



Jeremiah W. (Jay) Nixon, Governor

Sara Parker Pauley, Director

DEPARTMENT OF NATURAL RESOURCES

dnr.mo.gov

CERTIFIED MAIL – 7009 0960 0000 8848 4405
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
Proposed Openings in the Battery Storage and Handling Area
The Doe Run Company - 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)'s Class 1 Permit Modification request, dated October 11, 2013, without changes. The modification request was to create four openings in the Battery Storage and Handling Area as described below, in preparation for complying with the revised Secondary Lead Maximum Achievable Control Technology (MACT) requirements.

1. Two openings in the metal siding portion of the Battery Bunker wall to serve as access points for maintenance and replacement of the screw conveyors in the immediate area.
2. An opening in the wall between the drum shredder room and containerized storage area to allow feed materials to be transferred between the areas with a roller conveyor or similar equipment.
3. An opening for a man-sized door between the drum shredder room and containerized storage area to allow personnel to move between the areas without opening the current equipment access door.

We are approving the Class 1 Permit Modification request requiring prior director approval per the 40 CFR 270.42 (d)(2)(i), incorporated by reference in 10 CSR 25-7.270(1) with the following conditions.



Recycled Paper

Mr. James M. Lanzafame
December 19, 2013
Page 2

1. Any doors installed in the new openings should remain closed during normal operations.
2. The opening in the concrete wall between the drum shredder room and containerized storage area that will be equipped with the plastic strip door or a door of similar style and material should be inspected on a regular basis to verify compliance with the Secondary Lead MACT requirements.
3. The addition of the new roller conveyor or similar equipment associated with the opening in the wall between the drum shredder room and containerized storage area will likely cause a negligible increase in closure costs that should be covered by the current 15 percent contingency in the current closure cost estimate. However, BRRF should verify that any increase in the closure costs for the additional equipment will be covered by the 15 percent contingency or submit a revised closure cost estimate for the increased amount, if necessary.

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 40 CFR 270.42(a)(1)(ii), incorporated by reference in 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 this notice to the Department.

If you have questions regarding this letter, please contact William Fanska, P.E., 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
Southeast Regional Office, Missouri Department of Natural Resources