

# PERMIT BOOK

STATE OF MISSOURI



## DEPARTMENT OF NATURAL RESOURCES

MISSOURI AIR CONSERVATION COMMISSION

### PERMIT TO CONSTRUCT

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

Permit Number: **042007-018** Project Number: 2006-12-037

Parent Company: Lange-Stegmann Company

Parent Company Address: One Angelica Street, St. Louis, MO 63147

Installation Name: Lange-Stegmann Company

Installation Address: One Angelica Street, St. Louis, MO 63147

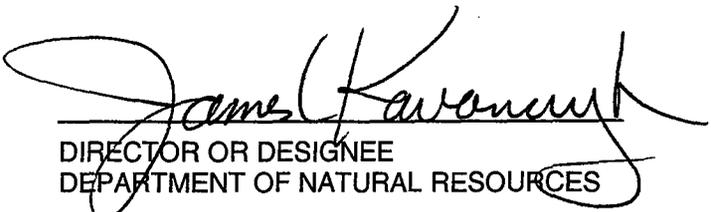
Location Information: City of St Louis

Application for Authority to Construct was made for:  
Construction of a fertilizer warehouse and a granular urea reformulation plant. This review was conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*.

- 
- Standard Conditions (on reverse) are applicable to this permit.
- Standard Conditions (on reverse) and Special Conditions are applicable to this permit.

APR 24 2007

EFFECTIVE DATE

  
DIRECTOR OR DESIGNEE  
DEPARTMENT OF NATURAL RESOURCES

PERMIT UNIT

STANDARD CONDITIONS:

Permission to construct may be revoked if you fail to begin construction or modification within two years from the effective date of this permit. Permittee should notify the Air Pollution Control Program if construction or modification is not started within two years after the effective date of this permit, or if construction or modification is suspended for one year or more.

**You will be in violation of 10 CSR 10-6.060 if you fail to adhere to the specifications and conditions listed in your application, this permit and the project review.** In the event that there is a discrepancy between the permit application and this permit, the conditions of this permit shall take precedence. Specifically, all air contaminant control devices shall be operated and maintained as specified in the application, associated plans and specifications.

You must notify the department's Air Pollution Control Program of the anticipated date of start up of this (these) air contaminant source(s). The information must be made available not more than 60 days but at least 30 days in advance of this date. Also, you must notify the Department of Natural Resources Regional office responsible for the area within which you are located with 15 days after the actual start up of this (these) air contaminant source(s).

A copy of this permit and permit review shall be kept at the installation address and shall be made available to Department of Natural Resources' personnel upon request.

You may appeal this permit or any of the listed special conditions to the Administrative Hearing Commission (AHC), P.O. Box 1557, Jefferson City, MO 65102, as provided in RSMo 643.075.6 and 621.250.3. If you choose to appeal, you must file a petition with the AHC within 30 days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed. If it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the AHC.

If you choose not to appeal, this certificate, the project review and your application and associated correspondence constitutes your permit to construct. The permit allows you to construct and operate your air contaminant source(s), but in no way relieves you of your obligation to comply with all applicable provisions of the Missouri Air Conservation Law, regulations of the Missouri Department of Natural Resources and other applicable federal, state and local laws and ordinances.

The Air Pollution Control Program invites your questions regarding this air pollution permit. Please contact the Construction Permit Unit at (573) 751-4817. If you prefer to write, please address your correspondence to the Missouri Department of Natural Resources, Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, attention: Construction Permit Unit.

STATE OF MISSOURI



DEPARTMENT OF NATURAL RESOURCES

MISSOURI AIR CONSERVATION COMMISSION

PERMIT TO CONSTRUCT

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

Permit Number:

Project Number: 2006-12-037

Parent Company: Lange-Stegmann Company

Parent Company Address: One Angelica Street, St. Louis, MO 63147

Installation Name: Lange-Stegmann Company

Installation Address: One Angelica Street, St. Louis, MO 63147

Location Information: City of St Louis

Application for Authority to Construct was made for:  
Construction of a fertilizer warehouse and a granular urea reformulation plant. This review was conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*.

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Standard Conditions (on reverse) are applicable to this permit.

Standard Conditions (on reverse) and Special Conditions are applicable to this permit.

