



Jeremiah W. (Jay) Nixon, Governor

Sara Parker Pauley, Director

DEPARTMENT OF NATURAL RESOURCES

dnr.mo.gov

September 23, 2011

Ms. Sheila G. Hoover
Environmental Manager
Akzo Nobel
3078 County Road 180
Carthage, MO 64836

RE: Approval of Class 1 Permit Modification with Prior Director Approval for 2011 Amendments to the Sampling and Analysis Plan for Groundwater and Surface Water Expert Management, Incorporated, Carthage, Missouri, Facility
EPA ID# MOD077887909

Dear Ms. Hoover:

The Missouri Department of Natural Resources (Department) received Expert Management, Incorporated's (EMI) 2011 Sampling and Analysis Plan Amendments on August 16, 2011. The Department notes that the 2011 Amendments supplement the Base Sampling and Analysis Plan that was approved September 30, 2009. Based on the changes in the groundwater monitoring schedule, the Department determined that the Sampling and Analysis Plan Amendments would be a Class 1 Permit Modification requiring prior director approval.

The Department has completed a review of the 2011 Amendments referenced above. Wells MW-101, MW-66, and MW-35 will be sampled for Appendix IX. constituents as per the Missouri Hazardous Waste Management Facility Part I Permit. Temporary Monitoring wells TMW-2, TMW-4, TMW-6, TMW-8, TMW-11, and TMW-12 are approved to abandon per 10 CSR 23-4.080 found at <http://www.sos.mo.gov/adrules/csr/current/10csr/10c23-4.pdf>. Any deviation from these well abandonment requirements may require approval of a variance. The Department notes that these wells were originally utilized for investigation purposes, but never sampled as part of the routine groundwater monitoring program.

The additional sampling obtained from the 2011 Amendments List will help fill data gaps previously identified, assess vertical migration, monitor locations of intermediate concentration, confirm the lack of certain constituents in some areas, and monitor groundwater downgradient of recent soil remediation activities. The Department hereby approves the proposed 2011 Amendments to the Sampling and Analysis Plan.

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EMI recently inquired about their laboratory expressing concerns over using SW-846 Method 8270C for hexachlorophene in Appendix IX. sampling. Chapter 2 of SW-846 lists 8270 as the applicable method for hexachlorophene; however, Method 8270C notes in the “key to analyte list” that there is “adsorption to walls of glassware during extraction and storage,” and it has “nonreproducible chromatographic performance.” As hexachlorophene is a disinfectant used as a topical anti-infective, anti-bacterial agent often used as soaps and toothpaste, and has not been a constituent of concern at EMI, the Department does not require testing for hexachlorophene using a separate analytical method.

EMI must send a notice of this 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 40 CFR 270.42(a)(1)(ii), as incorporated by reference in 10 CSR 25-7.270. EMI must send a copy of the notice to the Department.

If you have any questions regarding this letter, please contact Mr. Donald L. Dicks, Environmental Engineer, of my staff at the Missouri Department of Natural Resources, Hazardous Waste Program, P.O. Box 176, Jefferson City, MO 65102-0176, or by phone at (573) 751-3553 or 1-800-361-4827, or by e-mail at don.dicks@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:ddm

c: Michael Dandurand, P.E., Project Manager, U.S. EPA Region 7
Southwest Regional Office, Missouri Department of Natural Resources