

DEPARTMENT OF HEALTH, WELFARE
& BIO-ENVIRONMENTAL SERVICES
Bio-Environmental Services Division
Air and Water Pollution Control

September 11, 1984



Mr. Jeff Pallas
Environmental Protection Agency
Air Compliance Branch - Region IV
345 Courtland St., N.E.
Atlanta, Georgia 30365

BPW
NORTH 1ST STREET JACKSONVILLE, FLORIDA
RECEIVED
SEP 12 1984
DER-JACKSONVILLE

Dear Mr. Pallas:

Enclosed is a review of Anheuser-Busch's request for construction and operation permits for Boiler No.'s 1 through 4 at the Jacksonville plant. The following comments are provided:

1. The particulate emission limit in pounds per hour per boiler is based upon 0.1 lbs. per 10⁶ BTU heat input rate as stated in the November 3, 1981 letter.
2. As stated in the Summary Item (1), the applicable Rule at the time of permit application was 0.1 lbs. of particulate per 10⁶ BTU heat input (Enclosed is a copy of such Rule: Table II, Page 05-18. Florida Administrative Code(FAC)).
3. If modification requests were submitted at the present time, BACT would be applicable in accordance with Rule 17-2.600(6)(b) FAC.
4. The permits do not specifically limit particulate emissions to 0.1 lbs/10⁶ BTU heat input.

In conclusion the primary difference in the applicable rules is that the term plants has been changed to read source(s). This change is quite significant since under the current rules the 0.1 lbs of particulates per 10⁶ BTU heat input only applies to individual steam generators with a heat input $\geq 250 \times 10^6$ BTUs per hour.

Please direct all questions or comments to the undersigned.

Very truly yours,

Jerry E. Woosley
Assistant Engineer

DER
SEP 17 1984
BAQM

JEW/vj
Enclosure

- cc: Mr. Doug Dutton - DER, without enclosure
- cc: Mr. John Mueller - A.B., without enclosure
- cc: Ms. Nancy Wright - OGC, without enclosure
- cc: Ms. Carol Forthman - OGC, without enclosure
- ✓cc: Mr. Bill Thomas - DER, with enclosure
- cc: BESD/File 1060-B, with enclosure



heat input.

c. Owners of fossil fuel steam generators shall monitor their emissions and the effects of the emissions on ambient concentrations of sulfur dioxide, in a manner, frequency, and locations approved, and deemed reasonably necessary and ordered by the Department.

4. Nitrogen Oxides, expressed as NO₂, maximum two hour average;

a. Jacksonville Electric Authority's Northside Generating Station Unit 3 - 0.30 pounds per million Btu heat input.

b. Manatee County, Florida Power and Light Company's Manatee Generating Station - 0.30 pounds per million Btu heat input.

c. City of Tallahassee's A. B. Hopkins Station Unit 2 - 0.30 pounds per million Btu heat input.

d. Tampa Electric Company's Big Bend Station Unit #3 - 0.70 pounds per million Btu heat input.

e. A rule for limiting nitrogen oxide emissions from existing fossil fuel steam generators will be considered by the Environmental Regulation Commission by July 1, 1982.

(6) Fossil Fuel Steam Generators With Less than 250 Million Btu per Hour Heat Input, New and Existing Sources.

(a) Visible Emissions - Visible emissions with a density of Number 1 on the Ringelmann Chart (20 percent opacity) except that a density of 30 percent opacity shall be allowed for Monsanto Textiles Company boiler units 2 and 4, Escambia County, while burning fuel oil in conjunction with waste material derived from waste streams previously discharged into underground wells. A density of 40 percent opacity is permitted for not more than two minutes in any one hour.

(b) Particulate Matter - Best available control technology as determined pursuant to Section 17-2.630 shall be applied.

(c) Sulfur Dioxide - Best available control technology as determined pursuant to Section 17-2.630 shall be applied.

(7) Portland Cement Plants

(a) Existing kilns and coolers - as provided in the Process Weight Table, Section 172.610(1).

(b) New Sources.

1. Kilns - 0.3 pounds of particulate matter per ton of feed to the kiln.

2. Clinker coolers - 0.1 pounds of particulate matter per ton of feed to the kiln.

(8) Nitric Acid Plants - These limits are applicable to new and existing sources producing weak nitric acid (50 to 70 percent) by pressure or atmospheric pressure process.