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EFFECTIVE DATE

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DIRECTOR OR DESIGNEE  
DEPARTMENT OF NATURAL RESOURCES

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Permit No.	
Project No.	2006-12-037

#### SPECIAL CONDITIONS:

The permittee is authorized to construct and operate subject to the following special conditions:

*The special conditions listed in this permit were included based on the authority granted the Missouri Air Pollution Control Program by the Missouri Air Conservation Law (specifically 643.075) and by the Missouri Rules listed in Title 10, Division 10 of the Code of State Regulations (specifically 10 CSR 10-6.060). For specific details regarding conditions, see 10 CSR 10-6.060 paragraph (12)(A)10. "Conditions required by permitting authority."*

Lange-Stegmann Company  
City of St Louis

#### 1. Emission Limitation

- A. Lange-Stegmann Company shall emit less than 15 tons of particulate matter less than ten (10) microns in diameter (PM<sub>10</sub>) in any consecutive 12 month period from the equipment covered by this permit.
- B. Lange-Stegmann Company shall maintain an accurate record of PM<sub>10</sub> emitted into the atmosphere from the the equipment covered by this permit. Attachment A or an equivalent form shall be used for this purpose. Lange-Stegmann Company shall maintain all records required by this permit for not less than five (5) years and shall make them available immediately to any City of St. Louis personnel upon request.
- C. Lange-Stegmann Company shall report to the City of St. Louis Air Pollution Control Program's Enforcement Section, 1415 North Thirteenth Street, St. Louis, Missouri 63106, no later than ten (10) days after the end of the month during which the records from Special Condition Number 1.B indicate that the source exceeds the limitation of Special Condition Number 1.A.

#### 2. Control Equipment Requirements – Baghouse.

- A. Lange-Stegmann Company shall control emissions from the emission points listed in Table 1 using baghouses as specified in the permit application. The baghouses shall be operated and maintained in accordance with the manufacturer's specifications. 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).

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Permit No.	
Project No.	2006-12-037

**SPECIAL CONDITIONS:**

The permittee is authorized to construct and operate subject to the following special conditions:

Table 1. Baghouse Control Devices

Control Device No.	Emission Point No.	Point Description
CD-4	EP-9	Barge Unloading
CD-7A	EP-10	Multiproduct Loading/Transfer Tower
	EP-10-S2	Urea Fertilizer Transfer
CD-19A	EP-19A	Urea Fertilizer Truck Loading East
CD-19B	EP-19B	Urea Fertilizer Truck Loading West
CD-20	EP-20	Rail Car Trans Loading Tower
CD-21	EP-21	Product Cooler
CD-22	EP-22	Process Cooler
CD-23	EP-23-S1	Sizing Feed Silo
	EP-23-S2	Sizing Feed Elevator
	EP-23-S3	Sizing Screen
	EP-23-S4	Sizing Crusher*
	EP-23-S5	Sized Product Silo
	EP-23-S6	Sized Product Truck Loading
	EP-23-S7	Seed Material Silo
	EP-23-S8	Melter Material Feed Silo
	EP-23-S9	Drum Feed Elevator
	EP-23-S10	Melter Feed Elevator
	EP-23-S11	Drum Feed Elevator
	EP-23-S12	Recycle Surge Bin
	EP-23-S13	Internal Recycle Elevator
	EP-23-S14	Process Screen
EP-23-S15	Process Screen Feed Elevator	
EP-23-S16	Product Elevator	
CD-24	EP-24	Fluid Bed Deduster**

\* Additional control provided by cyclone separator CD-23A

\*\* Additional control provided by cyclone separator CD-24A

- 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 design conditions specified by the manufacturer's performance warranty.
- C. Lange-Stegmann Company shall maintain an operating and maintenance log for the baghouses which shall include the following:
  - 1) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
  - 2) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.

Page No.	5
Permit No.	
Project No.	2006-12-037

### SPECIAL CONDITIONS:

The permittee is authorized to construct and operate subject to the following special conditions:

#### 3. Control Equipment Requirements – Scrubbers

- A. Lange-Stegmann Company shall control emissions from EP-25-S1 and EP-25-S2 using a wet scrubber as specified in the permit 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. 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:
  - 1) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
  - 2) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.

