



Jeremiah W. (Jay) Nixon, Governor • Sara Parker Pauley, Director

DEPARTMENT OF NATURAL RESOURCES

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June 17, 2016

Mr. Bradley Vann, Project Manager
Superfund Division
United States Environmental Protection Agency, Region 7
11201 Renner Boulevard
Lenexa, Kansas 66219

RE: Comments on the Comprehensive Sampling Plan for Monitoring Sulfur Dioxide in Ambient Air

Dear Mr. Vann:

The Missouri Department of Natural Resources' Federal Facilities Section, in coordination with the Air Pollution Control Program and Solid Waste Management Program, has completed its review of the document titled Comprehensive Sampling Plan for Monitoring Sulfur Dioxide in Ambient Air dated May 27, 2016. It is our understanding that EPA has already sufficiently communicated our comments to Bridgeton Landfill LLC, so we are attaching our comments merely as a formality to maintain the record for this Superfund site. Thank you for giving us the opportunity to review and comment on the work plan.

If you have any questions pertaining to these comments please contact me by phone at (573) 751-8628, or by written correspondence at P.O. Box 176, Jefferson City, MO 65102.

Sincerely,

HAZARDOUS WASTE PROGRAM

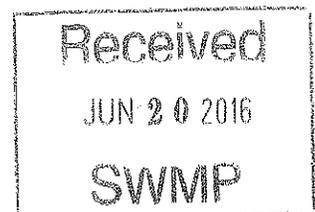
A handwritten signature in black ink, appearing to read "Ryan Seabaugh". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Ryan Seabaugh, P.E.
Federal Facilities Section

RS:rl

Enclosures: Comments on the Comprehensive Sampling Plan for Monitoring Sulfur Dioxide in Ambient Air

c: Mr. Chris Nagel, Solid Waste Management Program Director
Ms. Kyra Moore, Air Pollution Control Program Director



MISSOURI DEPARTMENT OF NATURAL RESOURCES
COMPREHENSIVE SAMPLING PLAN FOR MONITORING SULFUR DIOXIDE IN
AMBIENT AIR
Comments

1. The work plan indicates that it is intended to be a “comprehensive document providing detail for the ambient air monitor work plan, Quality Assurance Project Plan (QAPP), sampling and analysis plan (SAP), and field sampling plan (FSP) specific to this monitoring program.”

Comment: For longer term projects we ask monitoring organizations to follow a more specific Quality Assurance Project Plan (QAPP) template available at <http://dnr.mo.gov/env/apcp/qapptemplate.htm> in order to ensure specific EPA requirements are addressed. However, since this project duration is for only one year and EPA has not required Bridgeton Landfill, LLC to report data to EPA’s Air Quality System, the ‘comprehensive document’ format appears to be consistent with the Administrative Settlement Agreement and Order on Consent Terms cited in the work plan.

The QAPP may need to be revised if the project duration changes to exceed one year.

2. Zero drift criteria:

Comment: The zero drift of the SO₂ monitors should be controlled so it does not exceed 5 ppb between quality control checks. Ambient peak 1-hour SO₂ concentrations have decreased significantly across our statewide SO₂ monitoring network over the last year. Therefore, controlling zero drift has become more important to ensure lower concentration measurements between monitoring sites are more comparable. The work plan does not specify a specific zero adjustment criteria. We are using a 5 ppb zero adjustment criteria in the MDNR SO₂ monitoring network, including the Rider Trail I-70 near-roadway SO₂ monitor.

3. Audit gas ranges: In section 4.2.4, SO₂ Audit Method, the work plan cites audit concentrations that are higher than those EPA recently promulgated in 40 CFR 58 Appendix A, 3.1.2.1.

Comment: MDNR staff recently started auditing SO₂ monitors in the new audit ranges 4, 5, 6 and 7 to bracket the typical SO₂ ambient air monitoring concentrations typically measured in our network. Again, since this is a short term project, if EPA is agreeable to the higher audit ranges we are okay with that. The new audit range table may be found at: http://www.ecfr.gov/cgi-bin/retrieveECFR?n=40y6.0.1.1.6#ap40.6.58_161.a

If the project duration changes to exceed one year, audit gas ranges may need to be revised.

4. One-Point Quality Control (QC) Check:

Comment: Although the work plan specifies criteria to evaluate the one-point QC check, it does not specify the concentration range of the one-point QC check. As with the audit gas ranges discussed above, EPA recently lowered the QC check ranges cited in 40 CFR 58 Appendix A, 3.1.1. We recommend that the work plan specify the concentration range that they intend to use to perform the QC check and that the QC check concentration be lower than 75 ppb.

5. Section 5, Report and Recordkeeping:

Comment: We encourage EPA to consider requiring some preliminary 1-hour SO₂ data reporting. We use a weekly reporting period for some of our industry monitoring projects. At the very least, the plan should include a process for reporting any exceedances of the 1-hour SO₂ NAAQS to EPA within at least a 10 days of the exceedance or sooner if practicable.