

Missouri Department of dnr.mo.gov

**NATURAL RESOURCES**

Michael L. Parson, Governor

Dru Buntin, Acting Director

June 21, 2021

Ken Buchholz  
Assessment Emergency Response & Removal Branch  
U.S. EPA, Region VII  
11201 Renner Blvd  
Lenexa, KS 66219

Re: Request for Federal Action - Gateway Plating LLC Site; 2501 Texas Avenue,  
St. Louis, MO

Dear Ken Buchholz:

The Missouri Department of Natural Resources' Environmental Remediation Program's (ERP) Superfund Section is referring the Gateway Plating LLC site to the U.S. Environmental Protection Agency (EPA) Region 7 for a Time-Critical Removal Action to address risk associated with the potential for a release of hazardous substances associated with former plating operations at the site. Information below and enclosed documentation provide evidence of open and sealed 55 gallon barrels and other containers of unidentified materials, open tanks of liquids, and pressurized containers located at the facility. Further concerns relate to the structural integrity of the building, including a collapsing roof. A Request for Federal Action form is enclosed with this letter along with supporting documentation. A brief summary of the site is included below.

#### Background

The Gateway Plating LLC was a chrome plating, polishing, and metal finishing business that operated as a small-quantity generator (MO ID #038743, EPA ID #MOD985816990) at 2501 Texas Avenue in St. Louis. According to the Missouri Secretary of State's filed documents, Gateway Plating LLC filed its Articles of Organization on June 21, 2002, and is currently listed as an active entity. The Secretary of State's records did not include any Annual Registration Reports for Gateway Plating LLC.

A fire occurred at the facility in 2017, and all operations at the site ceased; the site has remained vacant. The site, located in a mixed industrial and residential area, is approximately six tenths of an acre. Dilapidated interconnected buildings, currently owned by Roy Gros, cover about two thirds of the site. Aerial photographs show that the northern portion of the facility's roof collapsed since operations ceased. The buildings contain various vessels with unidentified materials, open tanks of liquids, and pressurized containers, potentially containing hazardous substances.



Ken Buccholz

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On July 30, 2015, the Department's St. Louis Regional Office (SLRO) conducted a hazardous waste compliance evaluation inspection at the Gateway Plating LLC facility. Department staff noted nine violations during the inspection. The following were two of the violations that Gateway Plating LLC corrected at the time of the Department's inspection:

- Failure to clearly mark a container storing hazardous waste with the date upon which the period of accumulation begins, in violation of 10 CSR 25-5.262(1) incorporating 40 C.F.R. § 262.34(d)(4) referencing 40 C.F.R. § 262.34(a)(2).
- Failure to clearly mark a container as "Hazardous Waste," in violation of 10 CSR 25-5.262(1) incorporating 40 C.F.R. § 262.34(a)(3).

On April 1, 2021, Thomas Pickel, Executive Director of DeSales Community Development, contacted Peter Phillips, Major Project Manager for the St. Louis Development Corporation, regarding the remaining drums and tanks currently located on the site, looking for assistance on how to get the site cleaned up. On June 1, 2021, Peter Phillips forwarded Thomas Pickel's email to the Department's SLRO.

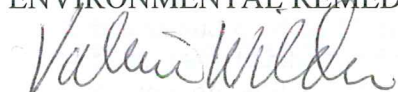
DeSales Community Development obtained access to the site through a court order in the City of St. Louis for themselves, the Department, and the EPA on April 29, 2021. The order is valid until October 29, 2021.

In March 2021, Peter Hoffman of Legal Services of Eastern Missouri, DeSales Assistant Director Becky Reinhart, DeSales Executive Director Thomas Pickel, a DeSales board member, and Ben Butterfield of SCI Engineering, inspected the property under the court order. During this inspection they noted that there were open and sealed barrels of unidentified materials, open tanks of unidentified liquids, numerous pieces of old equipment, and a partial roof collapse. Enclosed, in addition to the RFA Form, are all supporting documents: site location map, photographs, site inspection report, as well as contact information for Thomas Pickel.

If you have any questions, please feel free to contact me at 573-751-7880 or toll free at 1-800-361-4827, or by e-mail at [valerie.wilder@dnr.mo.gov](mailto:valerie.wilder@dnr.mo.gov).

Sincerely,

ENVIRONMENTAL REMEDIATION PROGRAM



Valerie Wilder, Chief  
Superfund Section

VW:abc

Enclosures

**REQUEST FOR FEDERAL ACTION**

The Missouri Department of Natural Resources requests, pursuant to Section 128(b)(1)(B)(i) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 U.S.C. § 9608(b)(1)(B)(i), the assistance of the United States Environmental Protection Agency, Region 7 (EPA) in the evaluation of site conditions and/or the performance of a response action, for the following site:

GATEWAY PLATING LLC  
Site Name

2501 TEXAS AVENUE  
Street Address/Property Description


ST. LOUIS  
City

ST. LOUIS CITY  
County

MISSOURI  
State

By making this request, the Requesting Agency recognizes that the EPA, or any other entity acting on behalf of the EPA, may use its authorities under CERCLA, the National Oil and Hazardous Substances Pollution Contingency Plan, 40 CFR Part 300, or any other federal statute, regulation or response program, to respond to and recover costs incurred in response to releases or threats of releases of hazardous substances, pollutants and/or contaminants at or from the site. By making this request, the Requesting Agency waives notice as otherwise required by Section 128(b)(1)(D) of CERCLA, 42 U.S.C. § 9628(b)(1)(D). The signatory of this request is authorized to make this request on behalf of the Requesting Agency.

Date 6/21/2021

  
Name




Chief, Superfund Section, Environmental Remediation Program  
Title

Missouri Department of Natural Resources  
Requesting Agency

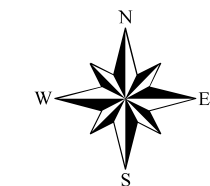
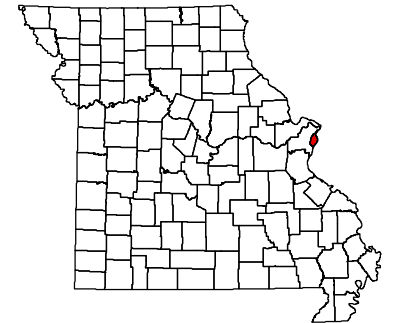
## Attachment A: Site Location Map

**Figure #1: Site Location Map**  
**Gateway Plating LLC Site**  
**2501 Texas Avenue**  
**St. Louis City County, Missouri**

**Legend**

-  Gateway Plating LLC Site
-  County Boundary
-  Local Roads

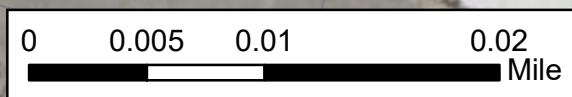
Population within one mile of site = 24,856



Created on: June 9, 2021 by Amanda Branson.  
 This map is located at:  
 M/Superfund/Gateway Plating LLC/Figure 1

Base Map: National Agriculture Imagery Program (NAIP) ortho photography 2016  
 Data Sources: US Census 2010; USFWS National Wetland Inventory; Missouri Department of Transportation; USGS National Hydrography Dataset

Although data sets used to create this map have been compiled by the Missouri Department of Natural Resources, no warranty, expressed or implied, is made by the department as to the accuracy of the data and related materials. The act of distribution shall not constitute any such warranty, and no responsibility is assumed by the department in the use of these data or related materials.



Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

Attachment B: Department Letter of Warning to Gateway Plating LLC



August 19, 2015

Mr. Steven Gros  
Gateway Plating LLC  
2501 Texas Avenue  
St. Louis, MO 63104

Dear Mr. Gros:

### LETTER OF WARNING

On July 30, 2015, Mr. Michael Davis of my staff conducted a hazardous waste compliance evaluation inspection at the Gateway Plating LLC (Gateway) facility located at the above address. The inspection was conducted under the authority of the Resource Conservation and Recovery Act (RCRA) of 1976 and Sections 260.375(9) and 260.377 of the Missouri Hazardous Waste Management Law (1977) as amended. The purpose of the inspection was to determine the facility's compliance with the Missouri Hazardous Waste Management Law and Regulations.

Please review the enclosed Small Quantity Generator Inspection Checklist and Universal Waste Attachment – Small Quantity Handler used by the inspector during the visit. The citations checked "V" on the checklist indicates violations that were determined by the inspector. There were 9 violations discovered during the inspection:

- 1. A6) Failure to update generator registration form if the information filed with the department changes, in violation of 10 CSR 25-5.262(2)(A)3.B.** The waste codes seen on manifests and the facility contact differ from what is registered with the Department and need to be updated. Currently only D002 and D007 are registered with the state. The generator must ensure the Department is updated if any information filed with the Department changes. While you're summary reports filed with the Department list some of the other codes being used, an updated notification must also be submitted. The appropriate form can be found at the following web address:  
<http://dnr.mo.gov/forms/index.html#HazardousWaste>.
- 2. (B10) Failure to clearly mark a container storing hazardous waste with the date upon which the period of accumulation begins, in violation of 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 262.34(a)(2).** The 55-gallon drum of waste copper cyanide was not marked with an accumulation start date (See Photo 9 & 10). This violation was corrected at the time of the inspection (photo 15). Please ensure all containers storing hazardous waste are marked with an accumulation start date when the first amount of hazardous waste is added to them.

3. **(B12) Failure to clearly mark a container as “Hazardous Waste”, in violation of 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(a)(3).** The 55-gallon drum of waste copper cyanide was not labeled as hazardous waste (photos 9 & 10). This violation was corrected at the time of the inspection (photo 15). Please ensure all containers storing hazardous waste are labeled in accordance with the regulations.
4. **(D8) Failure to post emergency coordinator's name and phone number near the telephone, in violation of 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(5)(ii)(A).** The emergency coordinator’s name and phone number must be posted next to the phone nearest to the hazardous waste storage area(s).
5. **(D10) Failure to post the telephone number of the fire department near the telephone, in violation of 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(5)(ii)(C).** The fire department’s phone number must be posted next to the phone nearest to the hazardous waste storage area(s).
6. **(D9) Failure to post location of fire extinguisher, fire alarms and spill control equipment near phone, in violation of 10 CSR 25-5.262(1) incorporating 40 CFR 62.34(d)(5)(ii)(B).** The location of the fire extinguishers and spill control/emergency equipment must be posted next to the phone nearest to the hazardous waste storage area(s).
7. **(S3) Failure to store unbroken lamps in closed, non-leaking containers/packages that are structurally sound to prevent breakage, in violation of 10 CSR 25-16.273(1) incorporating 40 CFR 273.13(d)(1).** Used lamps generated from building maintenance were stored in 4 foot cardboard boxes that were not closed (See Photo 12). This issue was corrected at the time of the inspection (See photo 14). Please ensure used lamps are stored and labeled in accordance with the regulations.
8. **(D14/D16) Failure to attempt to make arrangements with police, fire department, and emergency response teams, in violation of 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.37(a)(1) and (a)(3).** Based on types of waste handled and potential need for services, the owner or operator must attempt to make arrangements with police, fire department, and emergency response teams to familiarize them with the layout of facility, properties of waste handled, associated hazards, places where facility personnel would normally be working, entrances to roads inside the facility, and possible evacuation routes.
9. **(D17) Failure to attempt to make arrangements to familiarize local hospitals with facility, in violation of 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.37(a)(4).** The owner or operator must attempt to make arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and types of injuries and illnesses that could result from fires, explosions or releases at the facility.



To return this facility to compliance, you must correct the unsatisfactory features contained in this report **by September 30, 2015**, a written description of all actions taken and/or a schedule for completion of all necessary actions to correct the unsatisfactory features, along with supporting documentation, must be submitted to the Missouri Department of Natural Resources, St. Louis Regional Office, 7545 South Lindbergh Blvd., Suite 210, St. Louis, MO 63125.

