Florida Department of Environmental Protection

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April 23, 2012

Electronic Mail – Received Receipt Requested

AMacFarlane@harvestpower.com
Mr. Alex MacFarlane, VP of Project Development
Harvest Power, Orlando, LLC
221 Crescent Street, Suite 402
Waltham, Massachusetts 02453

Re: **Request for Additional Information**
Project No. 0951340-001-AC
Harvest Energy Garden - Orlando
Biogas-to-Energy and Fertilizer Project

Dear Mr. MacFarlane:

On March 22, 2012, our Central District Office received your application to construct the Harvest Energy Garden Biogas-to-Energy and Fertilizer Project to be located in Orange County at 2151 Bear Island Road, Lake Buena Vista, Florida. Shortly thereafter, the Division of Air Resource Management transferred your application to the Chemicals and Combustion Group in Tallahassee to evaluate issues related to Florida's Prevention of Significant Deterioration (PSD) program. This evaluation has focused on three areas of concern raised by the Department, Harvest Power, and Harvest Power's consultants:

1. Incorporation of the Harvest Power project (the Project) into Walt Disney World Company's Title V permit;
2. The relationship between Harvest Power and Walt Disney World Company (for PSD applicability); and
3. The relationship between Harvest Power and Reedy Creek Improvement District (RCID) (for PSD applicability).

After conversations with Harvest Power and after reviewing additional information they provided, the Department has addressed the first two areas of concern in a manner that we understand is favorable to the Project. First, the Department can issue Harvest Power its own Title V permit for which Walt Disney World Company (WDW) would have no compliance responsibility for the Harvest Power facility. Second, the Department does not view the relationship between WDW and Harvest Power as a determining factor for PSD applicability.

Based on the information available to the Department at this time, however, it appears that the relationship between Harvest Power and RCID triggers PSD applicability, specifically due to a "support dependency" relationship (outlined below). Because you have submitted an application for a minor source construction permit (i.e. no PSD analysis), we request additional information that would allow the Department to issue a minor source permit by addressing the Department's concerns regarding support dependency.

PSD Applicability

The PSD program is triggered if Harvest Power and RCID are a single "major stationary source" of air pollution. Rule 62-210.200, Florida Administrative Code, defines a major stationary source as all of the pollutant-emitting activities that (1) belong to the same industrial grouping; (2) are located on one or more contiguous or adjacent properties; and (3) are under the control of the same person or persons under common control. In the case of the Project, the Harvest Power facility will be located on RCID property that contains at least two pollutant-emitting activities with the same first two-digit SIC code (49 – electric, gas and sanitary services) as the Harvest Power facility: the 4952 wastewater treatment facility owned by RCID and the 4911 power plant owned by RCID. Therefore, PSD applicability hinges on the third requirement, "common control."

Common Control

Although common control is not defined in the Florida Administrative Code, the Environmental Protection Agency (EPA) has issued substantial guidance on what constitutes common control (please see attached letters from EPA). According to this guidance, EPA considers a number of factors relevant to whether two or more facilities are considered to be under common control. These include, but are not limited to, (1) common ownership; (2) one facility's decision-making authority over another; (3) service relationship between facilities; and (4) support dependency relationship between facilities. Any one of these factors can be determinative of common control. Based on information provided at this time, the Department is only concerned with the final factor, "support dependency."

Importantly, according to EPA, a presumption of common control exists when one facility is located on another's property. See attached letter from Gregg Worley, EPA Region 4 to Georgia Department of Natural Resources regarding Houston County Landfill (December 16, 2011). Because Harvest Power is locating on RCID's property, it is Harvest Power's burden to overcome this presumption.

Support Dependency

A support dependency relationship is determined by looking at the balance of four factors: (1) the degree to which one activity receives materials or services from the other; (2) the degree to which the primary activity exerts control over the support activity's operations; (3) the nature of any contractual arrangements between the facilities; and (4) the reasons for the presence of the activity on the same site as another (e.g., whether one activity would exist at that site but for the other activity).

1. **Receipt of Materials.** Harvest Power will rely on RCID for a substantial amount of its fuel material. According to the application, Harvest Power will receive at least 83% of its fuel input from RCID. While the application states 17% of Harvest Power's fuel will come from other sources, conversations with Harvest Power's consultant have indicated no contract or agreement exists for the 17%. Further, the "Waste Supply Agreement" between Harvest Power and RCID only allows Harvest Power to receive non-RCID waste from "time to time."

