



Jeremiah W. (Jay) Nixon, Governor

Sara Parker Pauley, Director

DEPARTMENT OF NATURAL RESOURCES

dnr.mo.gov

September 20, 2013

CERTIFIED MAIL – 70093410000189333856
RETURN RECEIPT REQUESTED

Mr. James M. Lanzafame
Environmental and Health Manager
The Doe Run Company
Buick Resource Recycling Facility, LLC
18594 Highway KK
Boss, MO 65440

RE: Class 1 Permit Modification with Prior Director's Approval with Conditions
Changes to Battery Bunker, and Battery Sulfurization Neutralization Building
Buick Resource Recycling Facility, LLC, Boss, Missouri
EPA ID# MOD059200089

Dear Mr. Lanzafame:

The Missouri Department of Natural Resources (Department) hereby approves Buick Resource Recycling Facility, LLC's (BRRF) Class 1 Permit Modification request, dated July 12, 2013, with conditions. The request was to make minor changes to the Paste Storage Area, Battery Bunker, and Battery Sulfurization Neutralization Building (formerly known as the BDC Building) in preparation for complying with the revised Secondary Lead Maximum Achievable Control Technology (MACT). These minor changes include adjusting openings and adjusting and enclosing existing equipment to make the process more efficient and conform to the new MACT regulations.

The Department is approving the Class 1 Permit Modification request requiring prior director approval with the following conditions:

1. Item number 3 of the Class 1 Permit Modification request consists of adding a new screw conveyor to transport posts, grids, separators, polypropylene chips, and a small amount of paste from the hydrodynamic separator to the paste bunker. The modification request goes on to state that the new screw conveyor will cause a negligible increase to the closure cost of the hydrodynamic separator and would be covered by the 15 percent contingency already included in the closure cost estimate. The 15 percent contingency



Recycled Paper

Mr. James Lanzafame
September 20, 2013
Page 2

only totals \$1791. Please submit more evidence to document that this negligible increase for the closure costs of the additional equipment will be covered under the 15 percent contingency.

2. Item number 5 of the Class 1 Permit Modification request is for the installation of a screw under the battery shredder conveyor to collect any material that may fall from the belt conveyor. Please submit an explanation on how the additional screw will be covered in the closure costs.

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), incorporated by reference in Code of State Regulations 10 CSR 25-7.270(1) and modified by 10 CSR 25-7.270(2)(A)6 and 10 CSR 25-7.270(2)(B)10. BRRF must send a copy of the notice to the Department.

If you have any questions regarding this letter, please contact Nathan Graessle, P.E., Environmental Engineer, 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 nathan.graessle@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:ngm

c: Mr. Wray Rohrman, Project Manager, U.S. EPA Region 7
Southeast Regional Office, Missouri Department of Natural Resources