Thank you for your cooperation. **Should you have any questions, please contact Mr. Michael Davis at (314) 416-2479 or by email at [michael.davis@dnr.mo.gov](mailto:michael.davis@dnr.mo.gov).**

Sincerely,

ST. LOUIS REGIONAL OFFICE



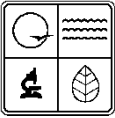
Tom Markowski  
Air and Land Section Chief

TM/MAD/pn

Enclosures

c: HWP (via exchange drive)

## Attachment #1



**SMALL QUANTITY GENERATOR INSPECTION CHECKLIST**

S

**FOR FACILITIES THAT GENERATE/ACCUMULATE < 1,000 KILOGRAMS (2,200 POUNDS OR APPROXIMATELY FIVE DRUMS < 2.2 POUNDS OF ACUTELY HAZARDOUS WASTE)**

NAME Gateway Plating LLC		DATE 7/30/15	EPA ID NUMBER MOD985816990	
ADDRESS 2501 Texas Avenue		RESOURCE RECOVERY NUMBER n/a	MO ID NUMBER 038743	TELEPHONE NUMBER WITH AREA CODE 314-865-1350
CITY St. Louis		COUNTY St. Louis City	ZIP CODE 63104	YEARS AT SITE 80
NUMBER OF EMPLOYEES 5		REGIONAL OFFICE TRACKING NUMBER		
DATE OF LAST INSPECTION 11/18/2008	REGIONAL OFFICE <input type="checkbox"/> KCRO <input type="checkbox"/> NERO <input type="checkbox"/> SERO <input checked="" type="checkbox"/> SLRO <input type="checkbox"/> SWRO			
PRIMARY CONTACT NAME Steven Gros		PRIMARY CONTACT TITLE Owner		
SECONDARY CONTACT NAME		SECONDARY CONTACT TITLE		

**CHECKLIST ATTACHMENTS**

Used Oil <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Resource Recovery <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Tank <input type="checkbox"/> Yes <input checked="" type="checkbox"/> No	Universal Waste <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No	Addendum <input checked="" type="checkbox"/> Yes <input type="checkbox"/> No
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**DESCRIPTION OF THE FACILITY'S OPERATION AND PLANT**

Gateway Plating LLC (Gateway) is a chrome plating, polishing, and metal finishing business. Gateway preforms custom chrome plating on a job shop basis. Parts that are plated are primarily automotive or household hardware. Parts are first cleaned by stripping in an alkaline (sodium hydroxide) bath and sometimes grinding to clean the parts prior to plating. The plating process begins with an acid (hydrochloric acid) bath for degreasing prior to plating the parts. Nickel plating after acid cleaning is done next to allow chrome to better adhere to the metal parts and then finally the parts are chrome plated. Certain parts (die cast parts) are copper plated (copper cyanide bath) using an electroless process prior to the nickel and chrome plating. Chemicals for the different baths in the plating process maintain effectiveness over a number of years. For this reason the baths are rarely changed out and instead are added to with fresh chemicals. When a bath does need to be replaced. It is either containerized in 55-gallon drums, or removed and transported off-site via a vacuum truck. Rinse baths associated with the cleaning and plating process are disposed of through the sanitary sewer, and Gateway has a discharge permit with MSD (See Attachment 5).

The Gateway facility occupies a city block encompassing about 20,000 square feet. Standard hours of operation are Monday through Friday 5:30 AM to 4:30 PM. Plating is only done 3 days a week (Tuesday-Thursday) with polishing and office work being done the other days.

**WASTE STREAM ANALYSIS**

<b>Waste Stream Description(s)</b>	<b>Waste Code(s)</b>	<b>Process that Generates the Waste and Location</b>	<b>How Managed Onsite (i.e., drums/containers, rollofs, etc.) + Storage Duration</b>	<b>Quantity Generated Per Month or Year (note which time period)</b>	<b>Transporter Name, Location &amp; Method of Transport (i.e., truck, rail)</b>	<b>MO Transporter License Verified</b>	<b>Receiving Facility Name + Location + Method of Treatment &amp; Disposal</b>
Waste Hydrochloric acid (Acid bath)	D002, D006, D007, D008	Plating Process	55-gallon drums/180 day	Variable	Kiesel Company (MO)		American Environmental Services, Inc. (KY)
Waste Sulphuric Acid (Stripping bath)	D002	Plating Process	55-gallon drums/180 day	Variable	Kiesel Company (MO)		American Environmental Services, Inc. (KY)
Waste Copper Cyanide (Copper plating bath)	D002	Plating Process	55-gallon drums/180 day	Variable	EQ Industrial Services		EQ Detroit Inc. (MI)
Nickel Sulfate (Solids)	Non-Haz	Plating Process	55-gallon drums/180 day	Variable	EQ Industrial Services		EQ Detroit Inc. (MI)
Strip Tank Bottoms (Solids) From Nickel Plating	Non-Haz	Plating Process	55-gallon drums/180 day	Variable	EQ Industrial Services		EQ Detroit Inc. (MI)
Caustic Cleaner (Solids) From Nickel Plating	Non-RCRA	Plating Process	55-gallon drums/180 day	Variable	EQ Industrial Services		EQ Detroit Inc. (MI)
Nickel Sulfate (Sludge)	Non-RCRA	Plating Process	55-gallon drums/180 day	Variable	EQ Industrial Services		EQ Detroit Inc. (MI)
Waste Chromic Acid (Chrome Plating Bath)	D002, D007	Plating Process	55-gallon drums/180 day	Variable	EQ Industrial Services		EQ Detroit Inc. (MI)
Used Lamps	-	Facility Maintenance	4 foot cardboard Boxes	Variable	Mail		Veolia

<b>A. GENERAL</b>						
	<b>C</b>	<b>V</b>	<b>NA</b>	<b>COMMENTS</b>		
1.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Facility has registered as a hazardous waste generator and paid fees. – Section 260.380.1(1) RSMo and 10 CSR 25.5.262(2)(A).	1	A6- Facility contact information needs to be updated.
2.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Generator determines if waste is hazardous pursuant to methods referenced in 40 CFR 262.11. – 10 CSR 25-5.262(1) incorporating 40 CFR 262.11.	1	
3.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Facility uses a licensed hazardous waste transporter. – Section 260.380.1(5) RSMo.	1	
4.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Facility uses an authorized hazardous waste treatment, storage or disposal facility or resource recovery facility. – Section 260.380.1(7) RSMo.	1	
5.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Facility has not constructed, substantially altered or operated a hazardous waste facility without first obtaining a hazardous waste facility permit from the department as specified in Section 260.395. – Section 260.390.1(1) RSMo.	1	
6.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	A person required to register also completes and files an updated generator registration form if the information filed with the department changes. – 10 CSR 25-5.262(2)(A)3.B.	2	
7.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Materials are not accumulated speculatively. – 10 CSR 25-4.261 incorporating 40 CFR 261.1(c)(8).	2	
8.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Facility can demonstrate legitimate recycling. – 10 CSR 25-4.261 incorporating 40 CFR 261.2(f).	2	

**PART 1: WALK-THROUGH INSPECTION**

<b>B. PRETRANSPORT, CONTAINERIZATION AND STORAGE</b>						
	<b>C</b>	<b>V</b>	<b>NA</b>	<b>COMMENTS</b>		
1.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The quantity of hazardous waste accumulated on site never exceeds 6,000 kilograms. – 10 CSR 25-5.261(1) incorporating 40 CFR 262.34(d)(1).	1	Gateway rarely has hazardous waste stored on-site do to the longevity of the chemical baths in the plating process. At the time of the inspection there was one 55-gallon, drum of waste copper cyanide (2/3 full) that was being prepared for off-site shipment in the next week.
2.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Storage does not exceed 180 days (or 270 days if transported > 200 miles). – 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d) or 40 CFR 262.34(e).	1	
3.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	If a container holding hazardous waste is not in good condition, or if it begins to leak, the owner or operator transfers the hazardous waste from this container to a container that is in good condition, or manages the waste in some other way that complies with the requirements of this part. – 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(2) referencing 40 CFR 265.171.	1	
4.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The owner or operator uses a container made of or lined with materials which will not react with, and are otherwise compatible with, the hazardous waste to be stored, so that the ability of the container to contain the waste is not impaired. – 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(2) referencing 40 CFR 265.172 .	1	
5.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	A container holding hazardous waste is always closed during storage, except when it is necessary to add or remove waste. – 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(2) referencing 40 CFR 265.173(a).	1	
6.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Container is not opened, handled, or stored in a manner which may rupture it or cause it to leak. – 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(2) referencing 40 CFR 265.173(b).	1	
7.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	A storage container holding a hazardous waste that is incompatible with any waste or other materials stored nearby in other containers, piles, open tanks or surface impoundments is separated from the other materials or protected from them by means of a dike, berm, wall or other device. – 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(2) referencing 40 CFR 265.177(c).	1	
8.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Containers of ignitable or reactive waste are stored at least 50 feet from property line (or meet requirements). – 10 CSR 25-5.262(2)(C)6 referencing 40 CFR 265.176 as amended by 10 CSR 25-7.265(2)(l) 7 & 8.	2	

B. PRETRANSPORT, CONTAINERIZATION AND STORAGE (CONTINUED)						
C	V	NA	COMMENTS			
9.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Waste is packaged/labeled/marked per Department of Transportation during entire on-site storage period. – 10 CSR 25-5.262(2)(C)1. *evaluate and comment on observation following program guidance	2	B9- At the time of the inspection, the facility's waste storage containers were not meeting Missouri's current requirements for packaging, marking and labeling per DOT requirements during the entire on-site storage period. However, this regulatory requirement is currently under revision, and once finalized should ensure compliance with the revised regulations.  B10- No accumulation start date was present on the 55-gallon drum of waste copper cyanide (See photos 9 & 10).*  B12- The drum of waste copper cyanide was not labeled "Hazardous Waste" (See Photos 9 & 10)*  * At the time of the inspection, the drum of waste copper cyanide was labeled "Hazardous Waste" and marked with an accumulation start date (See Photo 15).
10.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The date upon which each period of accumulation begins is clearly marked and visible for inspection on each container. – 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 262.34(a)(2).	2	
11.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Containers are protected from contact with accumulated liquids. – 10 CSR 25-5.262(2)(C)2.D(III)(b).	2	
12.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Containers are clearly labeled or marked "Hazardous Waste." – 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 262.34(a)(3).	2	
13.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Facility inspects areas where containers are stored at least weekly, looking for leaking containers and for deterioration of containers caused by corrosion or other factors. [Comment: See § 265.171 for remedial action required if deterioration or leaks are detected.] – 10 CSR 25-5.262(2)(C)2.C(I)&(II) incorporating 40 CFR 262.34(d) referencing 40 CFR 265.174.	2	
14.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Facility performs daily inspection of areas subject to spills when in use (i.e., loading and unloading areas and waste handling areas). – 10 CSR 25-5.262(2)(C)2.C(II).	2	
15.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Adequate aisle space is maintained to allow the unobstructed movement of personnel, fire protection equipment, spill control equipment, and decontamination equipment to any area of facility operation in an emergency, <i>unless</i> aisle space is not needed for any of these purposes. – 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.35.	2	
16.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Placards are available for transporter or a written contract is in place for transporter to supply placards. – 10 CSR 25-5.262(1) incorporating 40 CFR 262.33.	2	
17.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	While ignitable, reactive, incompatible or volatile waste is being handled, the owner/operator separates and protects these wastes from sources of ignition or reaction including, but not limited to, open flames, smoking, cutting and welding, hot surfaces, frictional heat, sparks (static, electrical, or mechanical), spontaneous ignition (i.e., from heat-producing chemical reactions), and radiant heat. Smoking and open flame is confined to specially designated locations. "No Smoking" signs are conspicuously placed wherever there is a hazard from ignitable or reactive waste. – 10 CSR 25-5.262(2)(C)2.F(II).	2	

