



February 3, 2010

Mr. Keith B. Rapp  
Project Manager  
ECOR Solutions  
3191 Copper Oaks Place  
Woodbury, MN 55125

RE: Missouri Hazardous Waste Management Facility Part I Permit Modification, Contingent Approval, Eaton Hydraulics, Incorporated (Formerly Vickers), Joplin, Missouri  
EPA ID# MOD007155781

Dear Mr. Rapp:

The Missouri Department of Natural Resources' Hazardous Waste Program (HWP) has completed its review of your July 29, 2009, Class 2 Permit Modification request, which included an updated Sampling and Analysis Plan (SAP) (Version 8). The HWP has the following comments, by item, regarding the requested changes.

### **Modification to the Surface Water Sampling Program**

The HWP concurs with the changes associated with the revised State Operating Permit (SOP) MO-0002411, dated July 2, 2009. These changes include: (1) ceasing to sample Outfall 001; (2) quarterly sampling of the new Outfall 004, which consists of non-contact cooling water from the LNAPL Treatment Plant prior to flowing to Outfall 002; (3) addition of chromium and phenol; (4) EPA Test Method 624 may be used for surface water analysis at Outfalls 002, 003, and 004, as per SOP MO-0002411, but groundwater analysis should continue to be performed by EPA SW-846 methods, as the HWP does not routinely approve the use of water test methods for groundwater in lieu of the SW-846 unless there is a particular reason to do so; (5) whole effluent toxicity criteria imposed on Outfall 004; and (6) zinc sampling parameters changed from dissolved species to total recoverable zinc.

### **Modifications to the Groundwater Monitoring Network-Well Abandonment**

The HWP approves abandonment of Wells 203-6, 402, 303-D, 414-I, 602-S, 702, 812-I, 826-S, 827, MPE-MS, all LNAPL area sumps (corrugated metal pipes in the Decommissioned

Surface Impoundment), 415, 712, 804, and 807-D. The HWP suggests retaining Wells 822, 825-I, and 830, and sampling these wells once every two years to ensure that the edge of the groundwater plume remains defined and to provide evidence of the need for additional action(s) should potential plume expansion be indicated.

### **Modifications to the Groundwater Monitoring Network-Well Installation**

Seven temporary wells were installed that included MPE-16S, MPE-16D, MPE-OW1S, MPE-OW1D, MPE-OW2S, MPE-OW2D, and MPE-OW3S, for multiphase extraction (MPE). This also included extension of the MPE monitoring parameters (air, flow, vacuum) to these locations. The HWP directs, per our December 18, 2009, letter to Unisys, that MPE continues to be implemented and optimized as an Interim Stabilization Measure under Special Permit Condition IX. of the Part I Permit.

### **Modification to the Groundwater Monitoring Frequency**

The HWP approves changing the frequency of monitoring for Wells 823 and 831 to an annual groundwater sampling schedule. Note that Well 827 is approved to abandon, while the HWP suggests Well 830 be monitored once every two years.

### **Modifications to Analytical Parameters in the Groundwater Monitoring Program**

The HWP does not approve changing from EPA Test Method 8260 and 8270 to EPA Test Method 624 and 625 for volatile organic compounds and semivolatile organic compounds, respectively, for groundwater monitoring. Additionally, analysis of metals in groundwater should continue to be done by EPA Test Method 6010B or 6010C rather than EPA Test Method 200.8. The water sampling methods may be used for the LNAPL Treatment Plant (LTP) and the surface water sampling. The HWP approves adding phenol and hexavalent chromium to the LTP discharge monitoring.

Additionally the HWP has the following comments on Version 8 of the SAP:

On page 7, in five sentences, you state, “These correct action technologies... .” These sentences should read, “These corrective action technologies... .”

On page 19, regarding the 15 LNAPL wells where the portable pumping system (PPS) is used to recover LNAPL, indicates that the PPS is generally done weekly. Standard Operating Procedure (SOP) #6 indicates that when product thickness is greater than 0.04 feet, the PPS will be employed. The amount of LNAPL being recovered, 0.56 gallon in the first six months of 2009 has diminished to the point that it does not seem reasonable to do weekly. Unisys may consider checking these wells on a reduced frequency (monthly or quarterly) to determine if product can be removed, rather than

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performing the task weekly. P-3, 206-4, RW-1 (the only three containing LNAPL during the first half of 2009), could be checked more frequently than the other LNAPL wells and Well 406 (DNAPL).

In Standard Operating Procedures #5, the sample locations in the LTP refer to Figure 18. This reference should be Figure 16.

The permit modification fulfills the requirement in Special Permit Condition IV.D.2. of the referenced permit. As part of the SAP review, the HWP has prepared a Groundwater Sampling and Analysis Plan Worksheet (Worksheet) that outlines the technical requirements that are typically expected to be included in a good quality SAP. A copy of this Worksheet is enclosed with this letter for your convenience.

Public participation requirements for a Class 2 Permit Modification were followed in accordance with 40 CFR 270.42 (b). A public meeting was held on Tuesday, August 25, 2009, at the Everett J. Ritchie Tri-State Mineral Museum in Schifferdecker Park, 4<sup>th</sup> Street and Schifferdecker Avenue, Joplin, Missouri. Mr. Roger Dickey, from Able Manufacturing, L.L.C., and Mr. Kavon Stull, from Empire Electric, were present and requested the sampling history for wells on their property that are proposed for abandonment. The sampling history of the wells and map were e-mailed to both parties. No written comments were received by the HWP during the 60-day public comment period. The comment period ran from July 29, 2009 to September 28, 2009.

Please provide replacement pages for the hard copy of the SAP and a revised electronic copy to address the above comments. The HWP approves the modification request and updated SAP contingent upon receipt of the updated pages.

If you have any questions, please contact Mr. Don Dicks, Environmental Engineer, at the Missouri Department of Natural Resources, HWP, P.O. Box 176, Jefferson City, MO 65102-0176, or by phone at (573) 751-3553. Thank you.

Sincerely,

HAZARDOUS WASTE PROGRAM

[Original signed by Robert Geller]

Robert Geller  
Director

RG:dds

Enclosure

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- c: Mr. Bill Anthony, ECOR Solutions
- Mr. Terry Etter, Unisys Corporation
- Mr. Steve Fesko, Eaton Corporation
- Kenneth Herstowski, P.E., U.S. EPA Region VII
- Southwest Regional Office, Missouri Department of Natural Resources