



Jeremiah W. (Jay) Nixon, Governor

Sara Parker Pauley, Director

## DEPARTMENT OF NATURAL RESOURCES

dnr.mo.gov

August 20, 2014

Mr. Charles Scudder  
Vice President and Secretary  
Expert Management Inc.  
120 White Plains Road  
Tarrytown, NY 10591-5522

RE: Conditional Approval of Class 1 Permit Modification with Prior Director Approval for 2014 Amendments to the Sampling and Analysis Plan for Groundwater and Surface Water Expert Management, Incorporated, Carthage, Missouri, Facility  
EPA ID# MOD077887909

Dear Mr. Scudder:

The Missouri Department of Natural Resources (Department) received Expert Management, Incorporated's (EMI) 2014 Sampling and Analysis Plan (SAP) Amendments for Groundwater and Surface Water on July 8, 2014, along with Figure 6 and a revised Table 5-2 received August 13, 2014, by e-mail. The Department notes that the 2014 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 2014 Amendments referenced above. The additional sampling obtained from the 2014 Amendments List will help fill data gaps previously identified, monitor up gradient well locations, monitor locations of intermediate concentration, re-sample selected deep bedrock wells in the shallow bedrock aquifer, and monitor groundwater downgradient of recent soil remediation activities. Additionally, boring logs from the soil gas monitoring wells C-01, C-02, C-03, and C-04 were included, as they are expected to be closed in 2014 or 2015 pending the Corrective Measures Study requirements. The soil gas monitoring wells should not be closed until the CMS has been reviewed and approved. Except for the closure of the soil gas wells, the Department hereby approves the proposed 2014 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.



Recycled Paper

Mr. Charles Scudder  
August 20, 2014  
Page 2

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:ddt

c: Michael Dandurand, P.E., Project Manager, U.S. EPA Region 7  
Sheila Hoover, Independent Consultant, Environmental Matters, Legacy Asset  
Management via e-mail  
Southwest Regional Office, Missouri Department of Natural Resources