



Missouri Department of dnr.mo.gov

**NATURAL RESOURCES**

Eric R. Greitens, Governor

Carol S. Comer, Director

May 25, 2017

Mr. Brett Whittleton  
Vice President  
Director, Legacy Assets & Environmental Affairs  
Akzo Nobel, Inc.  
525 W. Van Buren Street  
Chicago, IL 60607

RE: Class 1 Permit Modification with Prior Director Approval for 2017 Amendments to the Sampling and Analysis Plan for Groundwater and Surface Water; Expert Management, Incorporated, Carthage, Missouri, Facility EPA ID# MOD077887909

Dear Mr. Whittleton:

The Missouri Department of Natural Resources (department) has reviewed Expert Management, Incorporated's (EMI) 2017 Sampling and Analysis Plan (SAP) Amendments for Groundwater and Surface Water, received by e-mail on May 18, 2017. As in prior years, the 2017 Amendments supplement the Base SAP that was approved on September 30, 2009. Based on the changes in the groundwater monitoring schedule, the department has determined that the SAP Amendments are a Class 1 Permit Modification requiring prior director approval.

The 2017 SAP Amendments are expected to help refine the vertical extent of contaminants, represent individual areas of concentration, support the Mann-Kendall trend analysis and further define perchlorate concentrations in wells adjacent to and down-gradient of the General Dynamics property. The department hereby approves the proposed 2017 SAP Amendments.

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.

If you have any questions regarding this letter, please contact Mr. Jalal El-Jayyousi, P.E., 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 [jalal.el-jayyousi@dnr.mo.gov](mailto:jalal.el-jayyousi@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:dd



Mr. Brett Whittleton  
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- c: Mr. Mike Dandurand, Missouri State Coordinator, U.S. EPA Region 7
- Ms. Lisa Krogman, Legacy Asset Management, via e-mail
- Mr. Frank Lagrotta, Legacy Management Canada, via e-mail
- Southwest Regional Office, Missouri Department of Natural Resources