



Missouri Department of dnr.mo.gov

NATURAL RESOURCES

Eric R. Greitens, Governor

Carol S. Comer, Director

January 22, 2018

CERTIFIED MAIL – 7017 019 0000 6509 7534
RETURN RECEIPT REQUESTED

Curt Gardner, P.E.
EHS Team Member
BASF Corporation
3150 Highway JJ
Palmyra, MO 63461-2611

RE: Class 1 Permit Modification with Prior Director's Approval
Rerouting of Formulation (FFP) Waste Stream
BASF Corporation, Hannibal Plant, Palmyra, Missouri
EPA ID No. MOD050226075

Dear Mr. Gardner:

The Missouri Department of Natural Resources (Department) hereby approves BASF Corporation's (BASF) Class 1 Permit Modification request, dated December 12, 2017. The request was to install a new waste transfer line to move BASF's Formulation liquid waste stream (FFP) to the facility's South Incineration area aqueous waste tankage, ultimately feeding this waste to the "D" Incinerator.

This waste stream was previously being transferred to the North Incineration area via piping that recently experienced a structural failure. The Department understands that this change would require less linear feet of piping for the transfer of waste potentially reducing fugitive emissions. Department is approving the request for piping changes with the following conditions:

1. Within 60 days of receiving this letter, BASF shall submit an updated waste feed system flow diagram for each of the four incinerators at the facility to incorporate this modification.
2. Within 60 days of receiving this letter, BASF shall update their Part A Permit application to show that "D" Incinerator will now be receiving/treating D028 waste.
3. Prior to utilizing this new piping system, BASF must receive confirmation from the Department's Air Pollution Control Program that the addition of this waste feed to the



Curt Gardner, P.E.
January 22, 2018
Page 2

“D” Incinerator will not increase the emission limits established during the Comprehensive Performance Testing and therefore does not require a construction permit prior to operation. If an air construction permit is required, the facility must receive approval from the Department’s Air Pollution Control Program prior to utilizing this new piping system.

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, according to 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. Thank you.

Sincerely,

HAZARDOUS WASTE PROGRAM

[Original signed by Richard A. Nussbaum]

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

RAN:nk

c: Mike Dandurand, P.E., Project Manager, U.S. EPA Region 7
Nicole Weidenbenner, P.E., Missouri Department of Natural Resources, Air Pollution Control Program
Northeast Regional Office, (Via Electronic Exchange)
HWP-Compliance and Enforcement Section (Via E-mail)
Heidi Rice, HWP-Permits Section (Via E-mail)