C. SATELLITE ACCUMULATION						
C	V	NA	COMMENTS			
1.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>A satellite container holding hazardous waste is always closed during storage, except when it is necessary to add or remove waste. – 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)(i) referencing 40 CFR 265.173(a)</b>	1	There was no satellite accumulation on-site at the time of the inspection. Section not evaluated.
2.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>If a satellite container holding hazardous waste is not in good condition, or if it begins to leak, the owner or operator transfers the hazardous waste from this container to a container that is in good condition or manages the waste in some other way that complies with the requirements of this part. – 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)(i) referencing 40 CFR 265.171.</b>	1	
3.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>Satellite container is made of or lined with materials which will not react with, and are otherwise compatible with, the hazardous waste stored. – 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)(i) referencing 40 CFR 265.172.</b>	1	
4.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>Quantities accumulated in each satellite accumulation area do not exceed 55 gallons or one quart of acutely hazardous wastes. – 10 CSR 25-5.262(2)(C)3 incorporating 40 CFR 262.34(c)(1).</b>	1	

C. SATELLITE ACCUMULATION (CONTINUED)						
C	V	NA	COMMENTS			
5.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Satellite containers go to storage or are shipped within three days of filling and container holding the excess accumulation is marked with the date the excess amount began accumulating. – 10 CSR 25-5.262(2)(C)3 incorporating 40 CFR 262.34(c)(2).	1	
6.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Satellite container is marked either with the words "Hazardous Waste" or with other words identifying the contents and the beginning date of satellite storage. – 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1)(ii) as modified by 10 CSR 25-5.262(2)(C)3.	2	
7.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Hazardous waste is stored in satellite areas less than one year. – 10 CSR 25-5.262(2)(C)3.	2	
8.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Satellite containers are stored at or near any point of waste generation where wastes initially accumulate which is under the control of the operator of the process generating the waste. – 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(c)(1).	2	
D. PREPAREDNESS, PREVENTION AND EMERGENCY PROCEDURES						
C	V	NA	COMMENTS			
1.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Facilities must be maintained and operated to minimize the possibility of a fire, explosion or any unplanned sudden or non-sudden release of hazardous waste or hazardous waste constituents to air, soil or surface water which could threaten human health or the environment. – 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.31.	1	D8/D9/D10- The emergency contact information, location of fire extinguishers & fire alarms/spill equipment, and the number for the fire department were not posted by the phone.
<b>All facilities must be equipped with the items in 2-6 below unless none of the hazards posed by waste handled at the facility could require a particular kind of equipment specified below:</b>						
2.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Facility has an internal communications or alarm system capable of providing immediate emergency instruction (voice or signal) to facility personnel. – 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.32(a).	2	
3.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Facility has a device, such as a telephone or a hand-held two way radio, capable of summoning emergency assistance from local police departments, fire departments, or state or local emergency response teams immediately available at the scene of operations. – 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.32(b).	2	
4.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Facility has portable fire extinguishers, fire control equipment (including special extinguishing equipment, such as that using foam, inert gas, or dry chemicals), spill control equipment, and decontamination equipment. – 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.32(c).	2	
5.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Facility has water at adequate volume and pressure to supply water hose streams, or foam producing equipment, or automatic sprinklers, or water spray systems. – 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.32(d).	2	
6.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	In addition to the required equipment specified in 40 CFR 265.32, incorporated in 10 CSR 25-7.265, the generator also provides safety equipment such as fire blankets, gas masks, and self-contained breathing apparatus. – 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.32 as amended by 10 CSR 25-5.262(2)(C)2.G.	2	
7.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Communication and emergency equipment is tested and maintained. – 10 CSR 5-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.33.	2	
8.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The emergency coordinator's name and phone number is posted next to the phone. – 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(5)(ii)(A).	2	
9.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The locations of fire extinguishers and spill control material, and if present fire alarm, are posted next to the phone. – 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(5)(ii)(B).	2	

D. PREPAREDNESS, PREVENTION AND EMERGENCY PROCEDURES (CONTINUED)				COMMENTS	
	C	V	NA		
10.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The telephone number of fire department is posted next to the phone unless the facility has a direct alarm. – 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(5)(ii)(C). 2	D14/D16/D17 – Gateway has not attempted to make arrangements with local first responders, and emergency personnel (fire, police, emergency responders) and local healthcare facilities.
11.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	All employees are familiar with waste handling and emergency procedures relevant to their responsibilities during normal operations and emergencies. – 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(5)(iii). 2	
12.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Whenever hazardous waste is being poured, mixed, spread or otherwise handled, all personnel involved in the operation have immediate access to an internal alarm or emergency communication device, either directly or through visual or voice contact with another employee, unless such a device is not required under 265.32. – 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.34(a). 2	
13.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	If there is ever just one employee is on the premises while the facility is operating he has immediate access to a device, such as a telephone (immediately available at the scene of operation) or a hand-held two-way radio, capable of summoning external emergency assistance, <i>unless</i> such a device is not required under 265.32. – 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.34(b). 2	
14.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Based on types of waste handled and potential need for services, owner or operator has attempted to make arrangements with police, fire department, and emergency response teams to familiarize them with the layout of facility, properties of waste handled, associated hazards, places where facility personnel would normally be working, entrances to roads inside the facility, and possible evacuation routes. – 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.37(a)(1). 2	
15.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Where more than one police and fire department might respond to an emergency, owner or operator has attempted to make arrangements designating primary emergency authority to a specific police and a specific fire department and agreements are in place with any others to provide support to the primary emergency authority. – 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.37(a)(2). 2	
16.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The owner or operator has attempted to make agreements with state emergency response teams, emergency response contractors, and equipment suppliers. – 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.37(a)(3). 2	
17.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	The owner or operator has attempted to make arrangements to familiarize local hospitals with the properties of hazardous waste handled at the facility and types of injuries and illnesses that could result from fires, explosions or releases at the facility. – 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.37(a)(4). 2	
18.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Where state or local authorities decline to enter into such agreements, the owner or operator has documented the refusal in the operating record. – 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(4) referencing 40 CFR 265.37(a)(4)(b). 2	
19.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	At all times, at least one emergency coordinator(s) is on premise or on call (i.e., available to respond to an emergency by reaching the facility within a short period of time) with the responsibility for coordinating all emergency response measures specified in paragraph (d)(5)(iv) of this section. The employee is the emergency coordinator. – 10 CSR 25-5.262(1) incorporating 40 CFR 262.34(d)(5)(i). 2	



<b>D. PREPAREDNESS, PREVENTION AND EMERGENCY PROCEDURES (CONTINUED)</b>						
<b>C</b>	<b>V</b>	<b>NA</b>	<b>COMMENTS</b>			
20.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	If a spill occurs where there is clear and imminent danger to humans or the environment, reasonable action was taken to eliminate the danger. In the event of a spill of a reportable quantity of material under 40 CFR 302.4 and 302.5 (which includes table 302.4), the generator notifies in accordance with the notification procedure in 10 CSR 24-3.010. – 10 CSR 25-5.262(2)(l) referencing 40 CFR 302.4 & 302.5.	2	D20- Gateway has not had a spill of a reportable quantity.
<b>PART 2: RECORDS INSPECTION</b>						
<b>E. MANIFESTS</b>						
<b>C</b>	<b>V</b>	<b>NA</b>	<b>COMMENTS</b>			
1.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>Facility uses the manifest system, or the wastes are reclaimed under a contractual agreement. – Section 260.380.1(6) RSMo and 10 CSR 25-5.262(2)(B) or 10 CSR 25-5.262(1) incorporating 40 CFR 262.20(e)(1) and (2).</b>	1	See Attachment 3
2.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The generator maintains a copy of the reclamation agreement in his files for a period of at least three years after termination or expiration of the agreement.– 10 CSR 25-5.262(1) incorporating 40 CFR 262.20(e)(2).	2	
3.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Manifests are maintained for three years from the date the waste was accepted by the initial transporter. – 10 CSR 25-5.262(1) incorporating 40 CFR 262.40(a).	2	
4.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	MH02 is listed on manifest if the hazardous waste is 2, 3, 7, 8-tetrachlorodibenzo-p-dioxin (TCDD) as listed in 10 CSR 25-4.261(2)(D)3. – 10 CSR 25-5.262(2)(B)1.	2	
5.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Missouri waste codes MH01 and MH02 are used on manifest if applicable. – 10 CSR 25-5.262(2)(B)2.	2	
6.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The generator who transports or offers for transport a hazardous waste for off-site treatment, storage or disposal, or a treatment, storage and disposal facility who offers for transport a rejected hazardous waste load, must prepare a manifest (OMB Control Number 2050-0039) on EPA Form 8700-22A, according to the instructions included in the appendix to 40 CFR Part 262. – 10 CSR 25-5.262(1) incorporating 40 CFR 262.20(a)(1).	2	
7.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The generator's EPA ID number is entered on the manifest. (Item #1) – 10 CSR 25-5.262(1) incorporating 40 CFR 262.20(a)(1).	2	
8.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The total number of pages used to complete the manifest, plus the number of continuation sheets if any is entered on the manifest. (Item #2) – 10 CSR 25-5.262(1) incorporating 40 CFR 262.20(a)(1).	2	
9.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The emergency response phone number of the generator or phone number of an agency or organization who is capable of and accepts responsibility for providing detailed information about the shipment, and can reach a phone that is monitored 24 hours a day at all times the waste is in transportation (including transportation related storage), and reach someone who is either knowledgeable of the hazardous waste being shipped and has comprehensive emergency response information for the material being shipped or has immediate access to a person who has that knowledge and information about the shipment is entered on the manifest. (Item #3) – 40 CFR Part 262 – 10 CSR 25-5.262(1) incorporating 40 CFR 262.20(a)(1).	2	
10.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	A unique manifest tracking number (preprinted by a forms printer) is entered on the manifest. (Item #4) – 10 CSR 25-5.262(1) incorporating 40 CFR 262.20(a)(1).	2	
11.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The generator's name, mailing address, and phone number (site address only if different from mailing address) are entered on the manifest. (Item #5) – 10 CSR 25-5.262(1) incorporating 40 CFR 262.20(a)(1).	2	
12.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	All transporter's names and EPA ID numbers are entered on the manifest. (Items #6 & #7) – 10 CSR 25-5.262(1) incorporating 40 CFR 262.20(a)(1).	2	

