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**NATURAL RESOURCES**

Eric R. Greitens, Governor

Carol S. Comer, Director

**NOV 17 2017**

Mr. David Leigh  
Corporate Safety Technician  
Brenntag Mid-South, Inc.  
1408 Highway 136 West  
Henderson, KY 42420

RE: New Source Review Permit Correction – Permit Number: 072017-019A  
Project Number: 2017-10-002; Installation Number: 510-1093

Dear Mr. Leigh:

On October 2, 2017, the Air Pollution Control Program received your request to amend Operating Permit No. OP2015-005. This was the first permit issued to the installation by the Air Pollution Control Program's central office, rather than the City of St. Louis local permitting authority. OP2015-005 reevaluated the potential to emit for the installation, which included a number of worst-case scenario assumptions for unspecified process vessel operations. A significant amount of VOC/HAP emissions from the installation are methanol, which is emitted primarily from the 815,000 gallon methanol storage tank (EP-27). This vessel's type was originally unspecified, and thus, its potential emissions were calculated using the worst-case fixed roof storage tank emission factors taken from the EPA's emission factor database, WebFIRE; however, EP-27 is actually a floating roof tank, and it was mistakenly assumed to be a fixed roof tank in the operating permit application. This discrepancy makes the previously calculated potential to emit of the tank significantly higher than it should be. This amendment serves as a correction to the emission factor and emission rate of methanol for EP-27. Although OP2015-005 was the first permit to address these emissions, an operating permit cannot be amended before first addressing the project in a construction permit; therefore, Construction Permit No. 072017-019 is being amended to account for the methanol correction.

EP-27 was not a direct part of the project covered in Construction Permit No. 072017-019; but, the storage tank's methanol emissions were included in Attachment A, which was used to track and limit the installation's total HAP emissions below the major source level. Methanol emissions from EP-27 were recalculated using the more appropriate methods found in AP-42 Section 7.1 *Organic Liquid Storage Tanks* (November 2006), Subsection 7.1.3.2 *Total Losses from Floating Roof Tanks*. Attachment A of Construction Permit No. 072017-0019 has been updated to reflect the correct methanol and tank breathing loss emission values, and a replacement version can be found attached to this amendment. Brenntag Mid-South, Inc. shall continue to abide by all the Special Conditions of Construction Permit No. 072017-019 and comply with all applicable requirements.



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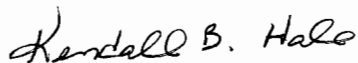
Mr. David Leigh  
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If you were adversely affected by this permit decision, you may be entitled to pursue an appeal before the administrative hearing commission pursuant to Sections 621.250 and 643.075.6 RSMo. To appeal, you must file a petition with the administrative hearing commission within thirty days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed; if it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the administrative hearing commission, whose contact information is: Administrative Hearing Commission, United States Post Office Building, 131 West High Street, Third Floor, P.O. Box 1557, Jefferson City, Missouri 65102, phone: 573-751-2422, fax: 573-751-5018, website: [www.ao.mo.gov/ahc](http://www.ao.mo.gov/ahc).

Please keep a copy of this amendment with Construction Permit No. 072017-019. If you have any questions regarding this correction, please do not hesitate to contact Ryan Schott, at the department's Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or at (573) 751-4817. Thank you for your attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM



Kendall B. Hale  
Permits Section Chief

KBH:rsj

Enclosures

c: St. Louis Regional Office  
PAMS File: 2017-10-002

## Attachment A – Combined HAP Tracking Sheet

Brenntag Mid-South, Inc.  
 Installation ID: 510-1093  
 Project Number: 2017-10-002  
 Permit Number: 072017-019A

This sheet covers the period from \_\_\_\_\_ to \_\_\_\_\_.  
 (month, year) (month, year)

A	B	C		D
Material Handled	<sup>1</sup> Amount Handled This Month	Combined HAP Emission Factor		<sup>2</sup> Combined HAP Monthly Emissions
Aatrex	Mgal	0.0002	lb/Mgal	tons
Solvent 142	Mgal	0.0024	lb/Mgal	tons
Aromatic 100	Mgal	0.0125	lb/Mgal	tons
Methanol	Mgal	1.3335	lb/Mgal	tons
Toluene	Mgal	1.6586	lb/Mgal	tons
Hexane	Mgal	8.7670	lb/Mgal	tons
Xylene	Mgal	0.0273	lb/Mgal	tons
Exxsol D-95	Mgal	0.0024	lb/Mgal	tons
Glycol Ether DB	Mgal	0.3403	lb/Mgal	tons
Diethylene Glycol Monomethyl Ether	Mgal	0.3403	lb/Mgal	tons
Isopar M	Mgal	0.0024	lb/Mgal	tons
Diethylene Glycol	Mgal	0.3403	lb/Mgal	tons
Methylene Chloride	Mgal	20.1043	lb/Mgal	tons
SD Alcohol 3A	Mgal	0.1249	lb/Mgal	tons
BMS PM-4083	Mgal	0.2202	lb/Mgal	tons
BMS PM-4217	Mgal	0.2694	lb/Mgal	tons
DEM Aerosol Alcohol Blend	Mgal	0.1689	lb/Mgal	tons
Formula 3C Special	Mgal	0.0204	lb/Mgal	tons
Formula C Anhydrous	Mgal	0.0806	lb/Mgal	tons
Prestilone PM 4082	Mgal	0.0775	lb/Mgal	tons
Natural Gas	MMscf	1.8885	lb/MMscf	tons
<b>E</b>	<b>Monthly Total Tank Breathing Losses:</b>			0.0223 tons
<b>F</b>	<b><sup>3</sup>Monthly Roof Landing Losses from EP-27:</b>			tons
<b>G</b>	<b><sup>4</sup>Monthly Startup, Shutdown &amp; Malfunction Emissions:</b>			tons
<b>H</b>	<b><sup>5</sup>Total Monthly Combined HAP Emissions:</b>			tons
<b>I</b>	<b><sup>6</sup>12-Month Rolling Total Combined HAP Emissions:</b>			tons

<sup>1</sup> Enter the amount of material handled in the given month, including all transfers (loading and unloading)

<sup>2</sup> Calculate using the following equation: [D] = [B] x [C] ÷ (2,000 lb/ton)

<sup>3</sup> Calculate using the following equation: [F] = (0.3922 tons/landing) x (number of EP-27 roof landings in the given month)

<sup>4</sup> As reported to the Air Pollution Control Program's Compliance/Enforcement Section according to 10 CSR 10-6.050

<sup>5</sup> Add all above values in Column [D]

<sup>6</sup> Add the Total Monthly Combined HAP Emissions to the value in Row [H] on the previous 11 months' Attachment A  
 A value less than **24.0** tons per year in Row [I] is required for compliance with Special Condition 1