



**MISSOURI HAZARDOUS WASTE MANAGEMENT FACILITY PERMIT
PART I
PERMIT NUMBER: MOD030712822**

PERMITTEE

Owner and Operator: Exide Technologies
Building 200
13000 Deerfield Parkway
Alpharetta, Georgia 30004

FACILITY LOCATION

25102 Holt 250 Road
Forest City, MO 64451
Holt County
North Latitude – 40°01'50"
West Longitude – 95°14'00"

FACILITY DESCRIPTION

The Exide Technologies - Canon Hollow Recycling Center receives lead-acid batteries and other lead-bearing wastes. These wastes are recycled to recover lead. This facility is a secondary lead smelting operation, located in northwest Missouri as shown in Figure 1.

PERMITTED ACTIVITIES

This Permit allows the Exide Technologies - Canon Hollow Recycling Center to treat hazardous waste in a stabilization unit, store hazardous wastes in containers and containment buildings,

dispose of hazardous waste generated by Exide in an on-site landfill, and conduct post-closure care of a closed landfill. This Permit contains corrective action conditions to address releases to the environment from Solid Waste Management Units and/or Areas of Concern as necessary and appropriate.

EFFECTIVE DATES OF PERMIT: September 23, 2009 to September 23, 2019

September 23, 2009

[Original signed by Robert Geller]

Date

Robert Geller, Director
HAZARDOUS WASTE PROGRAM

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INTRODUCTION

After public notice in accordance with 10 CSR 25-8.124, and review of Exide Technologies - Canon Hollow Recycling Center's Missouri Hazardous Waste Management Facility Permit Application (hereafter referred to as the application), the Missouri Department of Natural Resources (hereafter referred to as the Department) has determined that the application conforms to the provisions of the Solid Waste Disposal Act, as amended by the Resource Conservation and Recovery Act of 1976 (RCRA) and regulations promulgated thereunder by the U.S. Environmental Protection Agency (hereafter referred to as EPA) (codified and to be codified in Title 40 of the Code of Federal Regulations) and the Missouri Hazardous Waste Management Law (and all standards, rules, and regulations adopted under this act), Section 260.350, et seq., RSMo. In accordance with Section 260.375.13, RSMo, and the Solid Waste Disposal Act, the Department hereby approves the application and issues Permit Number MOD030712822 to Exide Technologies (hereafter referred to as the Permittee) for the construction and operation of the hazardous waste facility as set forth in the application and this Permit. This Permit also addresses corrective action requirements for Solid Waste Management Units and the requirements of the Hazardous and Solid Waste Amendments of 1984 (HSWA) as administered and enforced by the Department. Applicable regulations are found in 40 CFR Parts 260 through 264, 266, 268, and 270, and 10 CSR 25-7, as specified in this Permit. The Department is issuing this Missouri Hazardous Waste Management Facility (MHWMF) Part I Permit (hereafter referred to as the Permit) under state authority. EPA is issuing the HSWA Part II Permit under federal authority to address regulatory requirements of HSWA for which the state is not yet authorized. The MHWMF Part I Permit shall remain in effect even if the HSWA Part II Permit is terminated or has expired.

The following will collectively be referred to as the "approved permit application":

- The application submitted by the Permittee August 31, 1998, with revisions dated February 1, 2007, August 1, 2007, and October 30, 2008, and two addenda dated May 28, 2009, (Landfill 2 Permitted Capacity and Request for Abandonment of Monitoring Well OW-13);
- The Health Profile dated February 18, 1999, the update dated April 16, 2009, and acceptance dated May 29, 2009;
- The Exide Technologies Canon Hollow Recycling Center - Design Package for Proposed Whole Battery Storage Building dated September 27, 1999, approved May 24, 2000, and resubmitted May 20, 2009;

- The Sampling and Analysis Plan/Quality Assurance Project Plan for Landfill 1 and Landfill 2 dated October 31, 2008, and revision dated April 17, 2009;
- The Class 1 permit modification approval letter for the Closure and Post-Closure Care Plan, including conditions, dated February 25, 2009; and
- The Habitual Violator Disclosure Statement dated May 26, 2009.

The “consolidated permit application” is defined as the approved permit application (excluding the August 31, 1998, submittal), any changes resulting from the public comment period, and additional documents required to be submitted under the Schedule of Compliance.

All permit application information shall be available to the public unless the Permittee requests nondisclosure in writing, as set forth in Section 260.430, RSMo and 10 CSR 25-7.270(2)(B)2. This Permit and accompanying material will be available for review by the public at the Holt County Courthouse, County Clerk’s Office, in Oregon, Missouri; the Department’s central office in Jefferson City, Missouri; and the EPA Region VII office in Kansas City, Kansas.

The Permittee’s hazardous waste facility is located at 25102 Holt 250 Road, Forest City, Missouri. The Permittee is permitted to operate the container storage areas, containment buildings, stabilization unit, and an on-site hazardous waste landfill as specified in this Permit. The Permittee is required to conduct post-closure care of a closed landfill and address releases to the environment from Solid Waste Management Units and/or Areas of Concern as necessary and appropriate.

Operation of this hazardous waste facility and corrective action shall be in accordance with the provisions of this Permit, the Missouri Hazardous Waste Management Law (Sections 260.350 to 260.434, RSMo), the rules and regulations promulgated thereunder [Code of State Regulations, Title 10, Division 25 (10 CSR 25)] as effective on the date of this Permit, all the final engineering plans, specifications, and operating procedures that were submitted to the Department during the permit application review process, which are included in the final version of the permit application, which is hereby approved by the Department, and any other conditions, changes, or additions to the plans, specifications, and procedures as specified in this Permit. The consolidated permit application, which includes engineering plans, specifications, and operating procedures, is therefore, incorporated by this reference into the conditions of this Permit. All conditions specified in this Permit supersede any conflicting information in the consolidated permit application. Where conflicts arise between documents, the latest revision shall be effective.

Any inaccuracies found in information submitted by the Permittee may be grounds for the termination, revocation and reissuance, or modification of this Permit in accordance with 40 CFR Part 270 Subpart D, incorporated by reference in 10 CSR 25-7.270(1) and modified in 10 CSR 25-7.270(2)(D), and for potential enforcement action. The Permittee shall inform the Department of any deviation from, or changes in, the information in the application, which would affect the Permittee's ability to comply with the applicable regulations or permit conditions.

When the Department receives any information, such as inspection results, information from the Permittee, or requests from the Permittee, it may decide whether cause exists to modify, revoke and reissue, or terminate this Permit. All such changes to this Permit will be in accordance with 10 CSR 25-7.270(2)(D), 10 CSR 25-8.124, and 40 CFR Part 270 Subpart D, as incorporated by reference in 10 CSR 25-7.270(1).

The Permittee shall comply with all applicable environmental laws and regulations enforced by the Department. These environmental laws and regulations are administered by the Air Pollution Control Program, Hazardous Waste Program, Land Reclamation Program, Solid Waste Management Program, and Water Protection Program. Failure to comply with these environmental laws and regulations may, in certain circumstances, result in the suspension or revocation of this Permit and may subject the permit holder to civil and criminal liability.

This Permit for operational, closure, post-closure, and corrective action activities is issued only to the Permittee named above. This Permit is issued for a period of ten years and expires at midnight on September 23, 2019. This Permit is subject to review and modification by the Department in accordance with Section 260.395.12, RSMo. In accordance with 40 CFR 270.51, as incorporated in 10 CSR 25-7.270(1), if a timely and complete application is submitted, the conditions of the expired permit continue in force until the effective date or denial of a new permit.

The provisions of this Permit are severable. If any provision of this Permit, or the application of any provision of this Permit to any circumstance, is held invalid, the application of such provision to other circumstances and the remainder of this Permit shall not be affected thereby.

All citations to federal regulations throughout this Permit are for the sake of convenient reference. The federal regulations are adopted by reference in 10 CSR 25. In instances where state regulations are more stringent, the appropriate state reference is given and shall apply.

Any appeals of the issuance or denial of this Permit or specific permit conditions based on state authority shall be filed in accordance with 10 CSR 25-2.020 and Sections 260.395.11 and 621.250, RSMo. Anyone adversely affected or aggrieved by this decision, may appeal to have

the matter heard by the Administrative Hearing Commission. To appeal, a petition must be filed with the Administrative Hearing Commission within 30 calendar days after this Permit is mailed or delivered, whichever is earlier. If the petition is sent by registered mail or certified mail, it will be considered filed on the date it is mailed. If it is sent by any method other than registered mail or certified mail, it will be considered filed on the date it is received by the Administrative Hearing Commission.

40 CFR 264.101(a), as incorporated by reference in 10 CSR 25-7.264(1), requires all owners or operators of facilities seeking a permit for the treatment, storage, or disposal of hazardous waste to institute corrective action as necessary to protect human health and the environment from all releases of hazardous waste or hazardous constituents from any Solid Waste Management Unit, regardless of the time at which waste was placed in such unit.

40 CFR 264.101(b), as incorporated by reference in 10 CSR 25-7.264(1), requires that permits issued under the Hazardous Waste Management Law, contain a schedule of compliance for corrective action (where corrective action cannot be completed prior to permit issuance) and assurances of financial responsibility for completing such corrective action.

40 CFR 264.101(c), as incorporated by reference in 10 CSR 25-7.264(1), requires that corrective action be taken by the facility owner or operator beyond the facility property boundary, where necessary to protect human health and the environment, unless the owner or operator demonstrates that, despite the owner or operator's best efforts, the owner or operator was unable to obtain the necessary permission to undertake such action. 40 CFR 264.101(c) further stipulates that the owner or operator is not relieved of any responsibility to clean up a release that has migrated beyond the facility boundary where off-site access is denied. On-site measures to address such releases will be determined on a case-by-case basis. In addition, assurances of financial responsibility for completing such corrective action must be provided in accordance with 40 CFR 264.101.

40 CFR 270.32(b)(2), as incorporated by reference in 10 CSR 25-7.270(1), and Section 260.395.12, RSMo, requires that each permit issued under that section contain terms and conditions as the Department determines necessary to protect human health and the environment.

On July 6, 1999, Missouri received final authorization for revisions to its hazardous waste management program, including the corrective action portion of the HSWA Codification Rule (July 15, 1985, 50 FR 28702), which had been previously adopted by the state. Thus, the corrective action requirements implemented by the state in lieu of EPA are incorporated into this Permit and are under state authority. Authority for other HSWA requirements for which the state is not authorized is retained by EPA in the HSWA Part II Permit.

DEFINITIONS

For purposes of this Permit, terms used herein shall have the same meaning as those in Resource Conservation and Recovery Act (RCRA) and 40 CFR Parts, 260, 261, 264, 266, 268, and 270, and 10 CSR 25, unless this Permit specifically provides otherwise. Where terms are not defined in RCRA, the regulations, this Permit, or the U.S. Environmental Protection Agency guidance or publications, the meaning associated with such terms shall be defined by a standard dictionary reference or the generally accepted scientific or industrial meaning of the term.

“Area of Concern (AOC)” means any area where an actual or potential release of hazardous waste or hazardous constituents which is not from a Solid Waste Management Unit has occurred or is occurring and is determined by the Department to pose a current or potential threat to human health or the environment. Investigation and/or remediation of Area of Concerns may be required pursuant to Section 260.395, RSMo, and 40 CFR 270.32(b)(2), as incorporated by reference in 10 CSR 25-7.270(1).

“Director” means the Director of the Missouri Department of Natural Resources or authorized delegate.

“Facility” means:

- (1) All contiguous land and structures, other appurtenances, and improvements on the land used for treating, storing, or disposing hazardous waste; and
- (2) All contiguous property under the control of the owner or operator, for the purpose of implementing corrective action under 40 CFR 264.101, as incorporated by reference in 10 CSR 25-7.264(1) and as specified in Corrective Action Conditions I through XIV of this Permit.

“Hazardous constituent” means any chemical compound listed in 40 CFR Part 261 Appendix VIII, as incorporated by reference in 10 CSR 25-4.261.

“Hazardous waste” means any waste, or combination of wastes as defined by or listed in 10 CSR 25-4, which, because of its quantity, concentration, physical, chemical, or infectious characteristics, may cause or significantly contribute to an increase in mortality or an increase in serious irreversible, or incapacitating reversible illness or which may pose a threat to the health of humans or other living organisms.

“Release” means any spilling, leaking, pouring, emitting, emptying, discharging, injecting, pumping, escaping, leaching, dumping, or disposing of hazardous wastes (including hazardous

constituents) into the environment (including the abandonment or discarding of barrels, containers, and other closed receptacles containing hazardous wastes or hazardous constituents).

