

INTERMEDIATE STATE PERMIT TO OPERATE

Under the authority of RSMo 643 and the Federal Clean Air Act the applicant is authorized to operate the air contaminant source(s) described below, in accordance with the laws, rules, and conditions set forth here in.

Intermediate Operating Permit Number: OP2011-039
Expiration Date: AUG 11 2016
Installation ID: 510-0468
Project Number: 2007-05-121

Installation Name and Address

Lange-Stegmann Company
One Angelica Street
St. Louis, MO 63147
City of St. Louis County

Parent Company's Name and Address

N.A.

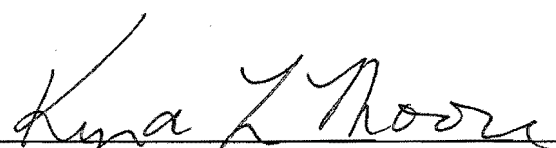
Installation Description:

The Lange-Stegmann Company was founded in 1926, and is situated within the City of St. Louis, Missouri. The company warehouses bulk fertilizers and other dry bulk materials, utilizing a combination of unloading, storage and loading systems in the normal course of business. Barge, railroad and truck transportation modes are all part of either the unloading or loading activities. The company is capable of storing liquids and dry granular products. The dry product is either stored indoors or outdoors in storage piles.

Lange-Stegmann Company is a potential major source of particulate matter less than or equal to ten microns (PM₁₀) because of its potential to emit. The installation has accepted voluntary, federally enforceable emission limitations limiting PM₁₀ emissions to less than major source level to qualify for this permit.

AUG 12 2011

Effective Date


Director or Designee

Department of Natural Resources

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I. Installation Description and Equipment Listing

INSTALLATION DESCRIPTION

The Lange-Stegmann Company was founded in 1926, and is situated within the City of St. Louis, Missouri. The company warehouses bulk fertilizers and other dry bulk materials, utilizing a combination of unloading, storage and loading systems in the normal course of business. Barge, railroad and truck transportation modes are all part of either the unloading or loading activities. The company is capable of storing liquids and dry granular products. The dry product is either stored indoors or outdoors in storage piles.

The installation is a potential major source of particulate matter less than or equal to ten microns (PM₁₀). The installation has accepted voluntary, federally enforceable emission limitations limiting PM₁₀ emissions to less than major source level to qualify for this permit.

The actual emissions for the past five years for the installation are listed below:

Reported Air Pollutant Emissions, tons per year					
Pollutants	2010	2009	2008	2007	2006
Particulate Matter ≤ Ten Microns (PM ₁₀)	6.57	8.39	6.84	8.18	7.87
Particulate Matter ≤ 2.5 Microns (PM _{2.5})	0.03	0.00	0.00	0.00	0.00
Sulfur Oxides (SO _x)	0.01	0.00	0.00	0.00	0.00
Nitrogen Oxides (NO _x)	1.63	0.00	0.00	0.00	0.00
Volatile Organic Compounds (VOC)	0.09	0.00	0.00	0.00	0.00
Carbon Monoxide (CO)	1.37	0.00	0.00	0.00	0.00
Lead (Pb)	0.00	0.00	0.00	0.00	0.00
Hazardous Air Pollutants (HAPs)	0.00	0.00	0.00	0.00	0.00
Ammonia (NH ₃)	0.05	0.00	0.00	0.00	0.00

EMISSION UNITS WITH LIMITATIONS

The following list provides a description of the equipment at this installation which emits air pollutants and identified as having unit-specific emission limitations.

Emission Unit #	EQ Reference #	Description of Emission Unit	Construction Date
EU0150	EP9	Dock Conveyors – Bulk material transfer from barge to conveyor system	1986
EU0160	EP9A	Dock Conveyors – Bulk material transfer from barge to conveyor system	1986
EU0170	EP9B	Dock Conveyors – Bulk material transfer from barge to conveyor system	1986
EU0180	EP9C	Dock Conveyors – Bulk material transfer from barge to conveyor system	1986
EU0190	EP10	Loading Tower - Loading spout from EP9 to truck	1986
EU0200	EP10A	Loading Tower - Loading spout from EP9 to truck	1986
EU0210	EP10B	Loading Tower - Loading spout from EP9 to truck	1986
EU0220	EP10C	Loading Tower - Loading spout from EP9 to truck	1986
EU0230	EP10D	Loading Tower - Loading spout from EP9 to railcar	1986
EU0240	EP10E	Loading Tower - Loading spout from EP9 to railcar	1986
EU0250	EP10-S2	Urea Fertilizer Warehouse Conveyor	2007
EU0260	EP19A & 19B	Urea Warehouse - Truck Loading	2007
EU0270	EP20	Urea Warehouse - Rail car transfer loading tower	2007
EU0280	EP21	Urea Granulating Plant - Product Cooler	2007
EU0290	EP22	Urea Granulating Plant - Process Cooler	2007
EU0300	EP23-S1	Urea Granulating Plant - Sizing feed silo	2007
EU0310	EP23-S2	Urea Granulating Plant - Sizing feed elevator	2007
EU0320	EP23-S3	Urea Granulating Plant - Sizing Screen	2007
EU0330	EP23-S4	Urea Granulating Plant - Sizing Crusher	2007
EU0340	EP23-S5	Urea Granulating Plant - Sized Product Silo	2007
EU0350	EP23-S6	Urea Granulating Plant – Sized Truck Loading	2007
EU0360	EP23-S7	Urea Granulating Plant - Seed Material Silo	2007
EU0370	EP23-S8	Urea Granulating Plant - Melter Feed Material Silo	2007
EU0380	EP23-S9	Urea Granulating Plant - DCD Feed Elevator	2007
EU0390	EP23-S10	Urea Granulating Plant - Melt Feed Elevator	2007
EU0400	EP23-S11	Urea Granulating Plant - Drum Feed Elevator	2007
EU0410	EP23-S12	Urea Granulating Plant - Recycle Surge Bin	2007

Emission Unit #	EIQ Reference #	Description of Emission Unit	Construction Date
EU0420	EP23-S13	Urea Granulating Plant - Internal Recycle Elevator	2007
EU0430	EP23-S14	Urea Granulating Plant - Process Screen	2007
EU0440	EP23-S15	Urea Granulating Plant - Process Screen Elevator	2007
EU0450	EP23-S16	Urea Granulating Plant - Product Elevator	2007
EU0460	EP24	Urea Granulating Plant - Fluid Bed Deduster	2007
EU0470	EP25-S1	Urea Granulating Plant - Granulation Drum	2007
EU0480	EP25-S2	Urea Granulating Plant - Urea Melter	2007

EMISSION UNITS WITHOUT LIMITATIONS

The following list provides a description of the equipment, which does not have unit specific limitations at the time of permit issuance.

Emission Unit #	EIQ Reference #	Description of Emission Unit	Construction Date
EU0010	EP1	Truck Receiving Pit to Bucket Elevator -Bulk fertilizer receiving pit to bucket elevator	1999
EU0020	EP1	Bucket Elevator to Warehouse - Bulk fertilizer is conveyed into the warehouse for interim storage	1999
EU0030	EP2	Side Mill - Bulk fertilizer transfer to conveyor elevator	1975
EU0040	EP2	Side Mill - Bulk fertilizer conveyor to truck	1975
EU0050	EP5	Fertilizer Domes - Fertilizer transfer from truck and rail to conveyor system to dome storage building to rail and truck transportation.	1984, 1997 & 2003
EU0060	EP5	Fertilizer Domes - Fertilizer transfer from truck and rail to conveyor system to dome storage building to rail and truck transportation.	1984, 1997 & 2003
EU0070	EP7	Upper Mill - Conveyor and elevator bulk transfer of fertilizer to truck	Unknown
EU0080	EP7	Upper Mill - Conveyor and elevator bulk transfer of fertilizer to truck	Unknown
EU0090	EP8	Bulk Toter - Transfer of bulk fertilizer from railcar to truck	1983
EU0100	EP8	Bulk Toter - Transfer of bulk fertilizer from railcar to truck	1983
EU0110	EP8A	Bulk Toter - Transfer of bulk fertilizer from railcar to truck	1983
EU0120	EP8A	Bulk Toter - Transfer of bulk fertilizer from railcar to truck	1983
EU0130	EP18	Expanded Clay Aggregate Storage Pile Activity and Erosion	
EU0140	E15	1,000 Gallon Diesel Fuel Storage Tank	
		Natural Gas-fired Boiler (less than 10 MMBtu/hr)	

II. Plant Wide Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect on the date of permit issuance.

Permit Condition PW001

10 CSR 10-6.065 Operating Permits

10 CSR 10-6.065(2)(C) and 10 CSR 10-6.065(5)(A) Voluntary Limitation(s)

Emission Limitation:

The permittee shall discharge into the atmosphere from the entire installation less than 100 tons of particulate matter with an aerodynamic diameter of less than or equal to ten microns (PM₁₀) in any consecutive 12-month period.

