Missouri
Department of
Natural Resources

The following letters relate the development of the 2009 non-EGU inventory:

1. The letter sent by the Missouri Department of Natural Resources' Air Pollution Control Program on March 15, 2006 to facilities in the St. Louis nonattainment area and surrounding counties to solicit feedback on a draft version of the 2009 attainment demonstration inventory.

2. A letter from Anheuser-Busch, dated April 11, 2006, with comments on the draft 2009 attainment demonstration inventory.

3. A December 22, 2006 letter approving VOC emission reduction credits for the JW Aluminum facility.

4. A May 26, 2006 letter from the Ford-Hazelwood facility stating that the facility is no longer in production mode.

Matt Blunt, Governor • Doyle Childers, Director

STATE OF MISSOURI
DEPARTMENT OF NATURAL RESOURCES

www.dnr.mo.gov

MAR 1 5 2006

Anheuser-Busch Inc-St. Louis
Mr. Chad Fisher
EHS Manager
One Busch Place 3-2
St. Louis, MO 63118

RECEIVED
MAR 2 1 2006
EHS DEPARTMENT

Dear Chad:

The Missouri Department of Natural Resources and the Illinois Environmental Protection Agency have been working to develop new State Implementation Plans (SIP) for the control of ozone and fine particulate matter in the St. Louis metropolitan area. It is important to both states that stakeholders be made aware of these efforts and everyone is given the opportunity to participate in the development of these plans. To that end, the agencies have formed a modeling workgroup and a control strategy workgroup, and have worked closely with East-West Gateway Council of Government's Air Quality Advisory Committee. Industry, business associations, environmental advocacy groups, and local, county, and state government representatives regularly attend these meetings. These agencies have formed a modeling workgroup and a control strategy workgroup to provide an opportunity for stakeholder input into the development of these plans. The purpose of this letter is to inform you about these activities and to again ask for your input.

About one year ago, St. Louis Regional Chamber and Growth Association asked you to review a spreadsheet that included an estimate of your 2002 air emissions. This was an important data set that the modeling workgroup was using to develop a reliable photochemical model. Using the 2002 data, modelers compared model-predicted concentrations with actual measurements, and have worked to improve the performance of the model. The group is now in the process of using the model to predict concentrations in 2009, and have made estimates of your emissions for that year. These estimates were made by applying economic growth factors and considering emission controls mandated by regulations that are "on the books." The quality of these future predictions relies on the quality of the emission estimates. The modeling results will be used to help evaluate various control strategies, making these estimates all the more important.

We ask that you review the 2009 emission estimates for your facility. You will find the estimate for your facility listed in a Microsoft Excel ™ spreadsheet that has been posted at http://www.dnr.mo.gov/env/apcp/SIPWORKGRP/SipGrpmain.htm#emissionsinventorydata. This site provides tables that list your 2002 emissions and details the calculations that were made to estimate your 2009 emissions. There are different spreadsheets depending on whether you are an electric generating utility or not. We have also posted emission projections for the area and mobile source categories for anyone who would like to review and comment on these as well.

We want to be very clear that the 2009 estimate for your facility is not an emission limit and it has no regulatory significance. It is simply an estimate for planning purposes. If you believe that the 2009 estimate for your facility needs to be adjusted because your facility has reached capacity or is planning changes such as the removal or control of an emission source or the construction of a new process, we ask that you provide a better estimate and the reasons you believe that the spreadsheet should be changed. At your earliest convenience, please complete this review and direct your responses, respectively, to:

Wendy Vit
Air Pollution Control Program
Missouri Department of Natural Resources
P.O. Box 176
Jefferson City, Missouri 65102
Wendy.Vit@dnr.mo.gov
Phone: (573) 751-4817

David Asselmeier
Illinois EPA – Bureau of Air
1021 North Grand Avenue East
P.O. Box 19276
Springfield, IL 62794-9276
Buzz.Asselmeier@epa.state.il.us
Phone: (217) 782-0285

For further information about the SIP development process, please go to: http://www.dnr.mo.gov/env/apcp/SIPWORKGRP/SipGrpmain.htm. We'd like to try and turn this around by the end of March, if possible.

Thank you for your attention to this important request. Please feel free to contact me with any questions about this effort at P.O. Box 176, Jefferson City, MO 65102 or by phone at (573) 751-4817 or e-mail at John.Rustige@dnr.mo.gov.

Sincerely,

AIR POLLUTION CONTROL PROGRAM

John Rustige

John Rustige, P.E.
Environmental Engineer

JR:lm

Anheuser-Busch, Inc.
ONE OF THE ANHEUSER-BUSCH COMPANIES

RECEIVED
2006 APR 17 PM 2:50
AIR POLLUTION
CONTROL PGM

Tuesday, April 11, 2006

Ms. Wendy Vit
Air Pollution Control Program
Missouri Dept of Natural Resources
P.O. Box 176
Jefferson City, MO 65102
Certified Mail 7002 3150 0004 0135 8221

Mr. David Asselmeier
Illinois EPA – Bureau of Air
1021 North Grand Avenue East
P.O. Box 19276
Springfield, IL 62794-9276
Certified Mail 7002 3150 0004 0135 8269

Dear Ms. Vit / Mr. Asselmeier:

On March 21, 2006, I received a request from Mr. John Rustige of Missouri Dept of Natural Resources Air Pollution Control Program (copy of letter attached) to review 2009 emission estimates for the Anheuser-Busch, Inc. St. Louis Brewery. The emission estimates will be used in the SIP development effort for ozone and fine particulate matter. I reviewed the estimates and provide the following data developed from internal economic growth factors and past Emission Inventory Questionnaires.

