



## **Class 2 RCRA Permit Modification Application**

### ***Increased Storage Capacity and Other Miscellaneous Improvements***

Prepared for  
Exide Technologies  
Canon Hollow Recycling Facility

Hazardous Waste Permit Number MOD030712822

May 2015



25102 Exide Dr, PO Box 159  
Forest City, MO 64451  
(660) 446-3321\*(660) 446-3324 facsimile

May 26, 2015

Mr. Richard Nussbaum  
Chief of Permits Section  
Missouri Department of Natural Resources  
Hazardous Waste Program  
1738 E. Elm Street  
Jefferson City, Missouri 65101-4130

Mr. James Aycock  
AWMD/WEMM  
EPA Region 7  
11201 Renner Boulevard  
Lenexa, Kansas 66219

Certified Mail Receipt - MDNR: 7012 3460 0001 9285 6204  
Certified Mail Receipt - US EPA: 7012 3460 0001 9285 6235

Re: Class 2 RCRA Permit Modification Application for Increased Storage, Other Miscellaneous Improvements, and Rescission of the Request for the Proposed Screw-Auger Conveyor  
Exide Technologies, 25102 Holt 250 Road, Forest City, Missouri; EPA ID Number MOD030712822

Dear Messrs. Nussbaum and Aycock,

Exide Technologies (Exide) plans to increase the hazardous waste storage capacity in the Stabilization/Staging & Storage Building (RCRA regulated containment building), make openings in the wall of the Charge Floor Area (RCRA regulated containment building), and install a man door into the Dock Entry Building (RCRA regulated containment building).

In addition, Exide would like to rescind the proposal to construct a small opening in the eastern wall of the Stabilization/Staging & Storage building that was included in the 2013 Class 2 RCRA Permit Modification Application for Facility Upgrades to Accommodate Negative Pressure Ventilation System. It was proposed that a non-regulated screw-auger conveyor would be installed in the area immediately adjacent to the Stabilization/Staging & Storage building that would require construction of an opening in the Stabilization/Staging & Storage building wall. In the time since that permit modification request was submitted, Exide has determined that the installation of the conveyor, and therefore the construction of an opening in the wall of the Stabilization/Staging & Storage building, is no longer necessary.

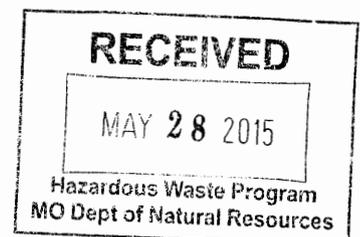
Should you or any of your associates have any questions, please feel free to contact me at (660) 446-3321 extension 14 or at [steve.carter@Exide.com](mailto:steve.carter@Exide.com).

Sincerely,



Steve Carter  
Plant Manager

cc: Ms. Hannah Elton, Exide Technologies  
Mr. Bill Fanska, MDNR-HWP  
Mr. Nathan Kraus, MDNR-HWP  
Mrs. Julie Marks, Barr Engineering, LLC.



# Class 2 RCRA Permit Modification Application

May 2015

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## List of Drawings

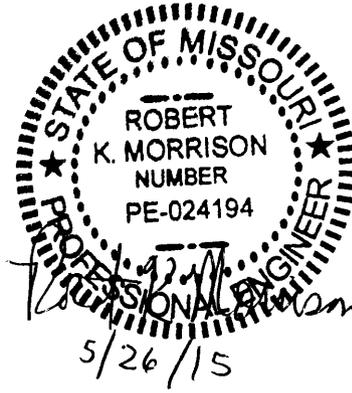
- Drawing G-01 Facility Location and Drawing Index
- Drawing G-02 Facility Overview and Proposed Modifications
- Drawing G-03 Flux Line System
- Drawing G-04 Man-Door Addition to the Dock Entry Building

## List of Appendices

- Appendix A Revised Part A Application
- Appendix B Inspection Checklist
- Appendix C Closure Plan/Revised Opinion of Closure Cost
- Appendix D Financial Assurance

Certifications

I hereby certify that this report was prepared by me or under my direct supervision and that I am a duly licensed Professional Engineer under the laws of the State of Missouri.



*Robert K. Morrison*

Robert K. Morrison  
PE #: 24194

May 26, 2015  
Date

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# 1.0 Introduction

Exide Technologies owns and operates a secondary lead smelting plant located in Holt County in northwest Missouri. The plant, known as the Canon Hollow Recycling Facility, is located approximately four miles northwest of Forest City, Missouri just off State Highway 111 (see Drawing G-01). The plant recycles lead-acid storage batteries and other lead-bearing raw material obtained from offsite into new metallic lead pig and block ingots. Some of the raw materials are classified as hazardous wastes and require storage in RCRA-permitted units. The recycling process generates a slag residue that is considered a hazardous waste.

All hazardous waste activities at the facility are regulated by the Missouri Department of Natural Resources (MDNR) and the Environmental Protection Agency (EPA). The hazardous waste storage and disposal activities are regulated under Missouri Hazardous Waste Management Facility Permit No. MOD030712822 (the Permit) and the recycling activities are regulated under Missouri Hazardous Waste Resource Recovery Certificate RR-0052.