“Solid Waste Management Unit (SWMU)” means any discernible unit at which solid wastes have been placed at any time, irrespective of whether the unit was intended for the management of solid or hazardous waste. Such units include any area at a facility at which solid wastes have been routinely and systematically released.

“Stabilization” means actions to control or abate threats to human health and/or the environment from releases at RCRA facilities and/or to prevent or minimize the further spread of contamination while long-term remedies are pursued.

SCHEDULE OF COMPLIANCE

- I. Within 60 calendar days after the effective date of this Permit, the Permittee shall:
- A. Submit to the Department two copies of the consolidated permit application as required by 10 CSR 25-7.270(2)(B)7. and defined in the Introduction of this Permit.
 - B. Submit to the Department a certification by the Permittee that the Permittee has read this Permit in its entirety and understands all permit conditions contained herein.
 - C. Submit to the Department a check or money order payable to "State of Missouri" for any outstanding engineering review costs.
 - D. Submit to the Department a check or money order payable to "State of Missouri" for \$1000 for each year the Permit is to be in effect beyond the first year. This Permit is effective for ten years. Since the Permittee has submitted a \$1000 deposit with the permit application and paid a \$1000 permit continuation fee for the current year, the remaining balance to be submitted by the Permittee is calculated as:

$$\text{Remaining balance} = \$9000.00 - \left(\left(\frac{\$1000.00}{365 \cdot \text{days}} \right) \times N_d \right)$$

where N_d equals the number of calendar days from the anniversary date of the original permit issuance to the date of permit reissuance. An invoice is included with this Permit based on the foregoing formula. The check shall be directed to the Hazardous Waste Program, Permits Section.

- E. Submit to the Department for approval a final Sampling and Analysis Plan/Quality Assurance Project Plan to reflect any additional requirements contained in this Permit.
- II. The Permittee shall construct the Proposed Spent Whole Battery Storage - Battery Storage Building (hereafter referred to as Proposed Battery Storage Building) within five years of the effective date of this Permit, in accordance with the September 27, 1999, Exide Technologies Canon Hollow Recycling Center - Design Package for Proposed Whole Battery Storage Building, approved May 24, 2000, and resubmitted May 20, 2009. The Permittee shall excavate contaminated soils and conduct confirmatory sampling prior

to construction of the Proposed Battery Storage Building, as outlined in the Design Package for Proposed Whole Battery Storage Building. The Permittee shall notify the Department 30 calendar days prior to excavating and sampling activities.

- III. Prior to utilizing the Proposed Battery Storage Building, the Permittee shall:
- A. Submit to the Department an updated closure cost estimate for the Proposed Battery Storage Building;
 - B. Submit to the Department for review draft updates to the financial assurance instrument to reflect the increased closure cost estimate;
 - C. After the Department's review of the draft update, the Permittee shall execute or otherwise finalize the update. The update must be in a form identical to the financial assurance documents reviewed by the Department.
 - D. Submit all original executed and/or otherwise finalized financial assurance instruments or other documents to the Department. The Permittee shall submit original executed or otherwise finalized instruments or documents. Facsimiles or photocopies are not acceptable.
 - E. Prior to utilizing the Proposed Battery Storage Building, the Permittee shall comply with Special Permit Condition I.B.4.a. and b.
- IV. Prior to initiating construction of Phase II of Landfill 2, the Permittee shall:
- A. Submit to the Department for review, the complete set of bid drawings, specifications, and the contractors qualifications; and
 - B. Submit a notification to the Department at least 15 calendar days prior to the expected start date of construction for Phase II of Landfill 2.
- V. The Permittee shall begin construction of Phase II for Landfill 2 as soon as practicable, but not to exceed a period of four years from the effective date of this Permit.
- VI. Prior to utilizing Phase II of Landfill 2, the Permittee shall notify the Director in accordance with Special Permit Condition V.C.16.

- VII. The Permittee shall comply with all corrective action and contingent corrective action requirements of this Permit, as specified in the Corrective Action Conditions and as Summarized in Table 3.

SUBMITTAL OF REQUIRED INFORMATION

- I. The Permittee shall submit two copies, unless otherwise requested, of all reports, documents, and plans/specifications required under the terms of this Permit to:

Chief, Permits Section
Missouri Department of Natural Resources
Hazardous Waste Program
P.O. Box 176
Jefferson City, MO 65102-0176

- II. The Permittee shall submit two copies of all reports, documents, and plans/specifications required under the terms of this Permit to:

Chief, RCRA Corrective Action and Permits Branch
U.S. Environmental Protection Agency Region VII
Air and Waste Management Division
901 North Fifth Street
Kansas City, KS 66101

STANDARD PERMIT CONDITION

- I. The Permittee shall comply with the requirements set forth in the Missouri Hazardous Waste Management Law (and all standards, rules, and regulations adopted under this Law), Section 260.350, et seq., RSMo, 40 CFR Part 264 Subpart H, 40 CFR 270.30, 40 CFR 270.40, 40 CFR 270.42, and 40 CFR 270.51, as incorporated and modified in 10 CSR 25-7 and 10 CSR 25-8.

GENERAL PERMIT CONDITIONS

I. The Permittee shall comply with the requirements set forth in 40 CFR Part 264 Subpart B, 40 CFR Part 264 Subpart C, 40 CFR Part 264 Subpart D, 40 CFR Part 264 Subpart E, 40 CFR Part 264 Subpart H, 40 CFR Part 268, and 40 CFR Part 270, as incorporated and modified in 10 CSR 25-7 and 10 CSR 25-8.

II. Notification of an Emergency Situation [Chapter 260.505.4, RSMo]

The Permittee shall, at the earliest practical moment upon discovery of an emergency involving the hazardous waste under the Permittee's control, notify the Department's emergency response hotline at (573) 634-2436 and the National Response Center at 1-800-424-8802.

SPECIAL PERMIT CONDITIONS

The Department has established the following additional permit conditions for the Permittee's hazardous waste facility.

I. Storage in Containers [10 CSR 25-7.264(2)(I)]

Three container storage areas are currently permitted and operating, the Hazardous Waste Container Storage (in the South Containment Building), the Spent Battery Trailer Parking Area, and the Spent Whole Battery Storage - Unloading Dock Staging/Storage Area. The Proposed Battery Storage Building is permitted, but shall not be constructed or operated until the excavation and confirmatory sampling requirements of Special Permit Condition I.B.4 are met. These units are located as shown on Figure 2 and are subject to the requirements of 10 CSR 25-7.264(2)(I).

A. Waste Identification

The Permittee shall store, in the permitted container storage areas, only hazardous wastes identified in the Hazardous Waste Permit Information Form from the approved permit application that are lead-bearing materials to be processed through the smelter, as outlined in 40 CFR Part 266, nickel cadmium batteries held for transshipping, industrial batteries held for transshipping, containerized air pollution control scrubber sludge and containerized wastewater sludge generated at the on-site treatment plant. Individual spent whole batteries are considered a container and shall be managed in accordance with this Permit. Non-regulated material may be stored in the container storage areas as long as the material does not interfere with hazardous waste operations, is containerized, and is managed in accordance with the requirements of Special Permit Condition I. All stored wastes are subject to the terms of this Permit.

K069* Emissions control dust from secondary lead smelting

*In accordance with 40 CFR 261.32, K069's listing is stayed administratively for sludge generated from secondary acid scrubber systems. The stay will remain in effect until further action is taken.

B. Waste Quantities

The Permittee shall store only the following quantities of hazardous wastes, nickel cadmium batteries held for transshipping, industrial batteries held for

transshipping, non-regulated material, containerized air pollution control scrubber sludge and containerized wastewater sludge generated at the on-site treatment plant in container storage areas according to this Permit:

1. Storage in the Hazardous Waste Container Storage (in the South Containment Building) shall not exceed 187 cubic yards of material. The Permittee shall not store materials that contain free liquids in this area, with the exception of spent whole batteries, as described in this Permit and the approved permit application.
2. Storage in the Spent Battery Trailer Parking Area shall not exceed 330 short tons or 15 trailers whichever is less. For trailer counting purposes: a 53-foot trailer is one trailer, a 28-foot "Pup" trailer counts as one half of a trailer, and a 28-foot "Box" truck counts as one half of a trailer. The Permittee shall not store materials that contain free liquids in this area, with the exception of spent whole batteries, as described in this Permit and the approved permit application.
3. Storage of material in the Spent Whole Battery Storage - Unloading Dock Staging/Storage Area shall not exceed 334 cubic yards of material. The Permittee shall not store materials that contain free liquids in this area, with the exception of spent whole batteries, as described in this Permit and the approved permit application.
4. Storage of material in the Proposed Battery Storage Building shall not exceed 1500 cubic yards of material. The Permittee shall not store materials that contain free liquids in this area, with the exception of spent whole batteries, as described in this Permit and the approved permit application.

The Permittee shall construct the Proposed Battery Storage Building within five years of the effective date of this Permit, in accordance with the September 27, 1999, Exide Technologies Canon Hollow Recycling Center - Design Package for Proposed Whole Battery Storage Building, approved May 24, 2000, and resubmitted May 20, 2009. The Permittee shall excavate contaminated soils and conduct confirmatory sampling prior to construction of the Proposed Battery Storage Building as outlined in the September 27, 1999, Exide Technologies Canon Hollow Recycling Center - Design Package for Proposed Whole Battery Storage Building,

approved May 24, 2000, and resubmitted May 20, 2009. The Permittee shall notify the Department 30 calendar days prior to excavating and sampling activities.

The Permittee shall not operate the Proposed Battery Storage Building until:

- a. The Permittee has submitted to the Director, by certified mail or hand delivery, a letter signed by the Permittee and a professional engineer registered in Missouri stating that the unit has been constructed or modified in compliance with this Permit 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;

The Permittee shall also include with this submittal the “as-built” design drawings and specifications for the building. These drawings and specifications shall be certified by a professional engineer registered in Missouri.

- b. The Director has inspected the newly constructed building and finds it is in compliance with the conditions of this Permit; or

Within 15 calendar days of the date of submission of the letter in paragraph 4.a. of this section, the Permittee has not received notice from the Director of his or her intent to inspect, prior inspection is waived, and the Permittee may commence utilization of the building.

C. Conditions of Containers [40 CFR 264.171]

1. If a container holding hazardous waste (including individual spent whole batteries) is not in good condition (e.g., severe rusting, apparent structural defects) or if it begins to leak, the Permittee shall transfer the hazardous waste to a container that is in good condition or manage the material in some other way that complies with the conditions of this Permit, such as over-packing. Leaking batteries shall be removed from the container storage area and processed immediately.

2. During the entire on-site storage period, containers storing hazardous wastes shall be labeled and marked in accordance with the applicable, currently-effective U.S. Department of Transportation (USDOT) regulations regarding hazardous wastes, 49 CFR Part 172, and 10 CSR 25-7.264(2)(I)2. Spent whole batteries shall be labeled and marked as outlined in Special Permit Condition I.E.2. and I.E.3.

D. Compatibility of Waste with Containers [40 CFR 264.172]

1. The Permittee shall use a container that is made of, or lined with, materials which will not react with and are otherwise compatible with the hazardous waste to be stored so that the ability of the container to contain the waste is not impaired.
2. Only USDOT approved containers shall be used for storage of hazardous wastes on-site. Spent whole batteries shall be stored as outlined in Special Permit Condition I.E.2. and I.E.3.

E. Management of Containers [40 CFR 264.173]

1. Hazardous wastes in containers shall be managed in accordance with the following:
 - a. A container holding hazardous waste shall always be closed during storage, except when it is necessary to add or remove material. A container holding hazardous waste shall not be opened, handled, or stored in a manner that may rupture the container or cause it to leak or spill.
 - b. The Permittee shall store containers in a manner that ensures physical stability and allows for visual inspection of each container and each container's label, except for visual inspection of containers where container size prohibits the inspection of center containers when palletized, provided the outermost containers are clearly labeled as to the number of containers on the pallet.
 - c. Containers shall not be stacked in a manner that causes leaks or spills of hazardous waste. In no case shall drummed material be stacked higher than three vertically-oriented 55-gallon sized drums.