(a) Visible emissions - 10 percent opacity.

(b) Nitrogen Oxides - 3 pounds per ton of acid produced (100 percent basis).

(9) Sulfur Recovery Plants - These limits are applicable to plants recovering sulfur from crude oil gas.

(a) New Plants - 0.004 pounds of sulfur dioxide per pound of sulfur input to the recovery system or 0.004 pounds of sulfur dioxide per pound of sulfur removed from an oil well.

(b) Existing Plants (for which a valid Department Construction permit was issued prior to July 1, 1973) - 0.08 pounds of sulfur dioxide per pound of sulfur input to the recovery system or 0.08 pounds of sulfur dioxide per pound of sulfur removed from crude oil or gas

1980

TABLE II
EMISSION LIMITING STANDARDS

| Stationary Sources | Particulates | Visible emissions | Sulfur dioxide, per million BTU heat input | Nitrogen oxides, per million BTU heat input, Maximum 2 hr. avg. expressed as NO ₂ |
|---|---|--|--|--|
| E. FOSSIL FUEL STEAM GENERATORS | | | | |
| (1) Plants with more than 250 million BTU per hour heat input | 0.1 pounds per million BTU heat input, maximum two hour average | Density of which is equal to or greater than Number 1 of the Ringelmann Chart (20 percent opacity) except that a shade as dark as Number 2 of the Ringelmann Chart (40 percent opacity) shall be permissible for no more than 2 minutes in any hour. The preceding sentence notwithstanding, an owner or operator of a facility may request the Department to determine opacity of emissions from the facility during initial performance tests. Upon receipt from such owner or operator of the written report of the re- | 0.8 pounds maximum two hour average | 0.30 pounds |
| (a) New sources burning | | | 1.2 pounds maximum two hour average | 0.70 pounds |
| 1. Liquid fuel | | | | 0.20 pounds |
| 2. Solid fuel | | | | |
| 3. Gaseous fuel | | | | |

COPY

2-1-80

Anheuser-Busch
 Steam Generators 1-4
 Permit Review

| Operation Permits | Expiration Date |
|---|---|
| Particulate limit not established | Boiler #1 A016-12825 Boiler #2 A016-12836 Boiler #3 A016-12837 Boiler #4 A016-12824 |
| May 1, 1980 | Applied for renewal operation permits for boiler numbers 1, 2, and 3. Note: AB indicated that each boiler should be permitted at 100 X 10 ⁶ BTUs/hr heat input. |
| June 4, 1980 | BESD requested additional information. |
| July 23, 1980 | AB letter stating that a heat input limit of 375 X 10 ⁶ and 300 X 10 ⁶ BTUs/hr for all three boilers on a 3 hour and 24 hour average respectively is acceptable to avoid PSD. |
| August 6, 1980 | BESD letter stating 3 hour and 24 hour averaging periods for maximum firing rates is satisfactory. |
| February 11, 1981 | AB withdraws renewal permit applications for Boiler numbers 1, 2, and 3 and submits one modification permit application for boiler numbers 1, 2, 3, and 4. |
| March 16, 1981 | BESD additional information letter sent. |
| March 18, 1981 | BESD sends letter to DER which forwards application to DER for processing. Included is BESD update on modelling, stack height, boiler capacity, and PSD applicability. |
| April 3, 1981 | Part of the information requested in March 16, 1981 BESD letter is received by BESD. |
| April 15, 1981 | AB letter to DER stating position on permitting thus far. |
| May 22, 1981 | Particulate stack tests submitted to BESD - 0.1 lb/10 ⁶ BTU limit passed. |
| May 28, 1981 | AB letter stating that work on stack height increase to commence soon. |

COPY

June 3, 1981
BESD letter to AB stating that maximum heat input on each boiler is limited to the test capacity plus 10%.

September 18, 1981
Preliminary Determination issued by DER. (Note: Permit limited fuel use to permitted allowable at 66.1×10^6 BTU/hr heat input on an annual basis for all four boilers combined. Therefore, PSD and BACT did not apply. Limit should have been to 1979 actual not allowable usage to preclude any net increase of pollutants).