E. MANIFESTS (CONTINUED)				COMMENTS	
	C	V	NA		
13.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The designated facility name, address, phone number, and EPA ID numbers are entered on the manifest. (Item #8) – 10 CSR 25-5.262(1) incorporating 40 CFR 262.20(a)(1).	2
14.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The Department of Transportation shipping description (proper shipping name, hazard class or division, waste identification numbers and packing group, plus reportable quantities if required) are entered on the manifest. (Item #9) – 10 CSR 25-5.262(1) incorporating 40 CFR 262.20(a)(1).	2
15.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The types of containers with appropriate abbreviations are entered on the manifest. (Item #10) – 10 CSR 25-5.262(1) incorporating 40 CFR 262.20(a)(1).	2
16.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The total quantity of waste, without decimals or fractions, based on actual measurements or reasonably accurate estimates of actual quantities shipped is entered on the manifest. (Item #11). Container capacities are not acceptable as estimates. – 10 CSR 25-5.262(1) incorporating 40 CFR 262.20(a)(1).	2
17.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Either the total weight in kilograms or pounds or the specific gravity in gallons, liters or cubic yards is entered on the manifest. (Item #12) – 10 CSR 25-5.262(2)(B)4.	2
18.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The waste codes most representative of the waste (federal and state codes) to describe each waste stream in Item #9 are entered on the manifest. The generator may enter up to six codes on the manifest. (Item #13) – 10 CSR 25-5.262(1) incorporating 40 CFR 262.20(a)(1).	2
19.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Special handling instructions for federally required information for which there is no specific space on the manifest such as alternative facility designations, manifest tracking number of the original manifest for rejected wastes and residues that are re-shipped under a second manifest, and the specification of PCB waste-descriptions and PCB out-of-service dates are entered on the manifest. (Item #14) – 10 CSR 25-5.262(1) incorporating 40 CFR 262.20(a)(1).	2
20.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The manifest is signed and dated. (Item #15) – 10 CSR 25-5.262(1) incorporating 40 CFR 262.20(a)(1).	2
21.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The generator designates another facility or instructs the transporter to return the waste if the transporter is unable to deliver the waste to the designated facility or to the alternate facility designated on the manifest. – 10 CSR 25-5.262(1) incorporating 40 CFR 262.20(d).	2
22.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The generator contracts with the designated facility to return the completed manifest to the generator within 35 days after the hazardous waste was accepted by the initial transporter and files an exception report within 45 days where applicable under (2)(D)2 of the rule. – 10 CSR 25-5.262(2)(B)5.	2
23.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The generator determined if waste must be treated before land disposal and if waste meets treatment standards. – 10 CSR 25-7.268(1) incorporating 40 CFR 268.7(a)(1).	2
24.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	A “Land-Ban” notification/certification is sent with manifests or with the first shipment if the waste or contaminated soil does not meet the treatment standards, or if the generator chooses not to make the determination. – 10 CSR 25-7.268(1) incorporating 40 CFR 268.7(a)(2).	2
25.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	The notification/certification includes the correct EPA hazardous waste number, corresponding treatment standards, manifest number and waste analysis data. – 10 CSR 25-7.268(1) incorporating 40 CFR 268.7(b)(3)(ii).	2
26.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Used oil that cannot or is not intended to be recycled is designated as D098 on the manifest. – 10 CSR 25-5.262(2)(B)3 referencing 10 CSR 25-11.279(2)(l)1.B.	2

**COMMENTS: INCLUDE DISCUSSION OF FACILITY'S WASTE MINIMIZATION PLAN**

**CHECK ALL POTENTIAL MULTI-MEDIA VIOLATIONS AND IMPACTS (SPECIFY AND COMMENT BELOW)**

Air Pollution Control	Public Drinking Water	Solid Waste Management	Hazardous Waste	Water Pollution Control
<input type="checkbox"/> Fugitive Dust <input type="checkbox"/> Particulate <input type="checkbox"/> Burning <input type="checkbox"/> Asbestos <input type="checkbox"/> Odors <input type="checkbox"/> Toxics <input type="checkbox"/> Other	<input type="checkbox"/> Taste & Odors <input type="checkbox"/> Bacteria <input type="checkbox"/> Pressure <input type="checkbox"/> Color <input type="checkbox"/> Flow <input type="checkbox"/> Toxics <input type="checkbox"/> Other	<input type="checkbox"/> Open Dumps <input type="checkbox"/> Littering <input type="checkbox"/> Waste Tire Dump <input type="checkbox"/> SLF <input type="checkbox"/> Other	<input type="checkbox"/> Transportation <input type="checkbox"/> PCBs <input type="checkbox"/> USTs/LUSTs <input type="checkbox"/> Other	<input type="checkbox"/> Animal Waste <input type="checkbox"/> Bypassing <input type="checkbox"/> Treatment Plant Operation <input type="checkbox"/> Sawdust <input type="checkbox"/> Sludge <input type="checkbox"/> Single Family <input type="checkbox"/> Ground Water <input type="checkbox"/> Storm Water <input type="checkbox"/> Toxics/UST <input type="checkbox"/> Other

**COMMENTS**

Additional Attachments:

Attachment 1- Photograph Addendum (1-15)

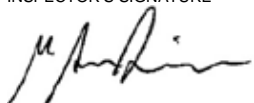
Attachment 2- Manifests and LDRs from Last Hazardous and Non-Hazardous Shipments

Attachment 3- Receipt of Last Universal Waste Lamps Shipment

Attachment 4- Copy of MSD Discharge Permit

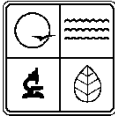
Attachment 5- Notification and Waste Stream Information Sheet.

INSPECTOR'S SIGNATURE



DATE

7/30/15



MISSOURI DEPARTMENT OF NATURAL RESOURCES  
 HAZARDOUS WASTE PROGRAM  
**UNIVERSAL WASTE ATTACHMENT – SMALL QUANTITY HANDLER**

U-S

**A SMALL QUANTITY HANDLER OF UNIVERSAL WASTE DOES NOT ACCUMULATE 5,000 KILOGRAMS OR MORE TOTAL OF ALL TYPES OF UNIVERSAL WASTE AT ANY TIME.**

NAME Gateway Plating LLC	DATE 7/30/15	EPA ID NUMBER MOD985816990	MO ID NUMBER 038743
ADDRESS 2501 Texas Avenue	TELEPHONE NUMBER WITH AREA CODE 314-865-1350		RR NUMBER n/a
CITY St. Louis	COUNTY St. Louis City	ZIP CODE 63104	YEARS AT SITE 80
CONTACT NAME Steven Gros		CONTACT TITLE Owner	NUMBER OF EMPLOYEES 5

<b>M. GENERAL</b>				
	C	V	NA	
1.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>Does not dispose of universal waste. – 10 CSR 25-16.273(1) incorporating 40 CFR 273.11(a).</b> 1
2.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>Does not dilute or treat universal waste except as provided by 40 CFR 273.17 or 40 CFR 273.13. – 10 CSR 25-16.273(1) incorporating 40 CFR 273.11(b).</b> 1
3.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Does not accept universal waste pesticides from other handlers unless operating a universal waste pesticide collection program per Missouri SOP. – 10 CSR 25-16.273(2)(B)1. 2
4.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	Universal waste accumulated for less than one year from the date generated or received from another handler. – 10 CSR 25-16.273(1) incorporating 40 CFR 273.15(a). 2
5.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Can demonstrate the length of time universal waste has been accumulated from the date it becomes a waste or is received (marking, labeling, inventory, dated area or other valid method). – 10 CSR 25-16.273(1) incorporating 40 CFR 273.15(c). 2
6.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Accumulates universal waste for only one year unless able to demonstrate activity is solely for the purpose of accumulating quantities to facilitate proper recovery, treatment or disposal. – 10 CSR 25-16.273(1) incorporating 40 CFR 273.15(b). 2

<b>N. PREPAREDNESS AND EMERGENCY TRAINING</b>				
	C	V	NA	
1.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<b>Immediately contains all releases of universal wastes and universal waste residues. – 10 CSR 25-16.273(1) incorporating 40 CFR 273.17(a).</b> 1
2.	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<b>Determines if materials from a universal waste release are hazardous waste and are properly managed. – 10 CSR 25-16.273(1) incorporating 40 CFR 273.17(b).</b> 1
3.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Provides all employees who manage universal waste with information describing proper handling and emergency procedures appropriate for universal wastes handled at the facility. – 10 CSR 25-16.273(1) incorporating 40 CFR 273.16. 2

<b>O. OFF-SITE SHIPMENTS</b>				
	C	V	NA	
1.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>Non-pesticide universal wastes only sent to another universal waste handler, destination facility, Missouri resource recovery facility or foreign destination. – 10 CSR 25-16.273(1) incorporating 40 CFR 273.18(a) as modified by 10 CSR 25-16.273(2)(B).</b> 1
2.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Complies with universal waste transporter requirements if self-transporting universal waste. – 10 CSR 25-16.273(1) incorporating 40 CFR 273.18(b). 2
3.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Uses proper shipping documents, packages, labels, marks and provides placards per Department of Transportation requirements on universal waste that meets hazardous materials definition. – 10 CSR 25-16.273(1) incorporating 40 CFR 273.18(c). 2

**O. OFF-SITE SHIPMENTS (CONTINUED)**

**C** (Compliant) **V** (Violation) **NA** (Not Applicable)

C V NA				COMMENTS	
4.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Ensures receiving handler agrees to accept universal waste prior to shipment. – 10 CSR 25-16.273(1) incorporating 40 CFR 273.18(d).	2
5.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Accepts rejected universal waste or agrees with receiving handler to ship to an alternate destination facility. – 10 CSR 25-16.273(1) incorporating 40 CFR 273.18(e).	2
6.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Contacts originating handler to discuss reshipment of the load back to originating handler or to a mutually agreed on destination facility if handler rejects a shipment or portion of a shipment of universal waste. – 10 CSR 25-16.273(1) incorporating 40 CFR 273.18(f).	2
7.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Originating handler receives back or sends rejected universal waste pesticides to another Missouri-certified resource recovery facility or destination facility if universal waste pesticides are rejected. – 10 CSR 25-16-273(2)(B)4.	2
8.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Immediately notifies the department if a shipment of hazardous waste is received and provides required information. – 10 CSR 25-16.273(1) incorporating 40 CFR 273.18(g).	2
9.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Manages waste in compliance with applicable solid waste regulations if receives a shipment of non-hazardous, non-universal wastes. – 10 CSR 25-16.273(1) incorporating 40 CFR 273.18(h).	2
10.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Exported universal waste regulations met including notification, annual reporting and record keeping. – 10 CSR 25-16.273(1) incorporating 40 CFR 273.20 referencing 40 CFR 262 Subpart E or Subpart H.	2

#### P. BATTERIES

C V NA				COMMENTS		
1.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>Damaged or leaking batteries kept in closed, structurally sound containers. – 10 CSR 25-16.273(1) incorporating 40 CFR 273.13(a)(1).</b>	1	Gateway does not handle universal waste batteries. Not Evaluated.
2.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>Battery cells immediately closed after the removal of electrolyte. – 10 CSR 25-16.273(1) incorporating 40 CFR 273.13(a)(2).</b>	1	
3.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>If casings of individual battery cells are breached then manages batteries as hazardous waste if characteristic. – 10 CSR 25-5.262(1) incorporating 40 CFR 262.11.</b>	1	
4.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>Determines if electrolyte removed from cells and other solid wastes generated from universal waste batteries exhibit hazardous waste characteristics and properly manages wastes. – 10 CSR 25-16.273(1) incorporating 40 CFR 273.13(3).</b>	1	
5.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Batteries stored in a manner to prevent releases to the environment (box, shrink wrapped pallet, container, etc.). – 10 CSR 25-16.273(1) incorporating 40 CFR 273.13(a).	2	
6.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Individual battery cells kept intact and closed while performing approved management of batteries (sorting, discharging, disassembling battery packs, etc.). – 10 CSR 25-16.273(1) incorporating 40 CFR 273.13(a)(2).	2	
7.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Batteries or battery containers clearly labeled or marked as “Universal Waste-Battery(ies)” or “Waste Battery(ies)” or “Used Battery(ies).” – 10 CSR 25-16.273(1) incorporating 40 CFR 273.14(a).	2	

#### Q. PESTICIDES

Only pesticides that have been recalled or are unused and gathered as a Missouri authorized waste pesticide collection program can be managed as universal wastes.