- d. The aisle space between rows shall be maintained to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation.
2. Palletized spent whole batteries shall be managed in accordance with the following:
 - a. In rows, two pallets in width, and no more than eight feet high;
 - b. The pallet stacking configuration shall in no way compromise the structural integrity of the stack, individual pallets, or individual batteries;
 - c. The batteries shall be shrink-wrapped in plastic to stabilize the palletized stacks;
 - d. The palletized stacks shall be labeled in accordance with applicable USDOT regulations and 10 CSR 25-7.264(2)(I)2; and
 - e. The aisle space between rows of palletized batteries shall be maintained to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation.
 3. Individual spent whole batteries shall be managed in accordance with the following:
 - a. The Permittee shall store spent whole batteries in a manner that ensures physical stability and allows for visual inspection of each battery;
 - b. Spent whole batteries shall not be handled or stored in a manner that may cause them to rupture, leak, or spill;
 - c. Individual spent whole batteries that are identified without a battery cap and contain liquids (this does not apply to dry batteries containing no acid that do not have a cap) shall be capped or managed as if they are not in good condition;

- d. Individual spent whole batteries shall be labeled in accordance with applicable USDOT regulations and 10 CSR 25-7.264(2)(I)2; and
- e. Individual spent whole batteries shall be stored in an organized manner to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation.

F. Inspections [40 CFR 264.174]

- 1. At least weekly, the Permittee shall inspect areas where containers are stored, in accordance with the approved permit application checklists. In the case of containers that may have free liquids, the inspection shall include looking for leaking containers and for deterioration of containers and the containment system caused by corrosion or other factors. At least weekly, the Permittee shall inspect the floor around containers checking for cracks. At least annually, the Permittee shall inspect the entire floor for cracks, including areas beneath containers. The annual inspection requirement may be met by partial inspections of the floor during movement of containers in and out of the storage areas. If cracks are found in the floor, repairs shall be initiated within 10 calendar days of the identification of a crack. Inspection results and any repairs shall be documented in the facility operating record.
- 2. The Spent Battery Trailer Parking Area shall be inspected daily, during periods of operation, in accordance with the approved permit application. The inspection shall include looking for leakage from the trailers and accumulation of liquid under the trailers. Any indication of leakage shall be properly managed and the affected trailer shall be unloaded immediately.

G. Containment [40 CFR 264.175]

- 1. The Permittee shall design and operate containment systems for the Hazardous Waste Container Storage (in the South Containment Building), Spent Whole Battery Storage - Unloading Dock Staging/Storage Area and the Proposed Battery Storage Building as follows:

- a. A base shall underlie the containers, which is free of cracks or gaps and is sufficiently impervious to contain leaks, spills, and accumulated precipitation until the collected material is detected and removed.
 - b. The base shall be sloped or the containment system shall be otherwise designed and operated to drain and remove liquids resulting from leaks, spills, or precipitation unless the containers are elevated or are otherwise protected from contact with accumulated liquids.
 - c. Run-on into the containment system must be prevented unless the collection system has sufficient excess capacity to contain any run-on that might enter the system.
 - d. Spilled or leaked waste shall be removed, and the area shall be cleaned up in as timely a manner as is necessary to prevent releases to the environment and provide for protection of on-site personnel.
2. The Permittee shall design and operate containment systems for the Spent Battery Trailer Parking Area as follows:
- a. The area may be used as general parking for incoming trailers of non-regulated material, outgoing trailers awaiting departure from the plant, trailers containing spent batteries, and for other general plant operational parking needs.
 - b. The Permittee shall maintain records, on-site, of all incoming and outgoing shipments to and from the plant.
 - c. Inspections and remedial actions for the trailers containing spent batteries shall in no way be impeded by the use of the Spent Battery Trailer Parking Area for reasons other than permitted storage.
 - d. The trailers containing spent batteries shall remain latched and sealed unless the trailer is being inspected or unloaded for recycling or storage within another permitted container storage area.

- e. Run-on onto the parking lot shall be collected or diverted into the storm water basin for collection and subsequent conveyance to the facilities wastewater treatment plant in accordance with the Missouri State Operating Permit.
- f. All trailers containing spent batteries shall remain on a surface which is free of cracks or gaps and is sufficiently impervious to contain leaks, spills, and accumulated precipitation until the collected material is detected and removed.

H. Staging [10 CSR 25-7.264(2)(A)3]

A container holding hazardous waste or a spent whole battery shall not be staged, stored, or managed in an area not addressed by this Permit for a period that exceeds 24 hours.

I. Special Requirements for Incompatible Waste [40 CFR 264.177]

- 1. The Permittee shall not place incompatible materials in the same container unless such action is in compliance with the requirements of 40 CFR 264.17(b).
- 2. The Permittee shall not place hazardous wastes in an unwashed container that previously held an incompatible material.
- 3. The Permittee shall separate by device (i.e., a dike or other physical means) containers of incompatible materials. No incompatible materials may be stored together in the storage areas without providing separation sufficient to prevent the mixing of any spilled materials that may be incompatible.

J. Closure [10 CSR 25-7.264(2)(G)]

At closure, the Permittee shall remove all hazardous wastes and hazardous waste residues from the container storage areas and containment systems and close in accordance with the Closure Plan in the approved permit application for the hazardous waste management facility. If the Permittee is unable to close according to the Closure Plan, then the Permittee must submit a permit modification to the Department in accordance with 40 CFR 270.42.

II. Storage and Treatment in Containment Buildings [40 CFR Part 264 Subpart DD]

Seven containment buildings are permitted:

- Mix Room,
- 80-foot x 80-foot Storage Area,
- South Containment Building,
- Stabilization/Staging & Storage,
- Dock Entry Building,
- Miscellaneous Storage Area, and
- Storage Area for Battery Plates with De Minimus Liquids.

One treatment unit in a containment building is permitted:

- Stabilization Unit.

These units are located as shown on Figure 2 and are subject to the requirements of 40 CFR Part 264 Subpart DD.

A. Waste Identification

The Permittee shall store, in permitted areas of containment buildings, only the wastes identified in the Hazardous Waste Permit Information Form from the approved permit application that are lead-bearing materials to be processed through the smelter as outlined in 40 CFR Part 266, smelter slag, air pollution control scrubber sludge and wastewater sludge generated at the on-site treatment plant. Non-regulated material may be stored in the containment buildings as long as the material does not interfere with hazardous waste operations and is managed in accordance with the requirements of Special Permit Condition II. All stored wastes are subject to the terms of this Permit.

K069* Emissions control dust from secondary lead smelting

*In accordance with 40 CFR 261.32, K069's listing is stayed administratively for sludge generated from secondary acid scrubber systems. The stay will remain in effect until further action is taken.

B. Waste Quantities

The Permittee shall not exceed storage of the following quantities of hazardous wastes and non-regulated material in containment buildings according to this Permit:

1. Storage of material in the Mix Room containment building shall not exceed 639 cubic yards of material. The Permittee shall not store any materials that contain free liquids in this area.
2. Storage of material in the 80-foot x 80-foot Storage Area shall not exceed 2253 cubic yards of material. The Permittee shall not store any materials that contain free liquids in this area.
3. Storage of material in the South Containment Building shall not exceed 1749 cubic yards of material. The Permittee shall not store any materials that contain free liquids in this area.
4. Storage of material in the Stabilization/Staging & Storage containment building shall not exceed 355 cubic yards of material. The Permittee shall not store any materials that contain free liquids in this area. The Permittee shall not store any wastes in the Slag Product Work Area of this containment building, as identified on Figure 2. Only the Stabilization Unit located in the Stabilization/Staging & Storage containment building shall be used for treatment of hazardous waste. Air pollution control scrubber sludge, smelter slag, wastewater sludge generated at the on-site treatment plant and soils excavated onsite for remediation purposes may be treated in the Stabilization Unit. Treatment in the Stabilization Unit shall not exceed a rate of 10 short tons per hour.
5. Storage of hazardous waste in the Dock Entry Building containment building shall not exceed 1328 cubic yards of material. The Permittee shall not store any wastes that contain free liquids in this area.

6. Storage of hazardous waste in the Miscellaneous Storage Area containment building shall not exceed 155 cubic yards of material. The Permittee shall not store any wastes that contain free liquids in this area.
7. Storage of hazardous waste in the Storage Area for Battery Plates with De Minimus Liquids shall not exceed 1121 cubic yards of material. The Permittee shall meet free-liquid containment building requirements as specified in 40 CFR Part 264 Subpart DD.

C. Design and Operating Standards [40 CFR 264.1101]

1. The containment buildings shall be completely enclosed with a floor, walls, and a roof to prevent exposure to the elements (e.g. precipitation, wind, run-on), and to assure containment of the maximum permitted quantity of managed waste.
2. The floors and walls of the containment buildings shall be constructed of materials of sufficient strength and thickness to support themselves, the maximum permitted quantity of waste, and any personnel and heavy equipment that operate within the unit.
3. All surfaces shall be chemically compatible with the materials and waste to be managed in the containment buildings.
4. The containment buildings shall have a primary barrier designed to withstand the movement of personnel, waste, and handling equipment during the operating life of the facility.
5. All containment buildings, except the Storage Area for Battery Plates with De Minimus Liquids, shall manage only wastes containing no free liquids (the presence of which is determined by the paint filter test, a visual examination, or other appropriate means).
6. For the Storage Area for Battery Plates with De Minimus Liquids, the Permittee shall maintain:
 - a. A primary barrier to prevent the migration of hazardous constituents into this barrier;

- b. A liquid collection and removal system to minimize the accumulation of liquid on the primary barrier of the containment building;
 - c. A secondary containment system including a secondary barrier to prevent migration of hazardous constituents into this barrier; and
 - d. A leak detection system that is capable of detecting failure of the primary barrier and collecting accumulated hazardous wastes and liquids at the earliest practicable time. If leaks are detected, the Permittee shall comply with Special Permit Condition II.C.9.
7. The leak detection system for the Storage Area for Battery Plates with De Minimus Liquids shall be maintained in accordance with the following minimum requirements:
 - a. Constructed with a bottom slope of one percent or more;
 - b. Constructed of a granular drainage material with a hydraulic conductivity no less than 1×10^{-2} cm/sec and a thickness of no less than 30.5 cm, or constructed of synthetic or geonet drainage materials with a transmissivity no less than 3×10^{-5} m²/sec; and
 - c. Constructed with a liquid collection system of sufficient capacity to contain all liquid that may reach the reservoirs until such time the leak is detected and the liquid is removed.
8. The Permittee shall use controls and practices to ensure containment of the hazardous wastes within the containment buildings; and, at a minimum:
 - a. Maintain the primary barrier free of cracks, gaps, corrosion, or other deterioration that could cause hazardous wastes to be released from the primary barrier;
 - b. Maintain the level of the stored/treated hazardous waste within the containment walls of the unit so that material is not stored above the height of the concrete wall of the containment system at the wall and so that if a material pile within the system collapses it will not cause a release of hazardous waste over the top of the containment system;

- c. Operate decontamination stations at the heavy equipment exit of each containment building to prevent the tracking of hazardous waste out of the buildings by decontaminating all waste/material-handling vehicles prior to their exiting a containment building. No waste/material-handling vehicle shall exit any containment building without being decontaminated except during periods of freezing temperatures and/or weather conditions conducive to ice formation on travel surfaces. All rinsate shall be collected and properly managed. During periods of freezing temperatures and/or weather conditions conducive to ice formation on travel surfaces, and during any period the decontamination station is inoperable, hazardous wastes visible on any waste/material handling vehicles shall be physically removed over the decontamination station prior to exiting; and
 - d. Take measures to control fugitive dust emissions such that any opening (doors, windows, vents, cracks, etc.) exhibits no visible emissions, including when vehicles and personnel are entering and exiting the containment building.
9. If the Permittee detects a condition that could lead to or has caused a release of hazardous wastes or hazardous constituents, the Permittee shall repair the condition promptly in accordance with the following procedures:
- a. Enter a record of the discovery in the facility operating record;
 - b. Immediately remove the portion of the containment building affected by the condition from service;
 - c. Determine what steps shall be taken to repair the containment building, remove any leakage from the secondary collection system, and establish a schedule for accomplishing the cleanup; and
 - d. Notify the Director within seven calendar days after the discovery of the condition, and within 14 working days, provide a written notice to the Director with a description of the steps taken to repair

the containment building and a plan, including a schedule, for accomplishing the work not completed at the time of the written notice.

The Director will review the information submitted, make a determination regarding whether the containment building must be removed from service completely or partially until repairs and cleanup are complete, and notify the Permittee of the determination and the underlying rationale in writing.

Upon completing all repairs and cleanup, the Permittee shall notify the Director, in writing, and provide a verification signed by a professional engineer registered in Missouri that the repairs and cleanup have been completed according to the written plan submitted in accordance with Special Permit Condition II.C.9.d.

