



June 10, 2009

Mr. A. Keith Watson
Project Manager
Tronox, L.L.C.
One Leadership Square, Suite 300
211 North Robison Avenue
Oklahoma City, OK 73102

RE: Class 1 Permit Modification with Prior Director's Approval - Request to Eliminate the September Semi-Annual Groundwater Corrective Action Report, Tronox L.L.C., Springfield, Missouri, EPA ID# MOD007129406

Dear Mr. Watson:

The Missouri Department of Natural Resources' (Department) Hazardous Waste Program (HWP) received your letter dated May 15, 2009, requesting the elimination of the September Semi-Annual Groundwater Corrective Action Report. This has been required by Special Permit Condition II. F., of the Missouri Hazardous Waste Management Facility (MHWMF) Part I Permit.

The U.S. Environmental Protection Agency Resource Conservation and Recovery Act Burden Reduction Final Rule that bears on this issue becomes effective in Missouri through incorporation by reference in the state hazardous waste regulations on June 30, 2009. Once effective, this rule requires submission of groundwater corrective action reports on an annual as opposed to semi-annual basis. Inasmuch as Tronox's semi-annual report is not due under the current MHWMF Part I Permit until September 2009, we feel it appropriate to advise you in advance that elimination of the September semi-annual report for 2009 and subsequent years is hereby approved.

Please note that future annual reports submitted in March of each calendar year are expected to include all of the information specified in Special Permit Condition II. F., of the MHWMF Part I Permit, and include all sampling events for the previous calendar year. Tronox must send a notice of this Class 1 permit modification to everyone on the facility mailing list and the appropriate units of state and local government within 90 calendar days after the date of this letter, as outlined in 40 CFR 270.42(a)(1)(ii). Tronox must send a copy of this notice to the Department.

Mr. A. Keith Watson
June 10, 2009
Page 2

If you have any questions, please contact Mr. Donald L. Dicks, Environmental Engineer, of my staff, at the Missouri Department of Natural Resources, HWP, P.O. Box 176, Jefferson City, MO 65102-0176, or by phone at (573) 751-3553, or by e-mail at don.dicks@dnr.mo.gov.

Sincerely,

HAZARDOUS WASTE PROGRAM

[Original signed by Richard A. Nussbaum]

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

RAN:ddm

c: Ms. Lynn Slugantz, Project Manager, U.S. EPA Region VII
Southwest Regional Office