



## DEPARTMENT OF NATURAL RESOURCES

March 26, 2009

CERTIFIED MAIL – 7004 1160 0000 8176 5532  
RETURN RECEIPT REQUESTED

Ms. Sheila G. Hoover  
Environmental Manager  
ICI Group Services  
3078 County Road 180  
Carthage, MO 64836

RE: Class 1 Permit Modification with Prior Director's Approval  
Expert Management Inc., Carthage, Missouri, Facility, EPA ID# MOD077887909

Dear Ms. Hoover:

This letter is to notify you that the Missouri Department of Natural Resources (DNR) received Expert Management Inc.'s (EMI) Class 1 permit modification request, dated February 16, 2009. The request was for adding benzene, toluene, ethyl benzene, xylenes (BTEX), and methyl tertiary butyl ether (MTBE) as hazardous constituents to Table I, the Groundwater Protection Standard of the Part I Permit.

The DNR agrees with EMI that this is a Class 1 permit modification requiring prior director approval. The DNR is approving the modification request. EMI must send a notice of the 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 Code of Federal Regulations 40 CFR 270.42(a)(1)(ii). EMI must send a copy of the notice to the DNR.

EMI should continue to include analysis of these constituents near and downgradient of the vicinity of the wells where these constituents were detected. The maximum concentration limits proposed by EMI in the enclosed Table I for these constituents are acceptable and correctly reference the appropriate information sources. These constituents are included in the 2008 Sampling and Analysis Plan (SAP) that the DNR received September 11, 2008. Comments regarding this SAP are under development and an electronic draft of these comments will be forwarded to EMI shortly. Please note that based on Table 6-2, Summary of Mann-Kendall Analysis, in the July- December 2008 Semi Annual Groundwater Corrective Action Report, the

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BTEX constituents are increasing in MW-144. The levels reported in 2007 for benzene (1500 ug/l) and 2008 (2800 ug/l) reports exceed the maximum concentration limit of 5 ug/l for benzene.

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

Sincerely,

HAZARDOUS WASTE PROGRAM

[Original signed by Richard A. Nussbaum]

Richard A. Nussbaum, P.E., R.G.  
Chief, Permits Section

RAN:dds

Enclosure

c: Mr. David Garrett, Project Manager, U.S. EPA Region VII  
Southwest Regional Office, Missouri Department of Natural Resources