D. Inspections [40 CFR 264.15]

1. The Permittee shall inspect all containment building areas and the area immediately surrounding each containment building at least weekly for the purposes of detecting any signs of releases of hazardous waste.
2. The Permittee shall inspect the Storage Area for Battery Plates with De Minimus Liquids containment building and liquid collection and leak detection systems, including the collection reservoirs, each day of battery breaking operation or at least weekly during periods of no battery breaking activity.
3. At least weekly, the Permittee shall inspect all dry storage containment buildings for compliance with 40 CFR 264.1101(c)(1) and Special Permit Condition II.C.8. At least annually, the Permittee shall inspect the entire floor of all containment buildings for cracks, including areas under stored wastes and equipment. The annual inspection requirement may be met by partial inspections of the floor during movement of material in and out of the storage areas. Floor areas under permanently mounted equipment are exempt from this requirement. If a condition is detected that could lead to or has caused a release of hazardous waste, the Permittee shall repair the condition promptly, in accordance with the requirements of 40 CFR 264.1101(c)(3). Inspection results shall be recorded in the facility operating record.

E. Closure [10 CSR 25-7.264(2)(G)]

At closure, the Permittee shall remove all hazardous wastes and hazardous waste residues from the containment buildings, including the Stabilization Unit, and containment systems and close in accordance with the Closure Plan in the approved permit application for the hazardous waste management facility. If the Permittee is unable to close according to the Closure Plan, then the Permittee must submit a permit modification to the Department in accordance with 40 CFR 270.42.

III. Waste Minimization

Pursuant to 40 CFR 264.73(b)(9), the facility operating record shall contain a certification by the Permittee, made no less often than annually, that the Permittee has a program in place to reduce the volume and toxicity of hazardous waste that the Permittee generates to the degree determined by the Permittee to be economically practicable; and the proposed method of treatment, storage, or disposal is that practicable method currently available to the Permittee which minimizes the present and future threat to human health and the environment.

IV. Seismic Evaluation Requirements [10 CSR 25-7.270(2)(B)4.]

The Permittee has demonstrated compliance with the seismic requirements, as certified by a professional engineer registered in Missouri. The Permittee shall maintain the seismic evaluation in the operating record.

V. Landfill 2 [10 CSR 25-7.264(2)(N)]

Landfill 2 is permitted to receive material meeting all requirements of Special Permit Condition V. as outlined below. The current boundary of Landfill 2 and the planned boundary after expansion and closure of the landfill are shown on Figure 3 and in Section F of the approved permit application. Landfill 2 began operation in 1991 and has an overall design capacity of 754,000 cubic yards. The permitted landfill is designed for phased construction and use. Phase I has been constructed and is currently operating. Phase II construction shall be initiated within four years of the effective date of this Permit. Phase III will be constructed as Phase II approaches capacity. The operation of any phase of Landfill 2 shall in no way inhibit the construction of each subsequent phase.

Prior to construction of any new phase of Landfill 2, construction plans and specifications along with construction quality assurance/quality control (QA/QC) plans suitable for bid

submittals for each phase shall be submitted to the Department for review and approval, as applicable. As required by 10 CSR 25-7.264(2)(N)1.A.(III)(b), the Permittee shall place only wastes generated by its operator into the landfill.

A. Waste Identification

The Permittee shall dispose of only the wastes identified in the Hazardous Waste Permit Information Form from the approved permit application, smelter slag, air pollution control scrubber sludge, wastewater sludge generated at the on-site treatment plant and soils excavated onsite for remediation purposes into Landfill 2 at the facility. All hazardous waste shall be treated to meet 40 CFR Part 268 – Land Disposal Restrictions (LDR), prior to landfilling.

K069* Emissions control dust from secondary lead smelting

*In accordance with 40 CFR 261.32, K069's listing is stayed administratively for sludge generated from secondary acid scrubber systems. The stay will remain in effect until further action is taken.

B. Waste Quantities

1. Disposal of waste into Phase I of Landfill 2 shall not exceed 300,000 cubic yards of material. Disposal and management of waste in Phase I shall not contact unlined phases of Landfill 2, regardless of compliance with the permitted capacity.
2. Disposal of waste into Phase II of Landfill 2 shall not exceed 81,000 cubic yards of material. Disposal and management of waste in Phase II shall not contact unlined phases of Landfill 2, regardless of compliance with the permitted capacity.
3. Disposal of waste into Phase III of Landfill 2 shall not exceed 373,000 cubic yards of material.

C. Design and Operating Requirements

1. Landfill 2 must have a liner system designed, constructed, and installed to meet the requirements of 40 CFR 264.301(a) and (c) and 10 CSR 25-7.264(2)(N)2. and as specified in the approved permit application.

2. Landfill 2 shall have a leachate collection system (LCS) above the primary liner and a leak detection system (LDS) between the primary synthetic liner and lower composite liner designed, constructed and installed to meet the requirements of 40 CFR 264.301(c) and as specified in the approved permit application. The LDS will serve to detect leakage through the primary liner.
3. The Landfill 2 internal contact storm water runoff collection system, including the manhole and clean-outs, the LCS and the LDS shall be maintained to gravity feed liquids from the landfill to the on-site wastewater treatment plant, as specified in the approved permit application.
4. In accordance with 10 CSR 25-7.264(2)(N)2.G.(II), the Permittee shall analyze liquids from the LDS at least annually. If leachate is not generated within the LDS, an annual analysis shall be completed on leachate collected from the LCS. The leachate shall be analyzed for all analytical parameters identified in Table 1.
5. All storm water collected within the active phase of the landfill shall be transferred to the facility's wastewater treatment plant, or other Departmental approved location, in accordance with the requirements of this Permit and the approved design for the internal drainage system.
6. The Permittee shall design, construct, operate, and maintain run-on and runoff control systems, as required by 40 CFR 264.301(g) and (h), respectively, and as specified in the approved permit application.
7. If operation of Landfill 2 demonstrates that the landfill contains particulate matter subject to wind dispersal, the Permittee shall cover or otherwise manage the landfill to control wind dispersal to meet the regulatory requirements of 40 CFR 264.301(j), as incorporated in 10 CSR 25-7.264(1). If wind dispersal control is necessary, the Permittee shall submit a Class 1 permit modification to the Department for review and approval.
8. The Permittee shall monitor the LCS and LDS as specified in the approved permit application.

- a. If the measured flow rate within the LDS exceeds a monthly average of 500 gallons per acre per day (gpad), the following action shall be taken by the Permittee:
 - (1) The Department shall be notified within seven calendar days of the Permittee determining that the average monthly flow rate of 500 gpad has been exceeded.
 - (2) A report summarizing the previous month's average daily flow rates shall be submitted to the Department on a calendar monthly basis until the measured flow rate decreases below an average monthly flow rate of 500 gpad.
 - (3) Submit to the Department a review of the latest annual analysis of leachate from the LDS, as required by 10 CSR 25-7.264(2)(N)2.G.(II) and this Permit, with an assessment as to the need for a repetitive chemical analysis of the LDS leachate.
 - b. If the measured flow rate within the LDS exceeds a monthly average of 1200 gpad, the Permittee shall notify the Department within 15 calendar days. The Permittee shall also conduct a detailed, specific assessment of the elevated leakage rate. If the assessment determines that remedial action is warranted, the Permittee shall develop and implement a remedial plan to improve retardation of liquids through the primary synthetic liner. If the Permittee determines no remedial action is warranted, the Permittee shall submit a report summarizing the elevated leakage rate assessment and a detailed justification for not conducting remedial work. The assessment and subsequent remedial plan shall be approved by the Department prior to implementation.
9. The Permittee shall notify the Department, as soon as practicable, when Phase II of Landfill 2 reaches 90 percent of the permitted capacity.
 10. The Permittee shall operate a decontamination station to decontaminate all vehicles and equipment, which come into contact with the landfilled waste, prior to exiting the landfill. All decontamination fluids shall be collected and disposed of into the landfill in an area underlain by the Phase I or Phase II liner. Decontamination of all vehicles and equipment

shall occur any time contact with the landfilled waste occurs, except during periods of freezing temperatures and/or weather conditions conducive to ice formation on travel surfaces.

11. The Permittee shall notify the Department prior to any construction and/or repairs to occur within the boundary of the operating landfill or the closed landfill. Routine maintenance activities for the landfill and supporting equipment are exempt from this requirement. The boundary includes all contiguous property bounded by the Point of Compliance wells.
12. The Permittee shall maintain records of operation and inspections of the landfill, in accordance with 40 CFR 264.73 and as specified in the approved permit application. The Permittee shall implement an inspection program and maintain inspection records for the landfill, in accordance with 40 CFR 264.15 and 40 CFR 264.303 and as specified in the approved permit application. While in operation, the Permittee shall inspect the landfill weekly and after storm events, in accordance with 40 CFR 264.303(b).
13. The stormwater collection, LCS, and LDS lines shall be cleaned with a high pressure wash system on at least an annual basis to maintain the lines in a free flowing condition and to check the integrity of the lines. Compliance with this annual requirement shall be documented in the facility operating record.
14. The Permittee shall construct Landfill 2 in compliance with this Permit and the landfill design as specified in the approved permit application. In addition, the landfill shall be constructed in accordance with departmental approved construction plans and specifications, and the construction QA/QC plan.
15. Landfill 2 shall be designed, constructed, and operated to minimize erosion, landslides, and sloughing, in accordance with 10 CSR 25-7.264(2)(N)2.J.
16. The Permittee shall not dispose of any waste into the newly constructed Phase II or Phase III of Landfill 2 until the following requirements, as applicable, are completed:

- a. The Permittee has submitted to the Department for review, all results of the Construction QA/QC documentation report and a certification signed by the Construction Quality Assurance (CQA) officer that the approved CQA plan has been successfully carried out and that the unit meets the requirements of 40 CFR 264.301(c) or (d).
- b. The Permittee has submitted to the Director, by certified mail or hand delivery, a letter signed by the Permittee and a professional engineer registered in Missouri stating that Phase II or Phase III of Landfill 2 has been constructed or modified in compliance with this Permit 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.

The Permittee shall also include with this submittal the “as-built” design drawings and specifications for Phase II and Phase III of Landfill 2. These drawings and specifications shall be certified by a professional engineer registered in Missouri.

- c. The Director has inspected the newly constructed Phase II and Phase III of Landfill 2 and finds it is in compliance with the conditions of this Permit; or

Within 15 calendar days of the date of submission of the letter in paragraph 16.b. of this section, the Permittee has not received notice from the Director of his or her intent to inspect, prior inspection is waived, and the Permittee may commence utilization of Phase II or Phase III of Landfill 2.

D. Waste Analysis and Confirmation Sampling

The Permittee shall characterize all material being placed into the on-site landfill in accordance with the waste analysis plan, Section 5.0 of the approved permit application, and the following conditions:

1. The Permittee shall sample and analyze material from one batch to be placed in the on-site landfill on a calendar-quarterly basis to document compliance with LDRs using the Toxicity Characteristic Leaching Procedure (TCLP) test.

2. If a quarterly sampled batch fails to meet LDR standards, the treated material shall be retested to determine if the failure was due to an analytical error, or if the treatment process failed to meet LDRs. If an analytical error occurred, this shall be documented in the operating record and testing shall continue on a quarterly basis. If it is determined that the treatment process failed to meet LDRs, the following conditions shall apply:
 - a. The Permittee shall notify the department within 14 calendar days of determining that a sample has failed to meet LDRs; and
 - b. If the TCLP test demonstrates that the treated material does not meet LDRs, the material will be retreated until LDRs are met and the following sampling and analysis schedule shall be implemented:
 - (1) The Permittee shall analyze one sample per week from one batch per week to be placed in the on-site landfill for a minimum period of four consecutive weeks.
 - (2) If based upon a minimum four consecutive weeks of sampling, it is demonstrated that a specific parameter(s) meets LDRs, the testing frequency of that parameter(s) will be reduced to quarterly analysis.

VI. Landfill 2 Closure [10 CSR 25-7.264(2)(G)]

- A. In accordance with 40 CFR 264.111, the Permittee shall close Landfill 2 in a manner that:
 1. Minimizes the need for further maintenance; and
 2. Controls, minimizes, or eliminates, to the extent necessary to protect human health and the environment, post-closure releases of hazardous waste, hazardous constituents, leachate, contaminated runoff, or hazardous waste decomposition products to the soils, ground or surface waters, or to the atmosphere.