Monitoring/Record Keeping:

The permittee shall maintain an accurate record of emissions of PM₁₀ emitted into the atmosphere from this installation. The permittee shall record the monthly and running 12-month totals of the PM₁₀ emissions from this installation. Example form is attached as Attachment A (Plant-wide Emissions Tracking Record). The permittee may use this form, or forms of its own, so long as the forms used will accurately demonstrate compliance with the PM₁₀ emission limitation (less than 100 tons per consecutive 12-month period of PM₁₀).

Reporting:

The permittee shall report to the City of St. Louis Air Pollution Control Program, 1520 Market Street, Room 4058, St. Louis, MO 63103, and the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any deviation from or exceedance of any of the terms imposed by this permit condition, or any malfunction which causes a deviation from or exceedance of this permit condition.

Permit Condition PW002

10 CSR 10-6.220

Restriction of Emission of Visible Air Contaminants

Emission Limitation:

- 1) No owner or other person shall cause or permit emissions to be discharged into the atmosphere from any source in the St. Louis metropolitan area any visible emissions with an opacity greater than 20%.
 - a) Exception: Existing sources in the St. Louis metropolitan area that are not incinerators and emit less than twenty-five (25) pounds per hour (lbs/hr) of particulate matter shall be limited to 40% opacity.
 - b) A person may discharge into the atmosphere from any source of emissions for a period(s) aggregating not more than six (6) minutes in any 60 minutes air contaminants with an opacity up to 40%.

Monitoring:

- 1) The permittee shall conduct opacity readings on the emission unit(s) using the procedures contained in U.S. EPA Test Method 22. At a minimum, the observer should be trained and knowledgeable

about the effects on visibility of emissions caused by background contrast, ambient lighting, observer position relative to lighting, wind and the presence of uncombined water. Readings are only required when the emission unit(s) is operating and when the weather conditions allow. If no visible or other significant emissions are observed using these procedures, then no further observations would be required. For emission units with visible emissions perceived or believed to exceed the applicable opacity standard, the source representative would then conduct a Method 9 observation.

- 2) The following monitoring schedule must be maintained:
 - a) Observations must be made once per month. If a violation is noted, then
 - b) Weekly observations shall be conducted for a minimum of eight (8) consecutive weeks. Should no violation of this regulation be observed during this period then monitoring reverts to monthly monitoring.

Recordkeeping:

- 1) The permittee shall maintain records of all observation results (see Attachment B), noting:
 - a) Whether any air emissions (except for water vapor) were visible from the emission units,
 - b) All emission units from which visible emissions occurred, and
 - c) Whether the visible emissions were normal for the process.
- 2) The permittee shall maintain records of any Method 9 test performed in accordance with this permit condition. (See Attachment C)

Reporting:

- 1) The permittee shall report to the City of St. Louis Air Pollution Control Program, 1520 Market Street, Room 4058, St. Louis, MO 63103, and the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after the permittee determined using the Method 9 test that the emission unit(s) exceeded the opacity limit.
- 2) Reports of any deviations from monitoring, record keeping and reporting requirements of this permit condition shall be submitted annually in the annual compliance certification and monitoring report, as required by Section V of this permit.

III. Emission Unit Specific Emission Limitations

The installation shall comply with each of the following emission limitations. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect on the date of permit issuance.

EU0150 through EU0240 – Dock Conveyors and Loading Tower			
<ul style="list-style-type: none"> • PM emissions from these conveyors controlled by use of the existing conveyor enclosure system • PM emissions from the loading tower controlled by a baghouse (CD-7A). 			
Emission Unit	Description	Manufacturer/ Model #	2009 EIQ Reference #
EU0150	Dock Conveyors – Enclosed conveyors used to transfer bulk material from barge to conveyor system.	MARCO/ 151 & 361	EP9
EU0160	Dock Conveyors – Enclosed conveyors used to transfer bulk material from barge to conveyor system.	MARCO/ 151 & 361	EP9A
EU0170	Dock Conveyors – Enclosed conveyors used to transfer bulk material from barge to conveyor system.	MARCO/ 151 & 361	EP9B
EU0180	Dock Conveyors – Enclosed conveyors used to transfer bulk material from barge to conveyor system.	MARCO/ 151 & 361	EP9C
EU0190	Loading Tower with baghouse – Loading spout from EP9 (EU0150) to truck.	MARCO/	EP10
EU0200	Loading Tower with baghouse – Loading spout from EP9 (EU0150) to rail car or truck.	MARCO	EP10A
EU0210	Loading Tower with baghouse – Loading spout from EP9 (EU0150) to truck.	MARCO	EP10B
EU0220	Loading Tower with baghouse – Loading spout from EP9 (EU0150) to truck.	MARCO	EP10C
EU0230	Loading Tower with baghouse – Loading spout from EP9 (EU0150) to railcar.	MARCO	EP10D
EU0240	Loading Tower with baghouse – Loading spout from EP9 (EU0150) to railcar.	MARCO	EP10E

<p>Permit Condition EU0150-001 through EU0240-001</p> <p>10 CSR 10-6.060 Construction Permits Required</p> <p>St. Louis City APCP Construction Permit No. 00-11-047</p> <p>10 CSR 10-6.400 Restriction of Emission of Particulate Matter from Industrial Processes</p>
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Emission Limitation:

- 1) The permittee is limited to 15 tons of PM₁₀ emissions from the conveyor transfer (Dock Conveyors: EU0150 through EU0180) in any consecutive twelve month period.
 [Construction Permit 00-11-047, Section II: B]
- 2) The permittee is limited to five tons of PM₁₀ emissions from the loading spout (Loading Tower: EU0190 through EU0240) in any consecutive twelve month period.
 [Construction Permit 00-11-047, Section II: C]
- 3) The permittee shall not emit particulate matter from EU0190 through EU0240:
 - a) In excess of 68.96 lb/hr; and

- b) In concentration in excess of 0.30 grain per standard cubic feet of exhaust gases.
- c) Note: The emission rates in Emission Limitation 3)a) and 3)b) this permit condition apply to the sources individually and not the aggregated sources.

Operational Limitation:

- 1) The permittee shall only load trucks and rail cars with the baghouse control system in operation. [Construction Permit 00-11-047, Section III: A]
- 2) The conveyor from the barge to the loading station shall always be enclosed. [Construction Permit 00-11-047, Section III: C]

Monitoring:

Baghouse operation and maintenance – to ensure proper function, the following periodic monitoring shall be performed: [Construction Permit 00-11-047, Section III: A]

- 1) Check and document the baghouse pressure bi-monthly. The pressure drop across the baghouse shall be maintained within the range of 1.0 to 10.0 inches of water. If the pressure drop falls out of the normal operating range, corrective action shall be taken within eight (8) hours to return the pressure drop to normal.
- 2) Check the cleaning sequence of the baghouse semi-annually.
- 3) Thoroughly inspect bags for leaks and wear semi-annually.
- 4) Inspect every six (6) months all components that are not subject to wear or plugging, including structural components, housing, ducts and hoods.
- 5) If leaks or abnormal conditions are detected the appropriate measures for remediation shall be implemented within eight (8) hours. Bag replacement should be documented. Maintain a written record of the inspection and any action resulting from the inspection. All instruments and control equipment shall be calibrated, maintained, and operated according to the manufacture's specifications.

Recordkeeping:

- 1) The permittee shall record the type and amount of each product loaded through the system. [Construction Permit 00-11-047, Section IV: A]
- 2) The permittee shall calculate monthly the amount of PM₁₀ emissions generated from the conveyor transfer (Dock Conveyors) and the loading spout (Loading Tower). An emission total for every consecutive twelve month period shall be kept for both sources. Emission factors and control efficiencies to be used are listed in Attachment F. [Construction Permit 00-11-047, Section IV: C]

Reporting:

The permittee shall report to the City of St. Louis Air Pollution Control Program, 1520 Market Street, Room 4058, St. Louis, MO 63103, and the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, no later than ten days after any exceedance of any of the terms imposed by this permit condition.

