Return Receipt: 70130600000048616512
70130600000048616550

February 14, 2020

Ms. Jillian Hunt
Missouri Department of Natural Resources
Hazardous Waste Program
1730 Elm Street (lower level)
Jefferson City, MO 65102

RE: Green America Recycling, LLC/Continental Cement Company, LLC
Facility ID#: MOD054018288
MO ID#: 002430
Class 2 Permit Modification Request

Dear Ms. Hunt:

Green America Recycling, LLC (GAR) and Continental Cement Company, LLC (CCC), located in Hannibal, Missouri, are requesting a modification to the facility's RCRA Hazardous Waste Management Permit (MOD054018288). GAR intends to make the following changes to the operations at the facility that deal with hazardous waste management:

1. Expand the size and storage capacity of Container Storage Area #4 (CSA #4);
2. Add two (2) permitted truck unloading areas each with two (2) 6,000 gallon tankers for a total of 24,000 gallons of storage; and
3. Replace the existing hydropulper in Feed Prep #2 with a similar system that includes the ability to tip two drums at a time into the hydropulper unit.

Based on our previous discussions with MDNR, these changes qualify as Class 2 modifications as defined in 40 CFR § 270.42(b) since the increase in container storage and treatment capacity is each less than a 25% site increase. The current permitted container storage capacity for the site is 817,250 gallons. The expansion of CSA #4 will increase the permitted capacity of CSA #4 by 72,910 gallons (proposed total 204,160 gal - existing 131,250 gal), plus the addition of 24,000 gallons of tanker storage in the Direct Burn pads results in an 11.9% increase in container storage capacity, well within the 25% limit for a Class 2 modification. The new drum augering system will increase the Feed Prep #2's 470 short tons per day permitted capacity to 587 short tons per day, less than the 25% Class 3 modification threshold.

CSA #4 Expansion

The existing CSA #4 will be enlarged by adding an L-shaped expansion around the northwest corner of the building, all within the expanded CSA #4 building. See attached Drawings 1382-GA-115 and 1382-SC-101 for dimensions and containment details. The proposed pallet layout within the room is shown in attached Drawing 1382-GA-116.

The CSA #4 extension will also be underlaid by a synthetic liner system like that in the existing building. The central containment trench in the building (running north-south) will be extended to the northern addition, and the western addition's floor will continue the upward slope of the existing western half. An expanded door opening is included in the southern wall to allow two-way forklift traffic between CSA #4 and Feed Prep #2No rainfall allowance is required since the area will be totally within the building. The secondary containment calculations are shown in Table 1.

A leak detection system will be installed between the concrete floor and the underlying liner to ensure that leaks do not impact soil or groundwater. A slotted pipe will be positioned beneath the central trench in the northern extension, with the capped pipe extending through the foundation wall. The pipe will be periodically inspected to ensure that contaminants are not present.

The new extension will be protected by an expansion of the fire-fighting foam protection system that is currently in CSA #4. Double stacking of containers in CSA #4 will be controlled by the conditions identified in the Part I Hazardous Waste Management Permit.

Direct Burn Truck Unloading Pads

The facility is currently permitted to burn hazardous waste fuels in the kiln system, including in the pre-calciner and in the rotary kiln. In addition, Part II of the existing Hazardous Waste Management Permit allows use of direct transfer to the kiln system.

GAR is proposing to install two unloading pads along the west side of the rotary kiln in order to facilitate feeding wastes to the pre-calciner and the rotary kiln without the need to offload the trucks into the tank system and feeding the fuel from there. See Drawing GA, General Arrangement for a plan and section view of the proposed units.

Each unloading pad will provide adequate secondary containment for two (2) 6,000-gallon tankers (four total) based on the largest container volume. A rainfall allowance is included since the pads are not under roof.

See Table 2 for the secondary containment calculations including allowance for 5.29 inches of precipitation from a 24-hour, 25-year frequency rain event.

Drum Augering System Replacement

A new drum augering system will be installed in Feed Prep #2, replacing the existing system. The new system will be built next to the existing system, allowing for continued drum processing during construction, but the existing system will be removed from service prior to startup of the new system. The new system consists of a similarly sized hydropulper tank with a drum tipping system that is capable of processing two drums at a time. The new system will be permitted for 587 short tons per day treatment. Images of the new hydropulper and drum tipper system are included in Drawing S1, Drum Augering Rendering.

The drum augering system is located within Feed Prep #2 so the existing secondary containment for the room will continue to provide adequate containment for the operations.

The existing drum augering system that is being removed from service will be RCRA-closed after the new system is operational.

Impacts on Part A form

A modified Hazardous Waste Permit Information Part A Form is included with this submission, updating the Section 7 information to increase line 2 and line 9 permitted capacities for the Container Storage and Drum Decanting systems, respectively.

Impacts on Waste Analysis Plan (WAP)

Incorporation of these changes will not impact the Waste Analysis since no new wastes or waste codes will be received.

Impacts on Security

The changes to the operations in CSA #4 and Feed Prep #2 will continue to provide security within controlled access buildings. All gates and doors are kept secured when the facility is not in operation.

A six (6) foot high chain link fence will be provided around the direct burn unloading pads, like other restricted areas of the plant which are not in completely enclosed buildings.

Impacts on Inspection Plan

The existing inspection schedules identified in Tables 4-4 and 4-3 of the existing (2009) application continue to be applicable to the CSA #4 expansion and Feed Prep #2 drum augering system operations, respectively. The existing Table 4-1 in the current application addresses the inspection requirements for the Direct Burn Feed System. No changes are required to these sections.

Impacts on Training Plan

No changes are expected to the existing applications Training Plan. No new operations are required.

Impacts on Contingency Plan

The Contingency Plan does not need to be modified to address these changes; all systems are addressed in the current Plan.

Impacts on Closure Plan

The increased area and waste storage volume in CSA #4 will cause an increase in closure costs for this waste management unit. The following table summarizes those additional costs based on 2010 costs since the unit costs were developed in 2010. The additional inventory was divided between solid and liquid material in the same basis as the current closure cost estimate, and the bases for the calculations are the same.

Transportation & Disposal Estimates – CSA #4					
Waste Management Unit	Additional Permitted amount	Unit of Measure	Cost for T&D	Unit of Measure	Total T&D Cost
CSA #4 Expansion	72,910	Gallons			
• Liquid Matl.	47,673	Gallons	$0.40	$/Gallons	$19,069
• Solid Matl.	122,512	Pounds	$0.44	$/Pounds	$53,905
Total Disposal Costs					$72,974
Labor Costs			$10,999		

Decontamination/Disassembly/Loading/Reclamation Cost Estimates – CSA #4					
Waste Management Unit	Dimensions	Surface Area	Gallons Rinsate Generated	Cost for T&D	Total T&D Cost
Secondary Cont. Area Decon	118'x50' 35'x70.7'	8,375	838	$1.89	$1,583
Sampling Eqpt. Decon Fluids			50	$1.89	$95
Total T&D Decon Fluid Disposal					$1,677
			Costs		
Labor Costs			$2,400		
Other Costs			$300		

Sampling & Analytical Costs – CSA #4					
Waste Management Unit	# Rinsate Samples	# Soil Samples	Analytical Testing Cost	Labor Costs	Total Sampling & Analytical Costs
Decon	1	3	$3,674		
Background (QA/QC)	1		$935		
Labor				$500	
					$5,109

CSA #4 Extension Additional Closure Cost Estimate Total: $93,460 (2010$)

