PRC Environmental Management, Inc.
650 Minnesota Avenue
Kansas City, KS 66101
913-281-2277
Fax 913-281-5383

PRC

RECEIVED MAY 24 1993 RCRA SECTION

May 24, 1993

Mr. Ruben McCullers
Work Assignment Manager
U.S. Environmental Protection Agency
726 Minnesota Avenue
Kansas City, KS 66101

Re: Contract No. 68-W9-0006; Work Assignment No. R07068
Review Comments on the Closure Plan for the Waste Paint Filters and Overspray Paper Storage Unit and the Brule Incinerator Unit dated May 10, 1993 (Closure Plan)
Knapheide Mfg. Co., West Quincy, Missouri

Dear Mr. McCullers:

PRC Environmental Management, Inc. (PRC), is submitting review comments on the above referenced document. The May 10 closure plan was reviewed to ensure that the Environmental Protection Agency's (EPA) comments (dated October 15, 1992) on the original closure plan (dated April 7, 1992) were addressed. PRC also reviewed the May 10 closure plan to ensure that its proposed sampling activities would determine if a release has occurred from the closure area.

PRC found that the May 10 closure plan generally addresses EPA's comments on the original closure plan. PRC also determined that the sampling activities proposed in the closure plan were sufficient to determine if a release has occurred from the closure area.

As we discussed on May 19 and 20, 1993, PRC noted that the one major deficiency in the May 10 closure plan is that it does not establish specific closure performance standards. During our discussions, you mentioned that the Missouri Department of Natural Resources is the agency that will approve or disprove the closure performance standards and that PRC's technical review comments should not propose any standards.

If you have any questions or comments on this submittal, please call me at (913) 281-2277.

Sincerely,

Nathan Meyer

Nathan Meyer
Environmental Scientist

Enclosure (hard copy and disk copy)

cc: Aaron Zimmerman, U.S. EPA - RPO (cover letter only)
Paula Hirtz, PRC (cover letter only)
File

R00000380
RCRA Records Center

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TECHNICAL REVIEW COMMENTS
ON THE MAY 10, 1993, CLOSURE PLAN
FOR THE WASTE PAINT FILTERS
AND OVERSPRAY PAPER STORAGE UNIT
AND THE BRULE INCINERATOR UNIT
Knapheide Mfg. Company
West Quincy, Missouri

1.0 INTRODUCTION

The U.S. Environmental Protection Agency (EPA) requested that PRC Environmental Management, Inc. (PRC), review and prepare technical comments on the Closure Plan for the Waste Paint Filters and Overspray Paper Storage Unit and the Brule Incinerator (closure plan) submitted by the Knapheide Mfg. Company (Knapheide). The closure plan, dated May 10, 1993, was prepared for Knapheide by Schreiber, Grana & Yonley, Inc. PRC reviewed the closure plan to ensure that the Environmental Protection Agency's (EPA) comments (dated October 15, 1992) on the original closure plan (dated April 7, 1992) were addressed. PRC also reviewed this closure plan to ensure that its proposed sampling activities would determine if a release had occurred from the closure area. PRC's review and preparation of technical comments was completed under contract number 68-W9-0006, work assignment R07068.

2.0 COMMENTS

PRC found that the May 10 closure plan generally addresses EPA's comments on the original closure plan. PRC also found that the proposed soil sampling activities described in the closure plan were sufficient to determine if a release has occurred from the closure area. The proposed soil sampling adheres to the recommendations presented in EPA's comments on the original closure plan.

A major difference between the original closure plan and the May 10 closure plan is the disposal of the Brule incinerator and its concrete pad. The original closure plan states (on page 17) that the incinerator will be recycled as scrap metal if possible. The original closure plan did not address decontamination or disposal of the concrete pad. The May 10 closure plan states (on page 11) that the incinerator and its associated concrete pad will be disposed of at an approved hazardous waste disposal facility. PRC found this change to be acceptable.

A minor difference between the original closure plan and the May 10 closure plan is the size of the closure area. Figure No. 6 in the original closure plan shows the closure area to extend approximately 65 feet to the northeast of the Brule incinerator unit and 10 feet to the southwest of the storage unit. Figure No. 3 in the May 10 closure plan shows the "material transport pathway area" (closure area) to extend only to the northeast corner of the Brule incinerator unit and the southwest edge of the storage area. Because Knapheide has written that the exact dimensions of the closure area are not evident based on current site conditions, PRC recommends that the closure area be defined as the larger area shown on Figure No. 6 in the original closure plan.

The main deficiency that PRC noted in the May 10 closure plan is that it does not establish specific closure performance standards. The Missouri Department of Natural Resources is responsible for approving closure performance standards and granting closure.

Based on item 10d of the Consent Agreement/Consent Order dated March 4, 1993, EPA could hold in abeyance the facility's responsibility for financial assurance if the soil sampling analysis indicates (1) no detection of the constituents above the method detection limits identified in Table 2 of the May 10 closure plan, or (2) no detection of the constituents above the background level. If one or both of these conditions are met, this should indicate that no release has occurred and that the closure area does not require post-closure care pursuant to 40 Code of Federal Regulations § 265.117.

File: Knapheide

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MAY 24 1993

RCOM SECTION

STATE OF MISSOURI

Mel Carnahan, Governor • David A. Shorr, Director

DEPARTMENT OF NATURAL RESOURCES

DIVISION OF ENVIRONMENTAL QUALITY

P.O. Box 176 Jefferson City, MO 65102-0176

May 19, 1993

Mr. Ruben McCullers
U.S. Environmental Protection
Agency, Region VII
RCRA Branch
726 Minnesota Avenue
Kansas City, KS 66101

Dear Mr. McCullers:

This letter is to fulfill our commitment to the U.S. Environmental Protection Agency (EPA) to fully coordinate on the various ongoing environmental activities at the Knapheide site in West Quincy, Missouri. It is our understanding that you are the EPA-lead Project Manager for the corrective action taking place at the site under RCRA authority. We are also of the understanding that closure activities at the site are being directed by the Missouri Department of Natural Resources' (MDNR) RCRA Permits Section.

We wish to confirm that the cleanup of the volatile organic groundwater plume will continue to be pursued through a Consent Agreement with Knapheide under the authority of the Missouri Hazardous Waste Management Law. We are also working to reach an agreement with the company for the cleanup of the diesel groundwater plume from leaking aboveground storage tanks. A meeting has been set for Monday, May 24, 1993 to discuss these issues with the company, their attorney, and consultant.

We will continue to keep you informed as to the progress and status of these issues. Please coordinate with Mr. Kevin Kelly or Ms. Laurie Bobbitt of my staff at (314) 751-3176, where there may be overlap with your involvement at the site. We appreciate your interest, and hope that good communication and coordination will continue to avoid confusion between the many entities involved.

Sincerely,

HAZARDOUS WASTE PROGRAM

Edwin D. Knight, Chief
Superfund Section

EDK:lbt

c: Ms. Shelley Woods, Office of the Attorney General
Mr. David Freise, Hazardous Waste Program, MDNR
Mr. Bruce Martin, Hazardous Waste Program, MDNR
Mr. Kevin Kelly, Hazardous Waste Program, MDNR

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