- B. The Permittee shall submit construction drawings, specifications, and CQA plan, suitable for bid submittals, to the Department for review and approval prior to implementation of closure of Landfill 2.
- C. In accordance with 40 CFR 264.112(c), the Permittee must submit a written notification of or request for a permit modification to amend the closure plan approved under this Permit.
- D. The Permittee shall notify the Department in writing at least 60 calendar days prior to the date final closure of Landfill 2 is expected to begin.
- E. The final cover for Landfill 2 shall be constructed as specified in the approved permit application and the design drawings, specifications, and construction QA/QC plan approved by the Department. In accordance with 40 CFR 264.310 and this Permit, the final cover system shall be designed and constructed to:
 - 1. Provide long-term minimization of liquid migration through the closed landfill;
 - 2. Function with minimum maintenance;
 - 3. Promote drainage and minimize erosion or abrasion of the cover;
 - 4. Accommodate settling and subsidence so that the cover's integrity is maintained; and
 - 5. Have a permeability less than or equal to the permeability of any bottom liner system.
- F. In accordance with 40 CFR 264.115, within 60 calendar days of final closure the Permittee shall submit to the Department, by certified mail, a certification that Landfill 2 has been closed in accordance with this Permit and all approved design drawings, plans, and specifications. The certification must be signed by the Permittee and a professional engineer registered in Missouri. Supporting documentation shall be included with the engineer's certification.
- G. In accordance with and as specified in 40 CFR 264.116, and no later than the submission of the certification of the final closure of Landfill 2, the Permittee must submit to the local zoning authority, or the authority with jurisdiction over local land use, and to the Department, a survey plat indicating the location and

dimensions of landfill cells with respect to permanently surveyed benchmarks. The plat filed with the local zoning authority, or the authority with jurisdiction over local land use, must contain a note, prominently displayed, which states the owner's or operator's obligation to restrict disturbance of the hazardous waste disposal unit in accordance with the applicable 40 CFR Part 264 Subpart G regulations. The plat must be prepared and certified by a professional land surveyor registered in Missouri.

- H. In accordance with 10 CSR 25-7.264(2)(G)3 and 4, upon certification of Landfill 2 closure, the Permittee shall record a restriction on an instrument which is normally examined during a title search that in perpetuity will notify potential purchasers of the property that the land has been used to manage hazardous waste. The Permittee shall submit a notarized statement to the Department certifying that the restriction has been recorded with the Holt County Recorder of Deeds. The Permittee shall comply with the Missouri Environmental Covenants Act.

VII. Landfill 1 and Landfill 2 Post-Closure Care [10 CSR 25-7.264(2)(G)]

- A. The Permittee shall comply with all applicable provisions of 40 CFR Part 264 Subpart G, as incorporated in 10 CSR 25-7.264(1) and modified in 10 CSR 25-7.264(2)(G). Post-Closure care for Landfill 1 began November 16, 1992, and, in accordance with 40 CFR 264.117(a)(1), shall continue until November 16, 2022, unless the post-closure care period is modified in accordance with 40 CFR 264.117(a)(2). Post-closure care for Landfill 2 begins after completion of closure of Landfill 2 and continues for 30 years after that date, unless the post-closure care period is modified in accordance with 40 CFR 264.117(a)(2).
- B. During the post-closure care period for Landfill 1 and Landfill 2, the Permittee must comply with the requirements of 40 CFR 264.310 including, but not limited to:
1. Maintaining the integrity and effectiveness of the final cover;
 2. Continuing to operate the LCS as outlined in the approved permit application;
 3. Maintaining and monitoring the LDS and complying with all applicable LDS requirements as outlined in the approved permit application;

4. Maintaining and monitoring the groundwater monitoring system and complying with all applicable requirements of 40 CFR Part 264 Subpart F;
 5. Preventing run-on and runoff from eroding or otherwise damaging the final cover; and
 6. Protecting and maintaining surveyed benchmarks used to comply with 40 CFR 264.309.
- C. Post-closure care shall be conducted in accordance with the post-closure care plan in the approved permit application. The post-closure care plan may be amended, in accordance with 40 CFR 264.118(d), at any time during the active life of the facility or the post-closure period. Amendments are subject to the applicable permit modification requirements of 40 CFR Part 270 Subpart D, 10 CSR 25-7.270(2)(D), and 10 CSR 25-8.124.
- D. After final closure has been certified, the facility contact during the post-closure care period must keep the approved post-closure care plan for the remainder of the post-closure period, as required by 40 CFR 264.118(c).
- E. In accordance with 40 CFR 264.120 and no later than 60 calendar days after the completion of the post-closure care period, the Permittee must submit to the Department, by certified mail, a certification that the post-closure care period was performed in accordance with the approved plan. The certification must be signed by the Permittee and a professional engineer registered in Missouri.
- VIII. Landfill 1 and Landfill 2 Groundwater Monitoring [40 CFR 264.90 - 40 CFR 264.100]
- A. General Groundwater Monitoring Requirements (40 CFR 264.97)
1. The Permittee shall comply with applicable sections of 40 CFR 264.97 for detection monitoring systems, as specified in 40 CFR 264.98 and this Permit. All groundwater Sampling and Analysis Plan (SAP) procedures and techniques used in groundwater sampling, frequency, analysis, and measurement of groundwater-related parameters shall be designed to meet the requirements of 40 CFR Part 264 Subpart F, as incorporated in 10 CSR 25-7.264(1) and modified in 10 CSR 25-7.264(2)(F), and this Permit. The Permittee's sampling, analysis, and measurement protocols shall ensure the representative nature of all analysis and measurement results documents protection of human health and the environment.

2. The Permittee shall submit a final SAP/Quality Assurance Project Plan for the Department's approval within 60 calendar days of the effective date of this Permit to reflect any additional requirements contained in this Permit. The final SAP/Quality Assurance Project Plan shall be revised as necessary to be consistent with groundwater and surface water monitoring permit conditions.
3. The Permittee shall retain a copy of the approved groundwater SAP on-site and comply with the sampling and analysis procedures contained therein to provide a reliable indication of the groundwater quality below Landfill 1 and Landfill 2. The groundwater SAP shall set forth sample collection, preservation and shipment methodology; chain-of-custody procedures; and analytical methodology for field samples, trip blanks, and other quality control samples.
4. If the Permittee or the Department determines that a Point of Compliance (detection monitoring) well is incapable of adequately detecting a release from Landfill 1 or Landfill 2, the Permittee shall redevelop, repair or replace the well prior to the next regularly scheduled sampling event, as appropriate, to meet the requirements of 40 CFR 264.97(a)(3). Criteria and procedures for well redevelopment, repair, and replacement shall be performed in accordance with the Missouri Well Construction Rules, 10 CSR 23-1 through 10 CSR 23-4, and Sections 256.600 – 256.640, RSMo.
5. Any new groundwater monitoring well(s) installed by the Permittee to meet the requirements of this Permit shall be designed and constructed in accordance with the requirements of 40 CFR 264.97, 10 CSR 23-1 through 10 CSR 23-4, Monitoring Well Construction Code of the Missouri Well Construction Rules, and/or well-specific plans and specifications approved by the Department.

The Permittee shall submit to the Department's Hazardous Waste Program a copy of the well certification report form and the resulting certification acceptance required by 10 CSR 23-4.020 for any new monitoring wells installed pursuant to this Permit. This information shall be reported as part of the Annual Groundwater Monitoring Report, as defined in Special Permit Condition VIII.F.

6. Plugging and abandonment of any groundwater monitoring well(s) pursuant to the requirements of this Permit shall meet the requirements of 10 CSR 23-4.080.

The Permittee shall submit to the Department's Hazardous Waste Program a copy of the well registration report form and resulting registration acceptance required by 10 CSR 23-4.080 for any monitoring wells plugged pursuant to this Permit. This information shall be reported as part of the Annual Groundwater Monitoring Report, as defined in Special Permit Condition VIII.F.

7. Any change in the number, location, depth, or design of the Point of Compliance wells monitoring Landfill 1 or Landfill 2 shall require a Class 2 permit modification, in accordance with 40 CFR 270.42. Replacement of any Point of Compliance wells without changing their location, depth, or design shall require a Class 1 permit modification without prior Director approval, in accordance with 40 CFR 270.42. The Permittee may elect to submit an annual permit modification to address these changes in lieu of a modification for each individual change.
8. The Permittee shall contact the Department at least five working days prior to conducting any field work associated with the construction or modification of the groundwater monitoring system required by this Permit. The Department will then have the option to observe any portion of the system's construction or modification. This notification requirement applies to major work such as new wells, retrofitting of existing wells, or abandonment of wells. It does not apply to minor repairs, minor maintenance, or other minor changes.
9. A monitoring well inspection and maintenance program shall be implemented for the duration of groundwater monitoring pursuant to this Permit. This program shall be designed to ensure the structural integrity of all monitoring well installations is adequate to produce reliable monitoring results. The Permittee's groundwater SAP shall address the details of this program in accordance with the following requirements.
 - a. Surface well integrity inspections shall be performed at the time of each sampling event and shall be documented on a well inspection checklist. Surface integrity evaluations for each monitoring well shall include a visual inspection of the outer protective casing,

inner casing riser, surface well seal, well cap, and locking mechanism to document any damage or deterioration. The ground surface in the immediate vicinity of each monitoring well and the annular space between the outer protective casing and casing riser shall be inspected for visible anomalies (e.g., collection or ponding of water, ground subsidence, etc.).

- b. Subsurface well integrity inspections shall be performed annually, in accordance with the provisions contained in the Permittee's groundwater SAP, and shall be documented on a well inspection checklist. Subsurface well integrity inspections may consist of a combination of elements, including total well depth measurements, groundwater turbidity measurements, in situ hydraulic conductivity tests, casing caliper logs, down-hole television camera surveys, and/or other methods capable of verifying the subsurface integrity of the well casing and screen.
- c. Wellbore siltation evaluations shall be conducted on all monitoring wells on an annual basis. The Permittee's groundwater SAP shall specify performance standards for this evaluation to assess down-well siltation and well screen occlusion in all monitoring wells. This requirement shall be designed to ensure the representative nature of the Permittee's groundwater sample, analysis, and field measurement results through minimization of sampling and measurement interferences (e.g., turbidity, excessive well screen occlusion, etc.). The Permittee's groundwater SAP shall specify a well redevelopment trigger criterion based on a percentage of well screen occlusion and the potential of such occlusion to compromise the representative nature of the Permittee's groundwater sample, analysis, and field measurement results. Wells demonstrating well screen occlusion equal to or in excess of the selected criterion (10 percent occlusion) shall be redeveloped prior to the next scheduled sampling event.
- d. Monitoring well repairs shall be undertaken within 30 calendar days of identification of any surface or subsurface well integrity problem. If adverse weather or site conditions preclude the Permittee from gaining access to and/or repairing flood-impacted monitoring wells within the above-noted periods, then the Permittee shall take appropriate action as soon as practicable.

Written justification for any delay, completed well inspection checklists, a narrative description of any well repairs, and before and after photographic documentation (in the case of visible surface well repairs) shall be provided to the Department as part of the Annual Groundwater Monitoring Report, as defined in Special Permit Condition VIII.F.

- B. Detection Monitoring Program (40 CFR 264.98)
1. The Permittee shall determine groundwater quality and elevation on a semi-annual basis, according to the monitoring frequency and required parameters summarized in Table 1.
 - a. Sampling and analysis in accordance with this schedule shall begin during the next regularly scheduled sampling event following the effective date of this Permit.
 - b. Sampling and analysis of groundwater from any new wells required by 40 CFR Part 264 Subpart F and this Permit shall be performed no later than the next regularly scheduled sampling event following their installation.
 2. Only single sample analyses (as opposed to replicates) are required for the parameters listed in Table 1, with the exception of duplicate samples taken for QA/QC purposes.
 3. Field parameter values measured and reported by the Permittee shall be representative of stabilized well conditions.
 4. An evaluation of statistically significant increases in the groundwater monitoring parameters shall be conducted in accordance with the procedures described in the approved SAP.
 5. The Permittee shall initiate procedures, as described in the approved SAP and this Permit, as a response to demonstrated statistically significant increases in the groundwater monitoring parameters.

6. The Permittee shall perform groundwater analyses every five years for the select parameters identified in Table 1, unless triggered sooner due to a statistically significant increase, as outlined in Special Permit Condition VIII.E.

C. Point of Compliance (40 CFR 264.95)

The Point of Compliance is defined as a vertical surface located at the hydraulically down gradient limit of the waste management area that extends down into the uppermost aquifer underlying the regulated units. For the purposes of this Permit, the waste management area is described by an imaginary line circumscribing Landfill 1 and Landfill 2. The Point of Compliance monitoring wells encompass both Landfill 1 and Landfill 2. The Point of Compliance shall consist of the following well clusters: OW-201, OW-202A, OW-203A, OW-204B, OW-205, OW-206, OW-209, OW-210, OW-211, OW-212, and OW-213.