Transportation & Disposal Estimates – Direct Burn Truck Pads					
Waste Management Unit	Additional Permitted amount	Unit of Measure	Cost for T&D	Unit of Measure	Total T&D Cost
Direct Burn Pads	24,000	Gallons	$0.40	$/Gallons	$9,600
Labor Costs			$3,620		

Decontamination/Disassembly/Loading/Reclamation Cost Estimates – Direct Burn Truck Pads					
Waste Management Unit	Dimensions	Surface Area (ft^2)	Gallons Rinsate Generated	Cost for T&D	Total T&D Cost
Secondary Cont. Area Decon	47.7'x27' x2	2,576	258	$1.89	$487
Sampling Eqpt. Decon Fluids			25	$1.89	$47
Total T&D Decon Fluid Disposal					$534
			Costs		
Labor Costs			$1,200		
Other Costs			$300		

Sampling & Analytical Costs – Direct Burn Truck Pads					
Waste Management Unit	# Rinsate Samples	# Soil Samples	Analytical Testing Cost	Labor Costs	Total Sampling & Analytical Costs
Decon	2	4	$5,511		
Background (QA/QC)	1		$935		
Labor				$750	
					$7,196

Direct Burn Pads Additional Closure Cost Estimate Total: $22,450 (2010$)

Replacing the Drum augering system with a similar system will not cause the closure cost estimate for this operation to change. There will be no change in the amount of inventory that requires disposal, or in the costs to decontaminate the equipment or the Feed Prep #2 room.

The following table summarizes the expected changes to the existing Closure Cost estimate, adjusted for current costs of inflation.

Adjusted Closure Costs

Waste Management Unit	$
CSA #4 Expansion	$93,460 (2010$)
New Direct Burn Track Pads (2)	$22,450 (2010$)
Drum Augering System Replacement	No Changes
Subtotal	$115,910 (2010$)
2010 to 2019 Price Deflator *	1.169
	$135,500 (2019$)

* Based on the U.S. Bureau of Economic Analysis Table 1.1.9, Implicit Price Deflators for Gross Domestic Product, [https://apps.bea.gov/iTable/iTable.cfm?reqid=19&step=2#reqid=19&step=2&isuri=1&1921=survey]. 2010 = 96.111; 2019 = 112.355

The financial assurance mechanism will be modified for the additional closure costs and submitted to the Department prior to placing the modified/new units in operation.

Impacts on RCRA Air Emission Controls

The description of the air emissions standards for equipment leaks (40 CFR 264 Subpart BB) continues to apply to the new/modified equipment as described in the existing application in Section 3.10. Appendix F of Section 3 of the application will be updated after the new/modified units are constructed but prior to being placed in operation to identify and number the pieces of equipment (e.g., pumps, valves, connectors) that were added or changed during construction of these waste management units.

No changes are required to emission controls associated with the containers in CSA #4. All containers will continue to comply with Container Level 1 or Container Level 2 requirements.

The containers (truck tankers) stored in the Direct Burn Pads will meet Container Level 2 requirements.

Any potential emissions from the Drum Augering System are captured within Feed Prep #2 building and emissions are controlled as currently described in the application.

Impacts on Corrective Action

This project will add two (2) new Solid Waste Management Units (SWMU) to the Corrective Action portion of the application. Each of the Direct Burn Pads will be added to the SWMU list.

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GAR/CCC would appreciate the Department's prompt consideration of this permit modification request and we look forward to your review and concurrence. GAR would like to begin construction of CSA #4 in March 2020.

If you have any questions or require further clarification regarding the information provided, please contact me at 573-221-1740 ext. 3007, or via e-mail at talya.mayfield@greenamericarecycling.com.

Respectfully submitted,

Talya D. Mayfield

Talya Mayfield
Environmental Health & Safety Manager
Green America Recycling LLC / Continental Cement Company, LLC

cc: Patricia Murrow, U.S. EPA Region 7
Keith Turpin, Green America Recycling
Gary King, Trinity Consultants

GREEN AMERICA RECYCLING CONTINENTAL CEMENT

Table 1 – CSA #4 Secondary Containment Calculations

Existing	Width	Length	Depth	#	Ft3	gal	
Floor	81.7	129.7	0.5		2647.3	19,802.0	
Trench (to shallow point)	1	129.7	0.5		64.8	485.0	
Trench (small slope)	1	20.3	0.5	4	20.3	152.1	
Trench (long slope)	1	20.8	0.5	2	10.4	77.9	
Sump (deepest)	1	2	0.5	3	3	22.4	
						20,539.4	Existing total
Extension *							
Floor	81.7	50	0.5		1020.8	7,635.8	
Trench (to shallow point)	1	50	0.5		25.0	187.0	
Trench (small slope)	1	24	0.5	2	12.0	89.8	
Trench (long slope)							
Sump (deep)	1	2	0.5	1	1.0	7.5	
						7,920.0	Ext. total
						28,459.4	TOTAL
Less							
Pallet/Drum displacement	Rows	Pallets/row	gal/pallet		Vol (ft3)	Vol (gal)	
West half (in cont. vol.)	20	10	21.4			4,278	
West half (in cont. vol.)	3	9	21.4			578	
East Half (slope)	23	5	21.4			2,460	
						7,315.6	
Available containment							
Existing	20,539		gal				
Expansion	7,920		gal				
Less pallet displacement	(7,316)		gal				
	21,143.8		Net available secondary containment (gal)				
	204,160		gal	Expanded CSA #4 Permitted Capacity			
	20,416		gal	Required Containment volume (10%)			
	21,143.8 > 20,416		gal	Available containment exceeds required volume			

* Containment only takes advantage of the northern 50' extension since the western extension will be above the dock doors on the east side. (assumes only the one trench down the middle.

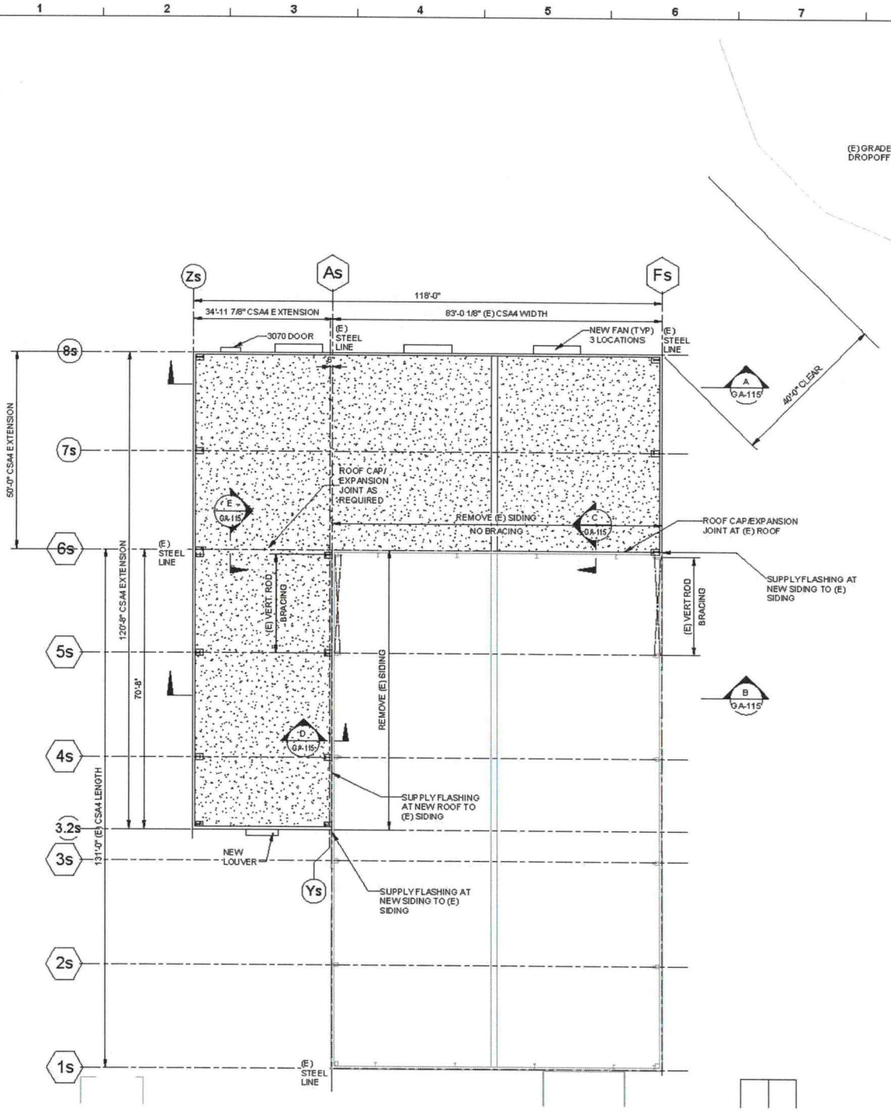
GREEN AMERICA RECYCLING CONTINENTAL CEMENT