**EU0250 through EU0270 – Urea Warehouse Conveying and Loading
EU0280 through EU0480 – Urea Granulating Plant**

- PM emissions to and from the urea warehouse operation controlled by baghouses (CD-7A, CD-19A & B and CD-20).
- Particulate emissions from product cooling process are controlled by a baghouse (CD-21). CD-21 is also used for product recovery.
- Particulate emissions from the process cooler are controlled by a baghouse (CD-22). CD-22 is also used for product recovery.
- Dust emissions from the sizing crusher are controlled first by a cyclone separator (CD-23A) and then a baghouse (CD-23)
- All conveying equipment, intermediate bins and sizing screens, internal to the granulation plant have fugitive particulate emissions controlled by a common baghouse CD-23.
- Dust emissions from the fluid bed deduster are controlled by a cyclone (CD-24A) and finally by a baghouse (CD-24).
- Cooling air from the granulation drum is sent to a multi-stage scrubber (CD-25) where any particulate matter and gases generated in the granulation process are scrubbed out.

Emission Unit	Description	Manufacturer/ Model #	2009 EIQ Reference #
EU0250	Urea Fertilizer Warehouse Conveyor	Waconia	EP10-S2
EU0260	Urea Fertilizer Warehouse truck loading (East & West)	Waconia	EP19A & 19B
EU0270	Urea Fertilizer Warehouse rail car transfer loading tower.	Waconia	EP20
EU0280	Urea Granulating Plant - Product cooler	ACT	EP21
EU0290	Urea Granulating Plant - Process cooler	ACT	EP22
EU0300	Urea Granulating Plant - Sizing feed silo	ACT	EP23-S1
EU0310	Urea Granulating Plant - Sizing feed elevator	ACT	EP23-S2
EU0320	Urea Granulating Plant - Sizing Screen	ACT	EP23-S3
EU0330	Urea Granulating Plant - Sizing Crusher	ACT	EP23-S4
EU0340	Urea Granulating Plant - Sized Product Silo	ACT	EP23-S5
EU0350	Urea Granulating Plant - Sized Truck Loading	ACT	EP23-S6
EU0360	Urea Granulating Plant - Seed Material Silo	Tube Connector	EP23-S7
EU0370	Urea Granulating Plant - Melter Feed Material Silo	Tube Connector	EP23-S8
EU0380	Urea Granulating Plant - DCD Feed Elevator	ACT	EP23-S9
EU0390	Urea Granulating Plant - Melt Feed Elevator	ACT	EP23-S10
EU0400	Urea Granulating Plant - Drum Feed Elevator	ACT	EP23-S11
EU0410	Urea Granulating Plant - Recycle Surge Bin	ACT	EP23-S12
EU0420	Urea Granulating Plant - Internal Recycle Elevator	ACT	EP23-S13
EU0430	Urea Granulating Plant - Process Screen	ACT	EP23-S14
EU0440	Urea Granulating Plant - Process Screen Elevator	ACT	EP23-S15
EU0450	Urea Granulating Plant - Product Elevator	ACT	EP23-S16
EU0460	Urea Granulating Plant - Fluid Bed Deduster	ACT	EP24
EU0470	Urea Granulating Plant - Granulation Drum	ACT	EP25-S1
EU0480	Urea Granulating Plant - Urea Melter	ACT	EP25-S2

Permit Condition EU0250-001 through EU0480-001

10 CSR 10-6.060 Construction Permits Required

Air Pollution Control Program Construction Permit No. 042007-018

10 CSR 10-6.400 Restriction of Emission of Particulate Matter from Industrial Processes

Emission Limitation:

- 1) The permittee shall emit less than to 15 tons of PM₁₀ from EU00250 through EU0480 in any consecutive twelve month period. [Construction Permit 042007-018, Special Condition 1A]
- 2) The permittee shall not emit particulate matter (PM) from EU0250 through EU0480 in excess of the amounts listed in the table below:

Emission Unit	PM Limit (lb/hr)
EU0250	68.96
EU0260	65.09
EU0270	65.09
EU0280	21.67
EU0290	31.73
EU0300	30.51
EU0310	30.51
EU0320	30.51
EU0330	30.51

Emission Unit	PM Limit (lb/hr)
EU0340	30.51
EU0350	30.51
EU0360	15.82
EU0370	15.82
EU0380	13.24
EU0390	15.82
EU0400	15.82
EU0410	22.27
EU0420	22.27

Emission Unit	PM Limit (lb/hr)
EU0430	37.77
EU0440	37.77
EU0450	25.16
EU0460	13.69
EU0470	32.52
EU0480	14.37

- 3) No person shall cause, allow or permit the emission of particulate matter from any source in a concentration in excess of 0.30 grain per standard cubic foot of exhaust gases.

Monitoring:

- 1) Control Equipment Requirements – Baghouse.
[Construction Permit 042007-018, Special Condition 2]
 - a) Lange-Stegmann Company shall control emissions from the emission units EU00250 through EU0460 using baghouses as specified in the Construction Permit 042007-018 application. The baghouse shall be equipped with a gauge or meter, which indicates the pressure drop across the control device. These gauges or meters shall be located such that the City of St. Louis Air Pollution Control Program employees may easily observe them. Replacement filters for the baghouses shall be kept on hand at all times. The bags shall be made of fibers appropriate for operating conditions expected to occur (i.e. temperature limits, acidic and alkali resistance, and abrasion resistance).
 - b) Lange-Stegmann Company shall monitor and record the operating pressure drop across the baghouses at least once every 24 hours whenever the plant is in operation. The operating pressure drop shall be maintained within the range of 1.0 to 10.0 inches of water.
 - c) Lange-Stegmann Company shall maintain an operating and maintenance log for the baghouses which shall include the following:
 - i) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
 - ii) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.
- 2) Control Equipment Requirements – Scrubbers
[Construction Permit 042007-018, Special Condition 3]

- a) Lange-Stegmann Company shall control emissions from EU0470 (EP25-S1) and EU0480 (EP25-S2) using a wet scrubber as specified in the Construction Permit 042007-018 application. The scrubber shall be operated and maintained in accordance with the manufacturer's specifications. The scrubber shall be equipped with a gauge or meter, which indicates the pressure drop across the control device (CD-25). These gauges or meters shall be located such that the City of St. Louis Air Pollution Control Program employees may easily observe them.
 - b) Lange-Stegmann Company shall monitor and record the operating pressure drop across the scrubber at least once every 24 hours whenever the plant is in operation. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer's performance warranty.
 - c) Lange-Stegmann Company shall maintain an operating and maintenance log for the scrubbers which shall include the following:
 - i) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
 - ii) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.
- 3) Control Equipment Requirements – Cyclones
[042007-018, Special Condition 4]
- a) Lange-Stegmann Company shall operate and maintain CD-23A and CD-24A in accordance with the manufacturer's specifications. Full cyclone discharges are made into their respective bag houses.
 - b) Lange-Stegmann Company shall monitor and record the operating pressure drop across the cyclones at least once every 24 hours whenever the plant is in operation. The operating pressure drop shall be maintained within the design conditions specified by the manufacturer's performance warranty.
 - c) Lange-Stegmann Company shall maintain an operating and maintenance log for the cyclones which shall include the following:
 - i) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
 - ii) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.

Recordkeeping:

Lange-Stegmann Company shall maintain an accurate record of PM₁₀ emitted into the atmosphere from the equipment covered by this permit condition. Attachment G or an equivalent form shall be used for this purpose. Lange-Stegmann Company shall maintain all records required by this permit condition for not less than five (5) years and shall make them available immediately to any City of St. Louis personnel upon request. [Construction Permit 042007-018, Special Condition 1B]

Reporting:

Lange-Stegmann Company shall report to the City of St. Louis Air Pollution Control Program, 1520 Market Street, Room 4058, St. Louis, MO 63103, no later than ten days after the end of the month during which the records Special Condition 1B of Construction Permit 042007-018 indicate that the source exceeds the limitation of Special Condition 1A of Construction Permit 042007-018. [Construction Permit 042007-018, Special Condition 1C]

IV. Core Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the Code of Federal Regulations (CFR), Code of State Regulations (CSR), and local ordinances for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect on the date of permit issuance. The following is only an excerpt from the regulation or code, and is provided for summary purposes only.

City of St. Louis Ordinance 68657, §16 Open Burning Restrictions

- 1) No person shall cause, suffer, allow or permit the open burning of refuse.
- 2) No person shall conduct, cause or permit the conduct of a salvage operation by open burning.
- 3) No person shall conduct, cause or permit the disposal of trade waste by open burning.
- 4) No person shall cause or permit the open burning of leaves, trees or the byproducts therefrom, grass, or other vegetation.
- 5) It shall be prima-facie evidence that the person who owns or controls property on which open burning occurs, has caused or permitted said open burning.

