



Jeremiah W. (Jay) Nixon, Governor

Sara Parker Pauley, Director

DEPARTMENT OF NATURAL RESOURCES

dnr.mo.gov

MISSOURI DEPARTMENT OF NATURAL RESOURCES EMERGENCY PERMIT FOR MANAGEMENT OF HAZARDOUS WASTE

PERMITTEE

Owner: Dyno Nobel, Incorporated
2795 E. Cottonwood Pkwy
Suite 500
Salt Lake City, UT 84121

Operator: Dyno Nobel, Incorporated
Carthage Plant
17562 Gum Road
Carthage, MO 64836

Permittee Contact: Scott A. Kolb, P.E.
Environmental Manager
Dyno Nobel, Incorporated
Carthage Plant
17562 Gum Road
Carthage, MO 64836

FACILITY LOCATION

Carthage Plant
17562 Gum Road
Carthage, MO 64836
Jasper County
EPA ID# MOD029719200

INTRODUCTION

The Missouri Department of Natural Resources (Department) hereby issues an emergency permit to the Dyno Nobel, Incorporated, Carthage Plant (Dyno) for treatment of hazardous waste. This emergency permit is issued under the authority of the Missouri Hazardous Waste Management Law, Sections 260.350 to 260.434, RSMo, and the regulations promulgated thereunder. Applicable regulations are found in Code of Federal Regulations 40 CFR 270.61, incorporated by reference in Code of State Regulations 10 CSR 25-7.270(1). The provisions of this permit are the responsibility of the Department.



Recycled Paper

References:

1. Letter dated February 13, 2012, from Scott A. Kolb, P.E./Dyno Nobel, Incorporated, to Missouri Department of Natural Resources, RE: Application for Open Burn Permit and Notification of Demolition and Renovation, Dyno Nobel Incorporated – Carthage Missouri
2. Letter dated February 22, 2012, from Scott A. Kolb, P.E./Dyno Nobel, Incorporated, to David Walker/Missouri Department of Natural Resources, RE: Application for Open Burn Permit, Dyno Nobel Incorporated – Carthage Missouri, US EPA ID # MOD029719200

EVENT DESCRIPTION

This emergency permit authorizes thermal treatment by open burning of the No. 4 Gelatin Pack House and No. 4 Gelatin Spare Parts buildings. These two buildings have been in operation for approximately 30 years and have been used exclusively to package dynamite. Thermal treatment is the safest way to demolish old explosive contaminated buildings. All buildings that have been in explosive service must be presumed to be contaminated with explosives. Therefore, the building structures may exhibit or contain D003, reactive hazardous waste, from this process.

PERMIT CONDITIONS

The permit conditions listed below are to be followed to the extent possible during the life of this emergency permit:

1. The No. 4 Gelatin Pack House and No. 4 Gelatin Spare Parts buildings will be burned according to the “General Burn Plan for Buildings or Magazines” procedure and the information provided with Reference 1.
2. The Permittee shall post signs on each side of the area within which the buildings are to be burned. The signs shall read “Danger - Unauthorized Personnel Keep Out” and be legible from a distance of at least 25 feet and shall be posted at each entrance to the area of the buildings, but not so as to interfere with thermal treatment activities.
3. During the period that thermal treatment operations are occurring, the Permittee shall limit access to the area where these two buildings are located to those personnel that require access to conduct the activities authorized in this emergency permit and have been properly trained and equipped.

4. The Permittee shall comply with all federal, state, and local laws and regulations. State environmental requirements are administered by the Air Pollution Control Program, the Hazardous Waste Program, the Land Reclamation Program, the Solid Waste Management Program, and the Water Protection Program. In addition to federal environmental laws and regulations, the Permittee shall comply with the Occupational Safety and Health Administration (OSHA) or the Mine Safety and Health Administration (MSHA) regulations for worker protection, as applicable.
5. After burning of buildings is complete, the Permittee shall collect a composite sample of the ash at each building location and analyze each composite sample to determine if it is a characteristic hazardous waste. Ash samples will be analyzed for toxic characteristic leaching procedure concentrations of metals listed in 40 CFR 261.24, Table 1, and for any other parameters as requested by the disposal facility. The Permittee shall dispose of the ash appropriately and in accordance with state and federal regulations based on the results of the analyses.
6. The Permittee shall perform a site inspection for closure purposes after removal of ash and debris. The site inspection shall be to verify removal of all potentially hazardous wastes.
7. The Permittee shall submit a report of the open burn thermal treatment activities as a closure report within 60 days of expiration of this emergency permit or of the completion of debris removal and site cleanup, whichever occurs first. The report shall include the following:
 - a. Color photographs showing the building burn operation, and the cleaned up area after removal of the ash and debris.
 - b. Laboratory report providing the results of analyses of ash samples.
 - c. A report of the results of the site inspection and any corrective actions taken, if necessary.
 - d. The owner or operator shall sign the report, making the certification under 40 CFR 270.11(d), as incorporated under 10 CSR 25-7.270(1) and (2).
8. The Permittee shall comply with requirements of 40 CFR Part 268, Land Disposal Restrictions, as incorporated in 10 CSR 25-7.268(1) and (2), as applicable.
9. Discharges that occur at the National Pollutant Discharge Elimination System operating permit number MO-00002402 outfall 009 as a result of precipitation greater than or equal to 0.1 inches during the life of this emergency permit or demolition activities resulting in

an outfall flow that allows for sample collection associated to this emergency permit for open burning/open detonation shall be sampled and analyzed for the parameters listed for outfall 009 in MO-0002402. The results of these sampling events shall be submitted to the Missouri Department of Natural Resources' Southwest Regional Office with the facilities quarterly discharge monitoring reports for outfall 009. Questions regarding this special condition can be directed to Chris Wieberg of the Water Pollution Program at 573-526-5781.

This emergency permit is effective for 90 calendar days from the date of issuance. This emergency permit may be terminated by the Department Director or his/her designee at any time without process if he/she determines that termination is appropriate to protect human health and the environment.

EFFECTIVE DATES OF PERMIT: March 22, 2012 to June 20, 2012

March 22, 2012

Date

[Original signed by Leanne Tippett Mosby for]

Sara Parker Pauley, Director
DEPARTMENT OF NATURAL RESOURCES