



Jeremiah W. (Jay) Nixon, Governor

Sara Parker Pauley, Director

DEPARTMENT OF NATURAL RESOURCES

dnr.mo.gov

September 25, 2015

CERTIFIED MAIL – 7009 0960 0000 8848 7222
RETURN RECEIPT REQUESTED

Mr. Jon Bennett
President
HazMat, Incorporated
140 West Monte Avenue
Bloomington, CA 92324

RE: Class 1 Permit Modification with Prior Director's Approval
Bulking of Hazardous Waste Solids
HazMat, Incorporated, Kansas City, Missouri
EPA ID# MOD981123391

Dear Mr. Bennett:

The Missouri Department of Natural Resources (Department) hereby approves HazMat, Incorporated's (HazMat) Class 1 Permit Modification request, dated August 4, 2015, and supplemental information submitted via e-mail on August 19, 2015, with conditions. The modification request was to allow bulking of hazardous waste solids on-site at the HazMat property.

The Department agrees with HazMat that this is a Class 1 Permit Modification requiring prior director approval, according to Code of State Regulations 10 CSR 25-7.270(1), which incorporates Code of Federal Regulations 40 CFR 270.42(d)(2). We are approving the Class 1 Permit Modification request with the following conditions:

1. HazMat shall provide a drawing using an appropriate scale that shows the proposed locations of: 1) the pad, 2) any covering/wind screens for the staging area (see Condition 4), and 3) the approximate area where the hazardous waste solid materials will be staged. This drawing shall also indicate the dimensions of the pad and any covering/wind screens for the staging area and the distances to the property lines.
2. HazMat shall document that the proposed roll-off containers will meet the container standards of 40 CFR Part 264 Subpart CC. This documentation shall be kept in the operating record and made available upon inspection or at the request of the Department.



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3. HazMat shall complete the bulking of solid hazardous waste materials in the roll-off containers within 24 hours of first starting the bulking operation. HazMat shall record the start time and end time for the consolidation of the solid hazardous waste materials in the roll-off containers on a consolidation sheet. Consolidation activities would begin with the time that the first container to be bulked is removed from a permitted storage area, and would end when the roll-off container leaves the property and all staged drums are either emptied or placed back in permitted storage. Both of these times and dates need to be reflected on the consolidation sheet.
4. HazMat shall not knowingly allow any free liquids to be placed into the roll-off containers as part of the bulking operations of hazardous waste solid materials. Should any free liquids inadvertently be introduced into roll-off containers during the bulking operations, Hazmat will follow the contingency plan received via e-mail on August 19, 2015, or subsequent versions approved by the Department.
5. HazMat shall not bulk materials in a way that produces visible dust. Materials that may produce dust include, but are not limited to, soils, sands, silts, and clays.
6. The proposed location of the roll-off container associated with these bulking operations is to be uncovered and exposed to the atmosphere. During the bulking operations, HazMat shall place barriers around the roll-off container to mitigate the effects of any wind and reduce the chance of any solid hazardous waste leaving the roll-off container. These barriers shall be placed on at least 3 sides around the roll-off container. The building may be considered the barrier for 1 side of the roll-off container.
7. HazMat shall take picture(s) or a video to document the bulking of the solid hazardous waste materials operation during the first or second time a new waste stream from a generator is being bulked. At a minimum, 2 pictures should be taken for each waste stream from each generator; 1 picture taken during the time when a container/drum is being emptied; and 1 picture taken of the contents of a container/drum for each waste stream. The picture(s)\video shall be used to document any dust typically generated from each generator and each of their different waste streams. A new picture(s) or a video will need to be taken if the basic nature of the waste stream from a generator changes, for a new generator, or a new waste stream that has not previously been bulked.

The pictures\videos should be labeled with the name of the generator, a brief description of the waste being bulked, the waste numbers(s) involved, and the date the picture/video was taken. The pictures shall be kept in the operating record for a minimum of 3 years and made available upon inspection or at the request of the Department.

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8. Any containers/drums that are staged for bulking, but the contents will not fit into the roll-off container shall be returned to the permitted storage area as soon as practical or shipped off-site via another method within 24 hours of movement out of the permitted storage area.
9. HazMat is reminded that the staging area/bulking operation will constitute a new Solid Waste Management Unit pursuant to the corrective action provisions of the permit and will be subject to investigation and/or remediation if any releases to soil or groundwater should occur as a result of this operation.

HazMat 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, according to 10 CSR 25-7.270(2)(A)6 and 10 CSR 25-7.270(1) which incorporates 40 CFR 270.42(a)(1)(ii). HazMat must send a copy of the notice to the Department.

If you have questions regarding this letter, please contact Mr. Cedric Cunigan, Project Manager, 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 cedric.cunigan@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:ccm

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