C V NA				COMMENTS		
1.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>Universal waste pesticides stored in closed, structurally sound container that is compatible with the wastes and not leaking or damaged. – 10 CSR 25-16.273(1) incorporating 40 CFR 273.13(b)(1).</b>	1	Gateway does not handle universal waste pesticides. Not Evaluated.
2.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>Universal waste pesticides stored in closed, structurally sound transport vehicles/vessels that are compatible with the wastes and not leaking or damaged. – 10 CSR 25-16.273(1) incorporating 40 CFR 273.13(b)(4).</b>	1	

#### Q. PESTICIDES (CONTINUED)

C (Compliant) V (Violation) NA (Not Applicable)

C V NA			COMMENTS			
3.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Universal waste pesticide stored in tanks that conform with Part 265 Subpart J except for 40 CFR 265.197(c), 265.200 and 265.201. – 10 CSR 25-16.273(1) incorporating 40 CFR 273.13(b)(3).	1	
4.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Universal waste pesticides sent only to authorized destination facility or Missouri universal waste pesticide program. – 10 CSR 25-16.273(2)(B).	1	
5.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Universal waste pesticides not sent to or received from another universal waste handler. – 10 CSR 25-16.273(2)(B).	1	
6.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Recalled universal waste pesticide container, tank, transport vehicle or vessel labeled or marked with the label that was on or accompanied the product as sold/distributed. – 10 CSR 25-16.273(1) incorporating 40 CFR 273.14(b)(1).	2	
7.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Unused universal waste pesticide container, tank, transport vehicle or vessel labeled or marked with the label that was on or accompanied the product as sold/distributed or the US Department of Transportation label as required by 49 CFR Part 172, or a label designated by the Missouri waste pesticide collection program. – 10 CSR 25-16.273(1) incorporating 40 CFR 273.14(c)(1).	2	
8.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Universal waste pesticides container, tank, transport vehicle or vessel marked or labeled clearly with product label and the words "Universal Waste Pesticide(s)" or "Waste Pesticide(s)." – 10 CSR 25-16.273(1) incorporating 40 CFR 273.14(b)(2) and (c)(2).	2	

#### R. MERCURY CONTAINING EQUIPMENT

C V NA			COMMENTS			
1.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Mercury containing equipment stored in a manner to prevent releases to the environment (box, container, etc.). – 10 CSR 25-16.273(1) incorporating 40 CFR 273.13(c).	1	Gateway does not handle universal waste mercury containing equipment. Not Evaluated.
2.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Damaged or leaking mercury containing equipment or mercury containing equipment with non-contained elemental mercury kept in a closed, structurally sound container. – 10 CSR 25-16.273(1) incorporating 40 CFR 273.13(c)(1).	1	
3.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Mercury ampules or open original housing holding mercury removed over or in a containment device. – 10 CSR 25-16.273(1) incorporating 40 CFR 273.13(c)(2)(ii).	1	
4.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Mercury from spills or leaks of broken ampules or open original housing holding mercury immediately transferred to container meeting 40 CFR 262.34 requirements. – 10 CSR 25-16.273(1) incorporating 40 CFR 273.13(c)(2)(iv).	1	
5.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Removed ampules or open original housing holding mercury stored in closed, non-leaking containers that are in good condition and packaged with adequate packing material to prevent breakage during storage, handling and transportation. – 10 CSR 25-16.273(1) incorporating 40 CFR 273.13(c)(2)(vii).	1	
6.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Open original housing holding mercury removed from mercury containing equipment immediately sealed with airtight seal. – 10 CSR 25-16.273(1) incorporating 40 CFR 273.13(c)(3)(i).	1	
7.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Determines if wastes generated from mercury ampules or housing removal activities exhibits hazardous waste characteristics. If hazardous waste then manages as hazardous waste per 40 CFR part 262. – 10 CSR 25-16.273(1) incorporating 40 CFR 273.13(c)(4).	1	
8.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Mercury clean-up system readily available – 10 CSR 25-16.273(1) incorporating 40 CFR 273.13(c)(2)(iii).	2	
9.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Area where ampules or open original housing holding mercury are removed is well ventilated and monitored to ensure compliance with applicable OSHA exposure levels of mercury. – 10 CSR 25-16.273(1) incorporating 40 CFR 273.13(c)(2)(v) and 273.33(c)(2).	2	

R. MERCURY CONTAINING EQUIPMENT (CONTINUED)				
	C	V	NA	COMMENTS
10.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Employees removing ampules or open original housing holding mercury thoroughly familiar with proper mercury handling and emergency procedure. – 10 CSR 25-16.273(1) incorporating 40 CFR 273.13(c)(2)(vi). 2
11.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Universal waste mercury equipment or containers marked or labeled clearly: "Universal Waste-Mercury Containing Equipment" or "Waste Mercury Containing Equipment" or "Used Mercury Containing Equipment." – 10 CSR 25-16.273(1) incorporating 40 CFR 273.14(d)(1). 2
12.	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Universal waste mercury containing thermostats or containers marked or labeled as "Universal Waste-Mercury Thermostat(s)" "Waste Mercury Thermostat(s)" or "Used Mercury Thermostat(s)." – 10 CSR 25-16.273(1) incorporating 40 CFR 273.14(d)(2). 2
S. LAMPS				
	C	V	NA	COMMENTS
1.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>Broken or leaking lamps immediately cleaned up and placed in closed, structurally sound, non-leaking containers and managed as hazardous waste. – 10 CSR 25-16.273(1) incorporating 40 CFR 273.13(d)(2) and 10 CSR 25-5.262(1) incorporating 40 CFR 262.11.</b> 1 S3- Unbroken used lamps were stored in unclosed boxes (See Photo 12).*
2.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<b>Bulb crusher or other type of treatment not performed on lamps. – Section 260.390.1(1) RSMo.</b> 1 *Boxes storing used lamps were properly closed at the time of the inspection (see Photo 14).
3.	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input type="checkbox"/>	Unbroken lamps stored in closed, non-leaking containers or packages that are structurally sound and adequate to prevent breakage. – 10 CSR 25-16.273(1) incorporating 40 CFR 273.13(d)(1). 2
4.	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	Each lamp or lamp container or package marked or labeled clearly as "Universal Waste Lamp(s)" or "Waste Lamp(s)" or "Used Lamps." – 10 CSR 25-16.273(1) incorporating 40 CFR 273.14(e). 2

## Attachment #2





**GENERAL INFORMATION**

FACILITY: Gateway Plating LLC      PROGRAM: HWP

ACTIVITY (INSPECTION, INVESTIGATION, ETC.): Inspection      DATE OF ACTIVITY: 7/30/15



**PHOTOGRAPH# 1**  
**DATE TAKEN:** 7/30/15  
**BY:** Michael Davis  
**DESCRIPTION:** Prepping Area- Stripping bath to prep parts for plating process.



**PHOTOGRAPH# 2**  
**DATE TAKEN:** 7/30/15  
**BY:** Michael Davis  
**DESCRIPTION:** Prepping Area- 55-gallon drums for stripping and pickling of parts to prep for plating process.



**PHOTOGRAPH# 3**

**DATE TAKEN:** 7/30/15

**BY:** Michael Davis

**DESCRIPTION: Plating Room-** Plating room involving cleaner bath, rinse, acid bath, rinse, nickel plating bath, triple rinse, chrome plating bath, and final rinses.



**PHOTOGRAPH# 4**

**DATE TAKEN:** 7/30/15

**BY:** Michael Davis

**DESCRIPTION: Plating Room-** Copper cyanide plating bath for smaller parts.



**PHOTOGRAPH# 5**

**DATE TAKEN:** 7/30/15

**BY:** Michael Davis

**DESCRIPTION: Plating Room-** Nickle plating bath.



**PHOTOGRAPH# 6**  
**DATE TAKEN:** 7/30/15  
**BY:** Michael Davis  
**DESCRIPTION:** Plating Room- Triple rinse baths following nickel plating



**PHOTOGRAPH# 7**  
**DATE TAKEN:** 7/30/15  
**BY:** Michael Davis  
**DESCRIPTION:** Plating Room- Chrome plating bath.



**PHOTOGRAPH# 8**  
**DATE TAKEN:** 7/30/15  
**BY:** Michael Davis  
**DESCRIPTION:** Bucket of absorbent used in case of spills from plating bathes. Several located throughout facility.



**PHOTOGRAPH# 9**  
**DATE TAKEN:** 7/30/15  
**BY:** Michael Davis  
**DESCRIPTION:** Chemical Storage Area- One 55-gallon drum of waste copper cyanide (about 2/3 full).



**PHOTOGRAPH# 10**  
**DATE TAKEN:** 7/30/15  
**BY:** Michael Davis  
**DESCRIPTION:** Chemical Storage Area- Label of waste copper cyanide drum. Not labeled "Hazardous waste and no accumulation start date (Violations B9 & B10 in checklist).



**PHOTOGRAPH# 11**  
**DATE TAKEN:** 7/30/15  
**BY:** Michael Davis  
**DESCRIPTION:** Maintenance Area- labeled box of used lamps.



**PHOTOGRAPH# 12**  
**DATE TAKEN:** 7/30/15  
**BY:** Michael Davis  
**DESCRIPTION:** Maintenance Area- Used lamp storage area. Boxes not closed (Violation-S3 in checklist).



**PHOTOGRAPH# 13**  
**DATE TAKEN:** 7/30/15  
**BY:** Michael Davis  
**DESCRIPTION:** Maintenance Area- Box that used lamps are transferred into prior to shipment to Veolia.



**PHOTOGRAPH# 14**  
**DATE TAKEN:** 7/30/15  
**BY:** Michael Davis  
**DESCRIPTION:** Maintenance Area- Corrected storage of used lamps.



**PHOTOGRAPH# 15**  
**DATE TAKEN:** 7/30/15  
**BY:** Michael Davis  
**DESCRIPTION:** Chemical Storage Area- Corrected label and accumulation start date on waste copper cyanide.

## Attachment #3

2993

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator ID Number MOD885816980	2. Page 1 of 1	3. Emergency Response Phone 314-421-0328	4. Manifest Tracking Number <b>007059260 JJK</b>			
5. Generator's Name and Mailing Address Gateway Plating 25010 Texas Avenue St. Louis, MO 63104		Generator's Site Address (if different than mailing address)						
Generator's Phone: 314-885-1350								
6. Transporter 1 Company Name The Kiesel Company				U.S. EPA ID Number MOT300011180				
7. Transporter 2 Company Name				U.S. EPA ID Number				
8. Designated Facility Name and Site Address American Environmental Services, Inc. 1689 Shar-Cat Road Calvert City, KY 42029				U.S. EPA ID Number KYD985073196				
Facility's Phone: 270-395-0504								
9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes		
		No.	Type			D002	D008	D007
X	1. UN1789, Waste Hydrochloric Acid, 8, II, "RC" (D002, D008, D007, D008, F009)	1	DF	55	G	D002	D008	D007
X	2. UN1832, Waste Sulphuric Acid, Spent, 8, II, "RC" (D002, F009)	1	DF	55	G	D002	F009	
	3.							
	4.							
14. Special Handling Instructions and Additional Information 1. MGT - 35516 2. MGT - 35517								
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true.								
Generator's/Offeror's Printed/Typed Name Steven Gros				Signature <i>Steven Gros</i>		Month Day Year 19 11 10		
16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Date leaving U.S.: _____								
17. Transporter Acknowledgment of Receipt of Materials								
Transporter 1 Printed/Typed Name David Portway				Signature <i>D. Portway</i>		Month Day Year 19 11 10		
Transporter 2 Printed/Typed Name				Signature		Month Day Year		
18. Discrepancy								
18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection								
18b. Alternate Facility (or Generator) _____ Manifest Reference Number: _____ U.S. EPA ID Number _____								
Facility's Phone: _____								
18c. Signature of Alternate Facility (or Generator)						Month Day Year		
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)								
1. H41		2. H41		3.		4.		
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a								
Printed/Typed Name M. W. M. M. M.				Signature <i>M. W. M. M. M.</i>		Month Day Year 10 16 10		



**LAND DISPOSAL NOTIFICATION AND CERTIFICATION**

American Environmental Services, Inc.

