



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7**

11201 Renner Boulevard
Lenexa, Kansas 66219

NOV 08 2016

Mr. Ryan Seabaugh, PE
Environmental Engineer
Missouri Department of Natural Resources
P.O. Box 176
Jefferson City, Missouri 65102

Dear Mr. Seabaugh:

The U.S. Environmental Protection Agency Region 7 Superfund Program is in the process of evaluating and identifying all applicable or relevant and appropriate environmental requirements (ARARs) for remedy selection at Operable Unit 1 (OU1) of the West Lake Landfill in Bridgeton, Missouri. This includes, to the extent practicable, identification of all pertinent state ARARs. This letter formally requests that the state of Missouri identify any potential ARARs for the remedies being evaluated in the Final Feasibility Study for OU1 at the West Lake Landfill. The remedies being evaluated include full excavation, partial excavation with off-site disposal, and capping in place scenarios.

The EPA requests that an appropriate state official identify potential ARARs on the enclosed tables or in an equivalent-type format. It is important that the state official provide specificity regarding the state ARARs that are identified. Your timely response will ensure that the state requirements you identify will be considered during selection of the site ARARs for the final remedial action. To qualify as a state ARAR, the requirement must be promulgated. A state requirement is promulgated if it is legally enforceable and of general applicability. The attached tables address the following three categories: chemical-specific requirements; location-specific requirements; and action-specific requirements.

As a reminder, chemical-specific requirements or ARARs are usually either health- or risk-based numerical values or methodologies that establish the acceptable amount or concentration of a chemical that may remain in or be discharged to the environment. Location-specific ARARs generally restrict certain activities or limit concentrations of hazardous substances solely because of geographical or land use concerns. Requirements addressing wetlands, historic places, floodplains, or sensitive ecosystems and habitats are potential location-specific ARARs. Action-specific ARARs are restrictions on the conduct of certain activities or the operation of certain technologies at a particular site. Regulations that dictate the design, construction, and operating characteristics of incinerators, air stripping units, or a landfill construction are examples of action-specific ARARs.

The EPA requests that all information concerning state ARARs be submitted to this Agency within 30 days of receipt of this letter. Upon receipt, the EPA will examine your responses to determine whether they are applicable or relevant and appropriate to the OU1 West Lake site. The EPA will attempt to incorporate the identified state ARARs into the site ARARs; however, it is important to clarify that all

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potential state ARARs identified may not be adopted in the final site ARARs. Your timely response will ensure that the state requirements you identify will be considered during selection of the site ARARs for the final remedial action. The EPA will coordinate with MDNR to discuss any questions or concerns regarding the state-identified ARARs.

If you have any questions, please contact Brad Vann at (913) 551-7611 or Chris Jump at (913) 551-7141.

Sincerely,



Lynn M. Juett
Branch Chief
Site Remediation Branch
Superfund Division

Enclosure

Potential
State ARARs

TABLE 1: CHEMICAL-SPECIFIC REQUIREMENTS

Chemical	Maximum Concentration Allowed	Medium	Reason Why Requirement is an ARAR	Regulatory Citation

Potential
State ARARs

TABLE 2: LOCATION-SPECIFIC REQUIREMENTS

Location Subject to Requirement	Requirement	Reason Why Requirement is an ARAR	Regulatory Citation

Potential
State ARARs

TABLE 3: ACTION-SPECIFIC REQUIREMENTS

Action Subject to Requirement	Requirement	Reason Why Requirement is an ARAR	Regulatory Citation