



Jeremiah W. (Jay) Nixon, Governor

Sara Parker Pauley, Director

## DEPARTMENT OF NATURAL RESOURCES

dnr.mo.gov

April 4, 2012

CERTIFIED MAIL – 7009 3410 0001 9259 0970  
RETURN RECEIPT REQUESTED

Mr. James M. Lanzafame  
Environmental Manager  
The Doe Run Company  
Buick Resource Recycling Facility  
HC1, Box 1395  
Boss, MO 65440

RE: Class 1 Permit Modification with Prior Director's Approval  
Buick Resource Recycling Facility (BRRF), Boss, Missouri  
EPA ID# MOD059200089

Dear Mr. Lanzafame:

This letter is to notify you that the Missouri Department of Natural Resources (Department) reviewed Buick Resource Recycling Facility's (BRRF) Class 1 Permit Modification Request dated March 9, 2009, and additional information submitted on August 15, 2009, and August 20, 2009. The request is to change the language of the facility's February 26, 2008, Modified Missouri Hazardous Waste Management Facility Permit Part I concerning the location of decontamination stations at the exit of the contaminant buildings.

The language of Permit Condition III.C.8.c will be revised. The revised condition will read:

“Operate decontamination stations at the heavy equipment exit of each containment building to prevent the tracking of wastes out of the buildings. All waste/material-handling vehicles shall be decontaminated as they exit any containment building 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, waste materials visible on any waste/material handling vehicles shall be physically removed prior to exiting a containment building.”

Mr. James M. Lanzafame  
April 4, 2012  
Page 2

The decontamination stations are to be inspected weekly. The decontamination stations shall be cleaned and repaired as needed. When the decontamination stations are to be repaired, all liquids shall be managed appropriately. Liquids shall be transported to the wastewater treatment plant or pumped directly into a drain that is connected to the wastewater treatment plant. At no time shall the liquids be allowed to flow over/along the ground.

Along with the proper management of all liquids contained in the decontamination station, all solids shall be managed appropriately. The solids may be utilized as feed in the blast furnace or returned to the containment building itself. If the solids are not to be used as feed, they shall be sampled and analyzed using Method 1311 in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods," EPA Publication SW-846 "Toxicity Characteristic Leaching Procedure" (TCLP) for all metals listed in Table 1 (enclosed). The results of this analysis shall be compared to the regulatory levels found in 40 CFR 261.24 Table 1. If the solids are found not to be a hazardous waste, the solids may be disposed of in BRRF's on-site landfill.

If the solids are found to have concentrations of metals that exceed the TCLP regulatory levels and are not to be utilized as feed in the blast furnace or returned to the containment building, the solids shall be transported and treated in the Covered Materials Storage Building. After treatment, the solids shall be sampled and reanalyzed using EPA 1311 for all underlying hazardous constituents as listed in Table 2 (enclosed). The results shall then be compared to the Universal Treatment Standards (UTS) concentrations found in 40 CFR 268.48. If the solids, after treatment, are found to meet the UTS, the solids may be disposed of in BRRF's on-site landfill. If after treatment the solids are found to still exceed the UTS, they shall be retreated and tested until they meet UTS.

BRRF shall document and include in the operating record when the decontamination stations are cleaned/repared and also the results of all testing associated with the solids removed from the decontamination stations, that are not utilized as feed in the blast furnace or returned to the containment building. During the operation of the decontamination stations, BRRF should be cognizant of Special Permit Condition III.C.5 concerning the management of waste with free liquids.

The Department agrees with BRRF that this is a Class 1 Permit Modification requiring prior director approval. We are approving the modification request. BRRF must send 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 date of this letter, as outlined in Code of Federal Regulations 40 CFR 270.42(a)(1)(ii). BRRF must send a copy of the notice to the Department.

If you have any questions regarding this letter, please contact George Fletcher, P.E., Environmental Engineer, of my staff at the Missouri Department of Natural Resources,

Mr. James M. Lanzafame  
April 4, 2012  
Page 3

Hazardous Waste Program, P.O. Box 176, Jefferson City, MO 65102-0176, or by phone at (573) 751-3553 or 1-800-361-4827, or by e-mail at [george.fletcher@dnr.mo.gov](mailto:george.fletcher@dnr.mo.gov). Thank you.

Sincerely,

HAZARDOUS WASTE PROGRAM

[Original signed by Darleen Groner for]

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

RAN:gfs

Enclosures

c: Mr. Randy Rohrman, Project Manager, U.S. EPA Region VII  
Southeast Regional Office, Missouri Department of Natural Resources