EPA ID# KYD985073176

1689 Shar-Cal Road, Calvert City, KY 42029

Phone: 270-395-0504

**1. GENERAL INFORMATION**

Generator: GATEWAY PLATING US EPA ID No. MOD985816990

Manifest No.: 007059260JJK Manifest Line No.(s) 1 and 2 of 9.b. (or 27.b)

EPA Waste Code No.(s): D002, F009

Waste Category:  Non-wastewater  Wastewater

Waste Subcategory, if applicable: \_\_\_\_\_

**2. TREATMENT STANDARDS:**

**A. F001 - F005 Solvent Waste (check each constituent present in the waste)**

Regulated Constituent	Waste water mg/L	Non-water mg/kg	Regulated Constituent	Waste water mg/L	Non-water mg/kg	Regulated Constituent	Waste water mg/L	Non-water mg/kg
Acetone	0.28	160	o-Cresol	0.11	5.6	Nitrobenzene	0.068	14
Benzene	0.14	10	Cyclohexanone	0.36	NA	Pyridine	0.014	16
n-Butyl alcohol	5.6	2.6	o-Dichlorobenzene	0.088	6.0	Tetrachloroethylene	0.056	6.0
Carbon tetrachloride	0.057	6.0	Ethyl acetate	0.34	33	Toluene	0.080	10
Carbon disulfide	3.8	NA	Ethyl benzene	0.057	10	1,1,1-Trichloroethane	0.054	6.0
Chlorobenzene	0.057	6.0	Ethyl ether	0.12	160	1,1,2-Trichloroethane	0.054	6.0
Cresol-mixed isomers (Cresylic acid) (sum of o-, m-, p-cresol concentrations)	0.88	11.2	Isobutyl alcohol	5.6	170	1,1,2-Trichloro-1,2,2 trifluoroethane	0.057	30
Cresol (m- and p-isomers)	0.77	5.6	Methanol	5.6	NA	Trichloroethylene	0.054	6.0
			Methylene chloride	0.089	30	Trichloromonofluoromethane	0.020	30
			Methyl ethyl ketone	0.28	36	Xylenes (total)	0.32	30
			Methyl isobutyl ketone	0.14	33			

**B. D001 Treatment Standards (check, if applicable)**

Waste Description	Wastewater	Non-wastewater
<input type="checkbox"/> High TOC ignitable characteristic liquids subcategory based on 40 CFR 261.21(a)(1) greater than or equal to 10% total organic carbon ignitable characteristic waste, except for the 261.21(a)(1) high TOC subcategory, that are managed in non-CWA / non-CWA-equivalent / non-Class I SDWA systems	NA	RORGS; or CMBST
<input type="checkbox"/> TOC subcategory, that are managed in non-CWA / non-CWA-equivalent / non-Class I SDWA systems	DEACT and meet 268.48 standards; or RORGS; or CMBST	DEACT and meet 268.48 standards; or RORGS; or CMBST

**C. Corrosive Waste Treatment Standards (check, if applicable)**

Waste Description	Wastewater	Non-wastewater
<input checked="" type="checkbox"/> Corrosive characteristic wastes that are managed in non-CWA / non-CWA equivalent / non-Class I SDWA systems	DEACT and meet 268.48 standards	DEACT and meet 268.48 standards

**D. California List Prohibited Wastes (check, if applicable)**

<input type="checkbox"/> HOC's 1000.0 mg/L	<input type="checkbox"/> Arsenic 500.0 mg/L	<input type="checkbox"/> Nickel 134.0 mg/L	<input type="checkbox"/> Acid ≤2 pH
<input type="checkbox"/> PCB's 50.0 mg/L	<input type="checkbox"/> Mercury 20.0 mg/L	<input type="checkbox"/> Thallium 130.0 mg/L	

**E. Hazardous Debris (check, if applicable)**

This waste is hazardous debris and is subject to the treatment standards in 40 CFR 268.45.

**3. F039, D001, D002, or D012 through D043 (write the underlying waste constituents below)**

US EPA Waste Code(s)	Regulated Constituent Present in Waste
1. D002	Hydrochloric Acid
2. D002	Sulfuric Acid
3.	
4.	

**4. Certifications (Check one)**

Waste does not meet applicable treatment standards in 40 CFR 268.40; or exceeds applicable prohibition levels of 40 CFR 268.32 or RCRA Section 3004(d).  Waste is subject to exemption from land ban treatment standards due to national capacity variance; or case-by-case extension under 40 CFR 268.5; or approved petition under 40 CFR 268.6 or 268.44.

Waste can be land-disposed without further treatment. It meets all applicable treatment standards in 40 CFR 268.40 and it does not exceed the prohibition levels upon generation. (Note: Additional certification must be signed.)  
 certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR Part 268 Subpart D and all applicable prohibitions set forth in 40 CFR 268.32 or RCRA section 3004(d). I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.

Signature \_\_\_\_\_ Date \_\_\_\_\_

hereby certify that all information supplied above, and attached, is complete and accurate to the best of my knowledge and ability to determine that no omissions or errors exist.

SIGNATURE X Steve H. [Signature] TITLE President DATE 9-15-10

Please print or type. (Form designed for use on elite (12-pitch) typewriter.)

<b>UNIFORM HAZARDOUS WASTE MANIFEST</b>		1. Generator ID Number MOD 965 816 990	2. Page 1 of	3. Emergency Response Phone 314-315-0771	4. Manifest Tracking Number 007800979 JJK		
5. Generator's Name and Mailing Address 2501 TEXAS ATTN: STEVE GROS ST. LOUIS MO 63104 Generator's Phone: (314) 865 4350		Generator's Site Address (if different than mailing address) 2501 TEXAS ST. LOUIS, MO 63104					
6. Transporter 1 Company Name EQ INDUSTRIAL SERVICES		U.S. EPA ID Number MID 900 263871					
7. Transporter 2 Company Name		U.S. EPA ID Number					
8. Designated Facility Name and Site Address 1923 FREDERICK DETROIT, MI 48214 Facility's Phone: (313) 347-1300		U.S. EPA ID Number MID 960 991 586					
GENERATOR	9a. HM	9b. U.S. DOT Description (including Proper Shipping Name, Hazard Class, ID Number, and Packing Group (if any))	10. Containers No. Type		11. Total Quantity	12. Unit Wt./Vol.	13. Waste Codes
		1. NON-REGULATED SOLID MATERIAL (Nickel Sulfate, Dry Solids)	1	DM	367	P lbs	NONE
		2. NON-REGULATED SOLID MATERIAL (Strip Tank Bottoms, Solid)	1	DM	472	P lbs	NONE
		3. NON-HAZARDOUS, NON RCRA (Caustic Cleaner, Dry Solids)	1	DF	33	P lbs	NONE
		4. NON-HAZARDOUS, NON RCRA (Non Hazardous Nickely Sulfate, sludge)	1	DM	356	P lbs	029L
14. Special Handling Instructions and Additional Information 01. D104137DET / NON-HAZARDOUS NICKEL SULFATE, DRY SOLIDS 02. D104138DET / NON-HAZARDOUS STRIP TANK BOTTOMS, SOLID 03. D104140DET / NON-HAZARDOUS CAUSTIC CLEANER, DRY SOLIDS 04. D104141DET / NON-HAZARDOUS NICKEL SULFATE, SLUDGE 24 HR. CONTACT# 314-315-0771							
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/ placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, I certify that the contents of this consignment conform to the terms of the attached EPA Acknowledgment of Consent. I certify that the waste minimization statement identified in 40 CFR 262.27(e) (if I am a large quantity generator) or (f) (if I am a small quantity generator) is true.							
Generator's/Offor's Printed/Typed Name STEVE GROS		Signature <i>Steve Gros</i>		Month Day Year 09/22/10			
TRANSPORTER	16. International Shipments <input type="checkbox"/> Import to U.S. <input type="checkbox"/> Export from U.S. Port of entry/exit: _____ Data leaving U.S.: _____		Transporter signature (for exports only): _____				
	17. Transporter Acknowledgment of Receipt of Materials		Transporter 1 Printed/Typed Name ANTHONY WESPER		Signature <i>Anthony Wesper</i>		Month Day Year 09/22/10
Transporter 2 Printed/Typed Name		Signature		Month Day Year			
DESIGNATED FACILITY	18. Discrepancy 18a. Discrepancy Indication Space <input type="checkbox"/> Quantity <input type="checkbox"/> Type <input type="checkbox"/> Residue <input type="checkbox"/> Partial Rejection <input type="checkbox"/> Full Rejection						
	18b. Alternate Facility (or Generator)		Manifest Reference Number: _____ U.S. EPA ID Number _____				
	Facility's Phone: _____		TDC Signature of Alternate Facility (or Generator)		Month Day Year		
19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems)							
1. NONE		2. NONE		3. H111		4. LW	
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in item 18a		Printed/Typed Name JULIE SMITH		Signature <i>Julie Smith</i>		Month Day Year 09/24/10	

## Attachment #4

**Confirmation # PRP341380841**  
**FedEx® Ground Universal Waste Package Returns Program (PRP)**

Preparing Universal Waste PRP Packages:

- ✓ For mercury containing lamp(s), place in original packaging (ONLY if the packaging is structurally sound) with original factory/manufacturer spacers included or packaging provided by your recycler. Seal all ends of the packaging with shipping tape.
- X For mercury thermostat(s) or battery(ies), place into a minimum 4-mil plastic bag. Twist the bag and seal using shipping tape. Place plastic bag into a packaging or container provided by your recycler and seal.
- If using original packaging, remove or black out any old shipping labels, including the original shipping bar code.
- Fill out the following on the Universal Waste PRP Label:

**From**

1. Check Lamp(s), Battery(ies), Mercury Thermostat(s), or Other (fill Other, ONLY if the material has been approved Universal Waste.)
  - Fill in the Accumulation Start Date (The Accumulation Start Date is when the first Universal Waste was placed in the packaging or container. The shipper has one (1) year from the Accumulation Start Date to store Universal Waste.)
- Affix the PRP Universal Waste Label to each package or container. **DO NOT ALTER THE UNIVERSAL WASTE PRP LABEL.** If you do not have enough labels, you must obtain additional labels from the company that provided them to you.
- Keep the back of this label as your receipt. You may have your FedEx® Ground driver sign below.

Options To Return PRP Packages:

Pick Up\* (for business locations ONLY)

- Log on to FedEx.com and select the "Pickup" tab. Then choose "FedEx Ground Package Returns Program."
- Call (888) 777-6040 to schedule a commercial pickup from your business location.
- If you receive regular pickups, give the package to your FedEx® Ground driver.

\* The FedEx® Ground driver cannot pickup any Universal Waste packages that are not properly prepared for transportation.

*Box Implored when he dropped it on the dock.*

**PICKUP RECEIPT**

Package returning to: Oryx

Universal Waste shipped for recycling:  Lamp(s)  Battery(ies)  Mercury Thermostat(s)  Other

Driver Signature: C. P. ...

7176277

Date: 3-25-08

## Attachment #5



**Metropolitan St. Louis  
Sewer District**

Division of Environmental Compliance  
10 East Grand Avenue  
St. Louis, MO 63147-2913  
Phone: 314.768.8200 www.stlmsd.com

May 21, 2013

Steve Gros  
President  
**MISSOURI PLATING**  
2501 Texas Ave.  
St. Louis, MO 63104

Re: **Discharge Permit No: 1020529900 - 1**  
**For premise at: 2501 Texas Avenue, St. Louis, MO 63104**

Dear Steve Gros:

Your Metropolitan St. Louis Sewer District Industrial Wastewater Discharge Permit issued on **May 1, 2012**, for the above premise, is hereby revised as per the attached revised permit.

The following revisions were made to the permit:

- The non-contact cooling water has been removed from Sample Point 001.
- The Combined Wastestream Formula (CWF) factor has been updated and is now 0.942.
- The permit number has been updated to match your facility id number in the MSD system.

We have reissued the entire permit for your convenience. Please replace your prior permit with this letter and the revised permit. The terms of the revised permit supersede your prior permit.

You must submit monitoring reports on a quarterly basis, as required by the conditions of this permit. The necessary report form is appended to the permit. It includes the specific certifications required by your permit. Please use this form for your report submittals.

This revision does not affect any monitoring or analysis of your discharge that may be necessary to comply with other requirements of your permit and in no way relieves you of your obligations to achieve the discharge limitations as provided in the permit.

We appreciate your cooperation and support in helping us to comply with federal regulations. Please contact me at 314.436.8721, if you have any questions.

