



Jeremiah W. (Jay) Nixon, Governor • Sara Parker Pauley, Director

DEPARTMENT OF NATURAL RESOURCES

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September 9, 2016

Lauri J. Gorton, P.E.
Director of Environmental Programs
and Senior Strategist
Greenfield Environmental Trust Group, Inc.
2116 East Estes Street
Milwaukee, WI 53207

RE: Revised Remedial Action Optimization Work Plan Approval
Former Tronox Facility at Springfield, Missouri
EPA ID# MOD007129406

Dear Ms. Gorton:

The Missouri Department of Natural Resources (Department) reviewed the Greenfield Environmental Trust Group (Trust), Inc.'s Response to Comments to the Department's July 15, 2016 comment letter on the Remedial Action Optimization Work Plan (RAO Work Plan) dated April 20, 2016. The Department has determined that the Trust has adequately addressed the comments in the revised RAO Work Plan dated August 16, 2016. As such, the Department hereby approves the revised RAO Work Plan.

Please be advised that the Department is also reviewing the RAO Phase 1 Technical Memorandum received on August 19, 2016, and will be providing comments to the Trust. Pending the outcome of this review, the Department may have further recommendations for the investigatory work at the Springfield facility. Also note that the Department received an updated Sampling and Analysis Plan (SAP) on August 22, 2016, in response to the July 15, 2016 comments on the RAO Work Plan. As indicated in our August 2, 2016 e-mail, the Trust should proceed with the approved RAO field work and not wait for approval of the revised SAP. The Department will provide comments and a checklist on the revised SAP at a later date.

If you need assistance or have questions regarding this letter or the enclosed comments, please contact Donald L. Dicks of my staff at the Missouri Department of Natural Resources, Hazardous Waste Program, P.O. Box 176, Jefferson City, MO 65102-0176, by telephone at (573) 751-3553 or 1-800-361-4827, or by e-mail at don.dicks@dnr.mo.gov. Thank you.

Sincerely,

HAZARDOUS WASTE PROGRAM

A handwritten signature in black ink, appearing to read "Richard A. Nussbaum".

Richard A. Nussbaum, P.E., R.G.
Chief, Permits Section

RAN:ddt

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c: Mr. Mike Dandurand, P.E., U.S. EPA Region 7
Amber Igoe, CHMM, Greenfield Environmental Multistate Trust LLC, via e-mail
Robert Lanning, Senior Scientist/Geologist, Environmental Works, via e-mail
Southwest Regional Office, Missouri Department of Natural Resources