To: Engeman, Diana[Engeman.Diana@epa.gov]; Law, Preston[law.preston@epa.gov]; Juett, Lynn[Juett.Lynn@epa.gov]; Hoefer, David[Hoefer.David@epa.gov]
Cc: Jackson, Robert W.[Jackson.Robertw@epa.gov]; Peterson, Mary[Peterson.Mary@epa.gov]; Buchholz, Ken[Buchholz.Kenneth@epa.gov]
From: Bernard-Drakey, Jamie
Sent: Mon 3/5/2018 8:07:40 PM
Subject: Martha Rose inquiries
1997 May 16 DNR Director Shorr to State Rep Howerton.pdf
1996 Oct 11-DNR to EPA on gw monitorp1.jpg

I will wait for input from Remedial before responding to MDNR about EPA doing 5 year reviews, or not, at this site. That is the only question MDNR has asked EPA.

For the recent Martha Rose Chemical site inquiry from MDNR about if EPA has done 5 year reviews or not, below and attached is the context of the inquiry. Mr. Carolan has been receiving EPA file documents under FOIA for maybe a year now, reviewed by Dave Hoefer before release, and I think Mr. Carolan is related to an individual who received a criminal sentence as part of the site investigations.

Todd Davis also had an inquiry from Mr. Carolan about a potential EPA funded Phase II assessment. Our response was that Todd/EPA had not received an application so we could not comment on the scope of a site specific Phase II. The redevelopment name for the site may be Holden Business Park.

From: Michael Carolan <mcarolan@charter.net>
Date: Friday, February 23, 2018 at 2:12 PM
To: <carol.comer@dnr.mo.gov>
Subject: Phase I ESA Holden Business Park

Carol Comer, Director
Missouri Department of Natural Resources
carol.comer@dnr.mo.gov

Dear Ms. Comer,

I am writing to obtain your response to facts that have recently come to light about an assessment your department funded: Phase I Environmental Site Assessment for the Holden Business Park Site, Contract No. C312021002, 12-1-2016.

I am planning on publishing the results and would like your thoughtful response given your responsibility toward the citizens of Missouri to protect their health and their environment.

I have attached two memorandum from your department regarding this site, part of which was a former Superfund site as you are aware. I have many more that I can forward to you.

What is clear from the documents is that your department was concerned about protecting public health and attempted to keep the groundwater and soil monitoring wells opened at the site between 1996 and 1999.

My question is why did your contractor, Seagull Environmental Technologies, Inc., under your supervision, disregard your agency's own memorandum about the public health and environmental issues the contractor was directed to study in the most recent Phase I Site Assessment?

Phase I Assessments, as far as I understand them, are tasked with documenting all past hazardous waste history of a proposed site to be developed. The neglect of these documents, including the last results of groundwater tested there in June 1996, seems to be clear.

The inclusion of these documents would alter the recommendations of the Phase I assessment to include testing both the soil and the ground water on specifically the former Superfund site and the adjacent unnamed tributary.

When the EPA removed the monitoring wells in 1999, your department concurred that the site remained contaminated and, at the same time, argued against the well closures. So why would you not recommend retesting this site, specifically the southern portion?

Another important question the public would like answered is why the DNR decided against monitoring the groundwater in and around the site after 1999 when the EPA dismantled the wells?

I would to discuss this as soon as possible. I can be reached at 413.210.4059.

Thank you,

Michael Carolan