



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7

11201 Renner Boulevard
Lenexa, Kansas 66219

JUN 18 2014

**CON 12-15
Doc #29845**

CERTIFIED MAIL

RETURN RECEIPT REQUESTED

Article Number: 7006 2760 0000 8649 7222

Mr. Doug Stracke
Clow Valve Company
902 South 2nd Street
Oskaloosa, Iowa 52577

RE: RCRA Post-Closure Financial Assurance for
Clow Valve Division of McWane, Incorporated
Oskaloosa, Iowa 52577
EPA RCRA ID No. IAD 981 711 807

Dear Mr. Stracke:

The U.S. Environmental Protection Agency has completed our review of Clow's financial assurance submittal for RCRA post-closure cost for the referenced facility. The EPA's review shows the following:

1. Financial Test

It appears that the financial test meets the criteria specified in 40 CFR 265.145(e)(1)(i) and 40 CFR 265.147(f)(1)(i). Clow did not submit audited financial statements for the fiscal year ended December 31, 2013. As a result, the amounts reported on the financial test cannot be verified.

The EPA is requesting Clow to submit the audited consolidated financial statements for the fiscal year ended December 31, 2013. The financial statements are needed to verify the amounts listed in Exhibit A that is attached to the Report of Independent Accountants to the Shareholders of McWane, Inc. and Subsidiaries.

2. Post-Closure Cost Estimates

There is a difference in the cost estimate submitted by Clow for the referenced facility, revised March 18, 2013 (\$766,231) and in the cost estimate listed in the March 28, 2014 financial test (\$527,299). The difference is \$238,989, indicating a decrease of almost a quarter of a million dollars in little over a year.

The difference may be due to the fact that Clow used a 27 year period in lieu of a 30 year period in computing the post-closure closure cost estimate.

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Using the annual post-closure cost estimates submitted by Clow, revised March 18, 2013, (\$24,677.32) the 30 year post-closure cost estimate, plus 15% for third-party oversight and coordination, is \$851,367.54.

The EPA is requesting Clow to review the EPA's computation for the post-closure cost estimate and submit the most current cost estimate based on a 30 year post-closure care period or provide an explanation supporting Clow's updated closure cost estimate computation.

3. Inflation Adjustment

It does not appear that Clow adjusted the post-closure cost estimate for inflation, as is required in 40 CFR 265.144(b). Using the current inflation factor of 1.015 the EPA's proposed current post-cost estimate based on a 30 year post-closure care period adjusted for inflation is \$864,138.05.

The EPA is requesting Clow to annually adjust for inflation the EPA-approved post-closure cost estimate.

Within thirty (30) calendar days of receiving this letter, please mail your response and documents to: Ms. Patricia Murrow, AWMD/WRAP, U.S. Environmental Protection Agency, 11201 Renner Boulevard, Lenexa, Kansas 66219.

If you want to make a confidentiality claim covering part or all of the information submitted, identify the material with words such as "trade secret," "proprietary," or "company confidential." The EPA will disclose this information only to the extent and by the means described in 40 CFR Part 2, Subpart B., provided that it qualifies as confidential business information.

Thank you for your cooperation in satisfying the financial assurance requirements at the referenced facility. If you have any questions on this matter, please feel free to contact me at (913) 551-7627 or by email at murrow.patricia@epa.gov.

Sincerely,



Patricia Murrow
Project Manager
Waste Remediation and Permitting Branch
Air and Waste Management Division

cc: Cal Lundberg, IDNR
Charles F. Nowlin, McWane, Incorporated



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7

11201 Renner Boulevard
Lenexa, Kansas 66219

JUN 17 2014

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Article Number: 7006 2760 0000 8649 7246

Mr. Doug Stracke
Clow Valve Company
902 South 2nd Street
Oskaloosa, Iowa 52577

RE: RCRA Post-Closure SAP and QAPP for
Clow Valve Division of McWane, Incorporated
Oskaloosa, Iowa 52577
EPA RCRA ID No. IAD981711807

Dear Mr. Stracke:

The U.S. Environmental Protection Agency has completed our review of the revised Sampling and Analysis Plan and the Quality Assurance Project Plan, both dated March 28, 2014, for RCRA post-closure at the referenced facility. Both documents were submitted by Terracon Consultants Incorporated in response to the EPA's letter dated February 7, 2014. The EPA provides the following comments on the revised plans:

