sampling means rinsate analysis results of non-detect with a DF=1 for organic constituents and analytical results equal to or below background levels for inorganic constituents.
2. If constituents are detected in the final rinsate for concrete structures at or below the U.S. Environmental Protection Agency Regional Screening Levels (RSL) tapwater concentration or the Missouri Risk-Based Corrective Action (MRBCA) Groundwater-Domestic Water Use concentration from Table B-2 and no further removal/decontamination efforts are expected, then Geocycle must provide the results of all analyses for that unit, and a recommendation with justification to pursue a risk-based closure. The Department will evaluate the recommendation to determine if additional sampling is necessary.
3. If constituents are detected in the final rinsate at concentrations exceeding the EPA RSL tapwater concentration or MRBCA Table B-2 Groundwater-Domestic Water Use concentration, then the owner/operator must either perform further decontamination to



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Ms. Rebecca Trujillo
June 13, 2012
Page 2

achieve these levels and/or remove the unit, or proceed with closing the unit using non-residential exposure assumptions. If Geocycle decides to close the unit using non-residential exposure assumptions, then an alternative closure plan for that unit will be submitted to the Department.

4. Supporting documentation submitted with the closure certification must include color photographs of closure activities.
5. Geocycle shall notify the Department in writing, according to 40 CFR 264.112(d), prior to the date on which it expects to begin closure activities. If Geocycle desires to begin closure activities immediately, it must coordinate in writing with the Department. The Department may elect to collect split or duplicate samples concurrently with the sampling performed as part of the closure activities.

Geocycle 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) and modified by 10 CSR 25-7.270(2)(A)6 and 10 CSR 25-7.270(2)(B)10. Geocycle must send a copy of the notice to the Department.

Geocycle is responsible for completing the approved work and submitting any reports within the time frames specified in the approved closure plan. Geocycle must submit a written extension request and justification for the request to the Department if Geocycle anticipates not meeting the schedule. Please submit three copies of any reports or submittals to the Department and two copies to the EPA.

If you have questions regarding this letter, please contact Mr. Dave Walker, 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 dave.walker@dnr.mo.gov. Thank you.

Sincerely,

HAZARDOUS WASTE PROGRAM

[Original signed by Darleen Groner for]

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

RAN:dwm

c: Mr. Doug Abeln, Schreiber, Yonley & Associates
Ms. Mary Grisolano, Project Manager, U.S. EPA Region 7
Northeast Regional Office, Missouri Department of Natural Resources