D. Compliance Period (40 CFR 264.96)

A compliance period for Landfill 1 and/or Landfill 2 need not be established unless and until a groundwater compliance monitoring program becomes necessary pursuant to 40 CFR 264.99. If needed, the compliance period will be established via a permit modification pursuant to 40 CFR 270.42.

E. Groundwater Protection Standard, Hazardous Constituents, and Concentration Limits (40 CFR 264.92, 264.93, and 264.94).

1. The Groundwater Protection Standard establishes the maximum concentration limits for hazardous constituents in the groundwater at the Point of Compliance. Statistical evaluation of the groundwater detection monitoring data shall be conducted as described in the approved SAP and shall be performed on all hazardous constituents and indicator parameters outlined in Table 1. The statistical evaluation shall be based on those methods contained in the most recent version of the U.S. Environmental Protection Agency (EPA) guidance document titled Statistical Analysis of Ground-Water Monitoring Data at RCRA Facilities and any subsequent addendum, (the current version is dated April 1989 and the subsequent addenda is dated July 1992) or other methods that are approved in advance by the Department. If the Permittee determines, pursuant to 40 CFR 264.98(g), that there is a statistically significant increase (or decrease in

pH) over background levels for any parameter listed in Table 1 at any Point of Compliance monitoring well(s), the Permittee shall;

- a. Notify the Director in writing within seven calendar days. The notification shall indicate what parameters or constituents have shown statistically significant increases and in which well(s);
 - b. Sample at the affected Point of Compliance well(s) for all detection monitoring parameters, outlined in Table 1, to confirm the increase. The confirmation sampling shall be performed immediately, and in no case exceed 30 calendar days from the date of evidence of a statistically significant increase;
 - c. Compare to established background concentrations for each constituent that has been detected at the compliance point; and
 - d. Submit within 60 calendar days of such determination, a Class 3 permit modification to establish a compliance monitoring program in accordance with 40 CFR 264.99.
2. If the Permittee determines that there is a statistically significant increase (or decrease in pH) over background levels for any parameter listed in Table 1 at any Point of Compliance monitoring well(s), the Permittee may demonstrate that a source other than the regulated unit caused the increase or that the increase resulted from an error in sampling, analysis, or evaluation. While the Permittee may make a demonstration under this paragraph in addition to, or in lieu of, beginning the compliance monitoring program in accordance with Special Permit Condition VIII.E.1.d., the Permittee is not relieved of the requirement to begin a compliance monitoring program within the time specified in Special Permit Condition VIII.E.1.d. unless the demonstration successfully shows that a source other than a regulated unit resulted in the increase or that the increase resulted from an error in sampling, analysis, or evaluation. The Permittee shall complete at least the following requirements for the demonstration under this paragraph to be considered:
- a. Notify the Director in writing, within seven calendar days of determining that a statistically significant increase at the compliance point has occurred, that the Permittee intends to make a demonstration under this paragraph;

- b. Within 90 calendar days, submit a report to the Director which demonstrates that a source other than the regulated unit caused the increase or that the increase resulted from an error in sampling, analysis, or evaluation; and
- c. Continue to monitor in accordance with the detection monitoring program established under Special Permit Condition VIII.B.

F. Groundwater Related Reporting Requirements

The Permittee shall prepare and submit, on an annual basis, a comprehensive evaluation of the facility wide groundwater monitoring program for the preceding calendar year (i.e., January through December). The Annual Groundwater Monitoring Reports and Annual Progress Reports may be submitted as a single report. The Permittee's Annual Groundwater Monitoring Report shall be submitted to the Department and EPA by March 1 of each calendar year for the preceding calendar year and shall include the following:

- 1. A narrative discussion of the nature and evolution of the Permittee's facility wide groundwater monitoring program, as well as conclusions concerning the overall adequacy of the program as related to its intended purpose, including any interim measures/stabilization actions. Any conclusions concerning inadequacies in the Permittee's groundwater monitoring program shall be accompanied by a discussion of proposed remedies. Specific details concerning any proposed remedies should be further developed outside of the scope of these reports and/or as otherwise specified in this Permit;
- 2. Comprehensively address all of the technical requirements of 40 CFR Part 264 Subpart F and this Permit. The Permittee shall summarize relevant groundwater monitoring information and shall present this information in the form of narrative discussions, groundwater flow calculations, and/or diagrammatic illustrations (e.g., tabular groundwater and statistical data summaries, hydrogeologic and potentiometric contour maps/cross-sections, chemical parameter trend graphs, calculated rate(s) of contaminant migration, contaminant isoconcentration maps/cross-sections, fence/isometric diagrams, groundwater flow nets, etc.), as appropriate; and

3. Detailed boring logs for new exploratory borings and/or detailed as-built monitoring well diagrams for any new monitoring wells installed during the corresponding reporting period.

Table 1 - Groundwater Monitoring, Sampling, Analysis, and Parameter Measurement Schedule

Parameters*	Type**	Maximum Detection Limit (ug/l)	Frequency
Antimony	HC	1.0 (a)	***every five years
Arsenic	HC	1.0 (a)	semi-annually
Barium	HC	4.0 (a)	***every five years
Cadmium	HC	1.0 (a)	semi-annually
Chromium	HC	10.0(a)	semi-annually
Copper	IN	4.0 (a)	***every five years
Lead	HC	4.0 (a)	semi-annually
Nickel	HC	4.0 (a)	***every five years
Selenium	HC	4.0 (a)	semi-annually
Silver	HC	4.0 (a)	semi-annually
Cobalt	IN	4.0 (a)	***every five years
Mercury	HC	1.0 (a)	***every five years
Thallium	HC	1.0 (a)	***every five years
Tin	IN	42 (a)	***every five years
Vanadium	IN	10.0 (a)	***every five years
Zinc	IN	10.0 (a)	***every five years
Sulfate	IN	1000.0 (a)	semi-annually
pH	FM/IN	Not Applicable	semi-annually
Specific Conductance	FM/IN	Not Applicable	semi-annually
Static Groundwater Elevation (b)	FM	Not Applicable	semi-annually
Temperature	FM	Not Applicable	semi-annually
Total Well Depth	FM	Not Applicable	annually

- (a) Detection Limit based upon the lowest achievable practical quantitation limit available from the Permittee's contract laboratory.
- (b) Potentiometric measurements shall be obtained at the time of each regularly scheduled sampling event from each sampled well. Elevation shall be to the nearest 0.01 foot.
- * Total Recoverable Metals
- ** HC = Hazardous Constituent, FM = Field Measurement, IN = Indicator
- *** Analysis frequency is every five years unless triggered sooner in selected wells due to a statistically significant increase as outlined in Special Permit Condition VIII.E.

IX. Surface Water Monitoring [10 CSR 25-7.264(2)(F)4]

The Permittee shall implement a surface water monitoring program during the operating life of Landfill 2 and the post-closure care period. This monitoring program shall be conducted in accordance with the regulations as required under 10 CSR 25-7.264(2)(F)4, the approved permit application, and the approved SAP. The Permittee shall submit to the Department's Hazardous Waste Program and EPA a copy of the un-interpreted lab data and a summary of the sampling and analysis activities conducted during each event with the Annual Groundwater Monitoring Reports required by Special Permit Condition VIII.F.

X. Financial Assurance [40 CFR Part 264 Subpart H and 10 CSR 25-7.264(2)(H)]

- A. In accordance with 40 CFR 264.142, the Permittee shall maintain a detailed written estimate, in current dollars, of the cost for implementing closure of the facility. The estimate must be based on the cost of hiring a third party to conduct closure activities. During the active life of the facility, the Permittee must adjust the closure cost estimate for inflation within 60 calendar days prior to the anniversary date of the establishment of the financial instrument(s) used to comply with 40 CFR 264.143 and 10 CSR 25-7.264(2)(H).
- B. In accordance with 40 CFR 264.144, the Permittee shall maintain a detailed written estimate, in current dollars, of the annual cost of post-closure monitoring and maintenance of Landfill 1 and Landfill 2. The estimate must be based on the cost of hiring a third party to conduct these activities. The estimate is calculated by multiplying the annual cost estimate by the number of years of post-closure care required. The post-closure cost estimate for the landfills is included in the approved permit application. During the active life of the facility and throughout the post-closure care period, the Permittee must adjust the post-closure cost estimate for inflation within 60 calendar days prior to the anniversary date of the establishment of the financial instrument(s) used to comply with 40 CFR 264.145 and 10 CSR 25-7.264(2)(H).
- C. The Permittee must comply with the financial requirements of 40 CFR Part 264 Subpart H, as incorporated and modified at 10 CSR 25-7.264(1) and (2)(H), for both closure and post-closure care. The financial assurance instrument(s) for closure and post-closure care shall be based on the cost estimates approved in this Permit and as revised annually for inflation costs, and any subsequent revised cost estimates for amended and approved closure and/or post-closure care plans.

- D. The Permittee must demonstrate financial responsibility for bodily injury and property damage to third parties for sudden and non-sudden accidental occurrences. This liability coverage must be demonstrated in accordance with the requirements of 40 CFR 264.147.

CORRECTIVE ACTION CONDITIONS

I. Identification of Solid Waste Management Units (SWMUs) and Area of Concerns (AOCs) [40 CFR 264.101]

The U.S. Environmental Protection Agency (EPA) conducted a RCRA Facility Assessment, as described in the June 4, 1986, "Site Investigation Report for Schuylkill Metals Corporation, Forest City, Missouri," to identify releases or potential releases from any SWMU or AOC at the facility which would require further investigation. Figure 4 identifies and indicates approximate locations of the SWMUs and AOCs identified at the Exide Technologies-Canon Hollow Recycling Center.

II. Notification Requirements for, and Assessment of, Newly Identified SWMUs and AOCs

- A. The Permittee shall notify the Department and EPA, in writing, no later than 15 calendar days after discovery of any SWMU(s) or AOC(s) identified subsequent to the issuance of this Permit.
- B. The Department may require a SWMU/AOC Assessment Work Plan for conducting an investigation of any newly identified SWMU(s) or AOC(s). Within 30 calendar days after receipt of the Department's request for a SWMU/AOC Assessment Work Plan, the Permittee shall submit a SWMU/AOC Assessment Work Plan to include but not be limited by the following:
 - 1. A discussion of past hazardous waste management practices related to the unit;
 - 2. A detailed investigation approach for groundwater, land surface and subsurface strata, surface water, and air as necessary to:
 - a. Determine if a release has occurred or is occurring at the unit;
 - b. Yield reliable, representative samples and results;
 - c. Determine impacts or potential impacts to human health and the environment; and
 - d. Sufficiently assess all constituents related to the unit;

3. A proposed schedule for implementation of the SWMU/AOC Assessment Work Plan which is predicated on the date of Departmental approval of the plan; and
 4. Identification of all data to be collected necessary to provide for a complete SWMU/AOC Assessment Report, as specified below.
- C. The SWMU/AOC Assessment Work Plan will be reviewed in accordance with the procedures set forth in Review and Approval Procedures, Corrective Action Condition XIV. The Permittee shall complete all activities described in the SWMU/AOC Assessment Work Plan in accordance with the schedule contained in the approved plan.
- D. The Permittee shall submit a SWMU/AOC Assessment Report to the Department and EPA according to the schedule specified in the approved SWMU/AOC Assessment Work Plan. The SWMU/AOC Assessment Report shall present and discuss the information obtained from implementation of the approved SWMU/AOC Assessment Work Plan. At a minimum, the SWMU/AOC Assessment Report shall provide the following information for each newly identified SWMU/AOC:
1. The location of the newly identified SWMU/AOC in relation to other SWMUs/AOCs;
 2. The type and function of the unit;
 3. The general dimensions, capacities, and structural description of the unit;
 4. The period during which the unit was operated;
 5. The physical and chemical properties of all wastes that have been or are being managed at the SWMU/AOC, to the extent possible;
 6. The results of any sampling and analysis conducted;
 7. Past and present operating practices;
 8. Previous uses of the area occupied by the SWMU/AOC;
 9. Amounts of waste handled; and

