JUN 2 4 2019

Mr. Michael Stansfield, P.E.
Operating Permits Unit Chief
Missouri Department of Natural Resources
Air Pollution Control Program
PO Box 176
Jefferson City, Missouri 65102

RE: Draft Part 70 Operating Permit
BCP Ingredients, Inc.
Installation ID 109-0004
Project No. 2017-02-062

Dear Mr. Stansfield:

On June 7, 2019, the Missouri Department of Natural Resources Air Pollution Control Program (MoDNR) published a public notice for a draft of the Part 70 Operating Permit for BCP Ingredients, Inc in Verona (BCP-Verona). The United States Environmental Protection Agency, Region 7 (EPA) has reviewed this draft permit and provides the following comments which we hope will improve this and future permits.

1) Permit Condition PW1 establishes a voluntary plant wide synthetic minor limit of less than 10 tons of any single hazardous air pollutant (HAP) and less than 25 tons of combined HAP in any 12-month rolling period. Permit Condition PW2 establishes a voluntary plant wide synthetic minor limit of less than 250 tons of volatile organic compounds (VOCs) in any rolling 12-month period. Permit Conditions PW1 and PW2 require the permittee to keep accurate records of HAP emissions and VOC emissions, respectively, using a custom tracking spreadsheet, as described in Attachment E. Attachment E details the process required by the permittee including a preferred hierarchy of emission factor determination methodology. However, in review of the custom spreadsheet provided by the permittee, the emission factors used to verify compliance with Permit Condition PW1 and PW2 are not identified. Without a documented emission factor determination or methodology included on Attachment E, it is difficult for the permit reviewer and/or field compliance inspector to evaluate compliance. Therefore, EPA recommends MoDNR seriously consider a requirement for the permittee to include their emission factor development procedure for each HAP and VOC on compliance documentation.

2) Permit Condition 1 includes an emission limitation where the permittee shall not emit VOCs from the encapsulation process, Emission Point EP9-1, in excess of 40 tons in any rolling 12-month period. Additionally, Permit Condition 1 includes an operational limitation where the permittee shall

Office	APSB	APSB	APSB
Name	Cheever-rlc	Knodel - JK	Algoe-Eakin
Initial/Date	6/20/19	6/21/19	6/20/19

control emissions from EP9-1 using dust collectors. Permit Condition also requires the permittee to monitor and record pressure drop across the dust collectors at least once every 24 hours while the associated equipment is in operation. Dust collectors are control devices associated with the capture and control of particulate matter (PM) and it is not clear to EPA how the control of PM also provides control of volatile organic compounds (VOC) associated with the encapsulation process, EP9-1. MoDNR has provided no discussion in the available permit record that correlates the capture of PM with VOC control.

However, following a review of Permit to Construct #012002-009, identified as the origin and authority for Permit Condition 1, it appears that Permit Condition 1 may not incorporate the special conditions of Permit to Construct #012002-009 completely and accurately. Permit to Construct #012002-009 limits VOC from the encapsulation process (EP9-1) to less than 40 tons in any consecutive 12-month period, however, Permit to Construct #012002-009, also requires the permittee to use a VOC Compliance Worksheet (Attachment A to Permit to Construct #012002-009) which tracks the amount of vegetable oil used in the encapsulation process and uses an emission factor based on a single performance stack test to determine pounds of VOC emitted per gallon of vegetable oil used. The Emissions/Control Evaluation discussion in Permit to Construct #012002-009 appears to indicate the dust collectors have been installed to control PM10, although Permit to Construct #012002-009 does not include a PM10 emission limitation.

It appears to EPA, Permit to Construct #012002-009 requires tracking of the amount of vegetable oil usage and to calculate VOC emissions based on the emission factor developed by the stack test completed in 2002. Therefore, EPA recommends MoDNR review the special conditions placed on the permittee by Permit to Construct #012002-009 and consider whether Permit Condition 1 completely and accurately presents these special conditions. EPA also is concerned that the permittee may be relying on an emission factor developed in 2002 and suggests MoDNR may want to consider requiring the permittee to conduct an emission factor determination stack test at least once during the term of this Part 70 operating permit.

