



Jeremiah W. (Jay) Nixon, Governor

Sara Parker Pauley, Director

## DEPARTMENT OF NATURAL RESOURCES

dnr.mo.gov

March 18, 2016

CERTIFIED MAIL – 7014 1200 0000 4389 2980  
RETURN RECEIPT REQUESTED

Mr. James M. Lanzafame  
Senior Environmental Technical Engineer  
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  
Request to Temporarily Open the Roof of the Palletized Storage Area  
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 March 8, 2016, with conditions. The request was to raise the roofing area above the scissor lifts that are being installed as part of an approved Class 2 Permit Modification that was approved on May 1, 2015. This raised roof area is needed in the Palletized Storage Area (permitted containment building) to provide sufficient height to allow the scissor lifts to operate and be maintained properly.

This request was discussed with you on March 7, 2016, during a phone call with a requested start date of March 17, 2016, for the construction activities associated with the proposed modification. Please note that the formal request for the modification was not received by the Department until March 15, 2016. As you know, permit modification requests that have extremely short turnaround times such as this one cannot always be accommodated due to other Department priorities and workloads. In the future, we would appreciate as much lead time as possible for any proposed permit modifications or other requests so that the Department is able to do a thorough review of the submitted information and process a timely approval.

The Department agrees with BRRF that this is a Class 1 Permit Modification requiring prior director approval, according to Code of State Regulations 10 CSR 25-7.270(1), which incorporates Code of Federal Regulations 40 CFR 270.42. We are approving the Class 1 Permit Modification request with the following conditions:

Mr. James M. Lanzafame  
March 18, 2016  
Page 2

1. Within 30 calendar days from the date of this letter, BRRF shall submit documentation signed by an appropriate BRRF representative and a registered professional engineer per 10 CSR 25-7.270(1) which incorporates 40 CFR 270.30(l)(2)(i), that the unit is in compliance with the requirements of the permit and regulations and is ready for its intended use. This documentation shall include the date that the temporary construction activities were completed.
2. The request states that the beginning date for the potential non-compliance for this unit will be March 17, 2016, and continue through March 27, 2016, requiring approximately 10 days. With this approval (for a period not to exceed 15 days from the date of this letter), the Department considers the aforementioned containment building (Palletized Storage Area) to be under construction. As such, controls shall be established and maintained to prevent releases from the building during construction. During times when the maintenance crews are not working on the roof structure, the roof opening shall be covered/sealed to prevent any releases from the permitted unit and to prevent precipitation from entering the building. Should any releases from the unit occur, they shall be cleaned up immediately and reported to the Department within 24 hours, detailing the amount of material released, the actions taken to remediate the release and what additional controls were instituted to prevent further releases.

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, according to 10 CSR 25-7.270(1), which incorporates 40 CFR 270.42(a)(1)(ii). BRRF must send a copy of the notice to the Department.

If you have questions regarding this letter, please contact Nathan Kraus, 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 [nathan.kraus@dnr.mo.gov](mailto:nathan.kraus@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:nkm

Mr. James M. Lanzafame  
March 18, 2016  
Page 3

- c: Darcy Bybee, Chief, Compliance and Enforcement Section, Air Pollution Control Program  
Ms. Christine Jump, Missouri State Coordinator, U.S. EPA Region 7  
Julie Marks, P.E., Barr Engineering Company  
Southeast Regional Office, Missouri Department of Natural Resources