



Jeremiah W. (Jay) Nixon, Governor • Scott Holste, Interim Director

## DEPARTMENT OF NATURAL RESOURCES

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

January 5, 2017

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

RE: Acknowledgement of Class 1 Permit Modification without Prior Director's Approval - Operating Parameters on "A" and "B" Incinerators that Regulate Particulate Matter  
BASF Corporation, Hannibal Plant, Palmyra, Missouri  
EPA ID # MOD050226075

Dear Mr. Gardner:

The Missouri Department of Natural Resources (Department) has reviewed BASF Corporation's (BASF) Class 1 Permit Modification notice, dated November 29, 2016. The modification request was to change certain parameter limits for Incinerators "A" and "B", while operating in either spray quenching or submerged quench mode, as approved in a letter dated November 14, 2016. These limits were set on several operating parameters that regulate emissions of particulate matter to the atmosphere. Due to the result of BASF's 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 192.1 to 207.3 gallons per minute,
2. The minimum high energy scrubber (recirc) flowrate at maximum gas production shall be revised from 251 to 258.5 gallons per minute, and
3. The minimum high energy scrubber pressure drop shall be revised from 33.5 to 34.3 inches of water column.

The current performance standards that control particulate matter for Incinerators A, B, C and D, including those identified in this permit modification 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

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- 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: 207.3
  - 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: 258.5
  - Incinerator C: 242
  - Incinerator D: 261
  
- Minimum high energy scrubber pressure drop expressed in terms of inches of water column.
  - Incinerator A and B: 34.3
  - Incinerator C: 61.2
  - Incinerator D: 52

The Department agrees with BASF that this is a Class 1 Permit Modification not requiring prior Director approval, according to an approval letter dated November 19, 2014. 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 change was put into effect, as outlined in Code of State Regulations 10 CSR 25-7.270(1) 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  
Steve Sidebottom, Environmental Specialist, ACP, MDNR  
Northeast Regional Office, Missouri Department of Natural Resources