10 CSR 10-6.050 Start-up, Shutdown and Malfunction Conditions

- 1) In the event of a malfunction, which results in excess emissions that exceed one hour, the permittee shall submit to the City of St. Louis Air Pollution Control Program within two business days, in writing, the following information:
 - a) Name and location of installation;
 - b) Name and telephone number of person responsible for the installation;
 - c) Name of the person who first discovered the malfunction and precise time and date that the malfunction was discovered.
 - d) Identity of the equipment causing the excess emissions;
 - e) Time and duration of the period of excess emissions;
 - f) Cause of the excess emissions;
 - g) Air pollutants involved;
 - h) Best estimate of the magnitude of the excess emissions expressed in the units of the applicable requirement and the operating data and calculations used in estimating the magnitude;
 - i) Measures taken to mitigate the extent and duration of the excess emissions; and
 - j) Measures taken to remedy the situation that caused the excess emissions and the measures taken or planned to prevent the recurrence of these situations.
- 2) The permittee shall submit the Paragraph 1 information list to the City of St. Louis Air Pollution Control Program in writing at least ten days prior to any maintenance, start-up or shutdown, which is expected to cause an excessive release of emissions that exceed one hour. If notice of the event cannot be given ten days prior to the planned occurrence, it shall be given as soon as practicable prior to the release. If an unplanned excess release of emissions exceeding one hour occurs during maintenance, start-up or shutdown, the City of St. Louis Air Pollution Control Program shall be notified verbally as soon as practical during normal working hours and no later than the close of business of the following working day. A written notice shall follow within ten working days.
- 3) Upon receipt of a notice of excess emissions issued by an agency holding a certificate of authority under Section 643.140, RSMo, the permittee may provide information showing that the excess emissions were the consequence of a malfunction, start-up or shutdown. The information, at a minimum, should be the Paragraph 1 list and shall be submitted not later than 15 days after receipt of the notice of excess emissions. Based upon information submitted by the permittee or any other

pertinent information available, the Director or the commission shall make a determination whether the excess emissions constitute a malfunction, start-up or shutdown and whether the nature, extent and duration of the excess emissions warrant enforcement action under Section 643.080 or 643.151, RSMo.

- 4) Nothing in this rule shall be construed to limit the authority of the City of St. Louis Air Pollution Control Program, the Director or commission to take appropriate action, under Sections 643.080, 643.090 and 643.151, RSMo to enforce the provisions of the Air Conservation Law and the corresponding rule.
- 5) Compliance with this rule does not automatically absolve the permittee of liability for the excess emissions reported.

10 CSR 10-6.060 Construction Permits Required

The permittee shall not commence construction, modification, or major modification of any installation subject to this rule, begin operation after that construction, modification, or major modification, or begin operation of any installation which has been shut down longer than five years without first obtaining a permit from the permitting authority.

10 CSR 10-6.065 Operating Permits

The permittee shall file a complete application for renewal of this operating permit at least six months before the date of permit expiration. In no event shall this time be greater than eighteen months. [10 CSR 10-6.065(6)(B)1.A(V)] The permittee shall retain the most current operating permit issued to this installation on-site. [10 CSR 10-6.065(6)(C)1.C(II)] The permittee shall immediately make such permit available to any Missouri Department of Natural Resources, St. Louis Air Pollution Control Program and U.S. EPA personnel upon request. [10 CSR 10-6.065(6)(C)3.B]

10 CSR 10-6.080 Emission Standards for Hazardous Air Pollutants and 40 CFR Part 61 Subpart M National Emission Standard for Asbestos

- 1) The permittee shall follow the procedures and requirements of 40 CFR Part 61, Subpart M for any activities occurring at this installation which would be subject to provisions for 40 CFR Part 61, Subpart M, National Emission Standard for Asbestos.
- 2) The permittee shall conduct monitoring to demonstrate compliance with registration, certification, notification, and Abatement Procedures and Practices standards as specified in 40 CFR Part 61, Subpart M.

10 CSR 10-6.100 Alternate Emission Limits

Proposals for alternate emission limitations shall be submitted on Alternate Emission Limits Permit forms provided by the Department. An installation owner or operator must obtain an Alternate Emission Limits Permit in accordance with 10 CSR 10-6.100 before alternate emission limits may become effective.

10 CSR 10-6.110 Submission of Emission Data, Emission Fees and Process Information

- 1) The permittee shall submit full emissions report either electronically via MoEIS, which requires Form 1.0 signed by an authorized company representative, or on Emission Inventory Questionnaire (EIQ) paper forms on the frequency specified in this rule and in accordance with the requirements outlined in this rule. Alternate methods of reporting the emissions, such as spreadsheet file, can be submitted for approval by the Director.
- 2) The permittee may be required by the Director to file additional reports.

- 3) Public Availability of Emission Data and Process Information. Any information obtained pursuant to the rule(s) of the Missouri Air Conservation Commission that would not be entitled to confidential treatment under 10 CSR 10-6.210 shall be made available to any member of the public upon request.
- 4) The permittee shall pay an annual emission fee per ton of regulated air pollutant emitted according to the schedule in the rule. This fee is an emission fee assessed under authority of RSMo. 643.079.
- 5) The fees shall be payable to the Department of Natural Resources and shall be accompanied by the an emissions report.
- 6) The permittee shall complete required reports on state supplied EIQ forms or electronically via MoEIS. Alternate methods of reporting the emissions can be submitted for approval by the Director. The reports shall be submitted to the Director by April 1 after the end of each reporting year. If the full emissions report is filed electronically via MoEIS, this due date is extended to May 1.
- 7) The reporting period shall end on December 31 of each calendar year. Each report shall contain the required information for each emission unit for the twelve (12)-month period immediately preceding the end of the reporting period.
- 8) The permittee shall collect, record and maintain the information necessary to complete the required forms during each year of operation of the installation.

10 CSR 10-6.130 Controlling Emissions During Episodes of High Air Pollution Potential

This rule specifies the conditions that establish an air pollution alert (yellow/orange/red/purple), or emergency (maroon) and the associated procedures and emission reduction objectives for dealing with each. The permittee shall submit an appropriate emergency plan if required by the Director.

10 CSR 10-6.150 Circumvention

The permittee shall not cause or permit the installation or use of any device or any other means which, without resulting in reduction in the total amount of air contaminant emitted, conceals or dilutes an emission or air contaminant which violates a rule of the Missouri Air Conservation Commission.

10 CSR 10-6.170

Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin

Emission Limitation:

- 1) The permittee shall not cause or allow to occur any handling, transporting or storing of any material; construction, repair, cleaning or demolition of a building or its appurtenances; construction or use of a road, driveway or open area; or operation of a commercial or industrial installation without applying reasonable measures as may be required to prevent, or in a manner which allows or may allow, fugitive particulate matter emissions to go beyond the premises of origin in quantities that the particulate matter may be found on surfaces beyond the property line of origin. The nature or origin of the particulate matter shall be determined to a reasonable degree of certainty by a technique proven to be accurate and approved by the Director.
- 2) The permittee shall not cause nor allow to occur any fugitive particulate matter emissions to remain visible in the ambient air beyond the property line of origin.
- 3) Should it be determined that noncompliance has occurred, the Director may require reasonable control measures as may be necessary. These measures may include, but are not limited to, the following:
 - a) Revision of procedures involving construction, repair, cleaning and demolition of buildings and their appurtenances that produce particulate matter emissions;
 - b) Paving or frequent cleaning of roads, driveways and parking lots;
 - c) Application of dust-free surfaces;

- d) Application of water; and
- e) Planting and maintenance of vegetative ground cover.

10 CSR 10-6.180 Measurement of Emissions of Air Contaminants

- 1) The Director may require any person responsible for the source of emission of air contaminants to make or have made tests to determine the quantity or nature, or both, of emission of air contaminants from the source. The Director may specify testing methods to be used in accordance with good professional practice. The Director may observe the testing. All tests shall be performed by qualified personnel.
- 2) The Director may conduct tests of emissions of air contaminants from any source. Upon request of the Director, the person responsible for the source to be tested shall provide necessary ports in stacks or ducts and other safe and proper sampling and testing facilities, exclusive of instruments and sensing devices as may be necessary for proper determination of the emission of air contaminants.
- 3) The Director shall be given a copy of the test results in writing and signed by the person responsible for the tests.

10 CSR 10-5.040 Use of Fuel in Hand-Fired Equipment Prohibited

It shall be unlawful to operate any hand-fired fuel-burning equipment in the St. Louis, Missouri metropolitan area. This regulation shall apply to all fuel-burning equipment including, but not limited to, furnaces, heating and cooking stoves and hot water furnaces. It shall not apply to wood-burning fireplaces and wood-burning stoves in dwellings, nor to fires used for recreational purpose, nor to fires used solely for the preparation of food by barbecuing. Hand-fired fuel-burning equipment is any stove, furnace, or other fuel-burning device in which fuel is manually introduced directly into the combustion chamber.

