



Jeremiah W. (Jay) Nixon, Governor

Sara Parker Pauley, Director

## DEPARTMENT OF NATURAL RESOURCES

dnr.mo.gov

September 26, 2016

Mr. Paul Andrews  
Senior Compliance Manager  
Safety-Kleen Systems, Incorporated  
734 Northwest Bypass 66  
Springfield, MO 65802

RE: Class 1 Permit Modification with Prior Director's Approval  
Revised Subpart BB Inspection Tagging  
Safety-Kleen Systems, Incorporated, Springfield, Missouri  
EPA ID# MOD000669069

Dear Mr. Andrews:

The Missouri Department of Natural Resources (Department) received Safety-Kleen Systems, Incorporated's (Safety-Kleen) Class 1 Permit Modification notice, dated August 22, 2016. The notification was for revisions made to a piping schematic to include 3 additional Subpart BB Tags. The additional Subpart BB inspection tagging would change Safety-Kleen's Subpart BB inspections content. Section B.4. of Appendix I of the 40 Code of Federal Regulations (CFR) 270.42 lists changes to the frequency or content of an inspection schedule as constituting a Class 2 Permit Modification.

However, due to the nature of this change and limited risk to human health and the environment, the Department believes that a Class 2 Permit Modification for these Subpart BB tagging additions is excessive. The Department agrees with Safety-Kleen that this should be a Class 1 Permit Modification with prior director approval. Therefore, the Department is hereby approving the requested changes to the piping schematic and updated Subpart BB tagging list as a Class 1 Permit Modification with prior director approval.

Safety-Kleen sent a notice of this modification to everyone on their facility mailing list and the appropriate units of state and local government, dated August 22, 2016, as outlined in 10 Code of State Regulations 25-7.270(1) which incorporates 40 CFR 270.42(a)(1)(ii).

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.



Recycled Paper

Mr. Paul Andrews  
September 26, 2016  
Page 2

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](mailto: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: Ms. Patricia Murrow, Project Manager, U.S. EPA Region 7  
Mr. Mark Reppond, Environmental Health & Safety Manager, Safety-Kleen Systems,  
Incorporated  
Southwest Regional Office, Missouri Department of Natural Resources