

**MISSOURI**  
DEPARTMENT OF  
NATURAL RESOURCES

**Mike Kehoe**  
Governor

**Kurt U. Schaefer**  
Director

January 15, 2025

Christine Jump, Project Manager  
U.S. Environmental Protection Agency, Region 7  
11201 Renner Boulevard  
Lenexa, Kansas 66219

RE: Missouri Department of Natural Resources' Position on the Draft Explanation of Significant Differences (ESD) for West Lake Landfill Operable Units 1 and 2, West Lake Landfill Superfund Site dated November 6, 2024

Dear Christine Jump:

The Missouri Department of Natural Resources appreciates the opportunity to provide its position on the ESD for Operable Units 1 and 2 of the West Lake Landfill, located in Bridgeton Missouri.

The department's position on the ESD is as follows:

The department has reviewed the Explanation of Significant Differences (ESD) for West Lake Landfill Operable Units 1 and 2. The department supports the Environmental Protection Agency's (EPA) proposed significant changes as presented.

It will be critical for EPA to fully incorporate into Operable Unit 1 all areas that contain radiologically impacted material along with those areas that are needed to implement the OU-1 remedy including any areas that must be maintained to ensure longevity and long-term protectiveness of the remedial system. As stated in the department's position on the 2018 Record of Decision Amendment, we recognize the need for perpetual care and monitoring and expect EPA to develop robust and durable long-term stewardship and monitoring plans. The department requests EPA secure financial assurances from the responsible parties assuring perpetual care and monitoring that protects state and local jurisdictions from bearing the cost of long-term stewardship.

Due to the presence of radiological materials in the Demolition landfill, and the high probability of radiological materials in the Bridgeton Landfill as well, the department recommends the EPA considers being the lead agency for all the potentially affected properties and include them under OU-1.

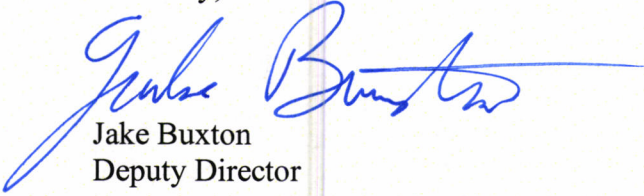


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We understand the EPA has drafted substantial comments on the 90% design documents submitted by the responsible parties. We encourage the EPA to continue requiring sufficient documentation to support the proposed ESD in the final design.

If you have any questions or need clarification on any of the comments submitted, please contact Ryan Seabaugh of my staff at 573-751-8628 or by email at [Ryan.Seabaugh@dnr.mo.gov](mailto:Ryan.Seabaugh@dnr.mo.gov).

Sincerely,



Jake Buxton  
Deputy Director

JB:rsd

c: Meg McCollister, Administrator, Environmental Protection Agency Region 7  
Michael S. Regan, Administrator, Environmental Protection Agency