



Jeremiah W. (Jay) Nixon, Governor

Sara Parker Pauley, Director

DEPARTMENT OF NATURAL RESOURCES

dnr.mo.gov

August 6, 2012

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 2012 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) 2012 Sampling and Analysis Plan (SAP) Amendments on June 8, 2012. The Department notes that the 2012 Amendments supplement the Base SAP that was approved September 30, 2009. Based on the changes in the groundwater monitoring schedule, the Department determined that the SAP Amendments would be a Class 1 Permit Modification requiring prior director approval.

The Department has completed a review of the 2012 Amendments referenced above. The additional sampling obtained from the 2012 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 2012 Amendments to the SAP.

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.

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If you have any questions regarding this letter, please contact Mr. Donald L. Dicks, Project Manager, 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