



Jeremiah W. (Jay) Nixon, Governor

Sara Parker Pauley, Director

## DEPARTMENT OF NATURAL RESOURCES

dnr.mo.gov

April 28, 2016

Sybil Chandler, MS, CSP, CHMM  
Environmental Health and Safety Manager  
Kansas City Field Office  
National Nuclear Security Administration  
14520 Botts Road  
Kansas City, MO 64147

Mr. Kevin Phillips  
Environmental Team Leader  
U.S. General Services  
Administration  
2300 Main Street  
Kansas City, MO 64108-2416

RE: National Nuclear Security Administration (NNSA)/General Services Administration,  
Class 1 Permit Modification with Prior Director's Approval to Add Additional  
Constituents to the Bannister Federal Complex Groundwater Monitoring Program;  
EPA ID#: MO9890010524

Dear Ms. Chandler and Mr. Phillips:

The Missouri Department of Natural Resources' Hazardous Waste Program (HWP) has reviewed your Class I permit modification with prior director approval request dated March 28, 2016, to add additional constituents to your permit, as per Special Permit Condition II.A.6. The HWP acknowledges this request as a Class 1 permit modification requiring prior director approval and hereby approves the modification. This modification adds the Total Petroleum Hydrocarbon (TPH) Gasoline Range Organics (GRO) sampling and analysis requirement to Wells 160 and 163 and selected surrounding wells, and the 1,4-dioxane sampling and analysis requirements to the select wells and surrounding downgradient wells noted below.

Should TPH GRO be detected in additional wells, TPH GRO will be sampled in additional wells further downgradient in an iterative fashion to determine the extent of TPH GRO. Any wells with confirmed detections will be added to the list of wells to be sampled for TPH GRO.

1,4-dioxane was identified in many wells during the recent "due diligence" sampling and analysis conducted by CenterPoint's consultant. The wells where 1,4-dioxane was detected and nearby downgradient wells will be sampled on two occasions with at least 60 days between the sampling events. If 1,4-dioxane is not detected during either of the sampling events, no further sampling for 1,4-dioxane in those wells is required. If 1,4-dioxane is detected during one or both



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sampling events, the wells with detections shall be added to the wells routinely sampled during the semi-annual sampling events conducted pursuant to your Permit. Additionally, if 1,4-dioxane is confirmed to be present in any of the wells, the most recent version of U.S. EPA RSL guidance for 1,4-dioxane in tap water, will be added to the Groundwater Protection Standard referenced in Tables I and IA of the Part I Permit.

Wells to be sampled for 1,4-dioxane include the following:

GS02-503-L, KC84-006-L, KC84-018-L, KC85-032-L, KC85-032-M, KC85-032-U, KC85-033-L, KC85-034-U, KC85-037-L, KC85-037-U, KC85-039-L, KC85-043-L, KC86-047-L, KC86-047-U, KC86-051-L, KC87-067-L, KC87-067-U, KC87-069-L, KC87-069-U, KC87-071-L, KC87-071-U, KC87-072-L, KC87-072-U, KC87-076-L, KC87-076-U, KC88-083-L, KC89-102-L, KC89-102-U, KC89-119-L, KC89-126-L, KC89-126-U, KC91-160-L, KC91-160-U, KC91-163-L, KC91-163-U, KC91-168-L, KC91-171-L, KC91-176-L, KC91-179-L, KC91-179-U, KC94-191-U, KC94-192-L, KC94-192-U, KC95-201-L, KC95-202-L, KC95-202-U, KC97-209-L, KC97-209-U, KC98-233-L and OW-001-L.

In accordance with 40 CFR 270.42(a)(ii), NNSA shall notify everyone on their mailing list within 90 days after this approval. When this has been done, please notify the department's HWP and enclose a copy of the notice. If you have any questions regarding this letter, please contact Mr. Donald L. Dicks, of my staff, at (573) 751-3553.

Sincerely,

HAZARDOUS WASTE PROGRAM

[Original signed by Richard A. Nussbaum]

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

RAN:ddt

c: Mr. Bob Aston, Project Manager, U.S. EPA Region 7  
Kansas City Regional Office, Missouri Department of Natural Resources