Year	AB est. VOC tons per day	MDNR est. VOC tons per day	AB NOx est. tons per day	MDNR est. NOx tons per day	AB CO est. tons per day	MDNR est. CO tons per day)	AB est. SOx tons per day	MDNR est. tons per day	AB est. PM10 tons per day	MDNR est. tons per day	AB est. PM2.5 tons per day	MDNR est. tons per day
2009	0.7	0.7	2.1	1.7	0.5	0.5	19.4	16.3	0.2	0.1	0.06	0

If you have any questions or need further assistance, please call me at 314-577-3584.

Sincerely,

Chad Fisher
EHS Manager
Anheuser-Busch, Inc. St. Louis Brewery

Cc Mr. John Rustige
Air Pollution Control Program
Missouri Dept of Natural Resources
P.O. Box 176
Jefferson City, MO 65102
Certified Mail 7002 3150 0004 0134 8857

Anheuser-Busch, Inc.
One Busch Place
St. Louis, MO U.S.A. 63118-1852

STATE OF MISSOURI
Matt Blunt, Governor • Doyle Childers, Director
DEPARTMENT OF NATURAL RESOURCES
www.dnr.mo.gov

DEC 2 2 2006

CERTIFIED MAIL, 70052570000215846662
RETURN RECEIPT REQUESTED

Mr. Martin Winger
Environmental, Health and Safety Manager
JW Aluminum
6100 South Broadway
St. Louis, MO 63111

RE: Emission Banking and Trading Request, Project 2005-09-003
Installation ID No. 510-0118, Account No. 10803024
Serial No. 20055100118 1V – 20055100118 1655V

Dear Mr. Winger:

On August 31, 2005 we received your request to bank volatile organic compounds (VOCs) Emission Reduction Credits (ERCs) generated at the JW Aluminum in St. Louis, Missouri. St. Louis is currently designated as a nonattainment area for eight-hour National Ambient Air Quality Standard for ozone. This request was processed in accordance with 10 CSR 10.410, *Emissions Banking and Trading Rules*.

The Air Pollution Control Program is granting your request to bank 1,655 tons per year of VOC emissions. The ERCs generated by the project were calculated by subtracting the post-project emissions from the pre-project emissions. JW Aluminum is opting to use a plant-wide VOC emissions cap for post-project operations of 600 tons per year in lieu of the calculated actual rate. Therefore, a total of 1,655 ERCs are generated when subtracting the plant-wide limit 600 tons per year from the pre-project emissions of 2,255 tons as described in the enclosed analysis. The amount of banked emissions granted is subject to the following conditions:

1. JW Aluminum shall be using Norpar-13 solvent and not use 140-solvent at all times at the installation. Using 140-solvent would be a violation of Missouri State Rules 10 CSR 10.410.
2. JW Aluminum shall amend the Part 70 operating permit (OP2003045) to make the modification and the plant-wide VOC emissions of 600 tons per year a practically enforceable condition.
3. It shall be a violation of Missouri State Rules 10 CSR 10.410 if JW Aluminum fails to operate in accordance with the conditions above unless JW Aluminum files a notice of withdrawal of banked credit for emission reductions which identifies the installation and source operation to which the withdrawn credit will be applied.

Please note on December 31 of each year, in accordance with the regulation, your account will be reduced by 3% and rounded down to the nearest ERC. If we can be of further assistance, please contact Maher Jaafari at the Department of Natural Resources' Air Pollution Control Program, PO Box 176, Jefferson City, MO 65102, or telephone (573) 751-4817.

We sincerely appreciate these voluntary reductions and thank you for your time and cooperation.

AIR POLLUTION CONTROL PROGRAM

James L. Kavanaugh,
Director

JLK: mjk

Enclosure

c: Mr. Mike Stansfield, Operating Permit Unit Chief
PAMS File 2005-09-003

File: 1890015
St. Louis County

RECEIVED
2006 MAY 30 PM 2:08
AIR POLLUTION
CONTROL PGM

Vehicle Operations
Ford Motor Company

St. Louis Assembly Plant
6250 North Lindbergh Boulevard
Hazelwood, Missouri 63042

May 22, 2006

Mr. Timothy W. Froeschner
Environmental Engineer
St. Louis County Department of Health
111 S. Meramec
St. Louis, MO 63105

Cc: Mr. Steve Feeler
Chief, Enforcement Section
Air Pollution Control Program
Missouri Dept of Natural Resources
205 East Jefferson Street
Jefferson City, MO 65102

RE: VOC Emission Report for the Ford Motor Company St. Louis Assembly Plant

Dear Mr. Froeschner:

The St. Louis Assembly Plant is no longer in production. The last production unit was produced at the end of the second week of March, 2006. The monthly VOC Emission report was submitted for March, 2006. It is the purpose of this correspondence to inform you that the St. Louis Assembly Plant is in an "idle" mode, with no production scheduled for the foreseeable future. Therefore, with your concurrence, monthly VOC Emission reports will no longer be submitted. In the event that production activities are resumed at a future date, you office will be promptly notified. If any further information or clarification is required, please contact Vincent Kelly at (314) 731-6329.

Sincerely,

Ron Brasher

Ron Brasher
Site Manager