



Missouri Department of dnr.mo.gov

NATURAL RESOURCES

Eric R. Greitens, Governor

Carol S. Comer, Director

March 20, 2018

CERTIFIED MAIL – 7014 1200 0000 4388 7610
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
Installation of a Man-Sized Door in the Covered Material Storage 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 February 21, 2018. The modification request was to install a personnel door in the interior wall of the Covered Material Storage Building (CMSB) that leads into an adjacent equipment building.

According to 10 CSR 25-7.270(1), incorporating Code of Federal Regulations 40 CFR 270.42, Appendix I, M.2., modification of a containment building unit without increasing the capacity of the unit generally requires a Class 2 permit modification. However, given the Department's directive in a previous letter to BRRF dated July 6, 2015, regarding handling of future operational/maintenance changes at the facility and the National Ambient Air Quality Standard requirement for Secondary Lead Smelters to keep operations under negative air pressure at all times, the Department agrees with BRRF that this is a Class 1 Permit Modification request requiring prior Director's approval. Our decision to approve the permit modification request is based on a thorough technical review of the request and applicable federal and state laws and regulations. We are approving the permit modification request with the following schedule of compliance items:

1. BRRF shall notify Nathan Kraus, P.E., of my staff by email of the start date for the requested alteration(s) to begin. This will act as the facility's notification of anticipated noncompliance per 10 CSR 25-7.270(1), incorporating 40 CFR 270.30(1)(2), in the event that the regulated unit may temporarily not be in full compliance with the governing regulatory requirements.



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2. Within 30 days of the completion of the alteration(s) to the regulated unit, BRRF shall submit documentation signed by the Permittee and a registered professional engineer per 10 CSR 25-7.270(1), incorporating 40 CFR 270.30(1)(2)(i), that the unit once again meets the requirements of the regulations and is ready for its intended use. Such documentation shall include the actual date of the unit's return to compliance and return to use.

BRRF must send a notice of the approved Class 1 Permit 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 required by 10 CSR 25-7.270(1), incorporating 40 CFR 270.42(a)(1)(ii). BRRF must send a copy of the notice to the Department.

This permit modification may include conditions you are not familiar with or are different from or in addition to the conditions of your current permit. We would be pleased to meet with you to discuss any questions you may have related to the permit modification conditions. An appointment can be set up by contacting Mr. 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. Any follow-up in response to your meeting request, whether by telephone, in-person meeting, or on-site visit, is considered Compliance Assistance and will focus on explaining the permit modification conditions to you. Thank you.

Sincerely,

HAZARDOUS WASTE PROGRAM

[Original signed by Richard A. Nussbaum]

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

RAN:nk

- c: Mr. Don Lininger, CHMM, US EPA Region VII
Ms. Julie Marks, P.E., Barr Engineering
Southeast Regional Office, (via Exchange Drive)
Kathy Flippin, HWP-Compliance and Enforcement Section (Via E-mail)
Nicole Eby, HWP-Compliance and Enforcement Section (Via E-mail)