

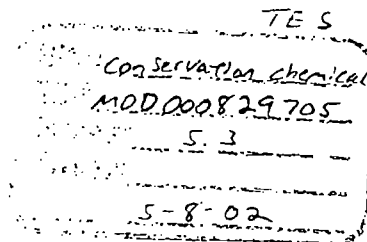


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION VII
901 NORTH 5TH STREET
KANSAS CITY, KANSAS 66101

MAY 08 2002

Peter D. Zaroni, P.E.
Burns & McDonnell Waste Consultants, Inc.
9400 Ward Parkway
Kansas City, Missouri 64114-3319



Dear Mr. Zaroni:

RE: Conservation Chemical Company (CCC) Site



40052847
SUPERFUND RECORDS

The Environmental Protection Agency (EPA) and Missouri Department of Natural Resources (MDNR) have completed the review of your letter dated March 5, 2002, which proposed metals effluent limits. Three of the proposed limits, arsenic, chromium and lead, are not acceptable. As a result, EPA has developed a counter proposal for effluent limits for those three metals; enclosed is Table I which summarizes pertinent information and specifies EPA's counter proposal.

The counter proposal is based upon the following logic: the effluent limits should equal the lower of either the ecotox value or the monthly, average National Pollutant Discharge Elimination System (NPDES) limit for each metal. Cadmium and lead are exceptions to this logic due to analytical detection level limitations. For cadmium, the detection level is 0.005 parts per million (ppm) which is adequately close to the ecotox value of 0.0035 ppm. For lead, the detection level of 0.025 ppm is not adequately close to the ecotox value of 0.015 ppm (or approximately 0.008 ppm if adjusted for water hardness). The lead effluent limit should be either 0.015 or approximately 0.008 ppm, whichever is correct for the water hardness. Please conduct that calculation and inform EPA of the correct value. Also, it is EPA's assumption that standard analytical methods exist with detection levels for lead in the 0.008 to 0.015 ppm range. Please inform EPA if that is not the case.

The EPA requests the Original Generator Defendants' (OGDs) response to this letter within thirty (30) days of receipt.

Sincerely,

Steve Auchterlonie
Remedial Project Manager
Superfund Division

Enclosure

cc: Candice McGhee, MDNR

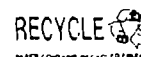


TABLE 1. EFFLUENT METALS LIMITS FOR THE CONSERVATION CHEMICAL COMPANY SITE

METAL	AVERAGE INFLUENT	AVERAGE EFFLUENT	MAXIMUM EFFLUENT	95% UPPER CONFIDENCE EFFLUENT	MCL	ECOTOX	MONTHLY NPDES	CURRENT ROD	OGDS PROPOSAL	EPA'S COUNTER
ARSENIC	<0.040	0.020	0.020	NOT CALCULATED (DL = 0.040)	0.050	0.190	0.080	0.050	0.190	0.080
CADMIUM	<0.005	0.0025	0.0025	NOT CALCULATED (DL = 0.005)	0.005	0.0035	0.050	0.002	0.005	AGREE
CHROMIUM	<0.010	0.0034	0.120	0.012	0.100	0.554	0.200	0.020	0.554	0.200
IRON	17 - 22	0.0883	0.890	0.210	0.300 (SMCL)	1.000	NOT DEFINED	0.020	1.000	AGREE
LEAD	<0.025	0.0125	0.0125	NOT CALCULATED (DL = 0.025)	0.015	0.015 (~0.008)	0.050	0.005	0.025	0.008 TO 0.015
NICKEL	0.045 - 0.083	0.0285	0.124	0.053	0.100	0.508	2.380	0.150	0.508	AGREE
ZINC	0.064 - 0.193	0.0165	0.380	0.050	2.000	0.338	1.480	0.030	0.338	AGREE
CYANIDE	0.035 - 0.076	0.035	0.192	0.047	0.200	0.0052	0.300	NOT DEFINED	NOT APPLICABLE	AGREE

* TOTAL METAL CONCENTRATIONS PRESENTED IN THE UNITS MG/L (PARTS PER MILLION)

- 1) AVERAGE INFLUENT CONCENTRATIONS FOR YEARS 1999, 2000 AND 2001
- 2) 95% UPPER CONFIDENCE CALCULATED BY ADDING ONE STANDARD DEVIATION TO AVERAGE EFFLUENT
- 3) MCL AND SMCL ARE ACRONYMS FOR MAXIMUM CONTAMINANT LEVEL AND SECONDARY MCL, RESPECTIVELY
- 4) ECOTOX LEVELS ARE CALCULATED USING EPA GUIDANCE AND ASSUMING WATER HARDNESS = 400MG/L
- 5) BASED UPON MISSOURI'S NPDES PERMIT REQUIREMENTS FOR MONTHLY AVERAGE CONCENTRATIONS