10 CSR 10-5.060 Refuse Not to be Burned in Fuel Burning Installations (Contained in State Implementation Plan)

No person shall burn or cause or permit the burning of refuse in any installation which is designed for the primary purpose of burning fuel.

10 CSR 10-6.165 Restriction of Emission of Odors

This requirement is not federally enforceable.

No person may cause, permit or allow the emission of odorous matter in concentrations and frequencies or for durations that odor can be perceived when one volume of odorous air is diluted with seven volumes of odor-free air for two separate trials not less than 15 minutes apart within the period of one hour.

10 CSR 10-5.240 Additional Air Quality Control Measures May be Required When Sources Are Clustered in a Small Land Area

The Air Conservation Commission may prescribe more restrictive air quality control requirements that are more restrictive and more extensive than provided in regulations of general application for:

- 1) Areas in which there are one or more existing sources and/or proposed new sources of particulate matter in any circular area with a diameter of two miles (including sources outside metropolitan area) from which the sum of particulate emissions allowed from these sources by regulations of general application are or would be greater than 2000 tons per year or 500 pounds per hour.
- 2) Areas in which there are one or more existing sources and/or proposed new sources of sulfur dioxide in any circular area with a diameter of two miles from which the sum of sulfur dioxide emissions

from these sources allowed by regulations of general application are or would be greater than 1000 tons for any consecutive three months or 1000 pounds per hour.

10 CSR 10-6.250 Asbestos Abatement Projects – Certification, Accreditation, and Business Exemption Requirements

The permittee shall conduct all asbestos abatement projects within the procedures established for certification and accreditation by 10 CSR 10-6.250. This rule requires individuals who work in asbestos abatement projects to be certified by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires training providers who offer training for asbestos abatement occupations to be accredited by the Missouri Department of Natural Resources Air Pollution Control Program. This rule requires persons who hold exemption status from certain requirements of this rule to allow the Department to monitor training provided to employees. Each individual who works in asbestos abatement projects must first obtain certification for the appropriate occupation from the Department. Each person who offers training for asbestos abatement occupations must first obtain accreditation from the Department. Certain business entities that meet the requirements for state-approved exemption status must allow the Department to monitor training classes provided to employees who perform asbestos abatement.

Title VI – 40 CFR Part 82 Protection of Stratospheric Ozone

- 1) The permittee shall comply with the standards for labeling of products using ozone-depleting substances pursuant to 40 CFR Part 82, Subpart E:
 - a) All containers in which a class I or class II substance is stored or transported, all products containing a class I substance, and all products directly manufactured with a class I substance must bear the required warning statement if it is being introduced into interstate commerce pursuant to §82.106.
 - b) The placement of the required warning statement must comply with the requirements pursuant to §82.108.
 - c) The form of the label bearing the required warning statement must comply with the requirements pursuant to §82.110.
 - d) No person may modify, remove, or interfere with the required warning statement except as described in §82.112.
- 2) The permittee shall comply with the standards for recycling and emissions reduction pursuant to 40 CFR Part 82, Subpart F, except as provided for motor vehicle air conditioners (MVACs) in Subpart B:
 - a) Persons opening appliances for maintenance, service, repair, or disposal must comply with the required practices pursuant to §82.156.
 - b) Equipment used during the maintenance, service, repair, or disposal of appliances must comply with the standards for recycling and recovery equipment pursuant to §82.158.
 - c) Persons performing maintenance, service, repair, or disposal of appliances must be certified by an approved technician certification program pursuant to §82.161.
 - d) Persons disposing of small appliances, MVACs, and MVAC-like appliances must comply with record keeping requirements pursuant to §82.166. ("MVAC-like" appliance as defined at §82.152).
 - e) Persons owning commercial or industrial process refrigeration equipment must comply with the leak repair requirements pursuant to §82.156.
 - f) Owners/operators of appliances normally containing 50 or more pounds of refrigerant must keep records of refrigerant purchased and added to such appliances pursuant to §82.166.

- 3) If the permittee manufactures, transforms, imports, or exports a class I or class II substance, the permittee is subject to all the requirements as specified in 40 CFR Part 82, Subpart A, Production and Consumption Controls.
- 4) If the permittee performs a service on motor (fleet) vehicles when this service involves ozone-depleting substance refrigerant (or regulated substitute substance) in the motor vehicle air conditioner (MVAC), the permittee is subject to all the applicable requirements as specified in 40 CFR Part 82, Subpart B, Servicing of Motor Vehicle Air conditioners. The term "motor vehicle" as used in Subpart B does not include a vehicle in which final assembly of the vehicle has not been completed. The term "MVAC" as used in Subpart B does not include the air-tight sealed refrigeration system used as refrigerated cargo, or system used on passenger buses using HCFC-22 refrigerant.
- 5) The permittee shall be allowed to switch from any ozone-depleting substance to any alternative that is listed in the Significant New Alternatives Program (SNAP) promulgated pursuant to 40 CFR Part 82, Subpart G, Significant New Alternatives Policy Program. *Federal Only - 40 CFR Part 82*

10 CSR 10-6.280 Compliance Monitoring Usage

- 1) The permittee is not prohibited from using the following in addition to any specified compliance methods for the purpose of submission of compliance certificates:
 - a) Monitoring methods outlined in 40 CFR Part 64;
 - b) Monitoring method(s) approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
 - c) Any other monitoring methods approved by the Director.
- 2) Any credible evidence may be used for the purpose of establishing whether a permittee has violated or is in violation of any such plan or other applicable requirement. Information from the use of the following methods is presumptively credible evidence of whether a violation has occurred by a permittee:
 - a) Monitoring methods outlined in 40 CFR Part 64;
 - b) A monitoring method approved for the permittee pursuant to 10 CSR 10-6.065, "Operating Permits", and incorporated into an operating permit; and
 - c) Compliance test methods specified in the rule cited as the authority for the emission limitations.
- 3) The following testing, monitoring or information gathering methods are presumptively credible testing, monitoring, or information gathering methods:
 - a) Applicable monitoring or testing methods, cited in:
 - i) 10 CSR 10-6.030, "Sampling Methods for Air Pollution Sources";
 - ii) 10 CSR 10-6.040, "Reference Methods";
 - iii) 10 CSR 10-6.070, "New Source Performance Standards";
 - iv) 10 CSR 10-6.080, "Emission Standards for Hazardous Air Pollutants"; or
 - b) Other testing, monitoring, or information gathering methods, if approved by the Director, that produce information comparable to that produced by any method listed above.

V. General Permit Requirements

The installation shall comply with each of the following requirements. Consult the appropriate sections in the Code of Federal Regulations (CFR) and Code of State Regulations (CSR) for the full text of the applicable requirements. All citations, unless otherwise noted, are to the regulations in effect as of the date that this permit is issued.

10 CSR 10-6.065, §(5)(E)2 and §(6)(C)1.B Permit Duration

This permit is issued for a term of five years, commencing on the date of issuance. This permit will expire at the end of this period unless renewed.

10 CSR 10-6.065, §(5)(C)1 and §(6)(C)1.C General Record Keeping and Reporting Requirements

- 1) Record Keeping
 - a) All required monitoring data and support information shall be retained for a period of at least five years from the date of the monitoring sample, measurement, report or application.
 - b) Copies of all current operating and construction permits issued to this installation shall be kept on-site for as long as the permits are in effect. Copies of these permits shall be made immediately available to any Missouri Department of Natural Resources' personnel upon request.
- 2) Reporting
 - a) All reports shall be submitted to the City of St. Louis Air Pollution Control Program, 1520 Market Street, Room 4058, St. Louis, MO 63103, and the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102.
 - b) The permittee shall submit a report of all required monitoring by:
 - i) April 1st for monitoring which covers the January through December time period.
 - ii) Exception. Monitoring requirements which require reporting more frequently than annually shall report no later than 30 days after the end of the calendar quarter in which the measurements were taken.
 - c) Each report shall identify any deviations from emission limitations, monitoring, record keeping, reporting, or any other requirements of the permit.
 - d) Submit supplemental reports as required or as needed. Supplemental reports are required no later than ten days after any exceedance of any applicable rule, regulation or other restriction. All reports of deviations shall identify the cause or probable cause of the deviations and any corrective actions or preventative measures taken.
 - i) Notice of any deviation resulting from an emergency (or upset) condition as defined in Paragraph (6)(C)7 of 10 CSR 10-6.065 (Emergency Provisions) shall be submitted to the permitting authority either verbally or in writing within two working days after the date on which the emission limitation is exceeded due to the emergency, if the permittee wishes to assert an affirmative defense. The affirmative defense of emergency shall be demonstrated through properly signed, contemporaneous operating logs, or other relevant evidence that indicate an emergency occurred and the permittee can identify the cause(s) of the emergency. The permitted installation must show that it was operated properly at the time and that during the period of the emergency the permittee took all reasonable steps to minimize levels of emissions that exceeded the emission standards or requirements in the permit. The notice must contain a description of the emergency, the steps taken to mitigate emissions, and the corrective actions taken.