Table 2 – Direct Burn Truck Pads Secondary Containment Calculations

	L (ft	W (ft)	D (ft)	ft3	Gal	
Containment	47.25	27	2.33	1488.4	11133.0	
Trench Sump	27	2	2	54.0	403.9	
Less Precipitation	47.25	27	0.44	562.4	4206.7	
Available containment volume					7330.3	
Largest container					6,000	
					1,330.3	gallons excess containment

GREEN AMERICA RECYCLING

CONTINENTAL CEMENT



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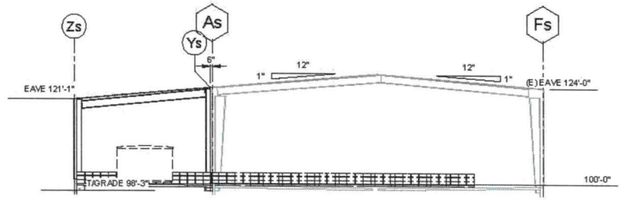
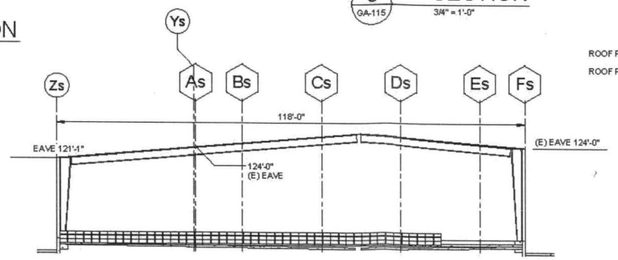
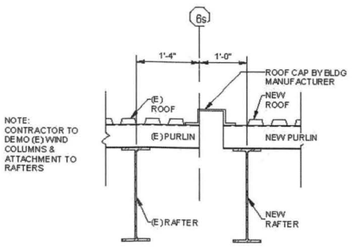
PLAN VIEW OF CSA4 EXTENSION
1/16" = 1'-0"







C GA-115 SECTION
3/4" = 1'-0"

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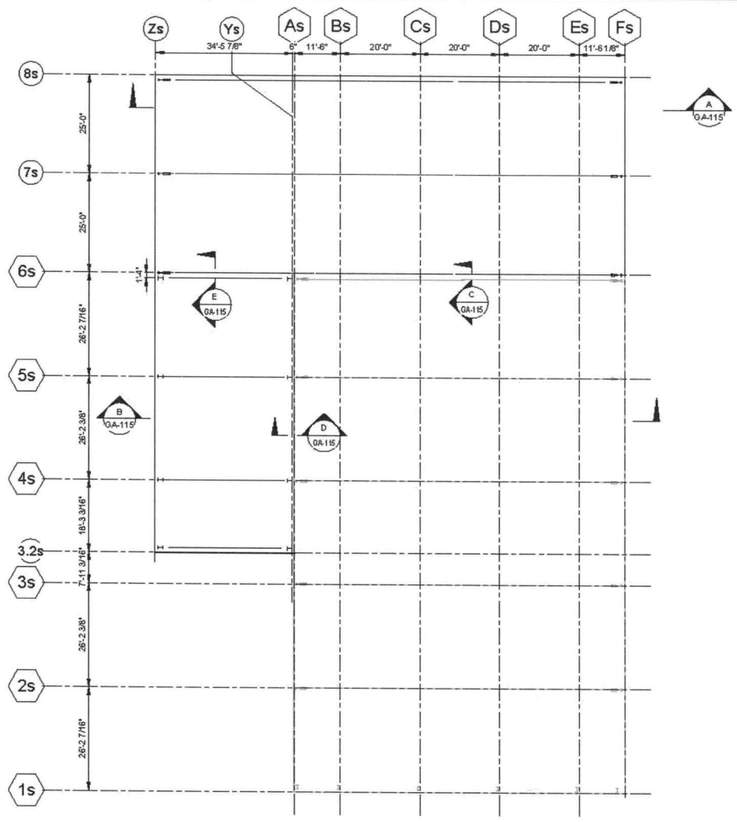
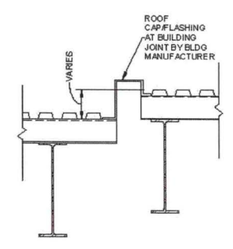
ROOF PLAN CSA4 EXTENSION
1/16" = 1'-0"





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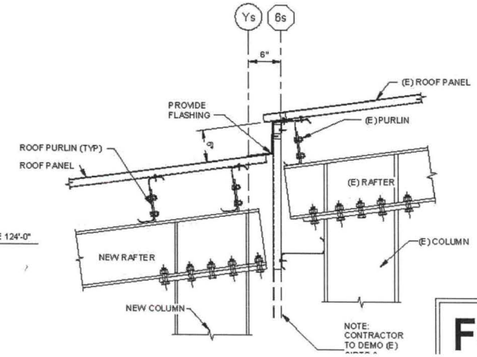


