



Missouri Department of dnr.mo.gov

**NATURAL RESOURCES**

Eric R. Greitens, Governor

Carol S. Comer, Director

February 26, 2018

CERTIFIED MAIL – 7014 1200 0000 4389 2614  
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  
Treatment of New Revysol Waste Streams  
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 February 6, 2018, which replaced the original request dated October 3, 2017. The request was to use BASF's North Incineration Units (Incinerators "A", "B", and "C") for the treatment and disposal of wastes created from the production of a new fungicide product, Revysol. The requested change also includes additional waste codes that will be managed by these incinerators.

According to Code of State Regulations 10 CSR 25-7.270(1), incorporating Code of Federal Regulations 40 CFR 270.42, Appendix I, L.6.b., burning of different waste codes that do not contain a POHC that is more difficult to burn than authorized by their permit, requires a Class 2 Permit Modification. However, BASF's submission included information that these incinerators, to a lesser extent, have managed these waste codes while burning waste created by the Pyrrole production process. This information was also verified by the Department's Air Pollution Control Program (APCP). In light of this information, the Department considers this request to be a Class 1 Permit Modification with Prior Director's Approval and is approving this change with the following comments and schedule of compliance items:

1. Within 60 days of receiving this letter, BASF shall update their Part A Permit application to show that "A", "B", and "C" Incinerators will now be receiving/treating U003 (Acetonitrile); U009 (Acrylonitrile); U103 (Dimethyl Sulfate); and U404 (Triethylamine)



Curt Gardner, P.E.

Page 2

wastes. This update shall identify all hazardous waste codes associated with each individual incinerator.

3. BASF shall also change and submit the updated Part A Permit application to identify the changes approved on January 22, 2018; that being the site's "D" incinerator is now receiving/treating D028 (1,2-Dichloroethane) waste.
4. With this approval, the Department would like to express their view on the waste code U154 (Methanol), in which BASF identifies as not listed due to it not meeting the definition at 40 CFR 261.33, "*Discarded commercial products, off-specification species, container residues, and spill residues thereof.*" The Department agrees with this assessment of methanol. However, BASF states that methanol is formed as a byproduct from an undesired side reaction, through degradation of a raw material reacting with water. This reaction produces methanol, therefore making BASF the generator. The methanol is subsequently sent for treatment and disposal through the incinerators. It is the Department's belief that U154 should be accounted for in the assessment of this waste. Please contact the Nathan Kraus, P.E., of my staff if BASF would like to further discuss this issue.

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) incorporating 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:nkd

- 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)