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TEXAS COMMISSION ON ENVIRONMENTAL QUALITY
Protecting Texas by Reducing and Preventing Pollution

January 21, 2010

MR CHAD MCKAY
PLANT MANAGER
ROBBINS & MYERS ENERGY SYSTEMS LP
10586 HWY 75 N
WILLIS TX 77378

Re: Void of Site Operating Permit
Permit Number: O2295
Robbins & Myers Energy Systems L.P.
R & M Willis Plant
Willis, Montgomery County
Regulated Entity Number: RN102144029
Customer Reference Number: CN600129233
Account Number: MQ-0548-Q

Dear Mr. McKay:

As requested in your December 4, 2009 letter, the above-referenced federal operating permit (FOP) for the Robbins & Myers Energy Systems L.P., R & M Willis Plant site, authorized under Title 30 Texas Administrative Code Chapter 122 (30 TAC Chapter 122) has been voided, as well as the above-referenced Federal Operating Permit (FOP) minor revision application for the R & M Willis Plant site has been withdrawn. Therefore, no response will be provided for the objection received on November 6, 2009 for the minor revision project. Based on your submission, we understand that federally enforceable emission limits, which include any maintenance, startup, and shutdown activity, for the site demonstrate that the site's potential to emit has been reduced below the major source threshold levels and the site no longer meets the applicability criteria for an FOP outlined in 30 TAC § 122.120.

We recommend that documentation be maintained which supports your representation that the R & M Willis Plant site no longer meets the 30 TAC § 122.120 applicability criteria. If it is later determined by either Robbins & Myers Energy Systems L.P. or the Texas Commission on Environmental Quality (TCEQ) that the R & M Willis Plant site is subject to 30 TAC Chapter 122 requirements, enforcement action may be pursued by the TCEQ.

If the R & M Willis Plant site becomes subject or is determined to have been subject to 30 TAC Chapter 122 requirements, the owner or operator must submit the appropriate application for an operating permit at that time.

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In accordance with 30 TAC § 122.146, you must submit a compliance certification (Form PCC) for the period from the date of the most recent certification to the date of this letter (not to exceed 12 months). This compliance certification must be submitted within 30 days of this letter to the Texas Commission on Environmental Quality Houston Regional Office, 5425 Polk Street, Suite H, Houston, Texas 77023-1452. Contact the TCEQ Regional Office should you have any questions regarding the compliance certification process.

Thank you for informing us of the status of your site. If you have any questions regarding this notice, please contact Ms. Lauren Pedroarena at (512) 239-5225.

This action is taken under authority delegated by the Executive Director of the TCEQ.

Sincerely,



Steve Hagle, P.E., Director
Air Permits Division
Office of Permitting and Registration
Texas Commission on Environmental Quality

SH/LP/ssl

cc: Mr. James Mueller, Manufacturing Services Manager, Robbins & Myers Energy Systems
L.P., Willis
Air Section Manager, Region 12 - Houston
Air Permits Section Chief, U.S. Environmental Protection Agency, Region 6, Dallas

Project Numbers: 14568 (SOP Void) and 14026 (SOP Minor Revision)