- ii) Any deviation that poses an imminent and substantial danger to public health, safety or the environment shall be reported as soon as practicable.
- iii) Any other deviations identified in the permit as requiring more frequent reporting than the permittee's annual report shall be reported on the schedule specified in this permit, and no later than ten days after any exceedance of any applicable rule, regulation, or other restriction.
- e) Every report submitted shall be certified by the responsible official, except that, if a report of a deviation must be submitted within ten days after the deviation, the report may be submitted without a certification if the report is resubmitted with an appropriate certification within ten days after that, together with any corrected or supplemental information required concerning the deviation.
- f) The permittee may request confidential treatment of information submitted in any report of deviation.

10 CSR 10-6.065 §(5)(C)1 and §(6)(C)1.D Risk Management Plan Under Section 112(r)

The permittee shall comply with the requirements of 40 CFR Part 68, Accidental Release Prevention Requirements. If the permittee has more than a threshold quantity of a regulated substance in process, as determined by 40 CFR Section 68.115, the permittee shall submit a Risk Management Plan in accordance with 40 CFR Part 68 no later than the latest of the following dates:

- 1) June 21, 1999;
- 2) Three years after the date on which a regulated substance is first listed under 40 CFR Section 68.130; or
- 3) The date on which a regulated substance is first present above a threshold quantity in a process.

10 CSR 10-6.065(5)(C)1.A General Requirements

- 1) The permittee must comply with all of the terms and conditions of this permit. Any noncompliance with a permit condition constitutes a violation and is grounds for enforcement action, permit termination, permit revocation and re-issuance, permit modification or denial of a permit renewal application.
- 2) The permittee may not use as a defense in an enforcement action that it would have been necessary for the permittee to halt or reduce the permitted activity in order to maintain compliance with the conditions of the permit
- 3) The permit may be modified, revoked, reopened, reissued or terminated for cause. Except as provided for minor permit modifications, the filing of an application or request for a permit modification, revocation and reissuance, or termination, or the filing of a notification of planned changes or anticipated noncompliance, does not stay any permit condition.
- 4) This permit does not convey any property rights of any sort, nor grant any exclusive privilege.
- 5) The permittee shall furnish to the Air Pollution Control Program, upon receipt of a written request and within a reasonable time, any information that the Air Pollution Control Program reasonably may require to determine whether cause exists for modifying, reopening, reissuing or revoking the permit or to determine compliance with the permit. Upon request, the permittee also shall furnish to the Air Pollution Control Program copies of records required to be kept by the permittee. The permittee may make a claim of confidentiality for any information or records submitted under this rule.
- 6) Failure to comply with the limitations and conditions that qualify the installation for an Intermediate permit make the installation subject to the provisions of 10 CSR 10-6.065(6) and enforcement action for operating without a valid part 70 operating permit.

10 CSR 10-6.065(5)(C)1.C Reasonably Anticipated Operating Scenarios

None.

10 CSR 10-6.065, §(5)(B)4; §(5)(C)1, §(6)(C)3.B; and §(6)(C)3.D; and §(5)(C)3 and §(6)(C)3.E.(I) – (III) and (V) – (VI) Compliance Requirements

- 1) Any document (including reports) required to be submitted under this permit shall contain a certification signed by the responsible official.
- 2) Upon presentation of credentials and other documents as may be required by law, the permittee shall allow authorized officials of the Missouri Department of Natural Resources, or their authorized agents, to perform the following (subject to the installation's right to seek confidential treatment of information submitted to, or obtained by, the Air Pollution Control Program):
 - a) Enter upon the premises where a permitted installation is located or an emissions-related activity is conducted, or where records must be kept under the conditions of this permit;
 - b) Have access to and copy, at reasonable times, any records that must be kept under the conditions of this permit;
 - c) Inspect, at reasonable times and using reasonable safety practices, any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and
 - d) As authorized by the Missouri Air Conservation Law, Chapter 643, RSMo or the Act, sample or monitor, at reasonable times, substances or parameters for the purpose of assuring compliance with the terms of this permit, and all applicable requirements as outlined in this permit.
- 3) All progress reports required under an applicable schedule of compliance shall be submitted semi-annually (or more frequently if specified in the applicable requirement). These progress reports shall contain the following:
 - a) Dates for achieving the activities, milestones or compliance required in the schedule of compliance, and dates when these activities, milestones or compliance were achieved, and
 - b) An explanation of why any dates in the schedule of compliance were not or will not be met, and any preventative or corrective measures adopted.
- 4) The permittee shall submit an annual certification that it is in compliance with all of the federally enforceable terms and conditions contained in this permit, including emissions limitations, standards, or work practices. These certifications shall be submitted annually by April 1st, unless the applicable requirement specifies more frequent submission. These certifications shall be submitted to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as the City of St. Louis Air Pollution Control Program, 1520 Market Street, Room 4058, St. Louis, MO 63103. All deviations and exceedances must be included in the compliance certifications. The compliance certification shall include the following:
 - a) The identification of each term or condition of the permit that is the basis of the certification;
 - b) The current compliance status, as shown by monitoring data and other information reasonably available to the installation;
 - c) Whether compliance was continuous or intermittent;
 - d) The method(s) used for determining the compliance status of the installation, both currently and over the reporting period; and
 - e) Such other facts as the Air Pollution Control Program will require in order to determine the compliance status of this installation.

10 CSR 10-6.065, §(5)(C)1 and §(6)(C)7 Emergency Provisions

- 1) An emergency or upset as defined in 10 CSR 10-6.065(6)(C)7.A shall constitute an affirmative defense to an enforcement action brought for noncompliance with technology-based emissions limitations. To establish an emergency- or upset-based defense, the permittee must demonstrate, through properly signed, contemporaneous operating logs or other relevant evidence, the following:
 - a) That an emergency or upset occurred and that the permittee can identify the source of the emergency or upset,
 - b) That the installation was being operated properly,
 - c) That the permittee took all reasonable steps to minimize emissions that exceeded technology-based emissions limitations or requirements in this permit, and
 - d) That the permittee submitted notice of the emergency to the Air Pollution Control Program within two working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and any corrective actions taken.
- 2) Be aware that an emergency or upset shall not include noncompliance caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error.

10 CSR 10-6.065(5)(C)5 Off-Permit Changes

- 1) Except as noted below, the permittee may make any change in its permitted installation's operations, activities or emissions that is not addressed in, constrained by or prohibited by this permit without obtaining a permit revision. Off-permit changes shall be subject to the following requirements and restrictions:
 - a) The change must meet all applicable requirements of the Act and may not violate any existing permit term or condition; the permittee may not change a permitted installation without a permit revision if this change is a Title I modification; Please Note: Changes at the installation which affect the emission limitation(s) classifying the installation as an intermediate source (add additional equipment to the record keeping requirements, increase the emissions above major source level) do not qualify for off-permit changes.
 - b) The permittee must provide written notice of the change to the Air Pollution Control Program's Enforcement Section, P.O. Box 176, Jefferson City, MO 65102, as well as EPA Region VII, 901 North 5th Street, Kansas City, KS 66101 and the City of St. Louis Air Pollution Control Program, 1520 Market Street, Room 4058, St. Louis, MO 63103, no later than the next annual emissions report. This written notice shall describe each change, including the date, any change in emissions, pollutants emitted and any applicable requirement that would apply as a result of the change; and
 - c) The permittee shall keep a record describing all changes made at the installation that result in emissions of a regulated air pollutant subject to an applicable requirement and the emissions resulting from these changes.

10 CSR 10-6.020(2)(R)12 Responsible Official

The application utilized in the preparation of this permit was signed by Michael D. Stegmann, President. If this person terminates employment, or is reassigned different duties such that a different person becomes the responsible person to represent and bind the installation in environmental permitting affairs, the owner or operator of this air contaminant source shall notify the Director of the Air Pollution Control Program of the change. Said notification shall be in writing and shall be submitted within 30 days of the change. The notification shall include the name and title of the new person assigned by the

source owner or operator to represent and bind the installation in environmental permitting affairs. All representations, agreement to terms and conditions and covenants made by the former responsible person that were used in the establishment of limiting permit conditions on this permit will continue to be binding on the installation until such time that a revision to this permit is obtained that would change said representations, agreements and covenants.