October 8, 1981
BESD comments on Preliminary Determination.

October 22, 1981
DER Final Determination issued (Construction Permit AC16-39951).

November 3, 1981
AB comments on Construction Permit AC16-39951.
Note: AB requests annual particulate limit of 28.95 T/yr/boiler which is based upon $0.1 \text{ lb}/10^6$ BTU particulate limit 66.1×10^6 BTU/hr heat input limit 8760 hours per year.

March 2, 1982
BESD letter requesting AB to submit application for operation permit.

March 30, 1982
Application for Operation Permit received by BESD. Permit deviations noted.

June 8, 1982
BESD requested AB to sign Waiver of 90 Day processing to 9/30/82.

June 14, 1982
Waiver executed by AB.

July 19, 1982
DER letter to AB outlining problems with operation permit application (see letter for details).

September 1, 1982
BESD letter to AB enclosing draft operation permit - Basis for permit emission limits also outlined.

September 16, 1982
AB requests surrogate tests for particulate and SO₂.

September 20, 1982
Operation permit issued based upon Construction Permit (Max. annual fuel oil consumption figure lowered to correspond to 1979 usage).

- September 22, 1982 AB requests particulate SO₂ and NO_x bubble limit (four boilers) on an annual basis.
- September 29, 1982 DER grants bubble limit.
(Note: BESD did not change operation permit to reflect bubble limits. BESD questions DER authority to issue bubble limits).

Summary

COPY

- (1) At the time of the permit application, the applicable rule limited part emissions to 0.1 lb/10⁶ BTU heat input at Plants with steam gen. capacity boilers rated at >250 X 10⁶ BTUs/hr heat input total.
- (2) Particulate emission limitations in Construction Permit were written as follows:
 - (A) (0.1 lbs/10⁶ BTU) (100 X 10⁶ BTU/hr)
= 10 lbs/hr Maximum per boiler
 - (B) 21.4 T/yr per boiler limitation based on base year 1979 fuel consumption and corresponding emission rate at 0.1 lb/10⁶ BTU input. Assume 150,000 BTU/gallon, this eliminates PSD and BACT review.
 - (C) Fuel consumption based on 1979 Boiler #1 usage X 4 [Baseline]

Possible Alternate Considerations

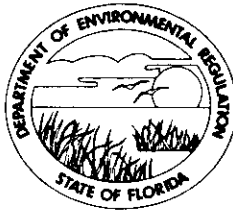
- (1) Bring boilers in compliance with 0.1 lb/10⁶ BTU limit.
- (2) Modify permit (through application and public notice) increasing allowable limit to: for example 0.17 lb/10⁶ BTU* or higher. This would involve a BACT determination. Also, the annual SO₂ limit could not be raised more than 40 tons (significance level) without triggering PSD review. Fuel consumption limit would have to be altered depending on the particulate lb/10⁶ BTU limit established. Non Attainment area impact modelling must be redone using higher emission limit of particulate.

*Depending on BACT determination

Main File

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY

May 11, 1984

Mr. John Mueller
Plant Manager
Anheuser-Busch, Inc.
P. O. Box 18017
Jacksonville, Florida 32229

Dear Mr. Mueller:

The bureau has received your letter dated April 25, 1984, requesting a meeting with us. You may call us at any time and arrange a meeting.

If there are any questions, please call Bruce Mitchell at (904)488-1344 or write to me at the above address.

Sincerely,

C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality Management

CHF/BM/s

cc: N. Wright
J. Woosley
D. Dutton



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

April 25, 1984

DER
APR 27 1984
BAQM

Mr. Clair Fancy
Deputy Bureau Chief
Central Air Permitting Section
Bureau of Air Quality Management
Department of Environmental Regulation
2600 Blairstone Road
Tallahassee, Florida 32301

Dear Mr. Fancy:

We corresponded with you on March 13, 1984, relative to a problem we are having with our package boilers in meeting particulate emission limits. We requested at that time that you advise us as to when and where we could formulate a proposed meeting to discuss the subject matter.

We have not heard from you to date, and would appreciate your acknowledgement of our correspondence.

