



Jeremiah W. (Jay) Nixon, Governor

Sara Parker Pauley, Director

## DEPARTMENT OF NATURAL RESOURCES

dnr.mo.gov

November 1, 2011

Mr. Craig Hogarth  
Director – Safety & Compliance  
Heritage Environmental Services, LLC  
7901 West Morris Street  
Indianapolis, IN 46231

RE: Class 1 Permit Modification Without Prior Director's Approval  
Heritage Environmental Services, LLC, Kansas City, Missouri  
EPA ID# MOD981505555

Dear Mr. Hogarth:

The Missouri Department of Natural Resources (Department) received Class 1 Permit Modification notices and requests as follows:

- In letters dated December 7, 2010, and March 2, 2011, Heritage Environmental Services, LLC (Heritage), announced updates to contact information in the contingency plan.
- In a letter dated March 4, 2011, Heritage requested a permit modification to clarify that electronic signatures are acceptable with regard to the waste analyses data retained as part of the facility operating record.
- In a letter dated June 22, 2011, Heritage requested to: 1) change the duration of numerous recordkeeping requirements from "until closure" of the facility to a period of three years, and 2) update several permit conditions to remove the adjective "independent" preceding "qualified professional engineer." This request was made pursuant to the *Resource Conservation and Recovery Act (RCRA) Burden Reduction Initiative* (see final rule published in the Federal Register on April 4, 2006).

The Department agrees with Heritage that these are Class 1 Permit Modifications not requiring prior director approval. Heritage sent a notice for each of the modifications to everyone on their facility mailing list and the appropriate units of state and local government per 40 CFR



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270.42(a)(1)(ii), incorporated by reference in 10 CSR 25-7.270(1). The notices were sent on the same date as the letters referenced above, and the Department received a copy of each notice for the administrative file.

If you have questions regarding this letter, please contact Steve Jaques, 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 [steve.jaques@dnr.mo.gov](mailto:steve.jaques@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:sjs

c: Ms. Christine Jump, State Coordinator, U.S. EPA Region 7  
Ms. Lisa Martin, Heritage Environmental Services, LLC  
Kansas City Regional Office, Missouri Department of Natural Resources