



State of Wisconsin \ DEPARTMENT OF NATURAL RESOURCES

Tommy G. Thompson, Governor  
George E. Meyer, Secretary

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December 30, 2000

FID #: 230191060

ANN BECKER  
FOLEY & LARDNER  
777 E. WISCONSIN AVENUE  
MILWAUKEE, WI 53202-5367

Subject: Emission Reduction Credits Held by Badger Generating Station, LLC

Dear Ms. Becker:

Thank you for notifying the department on December 4, 2000 of Badger Generating Company, LLC's purchase of VOC emission reduction credits. This letter is written to formally acknowledge the transfer of 50 (fifty) tons of VOC emission reduction credits from Tower Automotive to Badger Generating Company, LLC. These emission reduction credits were originally certified under permit 99-DJH-265-OP, which the department issued on December 12, 1999.

If you have any additional questions, please contact me at (608) 266-6876.

Sincerely,

Jeffrey C. Hanson, P.E.  
Construction Permit Team Leader  
Bureau of Air Management

cc: Tom Steidl – LS/5  
Raj Vakharia – AM/7  
SER Air Program  
Tower Automotive File - 241012970

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Quality Natural Resources Management  
Through Excellent Customer Service



# FOLEY & LARDNER

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EMAIL ADDRESS  
abecker@foleylaw.com

CLIENT/MATTER NUMBER  
059584-0102

December 4, 2000

## VIA FACSIMILE AND U.S. MAIL

Jeff Hanson  
Wisconsin Department of Natural Resources  
101 S. Webster Street  
Madison, WI 53707

Re: VOC Emission Reduction Credits

Dear Jeff:

As you may know, Badger Generating Company, LLC has purchased fifty additional VOC emission reduction credits ("ERCs") from Tower Automotive for purposes of satisfying the offsetting requirements of its pending air permit. Enclosed is a copy of the Notice of Offset Transfer submitted to the Department by Tower Automotive.

Please acknowledge in writing that the Department recognizes that the transfer has been effectuated, and that Badger Generating has all rights, title and interest in the ERCs. If you need any additional information or have any questions, please feel free to call me.

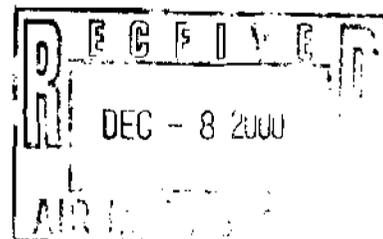
Very truly yours,



Ann C. Becker

Enclosure(s)

cc: Tom Steidl  
Rajen Vakharia  
Nazre Adum  
Paul Hurt



001.910385.1

ESTABLISHED 1842

A MEMBER OF GLOBALEX WITH MEMBER OFFICES IN BERLIN, BRUSSELS, DRESDEN, FRANKFURT, LONDON, SINGAPORE, STOCKHOLM AND STUTTGART

November 15, 2000

Mr. Dan Hellenberg  
Environmental Engineer  
WI DNR – Southeast Region  
Bureau of Air Management  
2300 N. M.L. King Jr. Drive  
P.O. Box 12436  
Milwaukee, WI 53212

Dear Mr. Hellenberg:

The attached "Notice of Offset Transfer" is being submitted to you as notice that 50 tons of VOC offset credits have been sold by Tower Automotive.

Sincerely,

A handwritten signature in black ink, appearing to read "Roland Berg", is written over the word "Sincerely,".

Cc: R. Harenda

EXHIBIT A

NOTICE OF OFFSET TRANSFER

TO: Wisconsin Department of Natural Resources  
Southeast Region Air Program  
2300 North Martin Luther King Jr. Drive  
P.O. Box 12436  
Milwaukee, Wisconsin 53212

Please be advised that effective as of the 15<sup>TH</sup> day of November, 2000, Tower Automotive, Inc. has transferred all rights, title and interest in Fifty (50) tons of volatile organic compound offset credits ("Transferred Offset") to the following entity:

Badger Generating Company, LLC  
7500 Old Georgetown Road  
Bethesda, MD 20814

The origin of the Transferred Offsets is set forth in the finding at Part 1, ¶2 of the December 16, 1999 Air Pollution Control Operation Permit Nos. 99-DJH-265-OP issued by the State of Wisconsin Department of Natural Resources for EI Facility No. 241012970, Tower Automotive, which is attached hereto for reference.

Please send an acknowledgement that, the Transferred Offsets have been transferred to the entity named above as soon as such transfer becomes effective.

TOWER AUTOMOTIVE, INC.

By Bob Haranda

Its Business Unit Leader - Shared Services

DATED: November, 15<sup>TH</sup>, 2000