



REGION 7

LENEXA, KS 66219

August 12, 2024

SENT VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Fletcher Stovall
Registered Agent for Trans Chemical Incorporated
419 East Desoto Avenue
St. Louis, MO 63147

RE: Notice of Noncompliance with the Clean Air Act
Permit Violations
Trans Chemical Incorporated

Dear Registered Agent:

On September 6, 2023, a representative of the U. S. Environmental Protection Agency inspected Trans Chemical Incorporated located at 419 East Desoto Avenue, St. Louis, Missouri 63147. The objective of the inspection was to determine compliance of the facility with the Clean Air Act and identify possible sources of volatile organic compound emissions. The facility was identified as a possible source of further investigation based on VOC emissions identified during the U.S. Environmental Protection Agency's geospatial measurement of air pollution screening conducted between September 12-15, 2022, in the St. Louis area. The inspection was part of the EPA's Creating Cleaner Air for Communities National Enforcement Compliance Initiative. A copy of the inspection report was sent to the facility on January 10, 2024.

This letter is to notify TransChemical that the EPA has reviewed the information collected during the inspection and has identified the following violation:

- The facility failed to accurately calculate monthly emissions as required by Section IV(E) in the Special Case permit issued by the City of St. Louis Department of Public Safety on March 20, 1998 (Permit No. 97-12-109).

Although the facility was not accurately calculating monthly emissions, EPA's review of the information gathered from the facility showed that total emissions were not above the major source threshold. The

EPA has determined that the potential violation listed above was satisfactorily addressed in a timely way. No further action on the part of the facility is required regarding this violation.

Please note that the correction of the violation does not prevent the EPA from pursuing appropriate enforcement actions, including penalties, for violations discovered because of the inspection in the future. The penalties sought within such an enforcement action can be up to \$57,617 per violation per day of noncompliance.

Please direct all questions concerning this letter to Christopher Appier at (816) 885-1706 or appier.christopher@epa.gov.

Sincerely,

David Cozad
Director
Enforcement and Compliance Assurance Division

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