FOR BID ONLY

REV	DATE	DESCRIPTION	BY	CHK	APP
A	12/04/2019	ISSUED FOR PEMB BID	RER	NJA	MCW
B	12/20/2019	ISSUED FOR BID	RER	RER	MCW

GREEN AMERICA RECYCLING
10107 HWY 79, HANNIBAL, MO 63401

DESIGNED:	RER
DRAWN:	NJA
CHECKED:	RER
SMACC APPR:	-
DATE:	12/04/19
DATE:	12/04/19
DATE:	12/04/19
DATE:	-

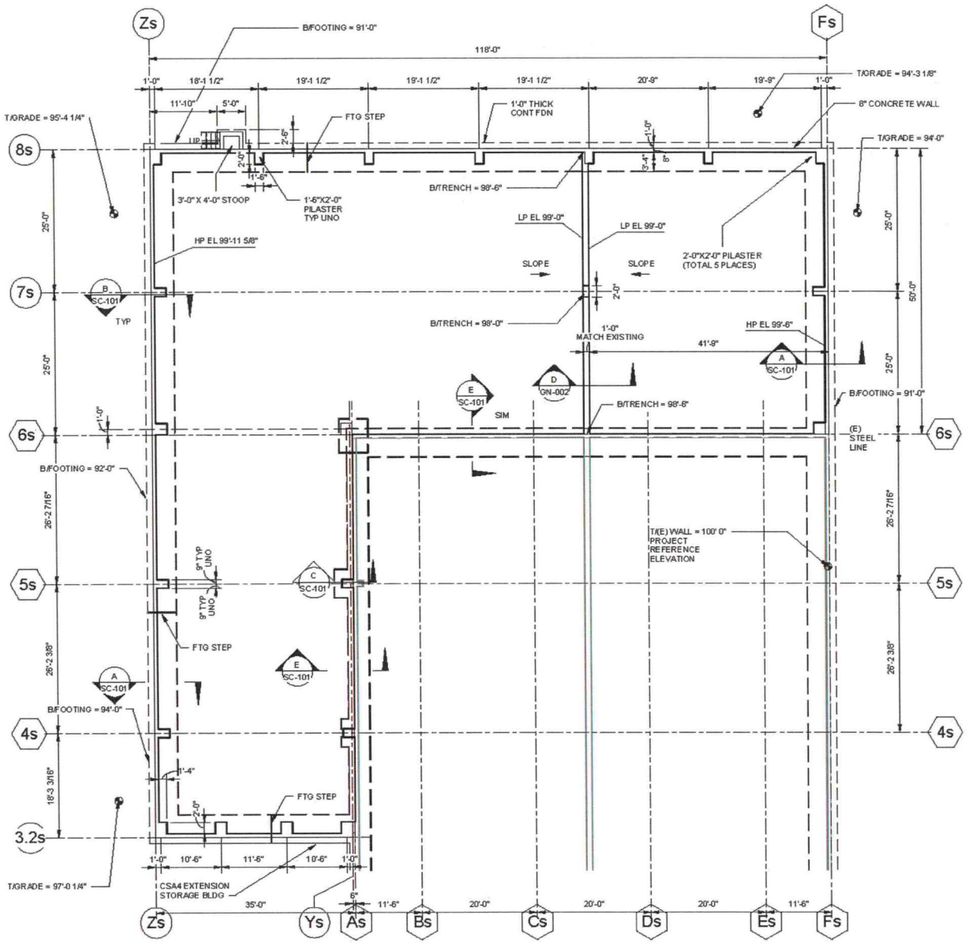
Industrial Ally
Engineering and Construction Services
1422 Eldridge Payne Rd. Suite 120
Chesterfield, MO 63017
INDUSTRIAL ALLY PROJECT NUMBER: 1382

WASTE PROCESSING UPGRADES
CONTAINER STORAGE AREA 4 (CSA4)
GENERAL ARRANGEMENT
PLAN @ SECTIONS OF CSA4 EXTENSION

IA DRAWING NUMBER
1382-GA-115
CLIENT DRAWING NUMBER

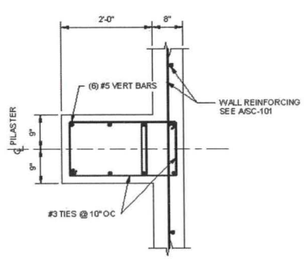
3:35:13 PM

GREEN AMERICA RECYCLING | CONTINENTAL CEMENT



FOUNDATION PLAN AT T/CONC 100'-0"
3/32" = 1'-0"

PROVIDE GROUNDING AT NEW FOUNDATIONS AND STRUCTURES COORDINATE WITH OWNER FOR LAYOUT AND DETAILS



D / SC-101 SECTION
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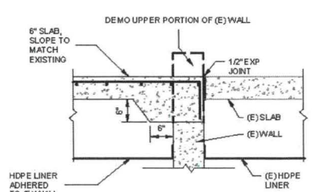

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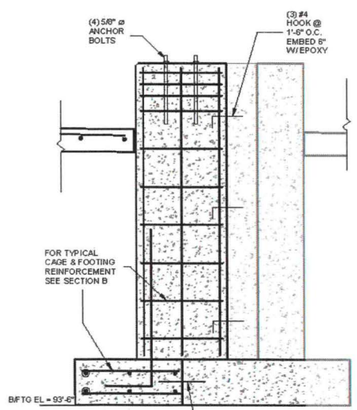

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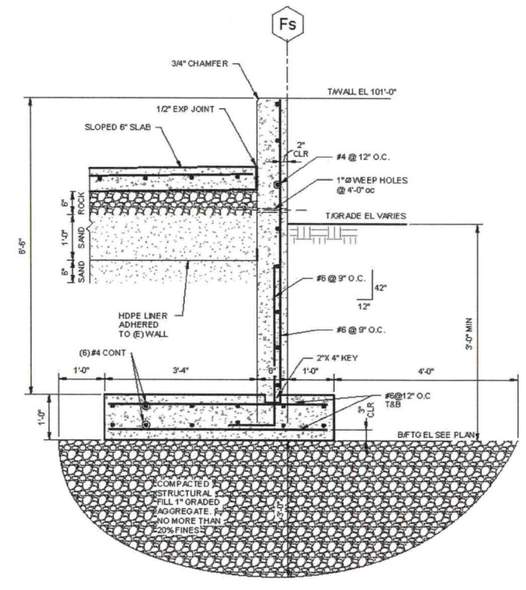

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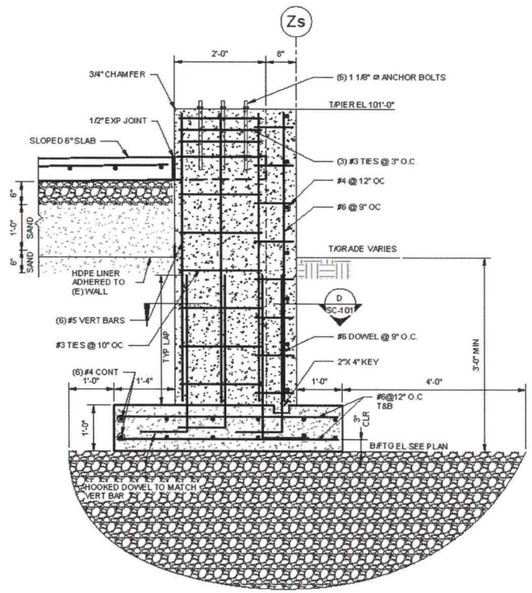


B / SC-101 SECTION
3/4" = 1'-0"

FOR BID ONLY
NOT FOR CONSTRUCTION

REV	DATE	DESCRIPTION	BY	CHK	APP
A	12/2/19	ISSUED FOR BID	RER	RER	MCW

GREEN AMERICA RECYCLING
10107 HWY79, HANNIBAL, MO 63401

DESIGNED:	RER	DATE: 12/05/19
DRAWN:	SY	DATE: 12/05/19
CHECKED:	MCW	DATE: 12/05/19
SMACC APPR: Approver		DATE:

Industrial Ally
Engineering and Construction Services
1422 Eldridge Payne Rd. Suite 120
Chesterfield, MO 63017
INDUSTRIAL ALLY PROJECT NUMBER: 1382

