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November 18, 1982

DRAFT

Mr. J. C. Patterson
Section Manager
Environmental Pollution Control
McDonnell Douglas Corporation
Dept. 191C, Bldg. 102
Box 516
St. Louis, Missouri 63166

Dear Mr. Patterson:

The department has conducted a completeness review of the McDonnell Douglas Corporation - St. Louis Tract I hazardous waste storage permit application.

The department has determined that the application is complete in accordance with 10 CSR 25-8.010(1)(B). The department in its review has found some deficiencies in the application and offers the following comments.

1) In accordance with 10 CSR 25-7.011(2)(C), the applicant must submit a complete signed application form provided by the department. These application forms were provided at the pre-application workshop of May 4, 1982, in Jefferson City, Missouri. Enclosed please find another blank copy for your use.

2) The Waste Analysis Plan indicated in Section C of your application is complete, but some question has arisen to the analysis of waste generated off-site. Will the procedures outlined in Figure C-1, page 61, be conducted on each shipment, or once a year? If each shipment is sampled, how many of the individual containers are sampled?

3) The container management practices indicated on page D-15 should provide that the drums will be stored in a closed condition and will be handled in a manner which will prevent spillage. Leaking containers should be repackaged. These additions will also aid compliance with 10 CSR 25-7.050(3)(B).

4) All reports, both written and oral, should be submitted to both the Environmental Protection Agency (EPA) and this department. This will achieve compliance with 10 CSR 25-7.011(2)(C)3., (5)(G)4. and 9., (6)(C), and (9)(C).

MISSOURI DEPARTMENT OF NATURAL RESOURCES
P.O. Box 1368 · 1915 Southridge Drive Jefferson City, Missouri 65102 (314) 751-3241

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RCRA RECORDS CENTER

Christopher S. Bond Governor
Fred A. Lafser Director

Division of Environmental Quality
Robert J. Schreiber Jr., P.E. Director

5) The leak detection system outlined in Section D of your application is still being reviewed by the Division of Geology and Land Survey. Specific comments and questions will be sent at a later date.

6) The financial statements provided in Section I are still being reviewed by the department for compliance with 10 CSR 25-7.011(8). Specific comments concerning the applicability of your financial assurance mechanism with the regulations will be sent at a later date.

7) The applicant shall address how compliance with 10 CSR 25-7.011(4)(G) can be documented. There may be additional comments as per comment #5 on this subject.

I would urge you to consider both the EPA, Region VII and the Department of Natural Resources comments before preparing your response to these comments. The permit review engineers would appreciate the opportunity to visit your facility and discuss these comments with you and your technical staff. The staff has tentatively set aside December 20 and 21, 1982, as the dates we plan to visit the four permit applicants in the St. Louis area.

If you have any questions or wish to arrange a site visit, please contact me or Joe Jansen at this office.

Sincerely,

DRAFT

John D. Doyle, P.E.
Chief, Technical Services Section
Waste Management Program

JDD:JJ:dsr

cc: Mr. Bob Stewart, EPA
St. Louis Regional Office