



Jeremiah W. (Jay) Nixon, Governor

Sara Parker Pauley, Director

DEPARTMENT OF NATURAL RESOURCES

dnr.mo.gov

November 21, 2013

CERTIFIED MAIL – 7009 3410 0001 8933 3771
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
Approval of Change to Decontamination Procedure for Blast Furnace Feed Storage
Building (BFFSB) Decontamination Station
The Doe Run Company - Buick Resource Recycling Facility, LLC, Boss, Missouri
EPA ID# MOD059200089

Dear Mr. Lanzafame:

The Missouri Department of Natural Resources (Department) has reviewed Buick Resource Recycling Facility, LLC's (BRRF's) request dated November 13, 2013, regarding proposed changes to the decontamination procedure intended to be employed as part of closure of the old Blast Furnace Feed Storage Building decontamination station. Though not proposed as a permit modification, we have reviewed the applicable requirements and have determined that this request constitutes a permit modification in accordance with Appendix I (D.1.d.) of 40 CFR 270.42 as incorporated by reference in 10 CSR 25-7.270(1). Thus, we are hereby approving this as a Class 1 Permit Modification with prior Director's approval.

The original approved closure procedure was to remove the grate, wash and triple rinse the concrete of the decontamination station, then sample the floor and four walls by core drilling, as well as the soil beneath the concrete. BRRF would then wait on the toxic characteristic leaching procedure (TCLP) analysis results to remove the concrete and send to an appropriate off-site disposal facility. Due to the time sensitive nature of this particular closure element and related construction needs to comply with the maximum achievable control technology requirements of the Air Pollution Control Program, BRRF proposes to simply consider the concrete a hazardous waste upon removal, place the material in suitable container(s), label the container(s), and place them in the 90-day hazardous waste generator storage area prior to sending this material off site as manifested hazardous waste to an appropriate hazardous waste facility. As the concrete is



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being removed, samples from the floor, walls, and soil underneath significant cracks would be taken as had been planned under the original approved closure plan. These samples will then be analyzed for TCLP and total metals.

BRRF must send a notice of this modification to everyone on the 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 questions regarding this letter, please contact Bill Fanska, 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 bill.fanska@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: Mr. Wray Rohrman, Project Manager, U.S. EPA Region 7
Ms. Kara Valentine, Attorney General's Office
Southeast Regional Office, Missouri Department of Natural Resources