#### 4. Control Equipment Requirements – Cyclones

- A. Lange-Stegmann Company shall operate and maintain CD-23A and CD-24A in accordance with the manufacturer's specifications. The cyclones 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.
- 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:
  - 1) Incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions; and
  - 2) Maintenance activities, with inspection schedule, repair actions, and replacements, etc.

REVIEW OF APPLICATION FOR AUTHORITY TO CONSTRUCT AND OPERATE  
SECTION (5) REVIEW

Project Number: 2006-12-037  
Installation ID Number: 510-0468  
Permit Number:

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

Complete: 12/14/2006  
Reviewed: 1/31/2007

Parent Company:  
Lange-Stegmann Company  
One Engelica Street  
St. Louis, MO 63147

City of St Louis

REVIEW SUMMARY

- Lange-Stegmann Company has applied for authority to construct a 60,000 ton fertilizer warehouse and a granular urea reformulation plant.
- Hazardous Air Pollutant (HAP) emissions are not expected from the proposed equipment.
- None of the New Source Performance Standards (NSPS) apply to the proposed equipment.
- None of the National Emission Standards for Hazardous Air Pollutants (NESHAPs) or currently promulgated Maximum Achievable Control Technology (MACT) regulations apply to the proposed equipment.
- Baghouses, cyclones and a scrubber will be used to control PM<sub>10</sub> emissions from the equipment in this permit.
- This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of PM<sub>10</sub> are conditioned to below de minimis levels for the entire installation as per applicant's request.
- This installation is located in City of St. Louis, a nonattainment area for ozone (O<sub>3</sub>) and an attainment area for all other criteria air pollutants.
- This installation is not on the List of Named Installations [10 CSR 10-6.020(3)(B), Table 2].

- Ambient air quality modeling was not performed since potential emissions of the application are below de minimis levels.
- Emissions testing is not required for the equipment.
- No Operating Permit is required for this installation.
- Approval of this permit is recommended with special conditions.

## INSTALLATION DESCRIPTION

The Lange-Stegmann Company is situated within the City of St. Louis, Missouri. It is a wholesaler of bulk fertilizers and utilizes 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 is an intermediate source under operating permits and is currently operating under permit no. OP97053.

The following permits have been issued to Lange-Stegmann Company from the City of St. Louis Air Pollution Control Program.

Table 2. Previously Issued Construction Permits

Permit Number	Description
98-12-080	Coal Storage Area
00-11-047	Truck and rail car loading

## PROJECT DESCRIPTION

Lange-Stegmann Company proposes to construct a fertilizer warehouse and a granular urea reformulation plant. The construction will consist of the emission points listed in Table 3. The respective maximum hourly design rates (MHDRs) for the various equipment are also shown this table.

Fertilizer will be offloaded from barges on the Mississippi River and transferred via conveyors to an existing transloading tower. The transfer rate of the conveyors will be increased from 250 tons per hour to 500 tons per hour as part of the project. Emissions from these conveyors will be controlled by use of the existing conveyor enclosure system.

The transloading tower is capable of loading railcars and/or trucks and also conveying fertilizer to the new warehouse through a new conveyor system. Particulate matter emissions from the transloading tower will be controlled by a baghouse (CD-10). This is an existing baghouse that will be modified to accommodate dust emissions from the new conveyor.

Solid urea fertilizer from the transloading tower will be conveyed into the new 60,000-ton warehouse. The warehouse is totally enclosed and any fugitive particulate emissions from the warehouse will be controlled by a new truck loading system baghouse (CD-19 A&B). CD-19 A&B will also control emissions from truck loading activities.

Urea fertilizer from the warehouse will be conveyed to a new railcar loading tower for loading onto railcars. Emissions from the new railcar loading tower will be controlled by a new railcar loading baghouse (CD-20).

Solid urea from the new warehouse will be conveyed to the new granulation plant. Approximately 50% of the urea will be melted in the urea melter to produce hot (285 °F) urea liquor. The other 50% will be used as starter raw material in the granulation drum. This starter raw material first goes through a screen and/or sizing crusher to produce particles of a desired size to be used as seed materials in the granulator. The dust from the screening system, conveyors and silos associated with the sized material is controlled by a baghouse (CD-23). Dust emissions from the sizing crusher are controlled first by a cyclone separator (CD-23A) and then a baghouse (CD-23).

