



September 30, 2009

CERTIFIED MAIL – 7004 1160 0000 8177 2974  
RETURN RECEIPT REQUESTED

Ms. Sheila G. Hoover  
Environmental Manager  
ICI Group Services  
3078 County Road 180  
Carthage, MO 64836-7493

RE: Base Sampling and Analysis Plan for Groundwater and Surface Water, and 2009  
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) Base Sampling and Analysis Plan (SAP) and the 2009 Amendments on August 31, 2009, submitted by Spotts, Stevens, and McCoy. Based on the changes in groundwater monitoring schedule, the Department determined that the SAP revisions would be a Class 1 permit modification requiring prior director approval. A SAP Worksheet is also enclosed for your information.

The Department has completed a review of the Base SAP and the 2009 Amendments referenced above. The Base SAP is to be used for several years, and the 2009 Amendments are for additional sampling that is needed in 2009 for filling data gaps previously identified, monitoring locations of intermediate concentration, monitoring areas down gradient of recent remediation activities, and resampling some areas that have not been sampled in recent sampling events. The Department approves the Base SAP and the 2009 Amendments.

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 Department.

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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 R. Bruce Stuart for]

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

RAN:ddm

Enclosure

c: Mr. David Garrett, Project Manager, U.S. EPA Region VII  
Southwest Regional Office