WASTE PROCESSING UPGRADES
CONTAINER STORAGE AREA 4
STRUCTURAL
CSA 4 EXPANSION FOUNDATION PLAN

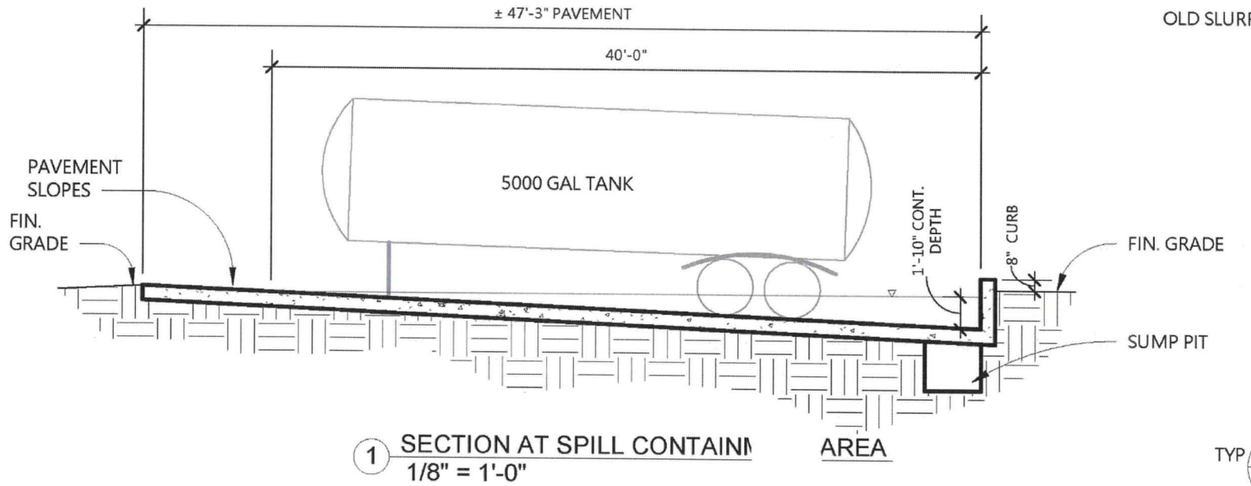
IA DRAWING NUMBER
1382-SC-101
CLIENT DRAWING NUMBER

REV. A | DWG. SCALE: As indicated

12/20/2019 3:45:57 PM

GREEN AMERICA RECYCLING

CONTINENTAL CEMENT



1 SECTION AT SPILL CONTAINM
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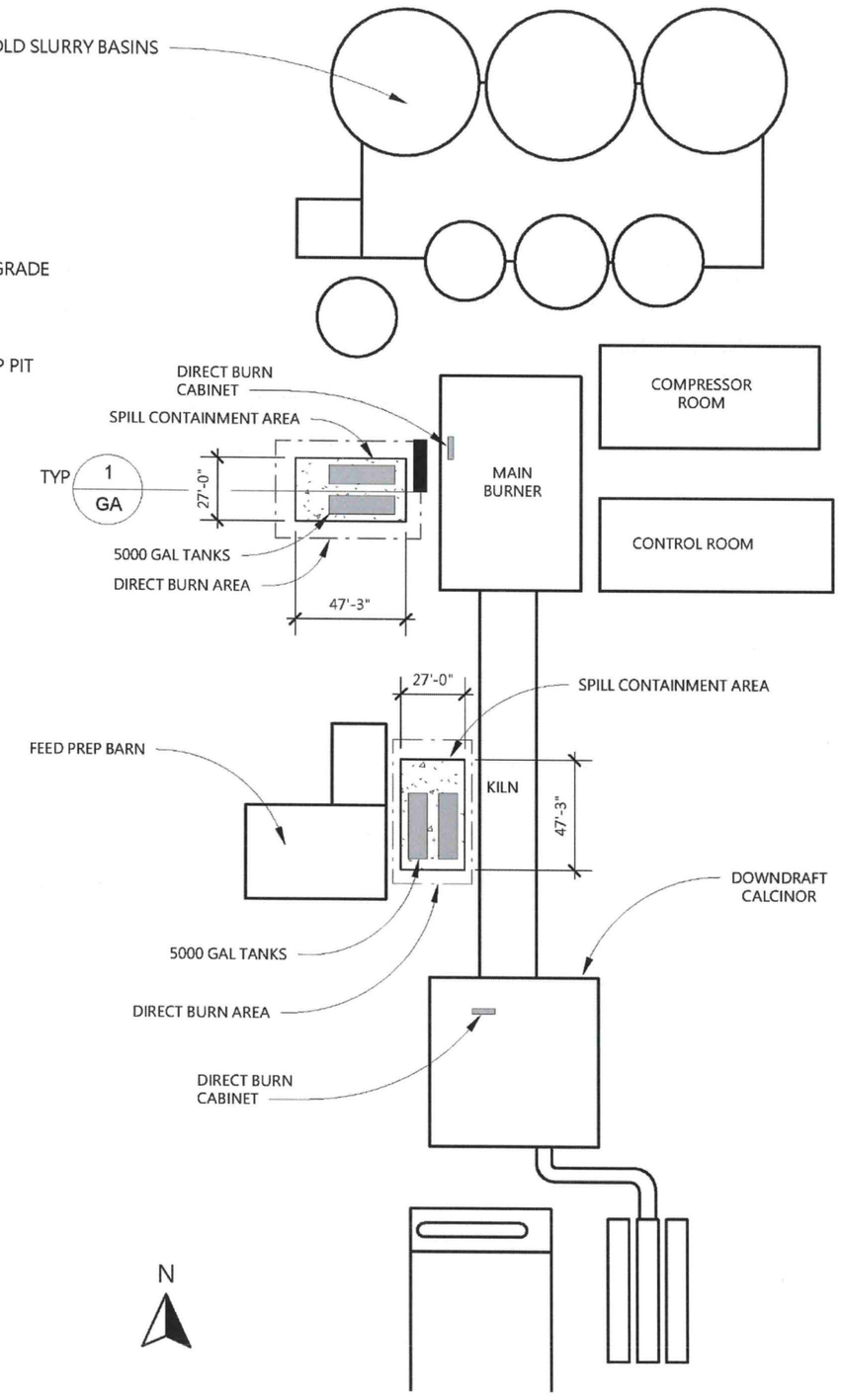

FRONTENAC ENGINEERING

EQUIPMENT PRO INCORPORATED
721 Parkwood Drive
Sainte Genevieve, MO 63670
573-883-2373

NO.	DATE	ISSUE / REVISION DESCRIPTIONS	REMARKS

DATE: 6/19/19
CHECKED: WB/DS
DRAWN: ACM
SCALE: AS NOTED

GENERAL ARRANGEMENT

GREEN AMERICA RECYCLING
NEW DIRECT BURN SYSTEMS
10107 HWY 79
HANNIBAL, MO 63401

SHEET NO.

GA

2019\190472 Equipment Pro - Green America Direct Burn System\Revit\190472.rvt
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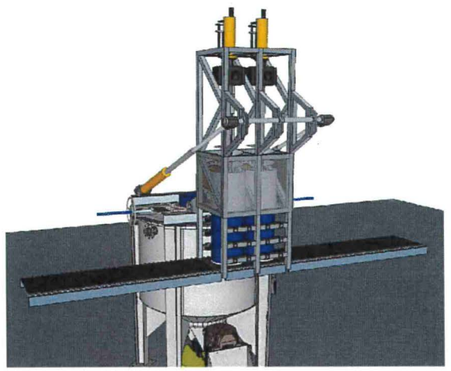
GREEN AMERICA RECYCLING

CONTINENTAL CEMENT



DRUM AUGER POSITION 1 VIEW 1
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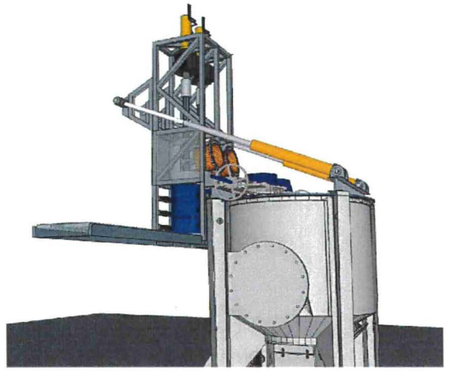