Very truly yours,

J. Mueller
John Mueller
Plant Manager

cb

file



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

[Handwritten signature]

March 13, 1984

Mr. Clair Fancy
Deputy Bureau Chief
Central Air Permitting Section
Bureau of Air Quality Management
Department of Environmental Regulation
2600 Blairstone Road
Tallahassee, Florida 32301

Dear Mr. Fancy:

The Jacksonville Brewery of Anheuser-Busch, Inc. has been experiencing difficulties in meeting the particulate emission limits as they relate to our package boilers. These limitations are currently specified in our permits as 0.1 lbs. per MMBTU. At the suggestion of Messrs. Wayne Tutt and Jerry Woosley of the Jacksonville Bio-Environmental Services Division, we would like to arrange a meeting with you and the local Jacksonville Department of Environmental Regulation personnel to discuss our efforts to meet the existing limitations and the possibility of negotiating permit revisions.

Would you please be so kind as to advise when and where the proposed meeting could take place.

Very truly yours,

John Mueller
John Mueller
Plant Manager

cb

cc: Messrs. T. Martin
W. Tutt
J. Woosley
D. DeHart

State of Florida
DEPARTMENT OF ENVIRONMENTAL REGULATION

INTEROFFICE MEMORANDUM

| For Routing To District Offices And/Or To Other Than The Addressee | | |
|---|--------------------|----------------|
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| From: _____ | Date: _____ | |
| Reply Optional [] | Reply Required [] | Info. Only [] |
| Date Due: _____ | Date Due: _____ | |

TO: Bill Thomas

THRU: Bill Blommel *WB*
Clair Fancy

FROM: Bruce Mitchell *BM*

DATE: March 26, 1984

SUBJ: ASP for Anheuser-Busch Companies, Inc.

ASP fl

I spoke with Jerry Woosley on March 23, 1984, about the above referenced company. He feels the following points are pertinent to the company's request in their attempt to obtain an ASP:

- o Each boiler is $< 250 \times 10^6$ Btu heat input/hour
- o Since each boiler would be a small boiler, a BACT for PM would need to be done per boiler (he said that a check was done and the current BACT PM emission rate was found to be approximately $0.17 \text{ lb}/10^6$ Btu heat input/hr; currently, the units are under a PM emission rate of $0.1 \text{ lb}/10^6$ Btu heat input/hr)
- o BACT would be required for SO_2 (currently they have a fuel sulfur limit of 2.5% content by weight)
- o ABC, Inc., and BES want a meeting with the BAQM, which will be arranged by BES

BM/s



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

March 13, 1984

3/20

*Bill -
 Please call them &
 set up at your convenience - as
 I will be out for 2 weeks.
 make sure BES is invited.
 Clair*

DER

MAR 15 1984

BAQM

Mr. Clair Fancy
 Deputy Bureau Chief
 Central Air Permitting Section
 Bureau of Air Quality Management
 Department of Environmental Regulation
 2600 Blairstone Road
 Tallahassee, Florida 32301

Dear Mr. Fancy:

The Jacksonville Brewery of Anheuser-Busch, Inc. has been experiencing difficulties in meeting the particulate emission limits as they relate to our package boilers. These limitations are currently specified in our permits as 0.1 lbs. per MMBTU. At the suggestion of Messrs. Wayne Tutt and Jerry Woosley of the Jacksonville Bio-Environmental Services Division, we would like to arrange a meeting with you and the local Jacksonville Department of Environmental Regulation personnel to discuss our efforts to meet the existing limitations and the possibility of negotiating permit revisions.

Would you please be so kind as to advise when and where the proposed meeting could take place.

Very truly yours,

John Mueller

John Mueller
 Plant Manager

cb

cc: Messrs. T. Martin
 W. Tutt
 J. Woosley
 D. DeHart

DEPARTMENT OF HEALTH, WELFARE
& BIO-ENVIRONMENTAL SERVICES
Bio-Environmental Services Division
Air and Water Pollution Control



February 23, 1984

Bill
Mr. John Mueller, Plant Manager
Anheuser - Busch, Inc.
P.O. Box 18017
AMF
Jacksonville, Florida 32229

DER

FEB 24 1984

Re: Power Boilers

BAQM

Dear Mr. Mueller:

Receipt of your letter of February 14, 1984, with attached chronology, is acknowledged. The proposed action plan, including the emulsifier tests, and/or the use of more detailed tests by B&W, is reasonable and acceptable to this Office. In reviewing the permitting decisions which have led to the present permitted emission limits, the Bio-Environmental Services Division (BESD) staff feels that there are some alternate options available to Anheuser-Busch.

