



Jeremiah W. (Jay) Nixon, Governor

Sara Parker Pauley, Director

DEPARTMENT OF NATURAL RESOURCES

dnr.mo.gov

June 13, 2014

CERTIFIED MAIL – 7004 1160 0000 8177 7474

RETURN RECEIPT REQUESTED

Mr. James Treloar
General Manager
Solvent Recovery, L.L.C.
700 Mulberry Street
Kansas City, MO 64101

RE: Class 1 Permit Modification with Prior Director's Approval
Restoration of Secondary Containment Curbing to Room B-5
Solvent Recovery, L.L.C., Kansas City, Missouri
EPA ID# MOD000610766

Dear Mr. Treloar:

The Missouri Department of Natural Resources (DNR) hereby approves Solvent Recovery, LLC's (Solvent Recovery) Class 1 Permit Modification request, dated May 8, 2014, with conditions. The modification request was to restore secondary containment curbing to the container storage area B-5 in order to reactivate operation of the Paint Related Materials Pail Crusher unit (also known as the 1 and 5 gallon loosepack unit). We are approving the Class 1 Permit Modification request requiring prior director approval with the following conditions:

1. The amended site plan, Figure 1-1, shows the modifications made to Room B-5 (previously known as Room C) to restore secondary containment curbing. The DNR informed Solvent Recovery of the requirement that any changes to drawings be certified by a professional engineer licensed in Missouri. Solvent Recovery states in the Class 1 Permit Modification request that a separate Class 2 Permit Modification is currently being prepared that will include new drawings for all of Room B, which will be certified by a professional engineer licensed in Missouri. Since the departure from the previous design in Room B-5 is minor, the DNR will accept the professional engineer certification of Room B in the upcoming Class 2 Permit Modification request, provided these overall Room B changes will include the minor modifications made to Room B-5.

Solvent Recovery must provide a certification by a professional engineer registered in Missouri of the design of Room B-5 along with the submittal of the upcoming Class 2 Permit Modification request or within 60 calendar days after the date of this letter if the



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Class 2 Permit Modification request will not be submitted by this date. If Solvent Recovery determines that the requested time frame for submittal of the new certified drawings for Room B is not enough time, please request extension at least 15 calendar days before the submittal due date.

2. The updated Part A provided in the May 8, 2014 Class 1 Permit Modification request requires further updating. The DNR sent a comment letter to Solvent Recovery in response to a different Class 1 Permit Modification request, dated April 29, 2010, and by e-mail on January 13, 2014. In the General Comments section of this letter, many items were detailed that needed to be updated on the Part A form. Several of these items still apply and were not updated in the Class 1 Permit Modification request, dated May 8, 2014. Specifically, the following items need to be updated in the Hazardous Waste Permit Information Form:
 - a. Item 7, Process Codes and Design Capacities, page 3:
Lines 3 and 4, which describe the former shredders and the former super blend system, should be removed, as the DNR has noted that they no longer exist at the facility. The additional information for line 4, presented in line 1 under Item 8, Other Processes, should also be deleted.
 - b. Item 7, page 3:
Line 5 describes the process design capacity for one tank. The amount should be increased to the cumulative amount for all three tanks, as in other process design capacity amounts.
 - c. Item 7, page 3:
A line should be added under Item 7 for the Paint Related Materials Pail Crusher unit, as this is a treatment process for hazardous waste. The maximum hourly design rate in pounds per hour should be reported.
 - d. Item 7, page 3:
A line should be added under Item 7 for the amount of roll-off containers and their storage capacities in yards for non-liquid hazardous waste.
 - e. Item 9, Description of Hazardous Wastes:
The listed hazardous waste codes should be updated to reflect the correct process codes and descriptions for the hazardous waste codes for wastes currently being processed. It appears that this Item was partially updated.

Solvent Recovery must submit a revised, updated Part A form to the DNR within 30 days of the receipt of this letter that addresses the above items.

Solvent Recovery must send a notice of the modification to everyone on their 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 10 Code of State Regulations (CSR) 25-7.270(1) which incorporates

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40 Code of Federal Regulations 270.42(a)(1)(ii) and is modified by 10 CSR 25-7.270(2)(A)6 and 10 CSR 25-7.270(2)(B)10. Solvent Recovery must send a copy of the notice to the DNR.

If you have questions regarding this letter, please contact Bill Fanska, P.E., 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 bill.fanska@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:mp

c: Ms. Mary Grisolano, P.E., Project Manager, U.S. EPA Region 7
Kansas City Regional Office, Missouri Department of Natural Resources