

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

Jeremiah W. (Jay) Nixon, Governor • Sara Parker Pauley, Director

www.dnr.mo.gov

OCT 16 2012

Mr. William A. Ludwig
Corporate Environmental Director
National Beef Leathers
12200 N. Ambassador Drive, #500
Kansas City, MO 64163

RE: New Source Review Temporary Permit Request - Project Number: 2012-09-050

Installation ID Number: 021-0038

Temporary Permit Number: **102012-009**

Expiration Date: April 1, 2013

Dear Mr. Ludwig:

The Missouri Department of Natural Resources' Air Pollution Control Program has completed a review of your request to temporarily pour dry chromium sulfate powders directly to the leather tanning drums at your facility located in St. Joseph, Missouri. The Air Pollution Control Program is hereby granting your request to conduct this temporary operation at this location in accordance with Missouri State Rule 10 CSR 10-6.060(3).

You facility proposes to empty 25 kg (55 lb) bags of chromium sulfate to the drums currently being used for leather tanning. The tanning drums are under negative pressure from a scrubber and contain enough water that will allow the dry material to become immediately liquefied inside the drum. Each tanning batch will use 40 bags (1,000 kg or 2,200 lb total) of chromium sulfate. With 66 tons of material in stock, 60 tanning batches will be produced. This is a short-term project to deplete the existing inventory of chromium sulfate currently on hand in the 25 kg bags.

Emissions expected from this project are particulates, including particulate matter less than two-and-a-half microns in diameter (PM_{2.5}), particulate matter less than ten microns in diameter (PM₁₀) and particulate matter (PM). The particulates are also in the form of chromium sulfate and chromium oxide, which are hazardous air pollutants (HAP). The chromium is in trivalent form in which case the Screening Model Action Level (SMAL) is 5 tons per year. The PM emission factor used to calculate emissions is 1.29 lb/ton, taken from a previous mass balance test performed at the facility for a similar process (ammonium sulfate batching system). All of the PM are also considered PM_{2.5}, PM₁₀ and HAP for this evaluation. The estimated project potential emissions are 0.0426 tons calculated using (66 tons of chromium sulfate) x (1.29 lb/ton) ÷ 2,000 lb/ton.

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You are still obligated to meet all applicable air pollution control rules, Department of Natural Resources' rules, or any other applicable federal, state, or local agency regulations. Specifically, you should avoid violating 10 CSR 10-6.220, *Restriction of Emission of Visible Air Contaminants*, 10 CSR 10-6.165 *Restriction of Emission of Odors*, and 10 CSR 10-6.170 *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin*. None of the New Source Performance Standards (NSPS) or the currently promulgated Maximum Achievable Control Technology (MACT) Standards apply to the temporary operation.

A copy of this letter should be kept with the unit and be made available to Department of Natural Resources' personnel upon verbal request. If you have any questions regarding this determination, please do not hesitate to contact Chia-Wei Young at the departments' Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or by telephone at (573) 751-4817. Thank you for your time and attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM



Kyra L. Moore
Director

KLM:cyl

c: PAMS File: 2012-09-050
Kansas City Regional Office