Sincerely,  
**METROPOLITAN ST. LOUIS SEWER DISTRICT**

*Chris Bulmahn*

Chris Bulmahn  
Associate Engineer

Enclosures: Industrial Wastewater Discharge Permit, Self-monitoring Report Form

cc: Doug Mendoza  
Dave Kupke

METROPOLITAN ST. LOUIS SEWER DISTRICT  
DIVISION OF ENVIRONMENTAL COMPLIANCE  
INDUSTRIAL WASTEWATER DISCHARGE PERMIT

PERMIT NO: 1020529900 - 1

EFFECTIVE DATE: June 01, 2013

EXPIRATION DATE: April 30, 2017

ISSUED TO: MISSOURI PLATING  
2501 Texas Ave  
St. Louis, MO 63104

SIC NUMBER(S): 3471

TOTAL NUMBER OF PERMITTED DISCHARGE POINTS: 1

SAMPLING PT. REF NUMBER(S): 001


In accordance with the provisions of the Federal Pretreatment Regulations (40 CFR 403) and Metropolitan St. Louis Sewer District Ordinance No. 12559, the permittee is hereby authorized to discharge wastewater into the Metropolitan St. Louis Sewer District's sanitary or combined sewer system. All discharges so authorized shall be limited and controlled pursuant to the terms and conditions of this permit.

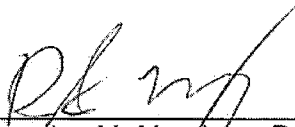
Noncompliance with any term or condition of this permit shall constitute an ordinance violation. If formal enforcement action is required to gain compliance, the permittee who is found guilty of a violation shall be subject to fine or imprisonment, or both such fine and imprisonment, for each violation. Each day in which any such violation shall continue shall be deemed a separate offense.

Compliance with the terms and conditions of this permit does not relieve the permittee of the obligation to comply with all other applicable pretreatment regulations, standards, or requirements under local, State and Federal laws, including any such regulation, standard, legal requirement, or law that may become effective during the life of this permit.

This permit only authorizes wastewater discharges identified herein. It does not apply to any other discharge.

METROPOLITAN ST. LOUIS SEWER DISTRICT

  
Chris Bulmahn  
Associate Engineer

  
Douglas M. Mendoza, P.E.  
Mgr. of Industrial Pretreatment

DISCHARGE LIMITATIONS

SAMPLING POINT REFERENCE NUMBER: 001

SAMPLING POINT LOCATION: MH in Victor, N of alley, between Texas & Ohio - flow from SE

AVERAGE WASTEWATER FLOW (GPD): 2,150

WASTEWATER SOURCE AND CATEGORY: Categorical (413 Sub A PSES JS <10K (CWF-yes)) + Plant & Equipment Washdown (Floor mopping office area) + Sanitary + Storm Water

DISCHARGE LIMITATIONS AND SELF-MONITORING REQUIREMENTS

Parameter	Limit *	Limit Type **	Sampling Frequency
Flow [GPD]	***	Daily Avg	***
Biochemical Oxygen Demand (5 Day) [mg/L]	****	Daily Avg	Once/3 mo
Chemical Oxygen Demand [mg/L]	****	Daily Avg	Once/3 mo
Total Suspended Solids [mg/L]	****	Daily Avg	Once/3 mo
Temperature [Deg C]	60	Instant	Once/3 mo
pH [SU]	11.5	Instant	Once/3 mo
pH [SU]	5.5	Instant	Once/3 mo
Cadmium (Total) [mg/L]	0.6594	4-Day Avg	Once/3 mo
Cadmium (Total) [mg/L]	0.7	Daily Max	Once/3 mo
Chromium (Total) [mg/L]	5.0	Daily Avg	Once/3 mo
Copper (Total) [mg/L]	2.7	Daily Avg	Once/3 mo
Cyanide Amenable to Chlorination [mg/L]	2.5434	4-Day Avg	Once/3 mo
Cyanide Amenable to Chlorination [mg/L]	4.71	Daily Max	Once/3 mo
Lead (Total) [mg/L]	0.3768	4-Day Avg	Once/3 mo
Lead (Total) [mg/L]	0.4	Daily Max	Once/3 mo
Nickel (Total) [mg/L]	2.3	Daily Avg	Once/3 mo
Zinc (Total) [mg/L]	3.0	Daily Avg	Once/3 mo
Total Toxic Organics [mg/L]	4.3049	Daily Max	Once/3 mo

\* Limits are based on MSD Ordinance 12559 and applicable federal categorical standards. See Section II of the permit conditions for explanation of any adjustments to the published limits made pursuant to Article V, Section 2.B of the Ordinance.

\*\* See Section I.A.2 of the permit conditions.

\*\*\* Report a measured or estimated average daily flow for at least one representative operating day per quarter. If additional flow measurements or estimates are made, all must be reported.

\*\*\*\* See Section I.A.11 of the permit conditions.



PERMIT CONDITIONS

SECTION I - GENERAL CONDITIONS:

A. MONITORING AND REPORTING REQUIREMENTS:

1. From the effective date of this permit, the permittee shall sample and analyze the discharge, at each of the identified sampling points. The pollutants to be monitored, the limitations, limitation types and minimum sampling frequencies are specified individually for each sampling point. The results of sample analyses and the results of all other self-monitoring activities specified in this permit shall be reported to the District as per paragraph A.9 below.

2. The limitation types, which may be specified in this permit, are defined as follows:

An **INSTANT** limitation is the maximum allowable concentration or mass of the pollutant in a grab sample for all pollutants except pH and temperature. For pH, the INSTANT limitations are the minimum and maximum allowable instantaneous pH values in standard units. For temperature, the INSTANT limitation is the maximum allowable instantaneous temperature in degrees Celsius (centigrade).

A **DAILY AVG** limitation is the maximum allowable concentration or mass of the pollutant in a composite sample collected within a 24-hour period.

A **DAILY MAX** limitation is the maximum allowable concentration or mass of the pollutant in any sample collected within a 24-hour period.

A **MONTHLY AVG** limitation is the maximum allowable average concentration or mass of the pollutant determined by calculating the arithmetic average of the concentrations or masses found in all daily samples collected within a calendar month.

A **4-DAY AVG** limitation is the maximum allowable average concentration or mass of the pollutant determined by calculating the arithmetic average of the concentrations or masses found in the daily samples collected on four consecutive sampling days. Sampling days are not necessarily consecutive calendar days.

Note: A daily sample is any sample collected within a 24-hour period.

3. Unless specified otherwise in Section II of these conditions all samples, collected to satisfy the monitoring and reporting requirements of this permit, shall be of the following types:

a. Temperature, pH and chlorine residual measurements, when required, shall be made on-site at the points of discharge and those measurements reported as grab sample results except, if continuous monitoring is employed for pH and/or temperature, reporting shall be as per paragraph A.7 below.

b. For oil and grease, total phenols, cyanide, sulfide and volatile organics, when required, samples shall be **Grab Samples**.

c. For all other pollutants, samples shall be **COMPOSITE SAMPLES** made up by combining a minimum of four individual grab samples within a 24-hour period. The individual grabs must be adequately flow or time proportioned to ensure a composite sample that is representative of that day's discharge.

4. When monitoring is required for Total Toxic Organics (TTO), the TTO result shall be determined by summing all quantifiable values greater than 0.01 mg/l for the applicable toxic organics.

- For a discharge subject to a categorical pretreatment standard, the applicable toxic organics are listed in the standard. The standards are contained in 40 CFR 405 through 40 CFR 471.
- For all other discharges the applicable toxic organics are all of those, from the list in 40 CFR 401.15, which are or may be present in the discharge.

In addition to reporting the summed TTO result, the permittee shall include, with the self-monitoring report, the analytical value obtained for each toxic organic analyzed.

5. Sampling of all discharges shall be conducted in such a manner as to ensure that the results of individual samples (whether grab or composite) are representative of normal operations and that the results of all samples during the reporting period are representative of the conditions during the reporting period.

6. All sampling and analyses performed to satisfy the monitoring and reporting requirements of this permit shall be performed in accordance with the techniques prescribed in 40 CFR 136 and amendments thereto unless other techniques are prescribed, within this permit, for specific parameters.

7. If the permittee employs continuous monitoring techniques for pH, temperature, and/or lower explosive limit at any sampling point identified in this permit, unintentional and temporary excursions outside the limitations are allowed subject to the provisions of Article X, Subsection Two-D of District Ordinance 12559. The permittee shall include, with each self-monitoring report, a summary of the continuous monitoring data. For each month, the summary shall show all excursions outside the permitted limitations, the elapsed time for each excursion, and the total time for all excursions for temperature, pH, and/or lower explosive limit.

8. If the permittee monitors any of the listed pollutants, using the methods specified in this permit, more often than required by this permit, the results of all such additional monitoring and any additional flow measurements shall be included in the self-monitoring reports.

9. A self-monitoring report (on forms supplied or approved by the District) shall be submitted to the District's Division of Environmental Compliance for each calendar quarter. Each report shall include:

- All facility and sample description information required on the District's reporting form.
- Analytical results, with dates and times, for all analyzed samples collected within the quarter.
- Daily flows, with dates, for all measurements or estimates made within the quarter.
- Any certification statements required pursuant to the Special Conditions in Section II.
- Any other data or attachments required pursuant to the Special Conditions in Section II.

Each self-monitoring report shall be certified and signed by an individual authorized in accordance with the provisions of Article X, Section Three of District Ordinance 12559. The reports shall be submitted to the District as soon as possible after all required data are available, but no later than 28 days after the end of each quarter.

<u>For the calendar quarter of:</u>	<u>The report must be postmarked no later than:</u>
January 1 through March 31	April 28
April 1 through June 30	July 28
July 1 through September 30	October 28
October 1 through December 31	January 28

A report must be submitted for each calendar quarter even if, for any reason, sampling was not required or was not performed during the quarter. **The first report under this permit is due by July 28, 2013. For non-quarterly self-monitoring requirements, the permit year commences on April 1.**

10. If any sampling performed by the permittee, using the methods specified in this permit, indicates a violation of any permit limitation, the permittee shall notify the District's Division of Environmental Compliance within one business day of becoming aware of the violation. The permittee shall resample the discharge and shall submit the results of the resampling within thirty (30) days of becoming aware of the violation.

11. Unless specified elsewhere in this permit, discharges of Biochemical Oxygen Demand (BOD), Chemical Oxygen Demand (COD) and Total Suspended Solids (TSS) are not limited under the terms of this permit. However, the monitoring values reported will be used by the District to assess the applicability of extra-strength surcharges under the provisions of the District's Wastewater User Charge Ordinances. Extra-strength surcharges may be applicable when measured values exceed 300 mg/l for BOD, 600 mg/l for COD and/or 300 mg/l for TSS. If the permittee is currently subject to extra-strength surcharge, the BOD, COD and TSS values used for billing, as of the permit effective date, are listed in Section II of the permit conditions. These values are updated periodically and may change during the life of this permit.

#### B. CHANGE IN DISCHARGE:

1. The permittee shall not significantly increase the average daily volume, or flow rate of discharge or add any significant new pollutants or significantly increase the discharge of existing pollutants set forth in this permit without first having secured an amendment to the permit unless the permit conditions authorize such increase or additions without an amendment.

2. The permittee shall notify the District's Division of Environmental Compliance of any proposed significant new or increased discharge. The permittee shall make the notification at least ten (10) business days prior to the date of the planned increase or addition.

3. As defined in Article II of District Ordinance 12559, significant new or increased discharge means:

- a. Any discharge from a new process or facility or a new source.
- b. Any increase in volume or rate of discharge from an existing process or facility when the new long term average daily volume or rate of discharge will exceed the previous long term average by 20% or more.
- c. Any addition of a priority pollutant or toxic pollutant not previously present or suspected present in the permittee's discharge.
- d. Any addition of a hazardous waste subject to, but not previously reported under the reporting requirements in Article VIII, Section Nine of District Ordinance 12559.
- e. Any increase in mass of an existing regulated pollutant when the new long term average daily mass discharge of that pollutant will exceed the previous long term average by 20% or more.
- f. Any addition of a new pollutant or any increase in mass of an existing pollutant when the discharge of such pollutant may cause or contribute to interference or pass-through as these terms are defined in Article II of District Ordinance 12559.
- g. Any new batch discharges when previous discharges from an existing source at the permitted facility occurred on a continuous basis.

