



Jeremiah W. (Jay) Nixon, Governor

Sara Parker Pauley, Director

DEPARTMENT OF NATURAL RESOURCES

dnr.mo.gov

May 16, 2014

CERTIFIED MAIL – 7004 1160 0000 8177 7405
RETURN RECEIPT REQUESTED

Gregory G. Haug, P.E.
General Manager
Green America Recycling, LLC
10107 Highway 79
Hannibal, MO 63401

RE: Class 1 Permit Modification with Prior Director's Approval
Updates to Container Storage Area #1, Container Storage Area #5
Containment Systems, and Contingency Plan
Green America Recycling, LLC, Hannibal, Missouri
EPA ID# MOD054018288

Dear Mr. Haug:

The Missouri Department of Natural Resources (DNR) hereby approves Green America Recycling, LLC's (GAR) Class 1 Permit Modification request, dated March 18, 2014, without changes, conditions, or comments. The modification request contained four separate parts described below:

1. Changes to the type of waste permitted to be stored in Container Storage Area (CSA) #1
This requested change was from being able to store any waste in containers in CSA #1 to only being able to store solid waste in containers in this area. The purpose of this requested change was to eliminate the need to maintain the epoxy coating in this area. GAR noted having repeated problems with keeping the coating intact due to heavy equipment usage in this area.

This modification is considered a Class 1 Permit Modification with prior director approval according to Appendix I, A.8 of Code of Federal Regulations 40 CFR 270.42 since storing liquid waste in containers in CSA #1 will no longer be allowed.

2. Removal of the gates around CSA #5
Gates (i.e., movable cattle gates/fences) surrounding the CSA #5 were originally installed to serve as security measure to the waste contained in this area. Currently, GAR has 24-hour security at the main gate of the facility, restricted areas of the property are surrounded by a 6 foot tall chain linked fence, security cameras have been placed on the property, and the facility operates 24 hours a day, seven days a week. Therefore, these gates are no longer needed as a security measure around CSA #5, considering the current security measures for the facility. The approval for the removal of the gates is considered a Class 1 Permit Modification with prior director approval according to Appendix I, A.8 of 40 CFR 270.42.



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3. Changes to the Containment Systems

The requested change was to add language to the permit regarding the condition of the tank/container containment systems. The new proposed language would require that “if cracks and gaps occur in the containment systems, (then) they must be filled immediately with caulk, epoxy or other appropriate coating material to seal the defects.” The DNR interprets the term “immediately” to mean “as soon as practical” for this modification approval.

Modification of this nature would normally be considered a Class 1 Permit Modification without prior director approval according to Appendix I., A.4.a of 40 CFR 270.42. since the request would provide for more frequent maintenance of the containment systems. However, since this request was included as part of this Class 1 Permit Modification with prior director approval, it will be approved as such.

4. Updates to the facility emergency coordinators in the contingency plan

Modifications of this type normally would be considered a Class 1 Permit Modification without prior director approval according to Appendix I., B.6.d of 40 CFR 270.42. However, since this request was included as part of this Class 1 Permit Modification with prior director approval, it will be approved as such.

GAR must send a notice of this modification to everyone on their facility mailing list and the appropriate units of state and local government within 90 calendar days after the date of this letter, as outlined in Code of State Regulations 10 CSR 25-7.270(1), 10 CSR 25-7.270(2)(A)6, and 10 CSR 25-7.270(2)(B)10, which incorporates and modifies 40 CFR 270.42(a)(1)(ii). GAR must send a copy of the notice to the DNR.

If you have questions regarding this letter, please contact Mr. Dustin Thoenen, Project Manager, of my staff at the Missouri Department of Natural Resources, Hazardous Waste Program, P.O. Box 176, Jefferson City, MO 65102-0176, by telephone at (573) 751-3553 or 1-800-361-4827, or by e-mail at dustin.thoenen@dnr.mo.gov. Thank you.

Sincerely,

HAZARDOUS WASTE PROGRAM

[Original signed by Richard A. Nussbaum]

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

RAN:dtm

c: Ken Herstowski, P.E., Project Manager, U.S. EPA Region 7
Mr. Travis Woodward, Director of Sustainable Operations, Green America Recycling, LLC
Northeast Regional Office, Missouri Department of Natural Resources