DRUM AUGER POSITION 1 VIEW 2
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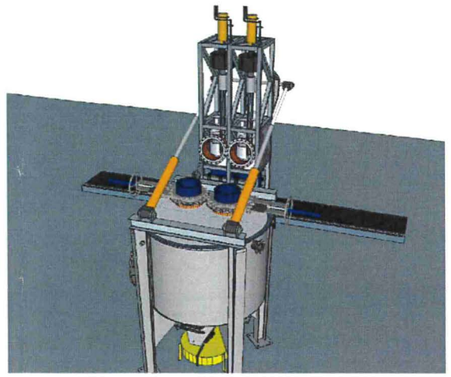

DRUM AUGER POSITION 1 VIEW 1
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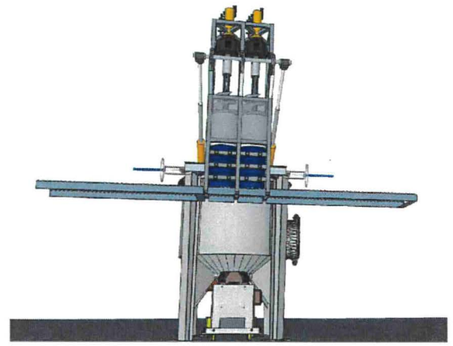

DRUM AUGER POSITION 1 VIEW 4
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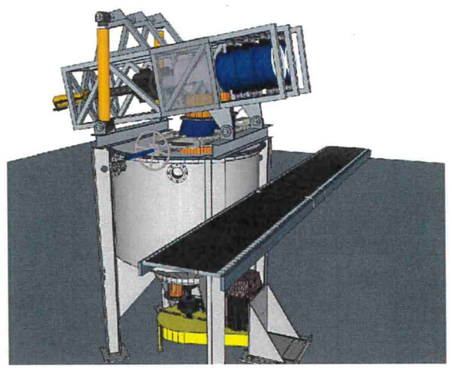

DRUM AUGER POSITION 2 VIEW 1
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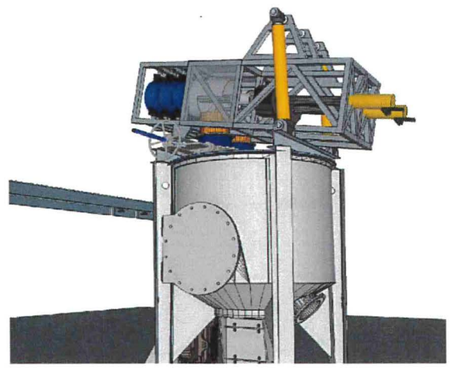

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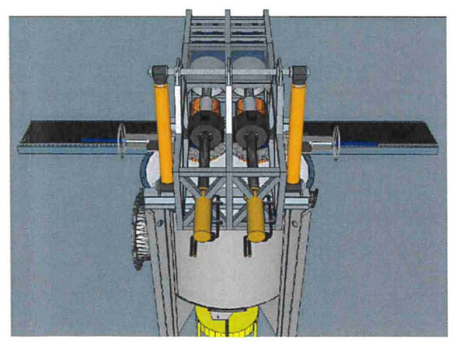
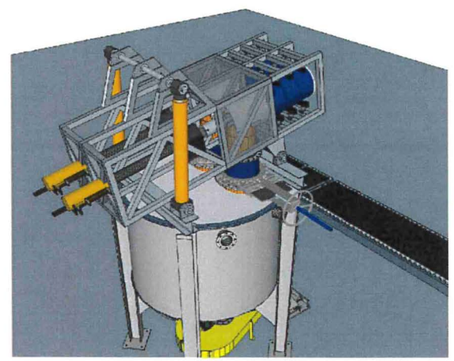
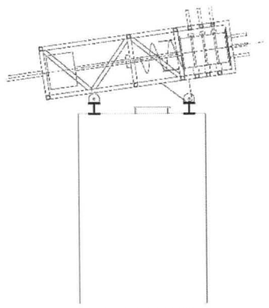


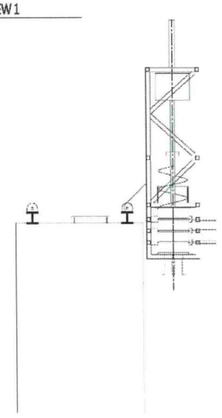
DRUM AUGER POSITION 2 VIEW 3
SCALE: N.T.S.



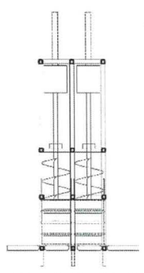
DRUM AUGER POSITION 2 VIEW 4
SCALE: N.T.S.



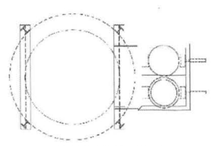
DRUM AUGER POSITION 2
SCALE: 1/4"=1'-0"



DRUM AUGER POSITION 1
SCALE: 1/4"=1'-0"



DRUM AUGER FRONT VIEW
SCALE: 1/4"=1'-0"



DRUM AUGER TOP VIEW
SCALE: 1/4"=1'-0"

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NO.	DATE	REMARKS
		ISSUE / REVISION DESCRIPTIONS

FRONTENAC ENGINEERING GROUP
CIVIL / STRUCTURAL / LAND SURVEYING
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WWW.FEGSTL.COM
MO CERTIFICATE OF AUTHORITY:
CIVIL / STRUCTURAL: 000888 LAND SURVEYING: 001225