1. **SAP, Page 1, Section 1.0 – Introduction.** The text states that the SAP will include the following elements required by the EPA. The fourth bulleted item specifies monitoring for indicator parameters. Per the EPA's February 7th letter, groundwater samples must continue to be analyzed for total metals in addition to indicator parameters. Revise the text in the fourth bullet to specify that groundwater samples will be analyzed for total metals and indicator parameters.
2. **SAP, Page 6, Section 1.4.1 - Monitoring Well and Sampling Activities.** It is the EPA's understanding that the installation of additional groundwater monitoring wells is not anticipated at this time. This work has already been conducted in accordance with the current EPA-approved SAP and QAPP. Also, the March 2014 QAPP does not address soil sampling activities. Therefore, the text in this section should be revised to indicate that well installation and soil sampling was conducted previously and should soil samples be necessary in the future, an addendum must be submitted to the EPA for review and approval prior to collecting any soil samples. Documentation on field forms or a memorandum is insufficient.

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3. **SAP, page 5, Section 2.2 – Groundwater Sample Collection – Monitoring Wells.** Between the second and third paragraphs add the following text that documents the modification to the groundwater monitoring program approved by the EPA in the February 7, 2014 letter:

“As documented in the EPA’s letter to Clow dated February 7, 2014, monitoring wells MW-1B and MW-15 (both up-gradient wells) have been eliminated for the statistical analysis and will be used solely for water level measuring points. Groundwater sampling will be conducted semi-annually from groundwater monitoring wells MW-2B, MW-3B, MW-4B, MW-6B, and MW-8B (up-gradient well). In the event that significant changes in groundwater conditions occur, the EPA may require Clow to resume quarterly groundwater monitoring wells sampling.”

4. **SAP, Page 23, Section 9.0 – Scheduling and Reporting Requirements.** Revise this section so that there is a clear distinction between work already completed under the previously EPA-approved work plans and the on-going work. The revised schedule should include all on-going post-closure work, which includes but not limited to semi-annual groundwater sampling and annual reporting. The Annual Report is due to the EPA on or before March 1st of each year.
5. **QAPP – Signature Page.** When the QAPP is revised and ready for approval, it must be submitted with all appropriate signatures.
6. **QAPP, Page 1, Section 1.1 – Introduction.** The text states that the SAP will include the following elements required by the EPA. The fourth bulleted item specifies monitoring for indicator parameters. Per the EPA’s February 7th letter, groundwater samples must continue to be analyzed for total metals in addition to indicator parameters. Revise the text in the fourth bullet to specify that groundwater samples will be analyzed for total metals and indicator parameters.
7. **QAPP, Page 5, Section 1.4.1 – Monitoring Well Installation and Sampling Frequency.** It is the EPA’s understanding that the installation of additional groundwater monitoring wells is not anticipated at this time. This work has already been conducted in accordance with the current EPA-approved SAP and QAPP. Therefore, revise the text in this section to state that should soil samples be necessary in the future, an addendum must be submitted for review and approval to the EPA prior to collecting any soil samples. Documentation on field forms or a memorandum is insufficient.
8. **QAPP, Page 14, Water Sampling – Monitoring Wells.** Before the first paragraph add the following text that documents the modifications to the groundwater monitoring program approved by the EPA in the February 7, 2014 letter:

“As documented in the EPA’s letter to Clow dated February 7, 2014, monitoring wells MW-1B and MW-15 (both up-gradient wells) have been eliminated for the statistical analysis and will be used solely for water level measuring points. Groundwater sampling will be conducted semi-annually from groundwater monitoring wells MW-2B, MW-3B, MW-4B, MW-6B, and MW-8B (up-gradient well). In the event that significant changes in groundwater conditions occur, the EPA may require Clow to resume quarterly groundwater monitoring wells sampling.”

Within thirty (30) calendar days of receiving this letter, please revise the SAP and QAPP in accordance with the above comments and mail the revised documents to: Ms. Patricia Murrow, AWMD/WRAP, U.S. Environmental Protection Agency, 11201 Renner Boulevard, Lenexa, Kansas 66219.

If you have any questions on this matter, please feel free to contact me at (913) 551-7627 or by email at murrow.patricia@epa.gov.

Sincerely,

A handwritten signature in black ink that reads "Patricia Murrow". The signature is written in a cursive style with a large initial "P" and a long, sweeping underline.

Patricia Murrow
Project Manager
Waste Remediation and Permitting Branch
Air and Waste Management Division

cc: Cal Lundberg, IDNR