10 CSR 10-6.065 §(5)(E)4 and §(6)(E)6.A(III)(a)-(c) Reopening-Permit for Cause

This permit may be reopened for cause if:

- 1) The Missouri Department of Natural Resources (MDNR) or EPA determines that the permit contains a material mistake or that inaccurate statements were made which resulted in establishing the emissions limitation standards or other terms of the permit,
- 2) Additional applicable requirements under the Act become applicable to the installation; however, reopening on this ground is not required if—
 - a) The permit has a remaining term of less than three years;
 - b) The effective date of the requirement is later than the date on which the permit is due to expire;or
 - c) The additional applicable requirements are implemented in a general permit that is applicable to the installation and the installation receives authorization for coverage under that general permit,
- 3) The Missouri Department of Natural Resources or EPA determines that the permit must be reopened and revised to assure compliance with applicable requirements.

10 CSR 10-6.065 §(5)(E)1.A and §(6)(E)1.C Statement of Basis

This permit is accompanied by a statement setting forth the legal and factual basis for the permit conditions (including references to applicable statutory or regulatory provisions). This Statement of Basis, while referenced by the permit, is not an actual part of the permit.

VI. Attachments

Attachments follow.

Attachment C: Method 9 Opacity Emissions Observation
10 CSR 10-6.220 Compliance Demonstration

Method 9 Opacity Emissions Observations	
Company	Observer
Location	Observer Certification Date
Date	Emission Unit
Time	Control Device

Hour	Minute	Seconds				Steam Plume (check if applicable)		Comments
		0	15	30	45	Attached	Detached	
	0							
	1							
	2							
	3							
	4							
	5							
	6							
	7							
	8							
	9							
	10							
	11							
	12							
	13							
	14							
	15							
	16							
	17							
	18							

SUMMARY OF AVERAGE OPACITY				
Set Number	Time		Opacity	
	Start	End	Sum	Average

Readings ranged from _____ to _____ % opacity.

Was the emission unit in compliance at the time of evaluation? _____

YES NO

 Signature of Observer

Attachment F: Construction Permit 00-11-047 Emission Factors and Control Efficiencies

Emission Factors & Control Efficiencies for the Railcar & Truck loading System

Product	Emission Factors (lb/ton)	
	Conveyor Transfer (Dock Conveyors)	Loading Spout (Loading Tower)
Ferro Silicon Pellets	0.0036	0.0012
Fertilizer	0.06	0.02
Fish Mill	0.39	0.13
Mixed Grain	0.01755	0.00585
Road Salt	0.0072	0.0024

Control efficiency for the conveyor transfer controls (enclosures) is 50%.

Control efficiency for the loading spout control system (baghouse) is 75%.

Attachment G: Construction Permit 042007-018 PM₁₀ Compliance Worksheet

**PM₁₀ Compliance Worksheet
 Urea Melting Plant and New Warehouse**

Monthly Receipt of Fertilizer (tons)	Composite PM ₁₀ Emission Factor* (lbs/ton)	Monthly PM ₁₀ Emissions** (tons) (a)
Column A	Column B	Column C = Column A x Column B x 0.0005
	0.013	
	0.013	
	0.013	
	0.013	
	0.013	
	0.013	
	0.013	
	0.013	
	0.013	
	0.013	
	0.013	
	0.013	
	0.013	
	0.013	
(b) Total PM ₁₀ Emissions Calculated for this Month in Tons:		
(c) 12-Month PM ₁₀ Emissions Total from Previous Month's Attachment G in Tons:		
(d) Monthly PM ₁₀ Emissions Total (b) from Previous Year's Attachment G in Tons:		
(e) Current 12-month Total of PM ₁₀ Emissions in Tons: [(b) + (c) - (d)]**		

* Factor Composite PM₁₀ emission factor derived by dividing potential emissions (pounds/hr) by maximum hourly design rate (tons/hr) of EP9.
 ** A 12-Month Total PM₁₀ emissions total of less than 15 tons for Column C and 12-Month Total PM₁₀ emissions from the rest of the installation indicates compliance.

STATEMENT OF BASIS

Voluntary Limitations

In order to qualify for this Intermediate State Operating Permit, the permittee has accepted voluntary, federally enforceable emission limitations. Per 10 CSR 10-6.065(5)(C)1.A.(VI), if these limitations are exceeded, the installation immediately becomes subject to 10 CSR 10-6.065(6) and enforcement action for operating without a valid part 70 operating permit. It is the permittee's responsibility to monitor emission levels and apply for a part 70 operating permit far enough in advance to avoid this situation. This may mean applying more than eighteen months in advance of the exceedance, since it can take that long or longer to obtain a part 70 operating permit.

Permit Reference Documents

These documents were relied upon in the preparation of the operating permit. Because they are not incorporated by reference, they are not an official part of the operating permit.

- 1) Intermediate Operating Permit Application, received May 8, 2007;
- 2) 2010 Emissions Inventory Questionnaire, received March 15, 2011;
- 3) U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*; Volume I, Stationary Point and Area Sources, Fifth Edition;
- 4) City of St. Louis Air Pollution Control Program Construction Permit No. 00-11-047 for the modification of the truck and railcar loading system; and
- 5) Air Pollution Control Program Construction Permit No. 042007-018 for construction of fertilizer warehouse and a granular urea reformulation plant;.

Applicable Requirements Included in the Operating Permit but Not in the Application or Previous Operating Permits

In the operating permit application, the installation indicated they were not subject to the following regulation(s). However, in the review of the application, the agency has determined that the installation is subject to the following regulation(s) for the reasons stated.

None

Other Air Regulations Determined Not to Apply to the Operating Permit

The Air Pollution Control Program (APCP) has determined that the following requirements are not applicable to this installation at this time for the reasons stated.

- 1) St. Louis City Ordinances Nos. 64749, 65108, 65488, 65442 and 65645
These ordinances were reviewed and considered at the time the application for this permit was submitted. Since that time, these ordinances have been repealed and replaced with St. Louis City Ordinance No. 68657. The only section of Ordinance 65645 that corresponds to a rescinded ordinance included in the State SIP and therefore federally enforceable is Section 16 - Open Burning Restrictions. This section of the new ordinance is the only section included in the operating permit at this time.

2) 10 CSR 10-6.260, *Restriction of Emission of Sulfur Compounds*

All combustion equipment at the installation uses pipeline grade natural gas and propane as a back-up fuel. Combustion equipment that uses exclusively pipeline grade natural gas as defined in 40 CFR 72.2 or liquefied petroleum gas as defined by American Society for Testing and Materials (ASTM), or any combination of these fuels is exempt from the requirements of this rule.

Construction Permit Revisions

The following revisions were made to construction permits for this installation:

1) Construction Permit No. 00-11-047;

Section II: Limitation A

“Particulate emissions from the loading spout and the conveyor are limited to 60.96 pounds per hour each under 10 CSR 10-5-050.”

Since the maximum hourly design rate for the emission unit is 500 tons/hr. The maximum hourly design rate was put into the equation $E = 55.0P^{0.11} - 40$ for process weight rates greater than 60,000 lb/hr of 10 CSR 10-6.400 and yielded an emission rate of 68.96 lb/hr. This condition was modified to include this limit rather than 60.96 lbs/hr.

New Source Performance Standards (NSPS) Applicability

There are no NSPS standards that are currently applicable to this installation.

Maximum Achievable Control Technology (MACT) Applicability

There are no MACT standards that are currently applicable to this installation.

National Emission Standards for Hazardous Air Pollutants (NESHAP) Applicability

40 CFR Part 61 Subpart M, *National Emission Standard for Asbestos*, §61.145(a), Standard for demolition and renovation, applies to the installation.

This regulation has been included in the operating permit because it applies to any demolition or renovation (as outlined in 40 CFR 61.145) of buildings containing asbestos at the installation.