#### C. PROBLEM DISCHARGE:

1. Problem discharge means any upset, slug discharge, bypass, spill or accident which does or may result in a discharge into the District's system of a prohibited substance; or of a regulated substance in excess of limitations established in this permit and which may: (a) cause interference or pass through; or (b) contribute to a violation of any requirement of the District's NPDES permit; or (c) cause violation of any State or Federal water quality standard.

2. In the event of any problem discharge into the District's system, the permittee shall immediately notify the District, by telephone, of the incident and shall provide such information as may be required at that time in order to assess the impact of the incident on the District's system or on water quality. Within five (5) business days following any such incident, the permittee shall submit to the District's Division of Environmental Compliance a detailed written report which contains a description of the incident and its cause, location within the permittee's facility, exact dates and times of the period of problem discharge and, if not yet corrected, the anticipated time the incident is expected to

continue, and steps taken or planned to correct the current incident and to reduce, eliminate and prevent occurrences of future such incidents.

3. Slug discharge control: The permittee shall develop and implement procedures to control slug discharges, as required by the District, and shall notify the District immediately of any changes at the permittee's facilities, not already addressed in the permittee's slug control requirements, which may affect the potential for a slug discharge.

**D. BYPASSING PROHIBITED:**

The permittee may not bypass any portion of its pretreatment facilities except when necessary to perform essential maintenance and then only if the bypass will not result in a violation of applicable pretreatment standards or requirements. Any other pretreatment facility bypass is prohibited unless:

- a. The bypass is unavoidable to prevent loss of life, personal injury or severe property damage;
- b. There are no feasible alternatives to the bypass; and
- c. In the event of an anticipated bypass, advance notice is provided to the District's Division of Environmental Compliance.

**E. PERMIT REVOCATION:**

This permit may be revoked after thirty (30) days notice to the permittee for cause including, but not limited to, the following causes:

- a. A violation of any term or condition of this permit.
- b. A misrepresentation or failure to fully disclose all relevant facts in obtaining this permit.

**F. PERMIT TERMINATION OR MODIFICATION:**

1. This permit may be modified, after thirty (30) days notice to the permittee following promulgation of new State, Federal or local regulations to ensure compliance with the effective dates contained in any such new regulations.

2. Whenever any discharge covered by this permit is permanently eliminated, or when the circumstances upon which the permit was based pursuant to MSD Ordinance 12559, Article VI, Subsection 3.A, change, this permit will be terminated or modified upon verification of the changes by the District's Division of Environmental Compliance.

**G. PERMIT RENEWAL:**

The permittee shall apply for renewal of this permit at least one hundred eighty (180) days prior to the expiration date contained herein.

**H. PERMIT TRANSFER:**

This permit may not be transferred or reassigned. If the premise covered by this permit is sold or otherwise transferred to a new owner, the new owner shall apply for a new permit at least ten (10) days prior to the transfer and shall abide by all of the provisions of District Ordinance 12559 until the District issues a new permit or denies the application.

I. RIGHT OF ENTRY:

In order to ensure compliance with the provisions of this permit, District Ordinances and applicable State and Federal regulations, District representatives may inspect a permittee's treatment, pretreatment or discharge control facilities, or any process or any area of the permittee's premise which may be a source of any discharge or a source of any pollutants contained in any discharge into the District's wastewater system; conduct sampling of such facilities, processes or areas; and examine or copy any permittee's records related to such discharges. Any duly authorized representative of the District, upon presentation of proper credentials and after execution of appropriate confidentiality agreements, shall be permitted access to appropriate areas of the permittee's premises without prior notice for these purposes. A representative of the permittee shall, if appropriate, accompany the District representative while the work is being performed and shall assure that all applicable safety rules are being observed by the District's representative.

J. RECORDS RETENTION:

The permittee shall retain and preserve, for not less than five (5) years, all records, books, documents, memoranda, reports, sample analysis results, correspondence and any and all summaries thereof relating to the monitoring, sampling and chemical analyses of the permittee's discharge made by or on the permittee's behalf.

K. DEFINITIONS:

Unless the context specifically indicates otherwise, the meaning of terms used in this permit shall be as defined in Article II of District Ordinance 12559.

L. SEWER USE ORDINANCE:

Unless the context specifically indicates otherwise, the permittee is subject to all provisions of District Sewer Use Ordinance 12559.

M. NOTIFICATION AND REPORTING:

1. All notifications and reports required by this permit shall be directed to:

Metropolitan St. Louis Sewer District  
Division of Environmental Compliance  
10 East Grand Avenue  
St. Louis, Missouri 63147-2913

2. Emergency notifications may be made 24-hours a day, 7 days a week by calling the District's dispatcher at (314) 768-6260.

3. During normal business hours, notifications may be made by calling the District's Division of Environmental Compliance at (314) 436-8710.

**SECTION II- SPECIAL CONDITIONS:**

These Special Conditions may supplement and/or amend the standard terms of this permit or the General Conditions in Section I. Where there is any perceived conflict between a Special Condition and either the standard permit terms or the General Conditions of Section I, the Special Condition shall govern.

**A. DERIVATION OF LIMITATIONS**

**A.1. Combined Waste Stream Formula Limits**

The limitations at sampling point 001 have been determined using the combined wastestream formula (CWF) pursuant to MSD Ordinance 12559, Article V, Section 2.B, based on data supplied by the permittee on **January 9, 2013**. The applicable categorical limitations have been adjusted using a **CWF factor of 0.942**. If the conditions used for these calculations change, the permittee shall notify the District's Division of Environmental Compliance of such changed conditions at least ten business days prior to the date of the planned change.

**A.2. Most Strict Limits**

Discharges at sampling point 001 are subject both to limitations from a categorical pretreatment standard and to MSD Ordinance 12559 limitations. Pursuant to Article V, Section 2.B of the Ordinance, the permit limitation for any parameter covered by both standards was set using the most strict of the two limitations.

**B. SPECIAL SAMPLING AND ANALYTICAL PROCEDURES**

**B.1. No Monitoring When Influenced by Storm Runoff**

Sampling point 001 may, at times, convey storm water in addition to wastewater regulated by this permit. The self-monitoring required pursuant to Section I.A.1 of this permit, shall be conducted only at times when the discharge of regulated wastewater will not be influenced by storm water runoff.

**C. SPECIAL CERTIFICATION AND REPORTING REQUIREMENTS**

**C.1. Special Certification in Lieu of Monitoring Total Toxic Organics at Combined Ordinance/Categorical Point**

Sampling and analysis for Total Toxic Organics (TTO) at sampling point 001 may be reduced from the frequency specified in this permit, to once annually, if the permittee certifies on each self-monitoring report that no dumping of concentrated toxic organics has occurred since filing the last report and that the facility is implementing the toxic organic management plan submitted to the District. The annual TTO results shall be reported on the appropriate quarterly self-monitoring report.

**THIS IS THE LAST PAGE OF THIS PERMIT**



INDUSTRIAL USER SELF MONITORING REPORT PAGE 2

**PART III: SPECIAL CERTIFICATION STATEMENTS**

Based on the special conditions contained in your discharge permit you may be required to certify the following. Please review your permit and **PLACE YOUR INITIALS ON THE LINES NEXT TO THE CERTIFICATIONS.**

<b>G</b>	<b>NO DISCHARGE OF TOXIC ORGANICS AT 40 CFR 413, 40 CFR 433, OR 40 CFR 469 SAMPLE POINTS</b> Discharges Subject to Categorical Standards for Electroplating (40 CFR 413), Metal Finishing (40 CFR 433) or Electrical & Electronic Components (40 CFR 469) can be exempted from TTO monitoring only at the Electroplating, Metal Finishing or Electrical & Electronic Components sample point 001 subject to the following certification:  _____ Based on my inquiry of the person or persons directly responsible for managing compliance with the permit limitation for total toxic organics (TTO), I certify that, to the best of my knowledge and belief, no dumping of concentrated toxic organics into the wastewaters has occurred since filing the last discharge monitoring report. I further certify that this facility is implementing the toxic organic management plan submitted to MSD.
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**PART IV: GENERAL CERTIFICATION STATEMENTS**

<b>A</b>	<b>NO DISCHARGE OF TOXIC ORGANICS AT ORDINANCE SAMPLE POINTS</b> If sample points subject only to MSD Ordinance limits are subject to TTO monitoring, and your premise neither uses or discharges toxic organics, you can be exempted from TTO monitoring subject to the following certification:  _____ In lieu of monitoring for TTO at sample point 001, I certify that to the best of my knowledge and belief, no toxic organics have been used at this premise or discharged into the wastewaters since filing of the last discharge monitoring report.
<b>B</b>	<b>DISCHARGE MONITORING REPORT CERTIFICATION</b> <b>All permittees must sign and complete the information below:</b>  I certify under penalty of Law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information, the information submitted is, to the best of my knowledge and belief, true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations.  Print or type name of signing official: _____  Title: _____ Telephone: _____  Signature: _____ Date: _____



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# Notification And Waste Stream Information

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**Epa ID** MOD985816990 **Missouri ID** 038743 **State Status** Small Quantity

**Date EPA Id Issued** 08/06/2001

**Notification Update Received:** 11/07/2012

**Record Add/Changed:** 11/07/2012

**Company Name** GATEWAY PLATING LLC

**Facility Address** 2501 TEXAS AVE  
ST LOUIS, MO 63104-2323

**County** ST LOUIS CITY

**Mailing Address** 2501 TEXAS AVE  
ST LOUIS, MO 63104-2323

**Contact Person/Position** ROY GROS

**Phone Number** (314) 865-1350

**Facility Owner** GATEWAY PLATING LLC

**Facility's Owner Address** 2501 TEXAS  
ST LOUIS, MO 63104

**Owner's Phone Number** (314) 865-1350 **Owner Type** Private

**Property Owner's Name** GATEWAY PLATING LLC

**Property Owner's Address** 2501 TEXAS  
ST LOUIS, MO 63104

**Property Owner's Phone Number** (314) 865-1350 **Property Owner Type** Private

**NAICS Code(s)**

332813

**TSD Facility** **TSD Identification Number:**  
**RCRA Identification Number:**

**Generator/Facility Information is Confidential**

**Large Quantity Handler Of Universal Waste**

**Registered EPA Hazardous Waste Numbers**

D000 D002 D007

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**EASTING** 741774.664 **NORTHING** 4276786.773

**HCollCode** **Street Centerline** **RefPtCode**

**Lat Long No Longer Dept Standards**

**LATITUDE** **LONGITUDE**

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# *Notification And Waste Stream Information*

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**Attachment C: Legal Services of Missouri 2021 Site Visit Photos**



210329-002



210329-003



210329-005



210329-007



210329-008



210329-009



210329-012



210329-013



210329-015



210329-016



210329-019



210329-020



210329-021



210329-022



210329-025



210329-027



210329-028



210329-030



210329-032



210329-035





210329-037



210329-039



210329-041



210329-042



210329-043



210329-044



210329-046



210329-049



210329-050



210329-051



210329-054



210329-057

Attachment D: Thomas J Pickel, DeSales Community Development,  
Contact Information



**Thomas J. Pickel**

Executive Director

**DeSales Community Development**

2759 Russell Blvd. | St. Louis, MO 63104

PHONE: 314-776-5444, ext. 1

EMAIL: [tom@desalescd.com](mailto:tom@desalescd.com)

<http://desalescd.com/>

*Founding Member of the Community Builders Network of Metro St. Louis*