



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 7**

11201 Renner Boulevard  
Lenexa, Kansas 66219

**JUL 14 2017**

Ms. Kyra L. Moore, Director  
Air Pollution Control Program  
Missouri Department of Natural Resources  
PO Box 176  
Jefferson City, Missouri 65102-0176

RE: Draft Permit to Construct Amendment  
Doe Run Company  
Buick Resources Recycling Facility (ID #093-0009)  
Project No. 2013-05-060

Dear Ms. Moore:

On June 7, 2017, The Missouri Department of Natural Resources' Air Pollution Control Program placed a draft of the amendment to the Permit to Construct #012005-008D for Doe Run Company, Buick Recycling and Resources Facility (Doe Run) in Boss, Missouri, on public notice. The United States Environmental Protection Agency, Region 7 (EPA) has reviewed this draft construction permit amendment and provides the following comments.

First, the transmittal letter for the Prevention of Significant Deterioration (PSD) Permit Amendment states that the MDNR has completed a review of Doe Run's May 24, 2013, application to increase the PM<sub>10</sub> limit on EP-08 in Special Condition 2 of the previously issued PSD Permit 012005-008C, to include condensable particulate matter (PM-CON) emissions. The background documents provided by MDNR in the public notice for this PSD Permit amendment includes many subsequent application revisions and modeling analysis, but not the May 24, 2013 application. The May 24, 2013 application should be included in the documents made available in the public record for permit review. MDNR should also identify in its transmittal letter other documents in the public record that it relied on for its review and determination.

Second, Special Condition 3 and Special Condition 4, in the draft PSD permit revision on public notice, propose to establish "temporary" PM<sub>10</sub> BACT limits for the reverberatory furnace and the blast and sweat furnaces, respectively. To inform the setting of the final PM<sub>10</sub> BACT limits, as required in Special Condition 12 of the draft permit on public notice, Doe Run is required to submit the results of a process variability study, as required in Special Condition 7 of the draft permit on public notice, along with proposed final limits. The variability study requires Doe Run to analyze inputs to the furnaces on 108 separate calendar days for sulfur, metals and other materials. Special Condition 6.B of the draft permit on public notice also requires Doe Run to demonstrate compliance with the temporary BACT limits within 180 days of permit issuance. Special Condition 6.B. refers to performance "tests," but is silent on how many such tests must be done.



Where the BACT limits take the form of lb of PM<sub>10</sub>/ton Pb produced, it is important to know how the PM<sub>10</sub> rate varies with the different types of materials being charged to the furnaces. MDNR should consider identifying the types of materials being charged to the furnaces. Also, a one-time stack test, along with 108 different days of material input, does not inform Doe Run, MDNR or the public about how emissions vary with these inputs. Additionally, it does not inform MDNR about the potential range of PM<sub>10</sub> emissions for setting BACT limits. To the extent MDNR plans to rely on this kind of analysis to set final BACT limits, MDNR and Doe Run should work together to develop an approved formal protocol to determine the number of tests and appropriate operating conditions necessary to establish the final BACT rates.

We appreciate the opportunity to provide comments. If you have any questions, please contact Bob Cheever by phone at (913) 551-7980 or email at [cheever.robert@epa.gov](mailto:cheever.robert@epa.gov).

Sincerely,



Mark A. Smith, Chief  
Air Permitting and Compliance Branch  
EPA Region 7