If you wish to discuss this matter, please contact this Office to arrange a meeting, and we will be happy to review the situation with you.

Very truly yours,

Wayne E. Tutt
Associate Engineer

WET/vj

cc: Mr. C. Fancy, P.E.
cc: Mr. Doug Dutton - DER



DEPARTMENT OF HEALTH, WELFARE
& BIO-ENVIRONMENTAL SERVICES
Bio-Environmental Services Division
Air and Water Pollution Control

July 14, 1983



DER

JUL 18 1983

BAQM

Bill
Mr. Clair Fancy, P.E.
Deputy Director
Central Air Permitting Section
Dept. of Environmental Regulation
2600 Blainstone Road
Tallahassee, Florida 32301

Re: Anheuser Busch Boilers,
Jacksonville

Dear Mr. Fancy:

The testing requirements presented in Mr. DeHart's letter dated July 8, 1983 are generally acceptable. I do recommend the following minor changes in the proposed testing protocol:

- (1) During PM testing of a base loaded boiler (90%-100% of design capacity) VE tests should be performed on all four boilers (by a minimum of two observers). This procedure should be followed for each boiler when base loaded.
- (2) In lieu of the SO₂ stack tests, a percent sulfur content analysis of fuel oil would suffice. This test should be performed according to standard ASTM method D-129 or D-2622.
- (3) In regards to testing the boilers during soot blowing, Mr. DeHart has indicated that soot blowing takes less than 5 minutes per shift per boiler. If this is the case, separate soot blowing particulate and VE tests would not be practical.

If you would like to discuss this matter further, please contact Wayne Tutt or me.

Very truly yours,

Jerry E. Woosley
Assistant Engineer

JEW/vj

cc: Mr. Doug Dutton - DER
cc: Mr. Don DeHart - Anheuser Busch





ANHEUSER-BUSCH COMPANIES

July 8, 1983

DER

JUL 11 1983

BAQM

Mr. C. H. Fancy, P.E.
Deputy Chief
Bureau of Air Quality Management
Florida Department of Environmental Regulation
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32301

RE: Requested Alternate Procedures; File Number ASP-F01-82

Dear Mr. Fancy:

Your letter of March 2, 1983, detailed a series of simultaneous particulate matter (PM), SO₂, and visible emission (VE) tests that the Department of Environmental Regulation (DER) believes is needed in order to properly evaluate Anheuser-Busch's request to use the VE test as a surrogate test for measuring PM emissions. Recently by phone, Mr. Bruce Mitchell and I discussed what the DER was attempting to evaluate in the testing series. One of the major concerns expressed by Mr. Mitchell was that the boilers may be properly adjusted to give satisfactory test results at one load range, like near 100% of capacity, but be improperly adjusted at a different load, like 50% of capacity, so that unsatisfactory test results would be obtained.

Your letter requested simultaneous tests at four different boiler loads for each boiler. For Anheuser-Busch, this would involve 16 complete EPA Method 5 tests. That many tests would require about three weeks of testing and cost an estimated \$30,000. In actuality, the Anheuser-Busch boilers do not operate for long periods at constant loads as are used in PM compliance testing. The boilers are continually responding to changing process steam demands. In any given hour, the boilers normally operate over their entire load range from 10% to 100% of capacity in the random frequency at any single load.

As an attempt to better represent the actual boiler operation and to maintain reasonable costs, Anheuser-Busch proposes an abbreviated testing program to be performed concurrently with the PM emissions tests that are now needed for the renewal of the boilers' operating permit. Mr. Mitchell indicated that the DER would need to evaluate the data submitted before finalizing its acceptance of the abbreviated program.

July 8, 1983

The test program proposed by Anheuser-Busch involves performing the simultaneous PM, SO₂ and VE tests as described in your March 2 letter, but only at 90% to 100% of the maximum operating capacity. This is the PM test requirement for the permit renewal. Before and/or after each of the above simultaneous tests (on the same day), VE tests would be performed on the other operating boilers, one at a time. An estimated ten (10) VE tests would be conducted on the variable load boilers. The steam output charts for these tested boilers will be included with the VE test results.

