



Jeremiah W. (Jay) Nixon, Governor

Sara Parker Pauley, Director

DEPARTMENT OF NATURAL RESOURCES

dnr.mo.gov

December 2, 2014

CERTIFIED MAIL – 7009 0080 0000 1925 8290
RETURN RECEIPT REQUESTED

Bryan Campbell
General Manager
Hazmat, Inc.
6300 Stadium Drive
Kansas City, MO 64129

RE: Class 1 Permit Modification with Prior Director's Approval
Bulking Liquid Hazardous Waste in the Truck Bay - Clarifications
Hazmat, Incorporated, Kansas City, Missouri
EPA ID# MOD981123391

Dear Mr. Campbell:

The Missouri Department of Natural Resources (DNR) has reviewed HazMat, Incorporated's (HazMat's) Class 1 Permit Modification request dated November 25, 2014. The modification request was to clarify two elements of the previous Class 1 modification approval of July 24, 2014, related to bulking liquid hazardous waste in the truck bay by transferring the material from drums into a vacuum truck for the purpose of efficient off-site transportation and eventual disposal. We are approving the Class 1 Permit Modification request requiring prior director approval with the following clarifications/conditions:

As expressed in the previous modification approval, the DNR's determination was that this operation falls under the U.S. Environmental Protection Agency Region 7 (EPA) policy that was previously provided to you and which allows for loading and unloading of hazardous waste in a non-permitted unit if these operations take place in less than a 24 hour period. Per HazMat's previous permit modification request, DNR's approval had restricted overnight parking of vacuum trucks in the truck bay as HazMat had indicated that the loading operations would only be conducted during normal business hours. This approval clarifies that HazMat may park vacuum trucks in the truck bay overnight as long as the truck loading operations do not exceed 24 hours. The operational times for the activities conducted in the truck bay area must be documented in the facility operating record and such documentation be made available to DNR during any inspections or as otherwise requested. The times recorded in the operating record shall reflect when the first drum/container is moved to the truck bay area for bulking to the vacuum truck and the subsequent time when the loaded vacuum truck leaves the property for its intended destination, an amount of time which shall not collectively exceed 24 hours. Please note that on-site movement of a partially or fully loaded vacuum truck in and out of the truck bay area for whatever reason will not restart the 24 hour clock.



Recycled Paper

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As noted in the DNR's previous permit modification approval, HazMat plans to bulk a variety of hazardous wastes, including ignitable waste, in its truck bay. According to a map submitted to DNR on May 13, 2014, both the hazardous waste in drums that will be transferred to the vacuum truck and the tank on the vacuum truck itself will be located more than 50 feet away from HazMat's property line. Again, per HazMat's previous permit modification request, DNR's previous approval stipulated that HazMat shall only be permitted to use a 3,000 gallon vacuum truck for hazardous waste bulking in the truck bay and shall ensure that all portions of the 3,000 gallon tank associated with the vacuum truck are at a distance of at least 50 feet from the property line. Due to later concerns expressed by HazMat regarding the potential tank configuration on vacuum trucks that may be servicing the site and associated compliance with the 50 foot requirement, the November 25, 2014, modification request asked for clarification regarding the applicability of the 50 foot requirement. From a regulatory standpoint, the 50 foot rule only applies to storage of hazardous waste. As long as the vacuum truck is not in the truck bay for more than 24 hours, the hazardous waste would not be considered to be in storage and the 50 foot from the property line requirement contained in the previous permit modification would not apply. Please note, however, that the facility is still limited to a vacuum truck of 3000 gallons or smaller per the previous permit modification approval (i.e., clarification regarding the 50 foot requirement should not be misconstrued as authorization to utilize trucks with tanks larger than 3000 gallons).

HazMat must send a notice of this 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 10 CSR 25-7.270(1), 10 CSR 25-7.270(2)(A)6 and 10 CSR 25-7.270(2)(B)IO which incorporates and modifies Code of Federal Regulations 40 CFR 270.42(a)(1)(ii). HazMat must send a copy of the notice to the DNR.

If you have questions regarding this letter, please contact Cedric Cunigan, 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 cedric.cunigan@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:tb

c: Mr. John Bennett, President, HazMat Inc.
Ms. Mary Grisolano, Project Manager, U.S. EPA Region 7
Kansas City Regional Office

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