



Jeremiah W. (Jay) Nixon, Governor

Sara Parker Pauley, Director

## DEPARTMENT OF NATURAL RESOURCES

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

May 20, 2011

CERTIFIED MAIL – 7009 3410 0001 9259 0444  
RETURN RECEIPT REQUESTED

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

RE: Class 1 Permit Modification with Prior Director's Approval  
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 March 2, 2011, submittal of the Class 1 Permit Modification request. The purpose of the modification is to replace/modify several components for Incinerator "A" at the BASF facility. We are approving the Class 1 Permit Modification requiring prior director approval for the following equipment upgrades and replacements.

- Replacement of the lower portion of the Oxidizer shell and the Spray Contactor with thicker components without changing the internal diameters or the combustion gas residence time.
- Installation of a rubber expansion joint between the Spray Contactor and Quench Tank.
- Installation of an internal weir to cool the newly installed expansion joint. There shall be no change in the combustion gas flow or overall combustion gas quenching.
- Replacement of components of the Downcomer used to introduce combustion gas under the liquid surface of the Quench Tank with those having oval holes of equivalent flow area to the square holes previously employed.
- Replacement of the Quench Tank with upgraded materials to increase pressure ratings of the equipment without changing the liquid holding capacity or internal diameter.
- Replacement of the equalization line connections and piping between the Quench Tank and Entrainment separator with increased diameter equipment.
- Relocation of the thermocouple wells housing thermocouples used to measure minimum combustion chamber temperature in the Oxidizer chamber to locations consistent with those on Incinerator "B."



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BASF must send a notice of the modification to everyone on their facility mailing list and the appropriate units of state and local government within 90 calendar days after the date of this letter, as outlined in Code of Federal Regulations 40 CFR 270.42(a)(1)(ii), incorporated by reference in Code of State Regulations 10 CSR 25-7.270(1). BASF must send a copy of the notice to the Missouri Department of Natural Resources.

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: Ken Herstowski, P.E., U.S. EPA Region 7  
Ms. Patricia Murrow, Project Manager, U.S. EPA Region 7  
Northeast Regional Office, Missouri Department of Natural Resources