



Jeremiah W. (Jay) Nixon, Governor

Sara Parker Pauley, Director

DEPARTMENT OF NATURAL RESOURCES

dnr.mo.gov

October 16, 2013

CERTIFIED MAIL – 7009 3410 0001 8933 5942
RETURN RECEIPT REQUESTED

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

RE: 2013 Site-Wide Recovery Well Evaluation and Groundwater Monitoring Work Plan Approval with Conditions, and Class 1 Permit Modification with Prior Director's Approval to do a 2013 Site-Wide Recovery Well Evaluation and Sampling Event Greenfield Environmental Multistate Trust, LLC, at 2800 West High Street Springfield, Missouri, EPA ID# MOD007129406

Dear Ms. Gorton:

The Missouri Department of Natural Resources (Department) reviewed the 2013 Site-Wide Recovery Well Evaluation and Groundwater Monitoring Work Plan for the Springfield facility received on September 20, 2013. The work plan is approved with the following conditions:

- 1) On page 3-6, Section 3, the last paragraph indicates the well locations for the deep zone are shown on Figure 3-3. However, the Work Plan copy we received didn't include the referenced Figure. Please provide.
- 2) Under Section 1.2, Objectives, and Section 4.1, Data Evaluation and Reporting, the technical objectives are listed. As BMW-10R exceeded the groundwater protection standard for the first time in 2012, the results of the proposed sampling event should be compared with previous years to assess if concentrations are increasing in the secondary zone.
- 3) Page 4-14, Site-Wide Recovery Well and Groundwater Monitoring Report: In order for the proposed report to fulfill the reporting requirements of the Annual Corrective Action Effectiveness Report, please note that the report should also include any yearly



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corrective action activities, like plugging wells, modifications to wells (building removal and conversion of RW-21 to a flush mount), and the surface water monitoring required by Special Permit Condition III of the Missouri Hazardous Waste Management Facility Part I Permit (not RCRA Permit).

Additionally, the Department also approves the Class 1 Permit Modification, with prior Director approval, received October 7, 2013. This permit modification allows the Trust to do a single sampling event this year in lieu of the two semiannual events specified in the facility's Sampling and Analysis Plan, and keep the facility in compliance with the Permit's obligations.

The Trust shall provide notice of the permit modification to all persons on each facility mailing list and the appropriate units of state and local government no later than 90 calendar days after the date of this letter as required by Code of Federal Regulations 40 CFR 270.42(a)(1)(ii). The Trust shall also provide a copy of the notice to the Department.

If you have any questions regarding this letter, please contact Mr. Donald L. Dicks, Project Manager, 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) 751-3467 or 1-800-361-4827, or by e-mail at don.dicks@dnr.mo.gov. Thank you.

Sincerely,

HAZARDOUS WASTE PROGRAM

[Original signed by Richard A. Nussbaum]

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

RAN:ddd

c: Mr. Wray Rohrman, Project Manager, U.S. EPA Region 7
Mr. Eric Roth, Senior Hydrogeologist, GSI Water Solutions, Incorporated via e-mail
Mr. Marc Weinreich, Vice President, Greenfield Environmental Multistate Trust, LLC
via e-mail
Southwest Regional Office, Missouri Department of Natural Resources