



Jeremiah W. (Jay) Nixon, Governor

Sara Parker Pauley, Director

DEPARTMENT OF NATURAL RESOURCES

dnr.mo.gov

April 15, 2014

CERTIFIED MAIL – 7009 0960 0000 8848 3941
RETURN RECEIPT REQUESTED

Mrs. Jami Gay
Environmental, Health and
Safety Manager
Euticals, Incorporated
2460 West Bennett Street
Springfield, MO 65807

RE: Class 1 Permit Modification with Prior Director's Approval
Euticals, Incorporated, Springfield, Missouri
EPA ID# MOD095038329

Dear Mrs. Gay:

The Missouri Department of Natural Resources (DNR) hereby approves Euticals, Incorporated's (Euticals) Class 1 Permit Modification request, dated February 19, 2014, with comments. The modification request, which is a revision of the original request, dated November 15, 2013, was for the addition of hazardous constituents to *Table 1 – Groundwater Protection Standards* of Euticals' Missouri Hazardous Waste Management Facility (MHWMF) Part I Permit. Furthermore, the modification request was for the addition of groundwater analytical methods for additional monitoring parameters to *Table 3 – Groundwater Monitoring, Sampling, Analysis, and Parameter Measurement Schedule* of Euticals' MHWMF Part I Permit. We are approving the Class 1 Permit Modification request requiring prior director approval with the following comments:

1. In the updated *Table 1 – Groundwater Protection Standards* and the updated *Table C-2, Summary of Media Cleanup Standards (MCSs) at the POC*, the maximum concentration limits for 1,1-dichloroethene and cis-1,2-dichloroethene are correct, but the source of these standards is listed as the U.S. Environmental Protection Agency (EPA) Region 3 Regional Screening Levels, whereas they are actually the EPA maximum contaminant levels. Please correct these minor errors and send replacement pages to the DNR and the EPA within 30 days of the receipt of this letter.
2. Euticals agreed to sample for two new semi-volatile organic compounds (SVOCs) and three new metals at all wells during the Spring 2014 sampling event. The SVOCs are



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2-methylnaphthalene and phenol, and the metals are arsenic, barium, and nickel. Please remember to include information from this sampling event in the 2nd Quarter Progress Report for 2014, which is due by September 1, 2014. Also by September 1, 2014, Euticals shall submit a proposal to the DNR for updates to the monitoring, sampling, and analysis plan (MSAP) regarding the sampling extent and frequency for SVOCs and metals. Once approved by the DNR, these MSAP updates will be upheld by Euticals' MHWMF Part I Permit.

3. The DNR notes that Euticals is not required to publish a notice in the Springfield News-Leader for a Class 1 Permit Modification with Prior Director's Approval (as proposed in the permit modification request). However, Euticals must conduct the appropriate public notice as outlined in the paragraph below.

Euticals 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 State Regulations 10 CSR 25-7.270(1), which incorporates and modifies Code of Federal Regulations 40 CFR 270.42(a)(1)(ii), and is modified by 10 CSR 25-7.270(2)(A)6 and 10 CSR 25-7.270(2)(B)10. Euticals must send a copy of the notice to the DNR.

If you have questions regarding this letter, please contact Meagan Prestegard, P.E., Environmental Engineer, 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 meagan.prestegard@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:mp

- c: Mr. Wray Rohrman, Project Manager, U.S. EPA Region 7
Southwest Regional Office, Missouri Department of Natural Resources

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