



Jeremiah W. (Jay) Nixon, Governor

Sara Parker Pauley, Director

DEPARTMENT OF NATURAL RESOURCES

dnr.mo.gov

July 14, 2011

CERTIFIED MAIL –7009 3410 0001 9259 1182
RETURN RECEIPT REQUESTED

Mr. James M. Lanzafame
Environmental and Health Manager
The Doe Run Company
Buick Resource Recycling Facility, LLC
18594 Highway KK
Boss, MO 65440

RE: Class 1 Permit Modification Request
Buick Resource Recycling Facility, Boss, Missouri
EPA ID# MOD059200089

Dear Mr. Lanzafame:

The Missouri Department of Natural Resources (Department) approves the Buick Resource Recycling Facility's (BRRF) certified drawings received on February 14, 2011, and May 3, 2011, and the revised Class 1 Permit Modification request, dated June 16, 2011, the enclosed e-mails dated March 24, 2011, May 12, 2011, and an inspection checklist received via e-mail on June 23, 2011. The request was for modification of the decontamination station located outside of the Reverbatory Furnace Feed Storage Bunker and building an enclosure around the decontamination station.

We are approving the Class 1 Permit Modification requiring prior director approval with the following conditions:

1. As stated in and e-mail from Mr. Lanzafame, enclosed, on May 12, 2011, the decontamination water will not be used for dust suppression at the facility, the decontamination water may be used in the water granulation system for the refinery and dross plant drosses. Any excess water shall be transported to the facility's on site waste water treatment plant. At no time shall decontamination water be allowed to flow over the ground.
2. As-built drawings showing the location of all water spray nozzles shall be submitted, as indicated in the enclosed e-mail from Mr. Lanzafame a total of four water sprayers will be used in the decontamination station.



Recycled Paper

3. The decontamination sump shall be emptied of solids and liquids every three months and inspected. If at any time the sump becomes full of solids or liquids, all solids and liquids shall be removed from the sump.
4. The submitted inspection checklist instruction 3 shall be modified to read: Once each quarter removed solids and liquids from sump. Also add an instruction to inspect the integrity of the sump after it has been emptied. Submit the revised inspection checklist with the specified changes within 15 days of receipt of this approval.
5. The newly enclosed "hallway" where the decontamination station is located shall be maintained in a clean state. No material shall be allowed to accumulate in the hallway. BRRF may move any material tracked from the containment building into the hallway back into the containment building. This shall be done at a frequency not to exceed three months between cleanings.
6. All water within the new "hallway" shall be contained within the footprint of the decontamination station grate, the channel from below the decontamination grate to the sump, and the sump. Decontamination water shall at no time be allowed to flow out side of the footprint of the decontamination station grate, the channel under the grate to the sump, and the sump.
7. If after inspection or at any other time the decontamination station or sump has become damaged, the decontamination station and sump shall be taken out of service until repairs have been made. All equipment must be decontaminated prior to leaving the containment building.
8. BRRF shall notify George Fletcher, P.E., of my staff via e-mail at george.fletcher@dnr.mo.gov 14 days prior to construction activities beginning at the Reveratory Feed Building Decontamination Station.
9. BRRF may not utilize the newly modified decontamination station until:
 - a. BRRF has submitted to the Department by certified mail or hand delivery a letter signed by the Permittee and a Professional Engineer registered in Missouri stating that the facility has been constructed or modified in compliance with this modification and shall request authorization to operate in accordance with 40 CFR 270.30(1)(2), as incorporated in 10 CSR 25-7.270(2)(C)1.B. BRRF shall also include "as-built" design drawings and specifications for the newly modified decontamination station and addition to the Reveratory Feed Storage Bunker Building;
 - b. The Department has inspected the newly modified decontamination station and addition to the Reveratory Feed Storage Bunker Building, and given authorization to operate; or
 - c. Within 15 days of submission of the documentation listed in condition 9.a BRRF has not received notice from the Department of their intent to inspect, prior inspection is waived, and BRRF may commence use of the

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newly modified decontamination station and addition to the Reveratory
Feed Storage Bunker Building.

The following are required modifications for the closure plan for the decontamination station:

1. During closure of this unit soil will be screened and compared to the U.S. Environmental Protection Agency Regional Screening Levels (RSL). The RSL's are used to generally determine if there is a risk associated with a site prior to any site specific screening levels being developed. Therefore, the most conservative value should be used during the first pass screening of results from soil analysis. If analysis indicates that the concentrations of metals exceed the lowest of the EPA RSL the unit cannot be considered clean closed and a modified closure plan shall be submitted for review and approval.
2. During closure of the unit concrete will be screened and compared to the concentration values obtained from "An Analysis of Selected Trace Metals in Cement and Kiln Dust." If the concentrations of metals in the concrete exceed the values obtained from "An Analysis of Selected Trace Metals in Cement and Kiln Dust" the area cannot be considered clean-closed and a modified closure plan shall be submitted for review and approval.
3. If any concrete or soil is to be removed, the removed materials shall be analyzed using Toxic Characteristic Leaching Procedure to determine if it is a hazardous waste. Regardless of the results of the Toxic Characteristic Leaching Procedure analysis the material shall be managed in an appropriate manner.
4. BRRF shall notify Mr. Fletcher of my staff via e-mail at george.fletcher@dnr.mo.gov 14 days prior to closure activities beginning at the old Reveratory Furnace Feed Storage Bunker decontamination station.

BRRF 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 Code of Federal Regulations 40 CFR 270.42(a)(1)(ii), incorporated by reference in Code of State Regulations 10 CSR 25-7.270(1). BRRF must send a copy of the notice to the Department.

If you need assistance or have questions regarding this letter, please contact George Fletcher, 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 george.fletcher@dnr.mo.gov. Thank you.

Sincerely,

HAZARDOUS WASTE PROGRAM

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[Original signed by Darleen Groner for]

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

RAN:gfm

c: Mr. Wray Rohrman, Project Manager, U.S. EPA Region 7
Southeast Regional Office, Missouri Department of Natural Resources