



Jeremiah W. (Jay) Nixon, Governor

Sara Parker Pauley, Director

## DEPARTMENT OF NATURAL RESOURCES

dnr.mo.gov

November 19, 2014

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

RE: Class 1 Permit Modification with Prior Director's Approval—Operating Parameters on  
"C" Incinerator that regulate Particulate Matter  
BASF Corporation, Hannibal Plant, Palmyra, Missouri  
EPA ID No. MOD050226075

Dear Mr. Gardner:

The Missouri Department of Natural Resources (Department) has reviewed BASF Corporation's (BASF) Class 1 Permit Modification request, dated October 30, 2014. The modification request was to change certain parameter limits for Incinerator "C", established in a letter from the Department dated May 3, 2011. These limits were set on several operating parameters that regulate emissions of particulate matter to the atmosphere. Due to the result of BASF's periodic Comprehensive Performance Testing (CPT) required for all Hazardous Waste Combustors regulated under the Code of Federal Regulations [40 CFR 63 Subpart EEE], the following more restrictive operating parameters shall be changed:

1. The minimum high energy scrubber blowdown flowrate shall be revised from 65 to 78.2 gallons per minute,
2. The minimum high energy scrubber (recirc) flowrate at maximum gas production shall be revised from 225 to 242 gallons per minute, and
3. The minimum high energy scrubber pressure drop shall be revised from 59.5 to 61.2 inches of water column.

We are approving the Class 1 Permit Modification request requiring prior director approval with the following comments:

1. All future CPT that will result in a “*more restrictive*” operating parameter(s) for a performance standard(s) specified in BASF’s Missouri Hazardous Waste Management Facility (MHWMF) Part I Permit and any subsequent modification shall be completed as a Class 1 permit modification *without* prior director approval.
2. All future CPT that result in a “*less restrictive*” operating parameter(s) for performance standards specified in BASF’s MHWMF Part I Permit and any subsequent modification shall be completed as a Class 1 permit modification *requiring* prior director approval.

The current performance standards that control particulate matter for Incinerators A, B, C and D, including those identified in this permit modification, and the November 2013 NOC for Incinerators A, B and D, are identified below:

- Maximum total combustion air plus fume feed rate expressed in terms of standard cubic feet per minute.
  - Incinerator A and B: 15,432
  - Incinerator C: 13,421
  - Incinerator D: 11,578
- Maximum total ash feed rate expressed in terms of pounds per hour.
  - Incinerator A and B: 4,244
  - Incinerator C: 5,126
  - Incinerator D: 4,463
- Minimum high energy scrubber blowdown flow rate expressed in terms of gallons per minute.
  - Incinerator A and B: 192.1
  - Incinerator C: 78.2
  - Incinerator D: 20
- Minimum high energy scrubber flow rate at maximum gas production flow rate expressed in terms of gallons per minute.
  - Incinerator A and B: 251
  - Incinerator C: 242
  - Incinerator D: 261
- Minimum high energy scrubber pressure drop expressed in terms of inches of water column.
  - Incinerator A and B: 33.5
  - Incinerator C: 61.2
  - Incinerator D: 52

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BASF must send a notice of this 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 State Regulations [10 CSR 25-7.270(1)] and as modified by 10 CSR 25-7.270(2)(A)6 and 10 CSR 25-7.270(2)(B)10 which incorporates 40 CFR 270.42(a)(1)(ii). BASF must send a copy of the notice to the Department.

If you have questions regarding this letter, please contact Nathan Kraus, P.E., of my staff at the Missouri Department of Natural Resources, Hazardous Waste Program, P.O. Box 176, Jefferson City, MO 65102-0176, by telephone at (573) 751-3553 or 1-800-361-4827, or by e-mail at [nathan.kraus@dnr.mo.gov](mailto:nathan.kraus@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:nkt

c: Ken Herstowski, P.E., Project Manager, U.S. EPA Region 7  
Northeast Regional Office, Missouri Department of Natural Resources  
Steve Sidebottom, Environmental Specialist, APCP, MDNR

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