3) Permit Condition 2 requires the permittee to inspect the ethylene oxide system each month for emission leaks. Should results indicate a leak, the permittee shall take necessary action to remedy the causes of any such leaks and restore the operation of the system to its original performance level. It is unclear what MoDNR means by the term "ethylene oxide system" and what exactly defines a "leak." Also, MoDNR does not include any reference test method(s) to be utilized by the permittee to determine a leak of ethylene oxide. Without knowing what equipment/items are being inspected, the method(s) used for leak evaluation, and the monitoring result that signifies a leak, it is practically impossible for the permit reviewer and/or field compliance inspector to verify compliance with this permit condition. Therefore, EPA recommends MoDNR consider specifying all equipment / items in the ethylene oxide system being monitored; an emission level that defines a leak; and the reference method(s) to be used by the permittee to achieve compliance with Permit Condition 2.

   Additionally, the record keeping requirement in Permit Condition 2, specifies a record retention of two years. However, the record retention requirements of Title V / Part 70 specify five (5) years and EPA recommends MoDNR consider modifying the record keeping requirement in Permit Condition 2 to match Title V / Part 70 requirements.

4) The permittee has taken voluntary synthetic minor hazardous air pollutant (HAP) limits and is therefore being regulated as an area HAP source. Pursuant to 10 CSR 10-6.075, MoDNR relies on EPA to be the regulating agency for all area HAP sources. Permit Condition 5 incorporates

applicable requirements from 40 CFR part 63, Subpart *ZZZZ-National Emission Standards for Hazardous Air Pollutants for Stationary Reciprocating Internal Combustion Engines* and Permit Condition 6 incorporates applicable requirements from 40 CFR part 63, Subpart CCCCCC-*National Emission Standards for Hazardous Air Pollutants for Source Category: Gasoline Dispensing Stations*. Both Permit Condition 5 and Permit Condition 6 present area source HAP requirements and therefore, pursuant to 10 CSR 10-6.075, compliance reporting should more appropriately be submitted to the Missouri Compliance Coordinator, Air Branch, Enforcement and Compliance Assurance Division at EPA with copies to MoDNR.

5) MoDNR's customary practice is to identify the Emission Unit Specific Emission Limitations section of their Part 70 operating permits with the Roman numeral III. It then follows that the Core Permit Requirements are identified with the Roman numeral IV, and the General Permit Requirements are identified with the Roman numeral V. EPA suggests MoDNR consider returning to their customary practice in this Part 70 permit.

   If MoDNR opts to leave the major section identification as presented in this draft operating permit on public notice, then EPA recommends MoDNR consider correcting the reporting reference in Permit Condition 5 from Section V to Section IV.

6) The Responsible Official section included in Section IV of this draft Part 70, indicates the application utilized in the preparation of this permit was signed by Merle Barber, Plant Manager. However, the Application for Authority to Operate in EPA files, as provided by MoDNR, is signed by Jeremy Christian, Plant Manager. EPA suggests MoDNR consider providing an explanation regarding the change in Responsible Official in the operating permit record.

7) Attachment E discusses "Custom Tracking Worksheets" specifically for HAP emissions associated with Permit Condition PW1; VOC emissions associated with Permit Condition PW2; and PM10 and ethylene oxide emissions associated with Permit Condition 1. However, PM10 and ethylene oxide emission tracking is required by Permit Condition 3, so EPA suggests MoDNR consider modifying Attachment E to match the draft Part 70 permit conditions. Also, Attachment E includes the reference to CEIDARS in the hierarchy for emission factor determination. The acronym CEIDARS may not be familiar to all and therefore, EPA suggests MoDNR provide a definition of CEIDARS.

We appreciate the opportunity to provide what we hope you will find to be constructive comments. If you have any questions, please contact Bob Cheever by phone at (913) 551-7980 or email at cheever.robert@epa.gov.

Sincerely,

Amy Algoe-Eakin, Chief
Air Permitting and Standards Branch
Air and Radiation Division
EPA Region 7

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 7
11201 Renner Boulevard
Lenexa, Kansas 66219

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for Amy Algoe-Eakin, Chief
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