10. Drainage areas and/or drainage patterns near the SWMU(s)/AOC(s).
- E. The Department will review the SWMU/AOC Assessment Report in accordance with the procedures set forth in Review and Approval Procedures, Corrective Action Condition XIV. Based on the findings of this report, the Department will determine the need for further investigations, including stabilization or a RCRA Facility Investigation (RFI), at specific unit(s) identified in the SWMU/AOC Assessment Report.
 - F. If the Department determines that additional investigations are needed, the Department may require the Permittee to prepare and submit for approval a work plan for such investigations. The Department will review this work plan for additional investigations in accordance with the procedures set forth in Review and Approval Procedures, Corrective Action Condition XIV. The Permittee shall complete all activities described in the work plan in accordance with the schedule contained in the approved plan.
- III. Notification Requirements for, and Assessment of, Newly Identified Releases from Previously Identified SWMUs and AOCs
- A. The Permittee shall notify the Department and EPA, in writing, no later than 15 calendar days after discovery of any newly identified release(s) of hazardous waste, including hazardous constituents from previously identified SWMUs and/or AOCs, discovered during the course of groundwater monitoring, field investigation, environmental auditing, or other activities undertaken after issuance of this Permit.
 - B. The Department may require a Newly Identified Release Work Plan for conducting an investigation of the newly identified release(s). Within 30 calendar days after receipt of notice that the Department requires a Newly Identified Release Work Plan, the Permittee shall submit a Newly Identified Release Work Plan to include, but not be limited by the following:
 1. A discussion of the hazardous wastes management practices related to the release;
 2. A detailed investigation approach for groundwater, land surface and subsurface strata, surface water, and air as necessary to:
 - a. Define the extent of the release area;

- b. Yield reliable, representative samples and results;
 - c. Determine impacts or potential impacts to human health and the environment; and
 - d. Sufficiently assesses all constituents related to the release;
 3. A proposed schedule for implementation of the Newly Identified Release Work Plan which is predicated on the date of Departmental approval of the plan; and
 4. Identification of all data to be collected necessary to provide for a complete Newly Identified Release Report, as specified below.
- C. The Department will review the Newly Identified Release Work Plan in accordance with the procedures set forth in Review and Approval Procedures, Corrective Action Condition XIV. The Permittee shall initiate and complete all activities described in the Newly Identified Release Work Plan in accordance with the schedule contained in the approved plan.
- D. The Permittee shall submit a Newly Identified Release Report to the Department and EPA according to the schedule specified in the approved Newly Identified Release Work Plan. The Newly Identified Release Report shall present and discuss the information obtained during implementation of the approved Newly Identified Release Work Plan. At a minimum, the report shall provide the following information for each newly identified release:
 1. The location of the newly identified release in relation to the SWMU/AOC under investigation and to other SWMU(s)/AOC(s);
 2. The general dimensions of the release;
 3. The period during which the release is suspected to have occurred;
 4. The physical and chemical properties of all wastes that have been determined to comprise the release;
 5. The results of any sampling and analysis conducted;
 6. Past and present operating practices near and at the location of the release;

7. Previous uses of the area(s) occupied near and at the location of the release;
 8. Amounts of waste handled near and at the location of the release; and
 9. Drainage areas and/or drainage patterns near and at the location of the release.
- E. The Department will review the Newly Identified Release Report in accordance with the procedures set forth in Review and Approval Procedures, Corrective Action Condition XIV. Based on the findings of the report and any other available information, the Department will determine the need for further investigation, including stabilization, a RFI, and/or a Corrective Measures Study (CMS).

IV. Interim/Stabilization Measures

- A. If the Permittee becomes aware of a situation that may require interim/stabilization measures to protect human health or the environment, the Permittee shall notify the Department within 24 hours of the time the Permittee becomes aware of the situation.
- B. If, during the course of any activity initiated under this Permit, the Permittee or the Department determines that a release or potential release of hazardous waste, including hazardous constituents, poses a threat to human health or the environment, the Department may require interim/stabilization measures to slow or stop the further spread of contamination until final corrective action measures can be implemented. The Department will determine the specific action(s) that must be taken to implement interim/stabilization measures, including potential permit modifications and a schedule for implementation of any corrective action necessary. The Department will inform the Permittee, in writing, of decisions regarding the action(s). This requirement shall not preclude the Permittee from responding to an emergency situation without direction from the Department.
- C. If, at any time, the Permittee determines that the interim/stabilization measures program is not effectively limiting or stopping the further spread of contamination, the Permittee shall notify the Department, in writing, no later than 10 calendar days after such a determination is made. The Department may require that the interim/stabilization measures program be revised to make it

effective in limiting or stopping the spread of contamination; or that final corrective action measures are required to remediate the contaminated media.

- D. In cases where releases present minimal exposure concerns and/or the remedial solution is straightforward, the Permittee may propose interim/stabilization measures for review and approval by the Department. These interim/stabilization measures shall be consistent with and may supplement and/or satisfy the requirements for a final remedy(s) in specific areas.

V. RCRA Facility Investigation (RFI) Work Plan

The Phase II RFI Work Plan was submitted on October 1, 2001. Comments on the Phase II RFI Work Plan were submitted to the Permittee on June 20, 2008. A revised Phase II RFI Work Plan was submitted May 5, 2009. The Permittee shall initiate and complete implementation of the Phase II RFI Work Plan in accordance with the schedule contained in the approved plan.

- A. If the Department determines that additional investigations are needed, the Department may require the Permittee to prepare and submit for approval a RFI Work Plan. The Permittee shall submit a RFI Work Plan to the Department and EPA within 60 calendar days of the notification of the requirement to prepare a RFI Work Plan. The RFI Work Plan shall be designed to investigate releases of hazardous waste, including hazardous constituents, to all appropriate media of concern including groundwater, land surface and subsurface strata, surface water, and air, as necessary. In order to substantiate future corrective action decisions, the RFI Work Plan shall contain provisions which are sufficient to meet the following objectives and a schedule for implementation of the work plan that is predicated on the date of Departmental approval of the plan:
1. Full characterization of the nature, vertical and horizontal extent, and rate of migration of releases of hazardous waste and/or hazardous constituents from SWMU(s)/AOC(s) at the facility and the actual or potential receptors of such releases; and
 2. Collection of any other pertinent data that may be utilized to substantiate future corrective action decisions.
- B. The RFI Work Plan shall be appropriate for site-specific conditions and shall be consistent with and address all applicable investigation elements described in the most recent version (currently May 1989) of the EPA guidance document entitled,

RCRA Facility Investigation Guidance; EPA 530/SW-89-031. At a minimum, the RFI Work Plan shall detail all proposed activities and procedures to be conducted at the facility, a description of current conditions, the schedule for implementing and completing such investigations, and for submission of reports (including the final RFI Report), the qualifications of personnel performing or directing the investigations, including contractor personnel, and the overall management of the RFI.

- C. The RFI Work Plan shall include a Quality Assurance Project Plan (QAPP). The QAPP shall present the policies, organization, objectives, functional activities, and specific quality assurance and quality control activities designed to achieve the data quality goals of the RFI. It shall include, at a minimum, the RFI objectives, sampling procedures, analytical methods, field and laboratory quality control samples, chain-of-custody procedures and data review, validation, and reporting procedures. The Permittee shall follow EPA Requirements for Quality Assurance Project Plans for Environmental Data Operations, EPA QA/R-5, March 2001 (reissued May 2006) or the most current version.
- D. The Permittee shall prepare and maintain a Health and Safety Plan during the project that assures the RFI activities are conducted in a manner that is protective of human health and the environment.
- E. Due to the complexity of defining the extent of contamination, the Permittee may be required to use a phased approach that requires the submittal of supplemental RFI Work Plans.
- F. The Department will review the RFI Work Plan(s) in accordance with the procedures set forth in Review and Approval Procedures, Corrective Action Condition XIV. The Permittee shall complete implementation in accordance with the schedules contained in the approved plan(s).

VI. RCRA Facility Investigation (RFI) Report

A RFI Report was submitted as Section 13 in the August 31, 1998, Permit Application. Section 13 is considered equivalent to a Phase I RFI Report. The following facility investigation documents are considered the Phase I RFI Report:

- Groundwater Characterization and Data Collection QA Plans, dated October 23, 1990.

- Soil Characterization Plan, dated November 14, 1990.
- Surface Water and Sediment Characterization Plan, dated December 14, 1990.
- Surface Water and Sediment Characterization Plan, dated March 24, 1991.
- Groundwater Characterization Plan, dated April 29, 1991.
- Sediment Characterization Study, dated June 4, 1992.
- Groundwater Level Survey and Monitoring Well Inspection Report, dated July 27, 1992.
- Groundwater Level Survey and Monitoring Well Inspection Report-Addendum No. 1, dated August 1992.
- Surface Water and Sediment Characterization Final Report, dated August 14, 1992.
- Soil Characterization Report, dated March 25, 1993.
- Groundwater Characterization Report, dated September 29, 1993.
- Storm Water Characterization Report, dated April 22, 1994.
- Soil Characterization Report, dated April 22, 1994.
- Groundwater Characterization Report, dated April 14, 1995.

The Permittee shall submit a final RFI Report to the Department and EPA that summarizes all work completed in accordance with the approved Phase II RFI Work Plan and all information contained in prior RFI Reports, including the Phase I RFI Report as outlined above.

The following conditions apply to all RFI Reports submitted to the Department and EPA, including the final RFI Report as outlined above.

- A. The Permittee shall submit a RFI Report to the Department and EPA according to the schedule contained in the approved RFI Work Plan set forth in Corrective

Action Condition V. The RFI Report shall present all information gathered under the approved RFI Work Plan along with a brief facility description and map showing the property boundary and all SWMUs/AOCs. The RFI Report must contain adequate information to support further corrective action decisions at the facility. Information contained in the RFI Report shall be presented in a format that is consistent with Section 5 of the most recent version (currently May 1989) of the EPA Publication entitled, RCRA Facility Investigation Guidance: EPA530/SW-89-031.

- B. The RFI Report shall provide an interpretation of the RFI information gathered, supported with documentation, to enable the Department to determine whether additional stabilization and/or a CMS may be necessary.

The RFI Report shall describe the procedures, methods, and results of all investigations of SWMUs/AOCs and associated releases, including, but not limited to, the following, as appropriate:

1. Characterization of the nature, concentration(s), horizontal and vertical extent, and direction/rate of migration of releases from SWMUs/AOCs at the facility;
2. Characterization of the environmental setting of the facility, including:
 - a. Hydrogeological conditions;
 - b. Climatological conditions;
 - c. Soil and bedrock characteristics;
 - d. Surface water and sediment quality; and
 - e. Air quality and meteorological conditions.
3. Characterization of SWMUs/AOCs from which releases have been or may be occurring, including unit and waste characteristics;
4. Descriptions of human and environmental receptors and associated risks to the receptors which are, may have been, or, based on site-specific circumstances, could be exposed to release(s) from SWMUs/AOCs;

5. Assessment of potential risks to the human and environmental receptors exposed to release(s) from SWMUs/AOCs;
 6. Extrapolations of future contaminant migration including description of contaminant fate and transport mechanisms, and pathways for human and/or environmental exposure;
 7. Statistical analyses to aid in the interpretation of data;
 8. Results of any interim/stabilization measures previously implemented; and
 9. Evaluation of data quality which may affect the nature and scope of a CMS as well as the evaluation of corrective measures alternatives thereunder (e.g., identification of any potential bias in the RFI data and documentation of its precision, accuracy, representativeness, completeness, comparability, validation, etc.)
- C. The Department will review the RFI Report in accordance with the procedures set forth in Review and Approval Procedures, Corrective Action Condition XIV. After review of the RFI Report, if the Department determines that the objectives of the RFI have not been met, the Department may require additional investigation. Upon approval of the RFI Report by the Department, the Department shall advise the Permittee as to the next step in the corrective action process that may include submittal of a CMS Work Plan pursuant to Corrective Action Condition VII.

VII. Corrective Measures Study (CMS) Work Plan

- A. If the Department determines that there has been a release of hazardous waste and/or hazardous constituents from a SWMU and/or AOC that may present a threat to human health or the environment, the Department may require a CMS Work Plan and will notify the Permittee in writing of this decision. This notice will identify the hazardous constituent(s) of concern and may specify remedial alternatives to be evaluated by the Permittee during the CMS Work Plan.
- B. As part of the CMS, the Department may require the Permittee to evaluate one or more specific potential remedies. These remedies may include a specific technology or combination of technologies that, in the Department's judgment, may be capable of achieving standards for protection of human health and the environment.