This concept is practical because, during the required PM tests, the one boiler being tested is set for constant operation near its capacity. The other two or three operating boilers then vary their loads automatically in response to the steam demand. In this way, the VE tests on the variable load boilers will be representative of their actual operation over their entire capacity range.

At this time, Anheuser-Busch is planning to conduct the simultaneous tests during the week of September 12, 1983. The testing will be coordinated with the Jacksonville Bio-Environmental Services so that they may observe the tests. Testing in September will allow Anheuser-Busch to complete some needed boiler repairs before performing the PM compliance tests.

If there are any questions concerning this proposal or the subsequent data that is submitted, you can contact me at the St. Louis office. My phone number is (314) 577-4158.

Very truly yours,



Donald M. DeHart
Senior Environmental Engineer

DMD:cmh

cc Mr. J. E. Woosley - Jacksonville Bio-Environmental Services

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL REGULATION

TWIN TOWERS OFFICE BUILDING
2600 BLAIR STONE ROAD
TALLAHASSEE, FLORIDA 32301-8241



BOB GRAHAM
GOVERNOR
VICTORIA J. TSCHINKEL
SECRETARY

March 2, 1983

Mr. Donald M. DeHart
Senior Environmental Engineer
Anheuser-Busch Companies, Inc.
One Busch Place
St. Louis, Missouri 63118

Re: Alternate Standards and Procedures Requested by
Anheuser-Busch Companies, Inc.; File Number ASP-F01-82.

Dear Mr. DeHart:

The Bureau received your package containing stack tests and VE (visible emissions) tests for ABC's (Anheuser-Busch Companies, Inc.) facility in Jacksonville, Florida, on February 14, 1983. The following comments are a result of the review of the data submitted:

1. The stack tests for the four boilers for particulate matter (PM) were conducted independently of the VE tests, making it impossible to directly correlate the opacity limit with a specific PM emission rate per boiler,
2. The steam output recording disc of each boiler was not submitted along with the stack test data, and
3. Stack tests for SO₂ were not submitted.

Therefore, the following data shall be required and submitted to the Bureau before further processing of your requests will resume:

1. While firing fuel oil, individual boiler stack tests for PM and SO₂ are to be conducted isokinetically and concurrently with a VE test at loads of 30%, 50%, 75% and 100% of the maximum rated capacity:
 - a. One complete EPA Method 5 and 6 test per boiler per load is required,
 - b. Fuel oil samples must be taken from the inlet fuel oil feed line during each test,

Mr. Donald M. DeHart


Page Two

March 2, 1983

- c. Lab analysis reports of the fuel oil samples must include the heat capacity, the density, the percent content by weight of the sulfur, ash, moisture, nitrogen, and metals; state the ASTM Procedure used,
 - d. EPA Reference Methods, Appendix A, 40 CFR 60, Nos. 1-4, 5, 6 and 9 are to be performed,
 - e. The boilers' steam output recording discs must be maintained during each boiler's stack test(s) and accompany the stack test reports,
 - f. The completed stack test reports must include the raw test data, the operating parameters (i.e., excess air range, MM Btu/hr heat input, etc), the calculations, any assumptions, the conclusions and pertinent data involved with performing the stack test(s), and
 - g. A VE test consists of opacity readings taken during a minimum of a one(1) hour observation per stack,
2. If stack continuous opacity monitors exist, submit the recordings taken during each stack test, and
 3. Submit a proposed fuel oil sampling scheme, including method of extraction, location of sampling point, sampling frequency, and the ASTM Procedure to be used in the lab analyses.

If there are any questions please call Bruce Mitchell at (904)488-1344 or write to me at the above address.

Sincerely,


C. H. Fancy, P. E.
Deputy Chief
Bureau of Air Quality
Management

CHF/BM/ks

cc: Jerry Woosley
Doug Dutton
Bill Blommel

PS Form 3871, Jan 1976

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2. ARTICLE ADDRESSED TO:
 Mr. Donald M. DeHart
 One Busch Place
 St. Louis, Missouri 63118

3. ARTICLE DESCRIPTION:

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 Mr. Donald M. DeHart
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 St. Louis, MO 63118

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