The seed material is cleaned of any remaining dust in a fluid bed deduster before being fed to the granulation drum. Dust emissions from the fluid bed deduster are controlled by a cyclone (CD-24A) and finally by a baghouse (CD-24).

Additives are added to the hot urea liquor, which is then pumped through a row of spray nozzles into the granulation drum. Inside the granulation drum the spray nozzles direct the hot liquid urea onto a falling curtain of solid urea seed granules to produce a properly sized and coated urea granule.

Cooling air from the granulation drum is sent to a multi-stage scrubber (CD-25) where any particulate matter generated in the granulation process is scrubbed out. CD-25 also scrubs air vents from the granulation drum to remove any ammonia formed from the urea melting process.

The granules (at 220°F) discharged from the granulation drum need to be cooled. The first stage of cooling is accomplished in a fluid bed cooler where air is used to cool the material to 174°F. The cooled granules are then discharged to a size separation screening system. Particulate emissions from this cooling process are controlled by a baghouse (CD-22). CD-22 is also used for product recovery.

The on-specification product from the sizing screen is cooled in a second fluid bed cooler from 174°F to 115°F. Particulate emissions from this cooling process are controlled by a baghouse (CD-21). CD-21 is also used for product recovery.

All conveying equipment, intermediate bins and sizing screens, internal to the granulation plant have fugitive particulate emissions controlled by a common baghouse CD-23.

An 8.6 MMBTU/hr natural gas fired boiler will provide the heat to melt the urea.

Table 3. Maximum Hourly Design Rates (MHDR) and Control Efficiencies

Emission Point No.	Point Description	MHDR (tons/ hr)	Control Device No.	Control Device Efficiency (%)
EP-9	Barge Unloading	500	CD-4*	50
EP-10	Multiproduct Loading/Transfer Tower	500	CD-7*	50
			CD-7A	98.5
EP-10-S2	Urea Fertilizer Transfer		CD-7*	70
			CD-7A	98.5
EP-19A	Urea Fertilizer Truck Unloading - East	360	CD-19A	99
EP-19B	Urea Fertilizer Truck Unloading - West	360	CD-19B	99
EP-20	Rail Car Trans Loading Tower	360	CD-20	99
EP-21	Product Cooler	12	CD-21	99
EP-22	Process Cooler	21.2	CD-22	99
EP-23-S1	Sizing Feed Silo	20	CD-23	99
EP-23-S2	Sizing Feed Elevator	20		
EP-23-S3	Sizing Screen	20		
EP-23-S4	Sizing Crusher	20		
EP-23-S5	Sized Product Silo	20		
EP-23-S6	Sized Product Truck Loading	20		
EP-23-S7	Seed Material Silo	7.5		
EP-23-S8	Melter Material Feed Silo	7.5		
EP-23-S9	Drum Feed Elevator	5.75		
EP-23-S10	Melter Feed Elevator	5.75		
EP-23-S11	Drum Feed Elevator	7.5		
EP-23-S12	Recycle Surge Bin	12.5		
EP-23-S13	Internal Recycle Elevator	12.5		
EP-23-S14	Process Screen	27.5		
EP-23-S15	Process Screen Feed Elevator	27.5		
EP-23-S16	Product Elevator	15		
EP-23-S4	Sizing Crusher	20		
EP-24	Fluid Bed Deduster	6.05	CD-24	99
			CD-24A**	95
EP-25-S1	Granulation Drum	22	CD-25***	99
EP-25-S2	Urea Melter	6.5		

\* enclosure, \*\* cyclone, \*\*\* wet scrubber

## EMISSIONS/CONTROLS EVALUATION

The emission factors and control efficiencies used in this analysis were obtained from the following sources:

1. Environmental Protection Agency (EPA) document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition, Section 8.2 *Urea* (7/93).
2. Environmental Protection Agency (EPA) Factor Information Retrieval (FIRE) version 6.25 software.
3. Application for Authority to Construct dated December 18, 2006 – Form 2.0, Form 3.0 and Form 3.0 Supplemental information. Some of the information from the application is summarized in Table 3 above.

Except for EP23-S4 and EP-25 all other emission factors used in this analysis are from the first two sources above. The emission factor for EP-23-S4 is based on data from an actual crusher screening operation as provided by the applicant. EP-25 emission factor is based on engineering calculation using data provided by the applicant.