Other Regulatory Determinations

1) 10 CSR 10-6.400, *Restriction of Emission of Particulate Matter From Industrial Processes*

10 CSR 10-6.400 limits the amount of particulate matter that is allowed from an emission unit, and is dependent on the process weight rate material processed excluding liquids and gases used solely as fuels and excluding air introduced for purposes of combustion.

a) The emission units to which this rule applies are listed below. The following calculations provide the allowable particulate emission rate based on 10 CSR 10-6.400 and the potential (maximum) emission rate. Process information and data used in these calculations are from the Intermediate Operating Permit Renewal Application, 2010 EIQ, AP-42 Section 8.2 and FIRE factors. Also, the following formula from 10 CSR 10-6.400 is used to calculate the PM allowable limit:

$E = 4.10P^{0.67}$ for process weight rates up to 30 tons (60,000 lbs) per hour,

$E = 55.0P^{0.11} - 40$ for process weight rates greater than 60,000 lb/hr, and

Where: E = rate of emission in lb/hr; and

P = process weight rate in tons/hr (maximum hourly design rate)

Emission Unit #	Maximum Design Rate (tons/hr)	PM Emission Factor	PM Potential Emissions (lbs/hr)		PM Allowable Emission Rate (lb/hr)
			Uncontrolled	Controlled	
EU0190	500.00	0.02	7.50	0.075	68.96
EU0200	500.00	0.02	7.50	0.075	68.96
EU0210	500.00	0.02	7.50	0.075	68.96
EU0220	500.00	0.02	7.50	0.075	68.96
EU0230	500.00	0.02	9.90	0.099	68.96
EU0240	500.00	0.02	9.90	0.099	68.96
EU0250	500.00	0.02	7.50	0.075	68.96
EU0260	360.00	0.02	5.40	0.054	65.09
EU0270	360.00	0.02	5.40	0.054	65.09
EU0280	12.00	7.78	70.02	0.700	21.67
EU0290	21.20	7.78	123.70	1.237	31.73
EU0300	20.00	0.02	0.30	0.003	30.51
EU0310	20.00	0.02	0.30	0.003	30.51
EU0320	20.00	0.02	0.30	0.003	30.51
EU0330	20.00	50	750.00	7.500	30.51
EU0340	20.00	0.017	0.26	0.003	30.51
EU0350	20.00	50	750.00	7.500	30.51
EU0360	7.50	0.017	0.10	0.001	15.82
EU0370	7.50	0.017	0.10	0.001	15.82
EU0380	5.75	0.017	0.07	0.001	15.82
EU0390	7.50	0.017	0.07	0.001	13.24
EU0400	7.50	0.017	0.10	0.001	15.82
EU0410	12.50	0.017	0.16	0.002	22.27
EU0420	12.50	0.02	0.19	0.002	22.27
EU0430	27.50	0.02	0.41	0.004	37.77
EU0440	27.50	0.017	0.35	0.004	37.77
EU0450	15.00	0.017	0.19	0.002	25.16
EU0460	6.05	7.78	35.30	0.353	13.69
EU0470	22.00	0.5464	9.02	0.090	32.52
EU0480	6.50	0.017	0.08	0.001	14.37

i) The PM emissions from the above emission units are controlled either by baghouses, scrubbers or cyclone as stated in the permit. Though, the uncontrolled emissions from these units comply with the process weight rate limit, monitoring of the control devices are included in this operating as required by Construction Permit 042007-018 to comply with the emission limits set by the Construction Permit042007-018.

b) According to 10 CSR 10-6.400(1)(B)7., fugitive sources are not subject to this rule.

i) The following fugitive sources are not subject to this rule.

Emission Unit #	EIQ Reference #	Description of Emission Unit
EU0150	EP9	Dock Conveyors – Bulk material transfer from barge to conveyor system

Emission Unit #	EIQ Reference #	Description of Emission Unit
EU0160	EP9A	Dock Conveyors – Bulk material transfer from barge to conveyor system
EU0170	EP9B	Dock Conveyors – Bulk material transfer from barge to conveyor system
EU0180	EP9C	Dock Conveyors – Bulk material transfer from barge to conveyor system

- ii) The units listed in the table below, listed as units without limitation, are fugitive sources that do not emit regulated pollutants from a discrete stack or vent. Emissions from these are not contained in an enclosure with a forced-air vent or stack. These sources do not have any type of capture/control devices and are not covered or required to control their emissions based on any past or current regulations. These sources are not subject to any specific rule except the plant-wide permit conditions PW001 and PW002.

Emission Unit #	EIQ Reference #	Description of Emission Unit
EU0010	EP1	Truck Receiving Pit to Bucket Elevator -Bulk fertilizer receiving pit to bucket elevator
EU0020	EP1	Bucket Elevator to Warehouse - Bulk fertilizer is conveyed into the warehouse for interim storage
EU0030	EP2	Side Mill - Bulk fertilizer transfer to conveyor elevator
EU0040	EP2	Side Mill - Bulk fertilizer conveyor to truck
EU0050	EP5	Fertilizer Domes - Fertilizer transfer from truck and rail to conveyor system to dome storage building to rail and truck transportation.
EU0060	EP5	Fertilizer Domes - Fertilizer transfer from truck and rail to conveyor system to dome storage building to rail and truck transportation.
EU0070	EP7	Upper Mill - Conveyor and elevator bulk transfer of fertilizer to truck
EU0080	EP7	Upper Mill - Conveyor and elevator bulk transfer of fertilizer to truck
EU0090	EP8	Bulk Toter - Transfer of bulk fertilizer from railcar to truck
EU0100	EP8	Bulk Toter - Transfer of bulk fertilizer from railcar to truck
EU0110	EP8A	Bulk Toter - Transfer of bulk fertilizer from railcar to truck
EU0120	EP8A	Bulk Toter - Transfer of bulk fertilizer from railcar to truck
EU0130	EP18	Expanded Clay Aggregate Storage Pile Activity and Erosion

- c) This regulation defines process weight to "exclude liquids and gases used solely as fuels and excluding air introduced for purposes of combustion" under 10 CSR 6.400(2)(A). For the boiler, the throughput only consists of gaseous fuel and combustion air. Therefore, there is no applicable throughput for the boiler.

2) 10 CSR 10-5.030, *Maximum Allowable Emission of Particulate Matter From Fuel Burning Equipment Used for Indirect Heating.*

The facility has a boiler with a heat input of less than 10 MMBtu/hr subject to the requirements of this rule. However, the Air Pollution Control Program does not consider this boiler to be capable of exceeding the particulate matter (PM) emission limitation (0.40 pounds of particulate matter per million Btu's of heat input) of this rule.

Conservatively assuming 1050 Btu per standard cubic foot of natural gas and using the PM emission factor 7.6 lb/MMscf for natural gas combustion (AP-42, Sections 1.4, July 1998); the potential

emission is 0.0072 lb/MMBtu. Therefore, the boiler is always expected to be in compliance with the PM limitation, this rule was not included in the applicable requirements section of this operating permit.

Other Regulations Not Cited in the Operating Permit or the Above Statement of Basis

Any regulation which is not specifically listed in either the Operating Permit or in the above Statement of Basis does not appear, based on this review, to be an applicable requirement for this installation for one or more of the following reasons.

- 1) The specific pollutant regulated by that rule is not emitted by the installation.
- 2) The installation is not in the source category regulated by that rule.
- 3) The installation is not in the county or specific area that is regulated under the authority of that rule.
- 4) The installation does not contain the type of emission unit which is regulated by that rule.
- 5) The rule is only for administrative purposes.

Should a later determination conclude that the installation is subject to one or more of the regulations cited in this Statement of Basis or other regulations which were not cited, the installation shall determine and demonstrate, to the Air Pollution Control Program's satisfaction, the installation's compliance with that regulation(s). If the installation is not in compliance with a regulation, which was not previously cited, the installation shall submit to the Air Pollution Control Program a schedule for achieving compliance for that regulation(s).

Prepared by:

Berhanu A. Getahun
Environmental Engineer

CERTIFIED MAIL: 70093410000190188261
RETURN RECEIPT REQUESTED

Mr. Michael D. Stegmann
Lange-Stegmann Company
One Angelica Street
St. Louis, MO 63147

Re: Lange-Stegmann Company, 510-0468
Permit Number: **OP2011-039**

Dear Mr. Stegmann:

Enclosed with this letter is your intermediate operating permit. Please review this document carefully. Operation of your installation in accordance with the rules and regulations cited in this document is necessary for continued compliance. It is very important that you read and understand the requirements contained in your permit.

You may appeal this permit to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.078.16 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within thirty (30) days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If you send your appeal by registered or certified mail, we will deem it filed on the date you mailed it. If you send your appeal by a method other than registered or certified mail, we will deem it filed on the date the AHC receives it.

If you have any questions or need additional information regarding this permit, please do not hesitate to contact Berhanu Getahun at the St. Louis Regional Office, 7545 S. Lindbergh, Suite 210, St. Louis, MO 63125, or by telephone at (314) 416-2960. You may also contact me with the Department's Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102, or by telephone at (573) 751-4817. Thank you for your time and attention to this matter.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Michael J. Stansfield, P.E.
Operating Permit Unit Chief

MJS/bgk

Enclosures

c: St. Louis City Air Pollution Control Program
PAMS File: 2007-05-121