DATE: 08/01/17
CHECKED: JJS
DRAWN: BDS
SCALE: N/A

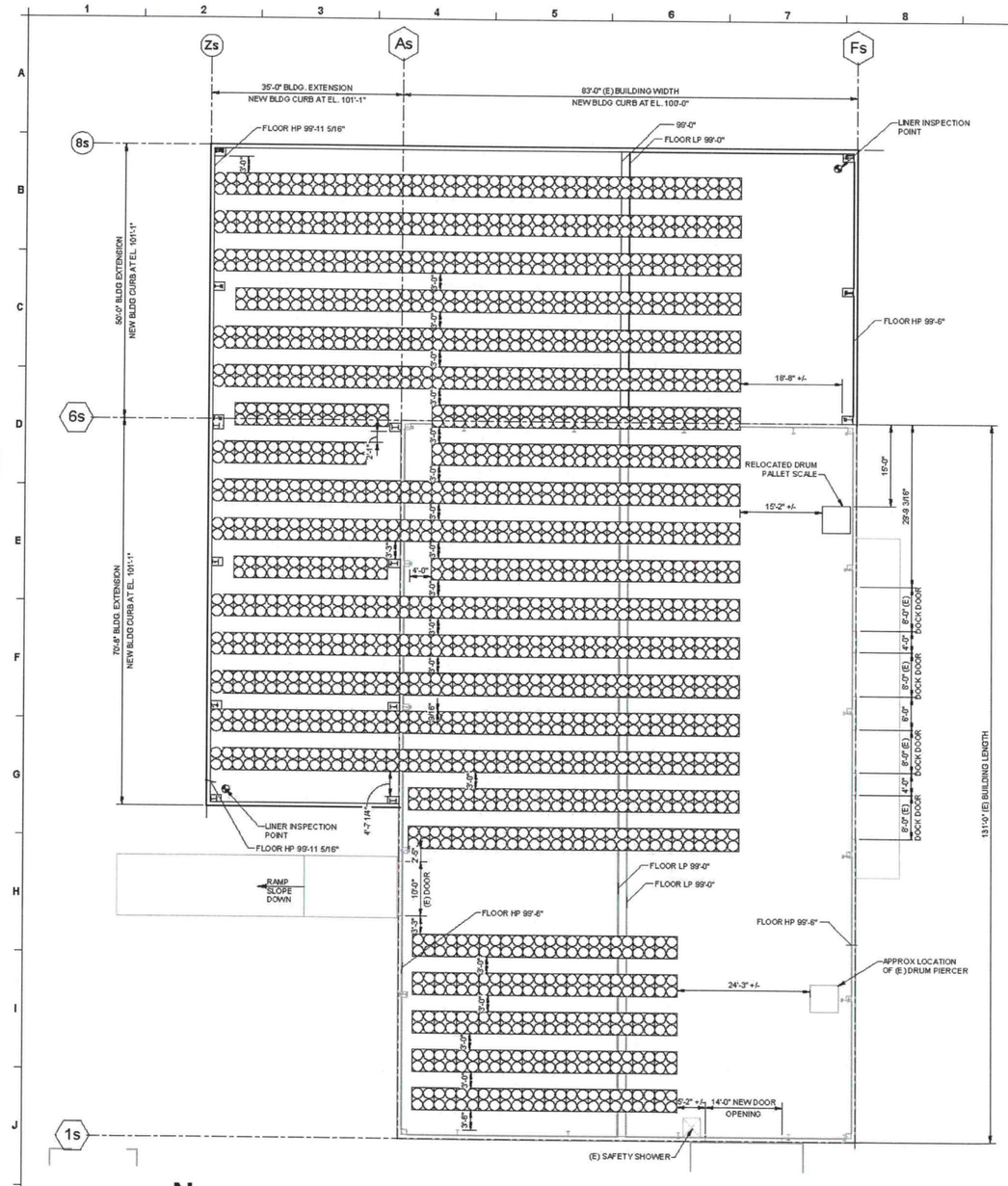
SHEET NO.
S1

DRUM AUGER RENDERINGS

EQUIPTMENT PRO
DRUM AUGER
SCHEMATIC DESIGN

N:\2017\17-0815 Equipment Pro - Rotar Drum Auger\17-0815 EP Drum Auger.rvt Plotted Date: 8/1/17 Time: 2:42 PM

GREEN AMERICA RECYCLING | CONTINENTAL CEMENT



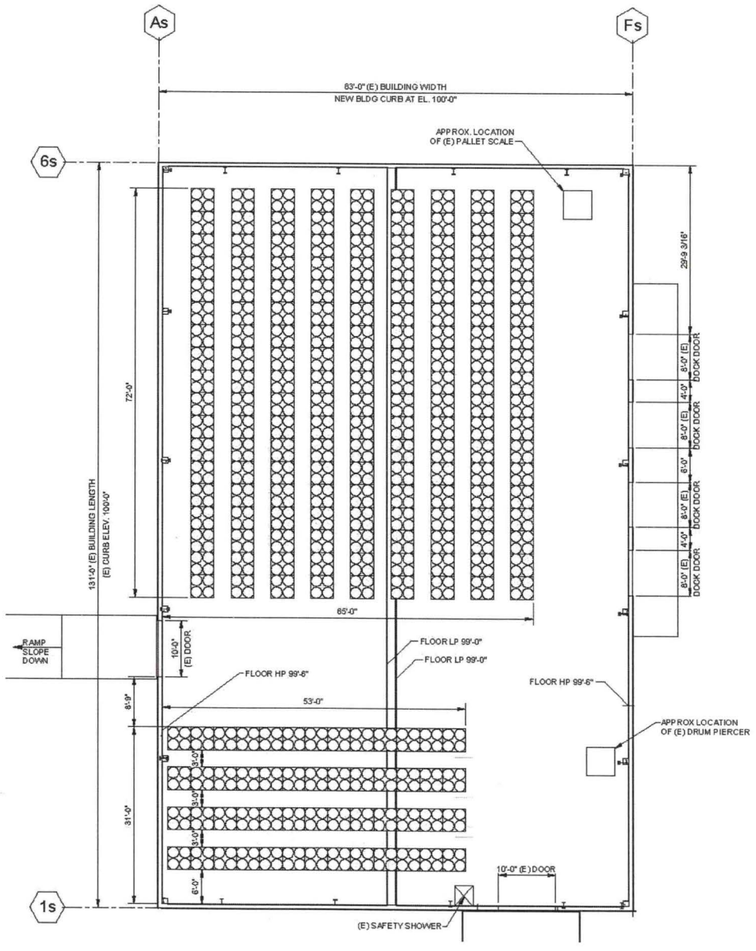
N

PLAN VIEW OF CSA4 EXTENSION - NEW STORAGE LAYOUT

3/32" = 1'-0"

NOTES:

1. REFERENCE ELEVATION 100'-0" IS THE TOP OF THE EXISTING CSA4 BUILDING CURB.
2. NEW STORAGE LAYOUT PROVIDES SPACE FOR (464) 48" SQUARE SPACES FOR SINGLE STACKED PALLET STORAGE, OR 1856 55-gal DRUMS.
3. CSA4 EXTENSION SHALL HAVE AN HDPE LINER BENEATH THE BUILDING FLOOR.



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PLAN VIEW OF CSA4 - EXISTING STORAGE LAYOUT

3/32" = 1'-0"

PRELIMINARY
NOT FOR CONSTRUCTION

REV	DATE	DESCRIPTION	BY	CHK	APP
A	12/04/2019	ISSUED FOR REVIEW	NJA		

GREEN AMERICA RECYCLING
10107 HWY 79, HANNIBAL, MO 63401

DESIGNED:	NJA	DATE:
DRAWN:	NJA	DATE:
CHECKED:		DATE:
SMACC APPR:		DATE:

Industrial Ally
Engineering and Construction Services
14222 Eldridge Payne Rd. Suite 120
Chesterfield, MO 63017
INDUSTRIAL ALLY PROJECT NUMBER: 1382

WASTE PROCESSING UPGRADES
CONTAINER STORAGE AREA 4
GENERAL ARRANGEMENT
PLAN VIEW OF STORAGE LAYOUT

IA DRAWING NUMBER
1382-GA-116
CLIENT DRAWING NUMBER

REV. A | DWG. SCALE: 3/32" = 1'-0"

12/4/2019 10:42:33 PM

GREEN AMERICA RECYCLING

CONTINENTAL CEMENT

GREEN AMERICA RECYCLING

CONTINENTAL CEMENT

OMB# 2050-0024; Expires 05/31/2020

United States Environmental Protection Agency
HAZARDOUS WASTE PERMIT PART A FORM

1. Facility Permit Contact

First Name Keith	MI D.	Last Name Turpin
Title Operations Manager		
Email keith.turpin@greenamericarecycling.com		
Phone 573-221-1740	Ext 3608	Fax 573-221-8487

2. Facility Permit Contact Mailing Address

Street Address 10107 Hwy 70		
City, Town, or Village Hannibal		
State Missouri	Country USA	Zip Code 63401

3. Facility Existence Date (mm/dd/yyyy)

11/01/1986

4. Other Environmental Permits

A. Permit Type	B. Permit Number	C. Description
N	MOG4902431	MO State Operating Permit - NPDES
N	MO0111686	MO State Operating Permit - NPDES
P	OP2011046	Part 70 Operating Permit - Air

5. Nature of Business

GAR operates a part B permitted RCRA TSD facility adjacent to Continental Cement, LLC (CCC). CCC utilizes waste-

derived materials to supplement coal as a fuel for the cement manufacturing process.

