



Jeremiah W. (Jay) Nixon, Governor

Sara Parker Pauley, Director

DEPARTMENT OF NATURAL RESOURCES

dnr.mo.gov

January 28, 2016

Ms. Talya Mayfield
Environmental Technician
Green America Recycling, LLC/
Continental Cement Company, LLC
10107 Hwy 79
Hannibal, MO 63401

RE: Class 1 Permit Modification Without Prior Director's Approval
Updates to Operating Limits Due to a Recent Comprehensive Performance Test
Green America Recycling, LLC/Continental Cement Company, LLC
EPA ID# MOD054018288

Dear Ms. Mayfield:

The Missouri Department of Natural Resources (Department) received Green America Recycling, LLC/Continental Cement Company, LLC's (GAR/CCC) Class 1 Permit Modification request, dated September 28, 2015. The modification request was to update the operating limits contained in Table V - Summary of Limits by Operating Mode in GAR/CCC's Missouri Hazardous Waste Management Facility Part I Permit issued on October 14, 1999, and as modified on March 19, 2013. The limits listed in Table V were established during the Comprehensive Performance Testing and were modified in the subsequent Notification of Compliance documentation, received July 16, 2015, in accordance with the requirements of Code of Federal Regulations 40 CFR Part 63 Subpart EEE. These limits are the on/off triggers for the Automatic Waste Feed Cut-Off mechanism controlling the feed of solid and liquid waste-derived material to the Gasification Unit (Miscellaneous Subpart X Treatment Unit).

The Department agrees with GAR/CCC that this is a Class 1 Permit Modification; however, the Department believes this modification does not require prior Director's approval, as stated in your September 28, 2015 request. The Department interprets the request as an informational change and has reviewed the modification according to the Code of State Regulations 10 CSR 25-7.270(1), which incorporates 40 CFR 270.42 Appendix I, A.I.

GAR/CCC sent a notice of the modification to everyone on their facility mailing list and the appropriate units of state and local government within 90 calendar days after the change was put

Ms. Talya Mayfield
Page 2

into effect, according to 10 CSR 25-7.270(1), which incorporates 40 CFR 270.42(a)(1)(ii). On January 28, 2016, the Department received a copy of the notice, dated October 26, 2015.

If you have questions regarding this letter, please contact Maria Bonney, P.E., of my staff at the Missouri Department of Natural Resources, 7545 South Lindbergh Boulevard, Suite 210, St. Louis, MO 63125-4839, by telephone at (314) 416-6205 or by e-mail at maria.bonney@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:bfm

c: Ken Herstowski, P.E., Project Manager, U.S. EPA Region 7
Mr. Matt Nelson, Facility Manager, Green America Recycling, LLC/Continental Cement
Company, LLC
Northeast Regional Office, Missouri Department of Natural Resources