



Jeremiah W. (Jay) Nixon, Governor

Sara Parker Pauley, Director

## DEPARTMENT OF NATURAL RESOURCES

[dnr.mo.gov](http://dnr.mo.gov)

May 3, 2011

Curt Gardner, P.E.  
Senior EHS Specialist  
BASF Corporation  
Agricultural Division  
3150 Highway JJ  
Palmyra, MO 63461-2611

RE: Class 1 Permit Modification Re-Submittal – Transfer of Incinerator Operating and Emission Compliance Requirements from *Resource Conservation and Recovery Act* to Hazardous Waste Combustor Maximum Achievable Control Technology  
BASF Corporation, Hannibal Plant, Palmyra, Missouri  
EPA ID No. MOD050226075

Dear Mr. Gardner:

This letter is to notify you that the Missouri Department of Natural Resources received BASF Corporation's July 28, 2010, re-submittal of the Class 1 Permit Modification request. The purpose of the modification is to remove requirements from the Missouri Hazardous Waste Management Facility Part I Permit that have been replaced by requirements under the Hazardous Waste Combustor National Emission Standards for Hazardous Air Pollutants. The *Resource Conservation and Recovery Act* permit will retain authority over the particulate matter standards (0.08 grains per dry standard cubic foot) specified in 40 CFR 264.343(c). We are approving the Class 1 Permit Modification with the following conditions.

BASF Corporation shall maintain the following performance standards:

- Maximum total combustion air plus fume feed rate in standard cubic feet per minute.
  - Incinerator A and B: 15,165
  - Incinerator C: 13,421
  - Incinerator D: 11,997
- Maximum total ash feed rate in pounds per hour.
  - Incinerator A and B: 4,255
  - Incinerator C: 5,126
  - Incinerator D: 4,307
- Minimum high energy scrubber blowdown flow rate in gallons per minute.
  - Incinerator A and B: 140
  - Incinerator C: 65
  - Incinerator D: 14



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- Minimum high energy scrubber flow rate at maximum gas production flow rate in gallons per minute.
  - Incinerator A and B: 254
  - Incinerator C: 225
  - Incinerator D: 172
  
- Minimum high energy scrubber pressure drop in inches of water column.
  - Incinerator A and B: 30.3
  - Incinerator C: 59.5
  - Incinerator D: 52.0

If you have any questions regarding this letter, please contact Mr. Mike Dandurand, Environmental Engineer, of my staff at the Missouri Department of Natural Resources, Hazardous Waste Program, P.O. Box 176, Jefferson City, MO 65102-0176, or by phone at (573) 751-3553 or 1-800-361-4827, or by e-mail at [mike.dandurand@dnr.mo.gov](mailto:mike.dandurand@dnr.mo.gov). Thank you.

Sincerely,

HAZARDOUS WASTE PROGRAM

[Original signed by Richard A. Nussbaum]

Richard A. Nussbaum, P.E., R.G.  
Chief, Permits Section

RAN:mdm

c: Ms. Nicole Eby, Enforcement Section, Air Pollution Control Program, Missouri  
Department of Natural Resources  
Ken Herstowski, P.E., U.S. EPA Region VII  
Ms. Patricia Murrow, Project Manager, U.S. EPA Region VII  
Northeast Regional Office, Missouri Department of Natural Resources