



NATURAL RESOURCES

Michael L. Parson, Governor

Carol S. Comer, Director

SEP 23 2019

Mr. Scott McMahan
 Safety, Health, and Environment Manager
 Unilever
 13000 East 35th Street
 Independence, MO 64055

RE: New Source Review Permit Amendment - Permit Number: 122015-009A
 Project Number: 2019-07-040; Installation Number: 095-0178

Dear Mr. McMahan:

On July 29, 2019 the Air Pollution Control Program received your request to amend Permit 122015-009 by removing Special Condition 2.D., which requires the facility to maintain a total dissolved solids (TDS) concentration below 1,500 ppm in each of the two evaporative condensers. Special Condition 2.E. of Permit 122015-009 allows the requirement for TDS sample collection to be eliminated if TDS sampling results demonstrated compliance for 24 consecutive months. The equipment has been operated seasonally so consecutive monthly data is not available; however, Unilever provided results from 12 months. The results indicate that the TDS concentration of 1,500 ppm has been exceeded on a number of occasions. Unilever has requested to update the potential to emit calculations in permit 122015-009 to reflect the results of the samples. The highest recorded sample is 9,310 ppm which is now used in the potential to emit calculations. Unilever has also worked to correct inconsistent information provided with the initial application for the drift loss rate. Permit 122015-009 uses 0.01%. Unilever has provided updated documentation from the manufacturer that the drift loss rate is 0.001%. The change in the drift loss rate and the TDS results in a new potential to emit summarized below in Table 3. The potential and conditioned potential of the application are slightly lower than determined in Permit 122015-009.

Table 3: Emissions Summary (tons per year)

Pollutant	Regulatory <i>De Minimis</i> Levels	Existing Potential Emissions	Existing Actual Emissions (2014 EIQ)	Potential Emissions of the Application	Conditioned Potential Emissions of the Application
PM	25.0	N/D	N/D	19.33	0.61
PM ₁₀	15.0	9.1	12.09	19.31	0.61
PM _{2.5}	10.0	N/D	12.09	19.30	0.61
SO _x	40.0	161.3	0.07	N/D	N/D
NO _x	40.0	53.3	9.9	N/D	N/D
VOC	40.0	11.3	0.84	N/D	N/D
CO	100.0	31.7	7.99	N/D	N/D
HAPs	10.0/25.0	N/D	0.00	N/D	N/D

N/A = Not Applicable; N/D = Not Determined

Mr. McMahan
Page Two

Despite showing exceedance for the TDS limit of 1,500 ppm in permit 122015-009, the evaporative condensers are a minor contributor of particulate emissions at only 0.42 tons per year using the updated data. This amendment removes the requirement to conduct monthly TDS samples since results from the samples show that actual TDS concentration does not change the permit type.

If you were adversely affected by this permit decision, you are entitled to pursue an appeal before the administrative hearing commission pursuant to Sections 621.250 and 643.075.6 RSMo. To appeal, you must file a petition with the administrative hearing commission within thirty days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed. If it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the administrative hearing commission. Whose contact information is: Administrative Hearing Commission, United States Post Office Building, 131 West High Street, Third Floor, P.O. Box 1557, Jefferson City, Missouri 65102, phone: 573-751-2422, fax: 573-751-5018, website: www.oa.mo.gov/ahc.

If you have any questions regarding this amendment, please do not hesitate to contact Chad Stephenson, at the department's Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102 or at (573) 751-4817. Thank you for your attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM



Kendall B. Hale
Permits Section Chief

KBH:sca

Enclosures

c: Kansas City Regional Office
PAMS File: 2019-07-040

Page No.	3
Permit No.	122015-009A
Project No.	2019-07-040

SPECIAL CONDITIONS:

The permittee is authorized to construct and operate subject to the following special conditions:

The special conditions listed in this permit were included based on the authority granted the Missouri Air Pollution Control Program by the Missouri Air Conservation Law (specifically 643.075) and by the Missouri Rules listed in Title 10, Division 10 of the Code of State Regulations (specifically 10 CSR 10-6.060). For specific details regarding conditions, see 10 CSR 10-6.060 paragraph (3)(E). "Conditions required by permitting authority."

Unilever
Jackson County, S14, T49N, R32W

1. **Superseding Condition**
The conditions of this permit supersede Special Condition 2 found in the previously issued construction permit 152015-009 issued by the Air Pollution Control Program.
2. **Evaporative Condenser Requirements**
 - A. The evaporative condenser(s) shall be operated and maintained in accordance with the manufacturer's specifications. Manufacturer's specifications shall be kept on site and made readily available to Department of Natural Resources' employees.
 - B. The cooling water circulation rate shall not exceed 61,200 gallons per hour per tower. Each evaporative condenser shall be equipped with a gauge or meter, which indicates the flowrate. These gauges or meters shall be located such that the Department of Natural Resources' employees may easily observe them.
 - C. The drift loss from the evaporative condensers shall not exceed 0.001 percent of the cooling water circulation rate. The drift loss shall be verified by manufacturer's guaranteed drift loss and shall be kept on site and made readily available to Department of Natural Resources; employees upon request.