7. Process Codes and Design Capacities

Line Number		A. Process Code			B. Process Design Capacity		C. Process Total Number of Units	D. Unit Name
					(1) Amount	(2) Unit of Measure		
0	1	S	0	2	450,000	G	10	Tanks #1-6, 8, 9, 13, 14
0	2	S	0	1	914,160	G	4	CSA #1, 3, 4, 5, Direct Burn #1, #2
0	3	S	0	6	1,305	Y	2	Feed Prep #1 & #2
0	4	T	0	1	75,000	U	10	Tanks #1-6, 8, 9, 13, 14
0	5	T	9	4	1,460	N	2	Feed Prep #1 & #2
0	6	T	8	1	14.55	D	1	Cement Kiln System

8. Description of Hazardous Wastes (Enter codes for Items 7.A, 7.C and 7.D(1))

Line No.		A. EPA Hazardous Waste No.				B. Estimated Annual Qty of Waste	C. Unit of Measure	D. Processes								
								(1) Process Codes								(2) Process Description (if code is not entered in 7.D1))
0	1	D	0	0	1	0-50,000	T	S	0	1	S	0	2	S	0	6	
								T	0	1	T	0	4	T	8	1	Included with above
								T	9	4	S	9	9	X	9	9	Included with above
0	2	D	0	0	2	0-25,000	T	S	0	1	S	0	2	S	0	6	
0	3	D	0	0	3												Included with above
0	4	D	0	0	4	0-50,000	T	S	0	1	S	0	2	S	0	6	
0	5	D	0	0	5												Included with above
0	6	D	0	0	6												Included with above
0	7	D	0	0	7												Included with above
0	8	D	0	0	8												Included with above
0	9	D	0	0	9												Included with above

9. Map

Attach to this application a topographical map, or other equivalent map, of the area extending to at least one mile beyond property boundaries. The map must show the outline of the facility, the location of each of its existing intake and discharge structures, each of its hazardous waste treatment, storage, or disposal facilities, and each well where it injects fluids underground. Include all spring, rivers, and other surface water bodies in this map area. See instructions for precise requirements.

10. Facility Drawing

All existing facilities must include a scale drawing of the facility. See instructions for more detail.

11. Photographs

All existing facilities must include photographs (aerial or ground-level) that clearly delineate all existing structures; existing storage, treatment, and disposal areas; and sites of future storage, treatment, or disposal areas. See instructions for more detail.

12. Comments

7. Process Codes and Design Capacities (Continued)

Line Number		A. Process Code			B. Process Design Capacity		C. Process Total Number of Units	D. Unit Name
					(1) Amount	(2) Unit of Measure		
0	7	T	0	4	150,000	U	2	Tanker Truck/RTC Washout
0	8	T	0	4	75	D	1	Blending in Ball Mill
0	9	X	9	9	587	N	1	Drum Decanting System
1	0	S	9	9	75	Y	1	Solids Storage Silo #1
1	1	S	9	9	150	Y	1	Solids Storage Pit (Feed Barn #2)
1	2	X	9	9	24,000	E	1	In-Line Mixing, pH Treatment
1	3	S	9	9	240	Y	1	Solidification / STU
1	4	X	9	9	470	N	1	Solidification / STU

8. Description of Hazardous Wastes (Enter codes for Items 7.A, 7.C and 7.D(1)) **(Continued)**

Line No.		A. EPA Hazardous Waste No.				B. Estimated Annual Qty of Waste	C. Unit of Measure	D. Processes									
								(1) Process Codes									(2) Process Description (if code is not entered in 7.D1))
1	0	D	0	1	0												Included with above
1	1	D	0	1	1												Included with above
1	2	D	0	1	2	0-25,000	T	S	0	1	S	0	2	S	0	6	
1	3	D	0	1	3												Included with above
1	4	D	0	1	4												Included with above
1	5	D	0	1	5												Included with above
1	6	D	0	1	6												Included with above
1	7	D	0	1	7												Included with above
1	8	D	0	1	8	0-230,000	T	S	0	1	S	0	2	S	0	6	
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February 14, 2020

NOTICE OF PERMIT MODIFICATION

As required by the Missouri Department of Natural Resources and the United States Environmental Protection Agency, Green America Recycling, LLC (GAR) and Continental Cement Company, LLC (CCC), located in Hannibal, Missouri, must notify all persons included on the RCRA Part B Permit mailing list whenever a modification to the Approved RCRA Part B Permit occurs.

This notification letter is intended to update you on a class 2 permit modification, submitted to the Missouri Department of Natural Resources on behalf of GAR requesting the following modifications:

1. Expand the size and storage capacity of Container Storage Area #4 (CSA #4);
2. Add permitted truck unloading / container storage containment pads associated with the Direct Burn operations for two (2) 6,000-gallon tankers in each storage area; and
3. Replace the existing drum augering system (hydropulper) in Feed Prep #2 with a similar system that includes the ability to tip two drums at a time into the hydropulper unit.

There is a 60-day public comment period that begins February 21. 2020 where comments may be submitted to the Missouri Department of Natural Resources at the following address:

Ms. Jillian Hunt
Missouri Department of Natural Resources
Hazardous Waste Program
1730 Elm Street
Jefferson City, MO 65102

GAR will hold a public meeting to answer any questions the public may have about the proposed permit modification. The meeting information is shown below:

March 10, 2020
5:00-7:00 pm
Hannibal High School Cafeteria
4600 McMasters Ave

If you have any question, please feel free to contact me at (573)221-1740 ext. 3007 or by e-mail at Talya.mayfield@greenamericarecycling.com

Respectfully submitted,
GREEN AMERICA RECYCLING, LLC / CONTINENTAL CEMENT COMPANY, LLC

Talya D. Mayfield

Talya Mayfield
GAR Environmental Health & Safety Manager

cc: Environmental Protection Agency - Chief, Waste Remediation & Permitting Branch
Missouri Department of Natural Resources – Chief, Permits Section
RCRA Part B Permit Mailing List

Newspaper Notice

PUBLIC MEETING NOTICE

Time and Location: March 10, 2020, at the Hannibal High School Cafeteria located at 4600 McMaster's Ave. in Hannibal, Missouri from 5:00pm-7:00pm.

Purpose: To inform the community of a Class 2 permit modification and to allow for public discussion.

Brief Description of the Facility and Proposed Operations: Green America Recycling and Continental Cement operate a cement kiln in Hannibal. Green America Recycling (GAR) is proposing to modify their hazardous waste management operations by expanding a drum storage area, adding truck unloading areas, and replacing a tank in a drum processing system.

Comments: A 60-day comment period for providing comments on the Class 2 permit application begins February 12 and ends April 12, 2020. Written comments may be sent to Ms. Jillian Hunt, Missouri Department of Natural Resources, Hazardous Waste Program, 1730 Elm St., Jefferson City, MO 65102 or by email to Ms. Hunt at Jillian.Hunt@dnr.mo.gov. If you have questions, you can reach Ms. Hunt by telephone at (573) 751-6796.

Document Location: A copy of the Class 2 modification request may be viewed and copied at the Hannibal Public Library, located at 200 South 5th St., in Hannibal, Missouri.

Special Services: If you need special services or accommodations to participate in this meeting you are encouraged to contact the facility at least seventy-two (72) hours before the meeting in order to arrange a way to meet your request.

Facility contact: Ms. Talya Mayfield at 10107 Highway 79, Hannibal MO 63401, or by telephone during normal business hours at (573) 221-1740, ext. 3007.

Note: The permittee's compliance history during the life of the permit being modified is available from the Agency contact person.