



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 7
901 N. 5th STREET
KANSAS CITY, KANSAS 66101

AIR PERMITTING AND
COMPLIANCE BRANCH

November 1, 2004

Ms. Leanne Tippett Mosby
Missouri Department of Natural Resources
P.O. Box 176
Jefferson City, MO 65102-0176

Dear Ms Mosby:

The following are comments on the preliminary permit determination for Doe Run Company – Resource Recycling Division – Buick Facility’s Prevention of Significant Deterioration Permit.

- 1) Special Condition No. 10 requires Doe Run to demonstrate compliance with emission limits listed in condition 9 by using specific stack test methods. In addition to the test methods the permit should also specify the number of test runs that are averaged to determine compliance and minimum test times and sample volumes.
- 2) Special Condition No. 15 requires a sulfur dioxide (SO₂) Continuous Emissions Monitoring System (CEMS) to demonstrate compliance with the SO₂ Best Available Control Limit (BACT) in Special Condition No. 2. Likewise, Special Condition No. 16 requires a CEMS for measuring carbon monoxide (CO) to demonstrate compliance with the CO BACT limit in Special Condition No. 3. First, the permit does not require these CEMS to meet any performance specifications. Second, the permit expresses the BACT limits in tons emitted in any rolling twelve month period. However, SO₂ and CO CEMS will return concentration data not emissions data. Doe Run would also have to monitor flow to measure the tons emitted. The permit would also need provisions for estimating emissions when monitoring data is unavailable.
- 3) The scrubbing system associated with the desulfurization area is required to achieve a control efficiency of at least 98 percent for PM₁₀ and lead by Special Condition No. 21. How will Doe Run verify compliance with the 98 percent efficiency? Is compliance with the emission rates in Table 1 considered proof of achieving the 98 percent efficiency? Is this permit condition redundant?
- 4) Special Condition No. 30 requires Doe Run to install low-NO_x burners. Low-NO_x burner is not defined. The permit needs to specify the emission limit you expect Doe Run to meet

- 5) The steps that Doe Run takes to preclude public access should be submitted before issuing the permit instead of being required by Special Condition No. 33.
- 6) You need to decide and the permit needs to specify the extent of the ambient air quality monitoring required by Special Condition No. 34.
- 7) Both Special Condition No. 14 and No. 25 D. make it unclear if Doe Run is required to comply with permit emission limits. Is it a violation of the permit if Doe Run exceeds any of the emission rates specified in Special Condition No. 9 or is there no permit violation if Doe Run complies with the requirement to submit a plan. Is the permit violated if Doe Run does not achieve a 75 percent reduction in SO_x emissions from the secondary smelting process?
- 8) We believe you have performed the SO₂ increment modeling consistent with the state rules. However, the issue of the correct baseline date raised in the Holcim permit still exists. Missouri may issue this permit with the increment analysis Missouri performed but if subsequent modeling shows SO₂ increment violations then SO₂ mitigation will be required at that time.
- 9) There is a typographical error in Special Condition No. 25 C. It refers to emission reductions established by Special Condition No. 24 but No. 24 does not have any emission reduction requirements.
- 10) Special Condition No. 37 should not be in the permit since this is a requirement on the Missouri Department of Natural Resources instead of Doe Run.
- 11) Consider writing the permit so monitoring is only required when the facility or equipment being monitored is in operation.

Please contact Ward Burns or my staff at (913) 551-7960 if you have any questions regarding this letter.

Sincerely,

JoAnn M. Heiman
Chief
Air Permitting and Compliance Branch