Potential emissions of the application represent the potential of the new equipment, assuming continuous operation (8760 hours per year). Existing potential PM<sub>10</sub> emissions for this installation were obtained from the installations Intermediate Operating Permit renewal received on November 8, 2002. Existing potential emissions of the other criteria pollutants are assumed to be below minor levels as there are no activities at the installation that generate these pollutants. Existing actual emissions were taken from the installations 2005 Emissions Inventory Questionnaire (EIQ) submittal. The following table provides an emissions summary for this project.

Table 4. Emissions Summary (tons per year)

Pollutant	Regulatory De Minimis Levels	Existing Potential Emissions	Existing Actual Emissions (2005 EIQ)	Potential Emissions of the Application	New Installation Conditioned Potential
PM <sub>10</sub>	15.0	<99.95	8.53	28.58	<15.00
SO <sub>x</sub>	40.0	<40.0	0.00	0.02	N/A
NO <sub>x</sub>	40.0	<40.0	0.00	3.69	N/A
VOC	40.0	<40.0	0.00	0.20	N/A
CO	100.0	<100.0	0.00	3.10	N/A
HAPs	10.0/25.0	<10.0/25.0	0.00	0.00	N/A

\*N/A = Not Applicable; N/D = Not Determined

## PERMIT RULE APPLICABILITY

This review was conducted in accordance with Section (5) of Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*. Potential emissions of PM<sub>10</sub> are conditioned to below de minimis levels for the entire installation.

## APPLICABLE REQUIREMENTS

Lange-Stegmann Company shall comply with the following applicable requirements. The Missouri Air Conservation Laws and Regulations should be consulted for specific record keeping, monitoring, and reporting requirements. Compliance with these emission standards, based on information submitted in the application, has been verified at the time this application was approved. For a complete list of applicable requirements for your installation, please consult your operating permit.

### GENERAL REQUIREMENTS

- *Submission of Emission Data, Emission Fees and Process Information, 10 CSR 10-6.110*  
The emission fee is the amount established by the Missouri Air Conservation Commission annually under Missouri Air Law 643.079(1). Submission of an Emissions Inventory Questionnaire (EIQ) is required June 1 for the previous year's emissions.
- *Restriction of Particulate Matter to the Ambient Air Beyond the Premises of Origin, 10 CSR 10-6.170*
- *Restriction of Emission of Visible Air Contaminants, 10 CSR 10-6.220*
- *Control of Odors in the Ambient Air, 10 CSR 10-5.160*

### SPECIFIC REQUIREMENTS

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

### STAFF RECOMMENDATION

On the basis of this review conducted in accordance with Section (5), Missouri State Rule 10 CSR 10-6.060, *Construction Permits Required*, I recommend this permit be granted with special conditions.

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Maurice Chemweno  
Environmental Engineer

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Date

## PERMIT DOCUMENTS

The following documents are incorporated by reference into this permit:

- The Application for Authority to Construct form, dated December 8, 2006, received December 14, 2006 designating Lange-Stegmann Company as the owner and operator of the installation.
- U.S. EPA document AP-42, *Compilation of Air Pollutant Emission Factors*, Fifth Edition.
- U.S. EPA Factor Information Retrieval (FIRE) version 6.25 software.



Mr. Daniel Kuttenkuler  
Project Manager  
Lange-Stegmann Company  
One Angelica Street  
St. Louis, MO 63147

RE: New Source Review Permit - Project Number: 2006-12-037

Dear Mr. Kuttenkuler:

Enclosed with this letter is your permit to construct. Please study it carefully. Also, note the special conditions, if any, on the accompanying pages. The document entitled, "Review of Application for Authority to Construct," is part of the permit and should be kept with this permit in your files.

Operation in accordance with these conditions, your new source review permit application and with your amended operating permit, is necessary for continued compliance.

The reverse side of your permit certificate has important information concerning standard permit conditions and your rights and obligations under the laws and regulations of the State of Missouri.

If you have any questions regarding this permit, please contact me at (573) 751-4817, or write the Department of Natural Resources' Air Pollution Control Program, P.O. Box 176, Jefferson City, Missouri 65102. Thank you for your time.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

Kendall B. Hale  
New Source Review Unit Chief

KBH: mcl

Enclosures

c: City of St. Louis  
PAMS File 2006-12-037  
Permit Number: