



Missouri Department of dnr.mo.gov

NATURAL RESOURCES

Michael L. Parson, Governor

Carol S. Comer, Director

April 9, 2021

Genevieve Sutton
Senior Environmental Engineer
Doe Run Viburnum Facility
P.O. Box 500
Viburnum, MO 65566

RE: Class 1 Permit Modifications with Prior Director's Approval
Additional CERCLA Soils to RAP Area
Doe Run Viburnum, Viburnum Missouri
EPA ID# MOD000823252

Dear Genevieve:

The Missouri Department of Natural Resources' Waste Management Program (WMP) hereby approves Doe Run Viburnum (Doe Run)'s Class 1 Permit Modification request, dated March 12, 2021. The modification request was to utilize the area covered by Doe Run's Remedial Action Plan (RAP) Permit, dated February 20, 2019, in order to manage additional lead-contaminated soils and sediments.

The United States Environmental Protection Agency (EPA), in cooperation with Doe Run, is asking to move Time-Critical, and future Non-Critical Soils from approximately twenty-five (25) yards from the City of Viburnum Operational Unit (OU-2) of the Viburnum Trend Lead Haul Road CERCLA site, and manage the remedial wastes at the Viburnum RAP Area. The subject request also identifies the EPA as a contractor working under the direct oversight of Doe Run.

The Doe Run Viburnum facility is permitted to receive the remediation waste described in the request, for treatment and disposal, through their RAP Permit. The WMP agrees with Doe Run that this is a RAP Modification request requiring prior review and approval, according to the third paragraph of the Permitted Activities Section, General Permit Condition VI., and Special Permit Condition I., of the approved RAP. Our decision to approve the permit modification request is based on a thorough technical review of the modification request and applicable federal and state laws and regulations.

Doe Run must send a notice of the approved RAP 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 required by 40 C.F.R. 270.42(a)(1)(ii). Doe Run must send a copy of the notice to the WMP.

Genevieve Sutton
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If you have questions regarding this letter, please contact Nathan Kraus, P.E., of my staff at the Missouri Department of Natural Resources, Waste Management Program, P.O. Box 176, Jefferson City, MO 65102-0176, at 573-751-3154, or by e-mail at nathan.kraus@dnr.mo.gov.

Sincerely,

WASTE MANAGEMENT PROGRAM



Charlene S. Fitch, P.E.
Chief, Engineering Section

c: Missouri State Coordinator, U.S. EPA Region 7
Southeast Regional Office, Missouri Department of Natural Resources