This permit modification application proposes changes to RCRA-regulated units to increase the permitted hazardous waste storage capacity, correct a minor computational error in the approved closure cost estimate, increase stabilization capacity for slag, streamline the delivery of non-hazardous materials for the blast furnace, and to increase safety for personnel entering and exiting the Dock Entry Building (DEB). This Class 2 permit modification proposes the following activities (see Drawings G-02 through G-04):

1. The storage capacity of the Stabilization/Staging & Storage Building will be increased to 1,179 cubic yards.
2. A computational error was made when calculating the square footage of the Stabilization/Staging & Storage Building for the opinion of closure cost estimate that was approved by MDNR in correspondence dated December 23, 2014. This permit modification proposes to correct that error.
3. An opening will be made in the south wall of the Charge Floor Area (a RCRA regulated containment building). A 4-bin storage hopper and weigh bin will be added to the exterior of the Charge Floor south wall for storage of non-hazardous waste feedstock. The feedstock will be transferred from the exterior bins to the Charge Floor via a conveyor and/or chute that will extend through the south wall of the Charge Floor Area.
4. A man-door will be added on the north wall of the DEB. A new man-door will be installed just to the east of the existing overhead door to facilitate ingress and egress of personnel.

These proposed Class 2 permit modifications are discussed in detail in Section 2.0, the resulting modifications to the RCRA Part A are described in Section 3.0, and modifications to the inspection forms are discussed in Section 4.0. As stated in Section 5.0, the proposed modifications do not require changes to the existing closure and post-closure plans. Revisions to the opinion of closure cost due to the proposed modification are detailed in Section 6.0, and the associated financial assurance

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mechanism and liability coverage is discussed in Section 7.0. Documents referenced in this Class 2 permit modification application are listed in Section 8.0.

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## **2.0 Modifications**

### **2.1 Stabilization/Staging & Storage Building Capacity Increase**

The hazardous waste storage capacity of the Stabilization/Staging & Storage Building is insufficient for Exide's needs. The capacity will be increased from 355 cubic yards of hazardous waste to 1,179 cubic yards. 40 CFR 270.42 Appendix I indicates that modifications to containment buildings that do not involve increasing the facility's entire containment building storage capacity by more than 25 percent are considered Class 2 modifications. Since the modification to this building includes an increase in total storage capacity of less than 25 percent, a Class 2 modification is appropriate.

### **2.2 Previous Opinion of Closure Cost Error**

A computational error was made when calculating the square footage of the Stabilization/Staging & Storage Building for the opinion of closure cost approved by MDNR in correspondence dated December 23, 2014. The square footage of the Stabilization/Staging and Storage building to be decontaminated was originally stated to be 34,232 square feet when the actual square footage should have been given as 32,932 square feet. As indicated in Appendix C, correction of this error results in a slight decrease in the Opinion of Closure Cost.

### **2.3 Charge Floor Area Wall Opening**

An automatic system for batching flux material will be installed outside the Charge Floor area (RCRA regulated containment building). The automatic system will be comprised of four storage bins with an approximate capacity of 10 tons each, a weighing system and material transfer equipment. The bins will contain non-regulated materials such as limestone, sand, cast iron, and shredded steel. When activated by plant operations personnel, the bins will feed material into a weighing system in quantities required to make a batch of flux material to be used in the blast furnace.

Once a complete batch is weighed, the flux material will be transferred from the weighing system into the Charge Floor area via a transfer system with a conveyor and/or chute. Installation of the conveyor and/or chute will require that an opening be constructed in the south wall of the Charge Floor Area. The opening will be approximately 2 feet wide by 2 feet tall and will be located approximately 6 feet above the floor of the Charge Floor Area and 2 feet from the east wall (see Drawings G-02 and G-03). The discharge of the transfer system will be closed off with a door or curtain to control airflow into the building to minimize effects on the building negative pressure.

### **2.4 Man-Door Addition to the Dock Entry Building**

A 3-foot by 7-foot man-door will be added to the north wall of the DEB; approximately 4 feet to the east of the existing overhead door (see Drawings G-02 and G-04). If deemed necessary, a temporary secondary wall will be constructed to minimize the escape of fugitive emissions and the track-out of materials from the DEB. This temporary measure will involve the usage of plastic sheeting, tarps, and framing materials as necessary.

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## 3.0 Changes to the RCRA Part A

Federal and State of Missouri regulations establish permitting and notification conditions for hazardous waste. A revised RCRA Part A permit application is included in Appendix A. Modifications include updating the name of the site contact person and an increase in the hazardous waste storage capacity of the Stabilization/Staging & Storage Building.

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## 4.0 Inspections

Inspection procedures for the RCRA regulated containment buildings will continue as prescribed in Part 7.0 of Section A of the *RCRA Permit Renewal Application*, Revised October 2008 (Barr, 2008). The inspection form for the Charge Floor Area has been modified to include inspection of the wall opening. Example inspection forms are included in Appendix B.

The increased treatment capacity of the Stabilization Unit, increased storage capacity for the Stabilization/Staging & Storage Building, and the addition of a man-door in the DEB does not require modification of the existing inspection forms for those units.

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## 5.0 Closure and Post-Closure Conditions

The modifications proposed in this Class 2 permit modification do not require changes to the approved closure plan contained in Section I of the *RCRA Permit Renewal Application, Revised October 2008* (Barr, 2008).

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## 6.0 Opinion of Closure Cost

A revised opinion of closure cost is provided in Appendix C. This revised opinion of closure cost is based on the cost/units approved by MDNR in correspondence dated December 23, 2014, updated for inflation, and includes the cost associated with the additional storage capacity in the Stabilization/Staging & Storage Building and correction of a previous computational error.

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## **7.0 Financial Assurance Mechanism and Liability Coverage for Closure**

A copy of the financial assurance mechanism for RCRA regulated areas is contained in Appendix D. The option chosen for establishing both financial assurance and liability coverage is a financial guarantee bond. The financial guarantee bond will be updated to include the Appendix C opinion of cost within 30 days of MDNR approval of this modification to the closure plan.

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## 8.0 References

Barr, 2008. *RCRA Permit Renewal Application*, Revised October 2008. Barr Engineering Co., October 2008.