



July 17, 2026

To: Missouri Department of Natural Resources, Water Protection Program
Subject: **Request for Written Clarification—HydroAg Environmental LLC Cassville Storage Tank, Missouri State Operating Permit No. MO-0141020**

Cc: Mayor Jon Horner, State Representative Scott Cupps, & State Senator Mike Moon

The City of Cassville previously submitted comments and participated in the public-comment process concerning the proposed HydroAg Environmental LLC storage facility north of Cassville. The City appreciates the opportunities provided by the Missouri Department of Natural Resources to participate in that process.

Following the public meetings and the City's further review of the proposed facility, we are submitting this follow-up request for written clarification concerning the protection of Cassville's public water supply. It is intended to ensure that the Department has fully considered the City's source-water concerns and that the City understands how those concerns will be addressed before a final permit decision is made.

The City of Cassville owns and operates a public water system, five (5) wells located at various locations and elevations, serving residents, businesses, schools, healthcare providers, public-safety operations, and other essential community services. The location of the proposed storage facility near Cassville, together with the karst characteristics of the surrounding area, raises questions regarding groundwater movement and the protection of the City's public water-supply wells. We also believe the public rural water systems would be impacted in a similar manner, but do not represent those interests in this letter.

The City respectfully requests a written response addressing the following questions:

1. Public water-supply evaluation: Has DNR evaluated the proposed facility's location in relation to Cassville's public water-supply wells, source-water protection areas, and groundwater recharge characteristics? If so, please provide or identify the findings of that evaluation.
2. Karst and hydrogeologic review: What site-specific information has DNR considered concerning nearby caves, sinkholes, losing streams, springs, fractured limestone, groundwater-flow pathways, and other karst features?
3. Coordination with drinking-water personnel: Has the Water Protection Program consulted with DNR's Drinking Water division or the City's public-water personnel regarding the proposed facility? If not, would the Department consider completing that consultation before taking final action?
4. Groundwater monitoring: Will the final permit require baseline and ongoing groundwater monitoring? If groundwater monitoring is not required, please explain how DNR determined that such monitoring is unnecessary at this location.

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5. Material sources and testing: Will the final permit identify or limit the facilities and waste streams authorized for storage? What testing will be required to determine the composition of incoming residuals and detect changes resulting from different sources or comingled materials?
6. Containment and leak detection: In addition to visual inspections and secondary containment, what provisions will detect release before contaminants migrate beyond the facility? Will the permit require tank-integrity testing or subsurface leak detection?
7. Emergency notification: Will the permit require immediate notification to the City following a spill, leak, containment failure, transportation accident, or other release that could affect groundwater, surface water, or the City's public water supply?
8. Odor and complaint response: What enforceable conditions will address odors associated with unloading, venting, storage, agitation, pumping, and material removal? How will verified complaints be investigated and resolved?
9. Relationship to land application: How has DNR evaluated the storage proposal in relation to HydroAg's pending land-application authorization? What lawful disposition is available if stored material cannot be land applied within the expected period?
10. Closure and financial responsibility: What permit conditions will ensure that adequate resources are available to remove the stored material, close the facility, and address contamination if operations cease or the operator is unable to fulfill its obligations?

We recognize that DNR must evaluate the application under applicable Missouri law and regulatory standards. The City's request is that the final administrative record clearly demonstrate how Cassville's public water supply, the area's karst geology, and the potential consequences of an unauthorized release were considered in the Department's decision.

Please provide the City with a written response to these questions or identify the documents in the permit record that address them, before final agency action. If a final decision is issued before a separate response can be provided, the City respectfully requests that these questions and the City's previous comments be specifically addressed in DNR's formal response to comments or permit decision documentation.

Thank you for your consideration and continued communication with the City of Cassville.

Respectfully,

Richard L Asbill

Richard L. Asbill
City Administrator

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