



**SUMMARY AND RESPONSE TO COMMENTS
DRAFT PART I PERMIT
MISSOURI PRESSED METALS, INCORPORATED
SEDALIA, MISSOURI
EPA ID# MOD073029936**

The Missouri Department of Natural Resources (hereafter the Department) issued a final Missouri Hazardous Waste Management Facility Part I Permit to Missouri Pressed Metals, Incorporated (hereafter the Permittee). The final permit requires the Permittee to continue performing post-closure care, including groundwater monitoring, for the former hazardous waste land disposal area and corrective action activities at the site. The Permit also contains contingencies that may be exercised in the event there is a newly identified release to the environment from a new- or previously-identified solid waste management unit or area of concern.

The Department conducted the public participation activities for the draft Part I Permit, as outlined in Code of State Regulations 10 CSR 25-8.124(1)(A)10. The Department invited the public to review and offer written comments on the draft permit during a 45-day public comment period. The public comment period began October 3, 2014, and ended November 17, 2014.

All written comments received during the public comment period concerning the draft Part I Permit are listed below. The Department's response to each comment and an explanation of how each comment was addressed in the final Part I Permit is also included. The Department changed certain requirements in the final Part I Permit based on technical or legal issues brought up by the comments. All changes made in the final Part I Permit are identified in the responses. This Summary and Response to Comments was prepared according to the requirements in 10 CSR 25-8.124(1)(A)17.

COMMENTS FROM DEPARTMENT STAFF:

Comment #1:

CORRECTIVE ACTION CONDITIONS: III. Groundwater Monitoring and Corrective Action Program – Former Land Disposal Unit [40 CFR 264.90-261.100]. The document refers to Maximum Detection Limits (also Table 1) when referring to analytical limits. Typically, these are referred to simply as “detection limits” which infer the minimum detection limits capable by the current technology used by the laboratory. While most instruments also have an upper (or maximum) detection limit, this is typically not discussed because serial dilution of the environmental sample can allow the instrumentation to appropriately portray the sample.

Response #1:

The final Part I Permit language has been changed to address this comment.

COMMENTS FROM THE PERMITTEE:

Comment #1:

CORRECTIVE ACTION CONDITIONS: Groundwater Monitoring and Corrective Action Program – Former Land Disposal Unit [40 CFR 264.90-261.100] Section III. E. Corrective Action Program (6). The draft permit states that the facility will sample “for all parameters contained in Appendix IX of 40 CFR Part 264.” However, the SAP, which was approved by MDNR on August 28, 2014, states that the facility will only sample for an amended Appendix IX list, consisting of:

- * Appendix IX volatile organic compounds (VOC) using EPA Method 8260.
- * Appendix IX semi-volatile organic compounds (SVOC) and 1,4-dioxane using EPA Method 8270.
- * Lead, cadmium, chromium, and arsenic using EPA Method 6010.

We request that clause III.E.6 be changed to indicate that the facility will sample for a modified Appendix IX list, as described in the approved SAP.

Response #1:

The final Part I Permit language has been changed accordingly.