- C. The Permittee shall submit a CMS Work Plan to the Department and EPA within 45 calendar days of notification of the requirement to conduct a CMS. The CMS Work Plan shall be consistent with guidance contained in the EPA document entitled, RCRA Corrective Action Plan (Final), May 1994, OSWER Directive 9902.3-2A. At a minimum, the CMS Work Plan shall provide the following information and a schedule for implementation of the work plan which is predicated on the date of Department approval of the plan:
1. A description of the general approach to investigating and evaluating potential remedies;
 2. A definition of the specific objectives of the study;
 3. A description of the remedies which will be studied;
 4. A description of those potential remedies that were preliminarily considered, but were dropped from further consideration including the rationale for elimination;
 5. The specific plans for evaluating remedies to ensure compliance with remedy standards;
 6. The schedules for conducting the study and submitting a CMS Report;
 7. The proposed format for the presentation of information; and
 8. Laboratory, bench-scale, pilot-scale and/or appropriate tests or studies to determine the feasibility or effectiveness of treatment technologies, or other technologies that may be appropriate in implementing remedies at the facility.
- D. The Department will review any CMS Work Plan required by this Permit in accordance with the procedures set forth in Review and Approval Procedures, Corrective Action Condition XIV. The Permittee shall initiate implementation of the plan and complete implementation in accordance with the schedule contained in the approved plan.

VIII. Corrective Measures Study (CMS) Report

- A. The Permittee shall submit a CMS Report to the Department and EPA according to the schedule contained in the approved CMS Work Plan. The CMS Report shall present all information gathered under the approved CMS Work Plan and shall be consistent with guidance contained in the EPA document entitled, RCRA Corrective Action Plan (Final), May 1994, OSWER Directive 9902.3-2A. The CMS Report shall summarize the results of the investigations for each remedy studied and any bench-scale or pilot tests conducted. The CMS Report shall include, but not be limited to, the following information:
1. Evaluation of performance, reliability, ease of implementation, and potential impacts of each remedy studied, including safety impacts, cross media impacts, and control of exposure to any residual contamination;
 2. Assessment of the effectiveness of each remedy in achieving adequate control of sources and clean up of the hazardous waste or hazardous constituents released from the SWMU(s)/AOC(s);
 3. Assessment of the time required to begin and complete each remedy;
 4. Estimation of the costs of implementing each remedy;
 5. Recommendation of a final remedy, or combination thereof, and rationale for selection; and
 6. Assessments of institutional requirements, such as state or local permits that may be needed, discussion of other environmental or public health requirements or institutional controls (e.g., local ordinances) that may substantially affect implementation of the final remedy and/or a draft of any site-specific institutional controls (e.g., an environmental covenant prepared pursuant to the Missouri Environmental Covenants Act) that are proposed as part of a final remedy.
- B. The CMS Report shall contain adequate information to support the Department in the remedy approval decision-making process.
- C. The Department will review the CMS Report in accordance with the procedures set forth in Review and Approval Procedures, Corrective Action Condition XIV.

Upon Departmental approval of the CMS Report, the Department may approve a final remedy as specified in Corrective Action Condition IX.

IX. Final Remedy

Following the approval of the CMS Report or equivalent, the Department will prepare a Statement of Basis (SB) summarizing the corrective measures alternatives that were evaluated by the Permittee, including the Department's basis of support for the proposed final remedy. Following the Department's preparation of the Statement of Basis, a permit modification will be initiated pursuant to 40 CFR 270.41 or 270.42(c), as applicable, to facilitate public review and comment on the Statement of Basis and proposed final remedy and, thereafter, final remedy approval by the Department and implementation of the approved final remedy by the Permittee. In accordance with 40 CFR 270.41, this Permit will be modified by the Department to require the Permittee to provide assurances of financial responsibility for completing corrective action, in accordance with 40 CFR 264.101(b). Upon completion of the public participation activities associated with the permit modification to implement the proposed final remedy, the Department will approve a final remedy that will: 1) be protective of human health and the environment; 2) control and/or eliminate the source(s) of contaminants so as to reduce or eliminate, to the maximum extent practicable, further contaminant releases, exposures or migration that may pose a threat to human health and the environment; and 3) meet all applicable federal, state, and local laws and regulations.

X. Activity and Use Limitations (AULs)

- A. The Permittee shall notify the Department before any construction or excavation activities that would disturb existing contamination at any SWMUs or other areas subject to AULs. This requirement will ensure that necessary precautions are taken when disturbing or exposing any contaminated environmental media at the facility. Future construction, excavation activities, or land use changes may necessitate further evaluation of site conditions at SWMUs with residual levels of contamination above corresponding regulatory thresholds.
- B. Before conveyance of any property at the facility, or transfer of custody or control of any real property, that is currently under control of this Permit, the Permittee shall submit a permit modification in accordance with 40 CFR 270.40 and incorporate such other requirements as necessary to continue the AULs engineering and institutional controls, as well as ongoing remediation and corrective action.

- C. The Permittee shall comply with the Missouri Environmental Covenants Act.

XI. Annual Progress Reports

- A. The Permittee shall submit to the Department and EPA, signed Annual Progress Reports summarizing all permitted corrective action activities undertaken during each calendar year. Each Annual Progress Report shall be due to the Department by March 1 of each calendar year for the preceding calendar year. The Annual Groundwater Monitoring Reports and Annual Progress Reports may be submitted as a single report.

The Annual Progress Reports shall continue to be submitted until such time as the Permittee's corrective action activities (including any long-term operation, maintenance and monitoring activities) are complete. The Annual Progress Reports shall include the following information for the time period being reported:

1. A description of the work completed;
 2. Summaries of all findings, including summaries of laboratory data;
 3. Summaries of all problems or potential problems encountered during the reporting period and actions taken to rectify problems;
 4. Projected work for the next reporting period; and
 5. Any instances of noncompliance with the corrective action requirements of this Permit not otherwise required to be reported elsewhere in this Permit.
- B. If the Department determines that further corrective action is required pursuant to Corrective Action Conditions II. through X., the frequency of submittal of progress reports may increase. If an increase in reporting frequency is necessary, the Department will provide written notification of the new reporting frequency to the Permittee.

As part of any additional corrective action activities undertaken pursuant to this Permit, detailed technical information required to be submitted as part of interim/stabilization measures, RFI and/or CMS reports and work plans need not be reproduced as part of the Permittee's Progress Reports.

- C. Copies of other reports (e.g., inspection reports), information, or data shall be made available to the Department and EPA upon request.

XII. Supplemental Data

All un-interpreted data, such as laboratory reports, drilling logs, bench-scale or pilot study data, and other supporting information gathered or generated during activities undertaken pursuant to this Permit shall be maintained by the Permittee during the term of this Permit, including the term of any reissued permits.

XIII. Corrective Action Cost Estimates and Financial Assurance

- A. Within 120 days after this Permit has been modified to include a final remedy, the Permittee shall demonstrate continuous compliance with the financial assurance requirements in effect at that time for corrective action being performed under state law. The effective financial assurance requirements for corrective action shall be consistent with and/or substantially equivalent to that specified in 40 CFR Part 264 Subpart H, as incorporated by reference in 10 CSR 25-7.264. The amount of financial assurance shall be based on the Permittee's cost estimate for the approved final remedy as contained in the approved CMS Final Report or equivalent.
- B. Annually, within 60 days before the anniversary date of the establishment of the financial assurance instrument, the Permittee shall adjust the corrective action cost estimate to account for inflation in accordance with 40 CFR 264.142(b) and any other changes in the costs associated with the implementation, operation, maintenance, and monitoring of the approved final remedy. If the cost estimate increases, documentation of adequate financial assurance for that increase shall be submitted to the Department within 60 days after the increase in the cost estimate.

XIV. Review and Approval Procedures

- A. Following submission of any plan or report pertaining to corrective action activities (excluding the Annual Groundwater Monitoring Reports and Annual Progress Reports), the Department will review and either approve or comment on the plan or report in writing. If the Department does not approve the plan or report, the Department will notify the Permittee, in writing, of the plan or report's deficiencies and specify a due date for submittal of a revised plan or report.

- B. If the Department does not approve the revised plan or report, the Department may modify the plan or report and notify the Permittee of the modifications. The plan or report as modified by the Department is the approved plan or report.
- C. If the Permittee disagrees with any Department-initiated plan or report modifications, and a mutually acceptable resolution of such modifications cannot be informally reached, the Permittee may file any appeal of the Department-initiated modifications in accordance with 10 CSR 25-2.020 and Sections 260.395.11 and 621.250, RSMo.
- D. Should the Permittee require additional time to submit a scheduled document or perform other activities required by this Permit, the Permittee shall provide a written extension request to the Department at least 15 calendar days prior to the scheduled due date of the document or activity. The Permittee's extension request shall specify the amount of additional time requested and shall be accompanied by the Permittee's justification for the extension. Review and approval of extension requests shall be in accordance with this Permit condition.

FACILITY SUBMISSION SUMMARY

**Table 2 – Planned Submittal Requirements
 Pursuant to this Permit and Schedule of Compliance**

Submittal Requirements	Due Date	Permit Condition
Submit two copies of the consolidated permit application.	Within 60 calendar days of effective date of Permit.	Schedule of Compliance Item I.A.
Submit certification that Permittee has read and understands this Permit.	Within 60 calendar days of effective date of Permit.	Schedule of Compliance Item I.B.
Submit a check or money order for any outstanding engineering review costs.	Within 60 calendar days of effective date of Permit.	Schedule of Compliance Item I.C.
Submit a check or money order for each year this Permit is to be in effect beyond the first year.	Within 60 calendar days of effective date of Permit.	Schedule of Compliance Item I.D.
Submit final SAP/QAPP.	Within 60 calendar days of effective date of Permit.	Schedule of Compliance Item I.E.
Notify the Department, excavate contaminated soils, and conduct confirmatory sampling.	Prior to construction of the Proposed Battery Storage Building.	Schedule of Compliance Item II.
Update financial assurance and submit notification to the Director.	Prior to utilizing the Proposed Battery Storage Building.	Schedule of Compliance Item III.
Submit complete set of bid drawings, specifications, and CQA for Phase II of Landfill 2.	Prior to construction of Phase II of Landfill 2.	Schedule of Compliance Item IV.a.
Submit notification of the intent to begin construction of Phase II of Landfill 2.	Fifteen calendar days prior to initiating construction of Phase II of Landfill 2.	Schedule of Compliance Item IV.b.
Submit required documents and notify the Department.	Prior to utilizing Phase II of Landfill 2.	Schedule of Compliance Item VI.
Biennial Report with information required by 40 CFR 264.75.	March 1 of each even numbered calendar year.	General Permit Condition I.
RCRA Facility Investigation (RFI) Report	According to the schedule in the approved RFI Work Plan.	Corrective Action Condition VI.A.
Annual Groundwater Monitoring Report.	March 1 of each calendar year.	Special Permit Condition VIII.F.
Annual Progress Report.	March 1 of each calendar year.	Corrective Action Condition XI.

Table 3 – Summary of the Corrective Action Submittal Requirements Pursuant to the Contingent Corrective Action Conditions of this Permit

Contingent Submittal Requirements	Due Date	Corrective Action Condition
Written Notification of Newly Identified SWMU(s) and AOC(s)	No later than 15 calendar days after discovery.	II.A.
SWMU/AOC Assessment Work Plan	Within 30 calendar days of notice by the Department that a work plan is required.	II.B.
SWMU/AOC Assessment Report	According to the schedule in the Assessment Work Plan.	II.D.
Written Notification of Newly Identified Releases from SWMU(s) and AOC(s)	No later than 15 calendar days after discovery.	III.A.
Newly Identified Release Work Plan	Within 30 calendar days of notice by the Department that a work plan is required.	III.B.
Newly Identified Release Report	According to the schedule in the approved Newly Identified Release Work Plan.	III.D.
Stabilization Notification	Within 24 hours of discovery of need for stabilization.	IV.A.
RCRA Facility Investigation (RFI) Work Plan	Within 60 calendar days of notice by the Department that a work plan is required.	V.A.
RCRA Facility Investigation (RFI) Report	According to the schedule in the approved RFI Work Plan.	VI.A.
Corrective Measures Study (CMS) Work Plan	Within 45 calendar days of notice by the Department that a work plan is required.	VII.A.
Corrective Measures Study (CMS) Report	According to the schedule in the approved CMS Work Plan.	VIII.A.

Figure 1 – Location of the Exide Technologies Facility

**Figure not available due to size.
Please see hard copy.**

Figure 2 – Permitted Hazardous Waste Storage, Treatment and Containment Building Areas

**Figure not available due to size.
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Figure 3 – Location of Landfill 1 and Landfill 2

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Figure 4 – Location of Solid Waste Management Units and Areas of Concern

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