2. **Contractual Arrangements.** RCID and Harvest Power have significant contractual arrangements with each other, addressing both input to and output from the proposed facility. First, Harvest Power and RCID's "Waste Supply Agreement" lays out the amount of waste RCID will supply to Harvest and how the waste will be transported. The contract states the Harvest Power facility will be adjacent to RCID's wastewater treatment facility and that Harvest Power will receive wastewater substances directly from a pipeline owned by RCID. RCID also has certain pretreatment requirements pursuant to the contract. Food waste, grease, and animal manure will be delivered by RCID trucks. The "Waste Supply Agreement" also has specific conditions requiring Harvest Power to control odor created by the Project and the handling of

wastewater from RCID. The parties' relationship appears to be mutually beneficial because Harvest Power is helping RCID with odor control regarding its wastewater. Finally, the contract, as well as Harvest Power's application, indicates any remaining effluent from Harvest Power will be returned to RCID.

Second, Harvest Power and RCID's "Power Purchase Agreement" provides that RCID will purchase 100% of the energy Harvest Power produces for 20 years and provides that Harvest Power will deliver its energy to a delivery point "adjacent" to the Harvest Power property.

3. **Service Relationship**. The Department understands that the Harvest Power and RCID facilities will not have a service relationship.

4. **Reasons for Facility Location**. It appears that existing RCID infrastructure compels location of the Harvest Power facility on RCID property. As provided in its application and the parties' contracts, Harvest Power is receiving a vast majority of its fuel input via a RCID pipeline, and also via RCID truck. Harvest Power effluent will be returned to RCID. As indicated above, the "Waste Supply Agreement" requires that Harvest Power locate adjacent to RCID's wastewater treatment plant. Moreover, the "Power Purchase Agreement" appears to relieve either party of the burden of transmitting power over any significant distance.

In light of the foregoing, please provide any further information you may have that would indicate the Harvest Power and RCID facilities do not trigger PSD review due to a support dependency relationship. Rule 62-4.055(1), F.A.C. requires applicants to respond to requests for information within 90 days or to provide a written request for an additional period of time to submit the information.

If you have any technical questions regarding this matter, please contact the project engineer, Tammy McWade, at 850/717-9086 or at tammy.mcwade@dep.state.fl.us. If you any questions or wish to schedule a meeting regarding PSD applicability, please contact me at 850/717-9024 or at justin.b.green@dep.state.fl.us.

The Department encourages the type of project Harvest Power has proposed and we look forward to working with you and your consultant to resolve remaining issues.

Sincerely,

Justin B. Green, Administrator
Chemicals and Combustion Industries Group
Office of Permitting and Compliance

This letter was sent to the following persons by electronic mail with received receipt requested.

John M. Eustermann, Harvest Power, Inc.: jeustermann@harvestpower.com
Alex MacFarlane, Harvest Power: AMacfarlane@harvestpower.com
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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

December 16, 2011

Mr. James Capp
Chief, Air Protection Branch
Environmental Protection Division
Georgia Department of Natural Resources
4244 International Parkway, Suite 120
Atlanta, Georgia 30354

Dear Mr. Capp:

This letter is in response to your letter dated February 8, 2010, requesting that the U.S. Environmental Protection Agency make a common control determination concerning the landfill gas-to-energy plant that is owned, maintained, and operated by PowerSecure, Inc., and located on property leased from the Houston County Landfill in Kathleen, Georgia. Because Georgia's prevention of significant deterioration (PSD) and title V programs have been approved by the EPA, it is the State's responsibility to ensure that source determinations are made consistent with minimum program requirements. Thus, this letter is provided as guidance to assist the permitting authority in this applicability determination, is based on the information provided to us, and does not constitute a final agency action.

Based on the information provided, it is our understanding that Houston County Landfill generates the landfill gas that will be used by PowerSecure and has contracted with Flint Electric Membership Cooperative (FEMC) to purchase this landfill gas. Further, we understand that FEMC has contracted with PowerSecure to receive and treat the landfill gas, and then use it to generate electricity. According to the information you submitted, the PowerSecure facility will consist of two landfill gas-fired Caterpillar G3520C engine generators and associated support equipment, including a landfill gas treatment system.

As more fully explained below, the EPA agrees with the Georgia Environmental Protection Division (EPD) that it is appropriate to consider the facilities at the site to be under common control and therefore a single stationary source under the PSD program. The EPA made this determination after reviewing the submitted documents, including various agreements between the respective parties. Under the PSD program, a "stationary source" is defined as "any building, structure, facility, or installation which emits or may emit a regulated [New Source Review] pollutant." The rule further defines "building, structure, facility or installation" as "all of the pollutant-emitting activities which belong to the same industrial grouping, are located on one or more contiguous or adjacent properties, and are under the control of the same person (or persons under common control)..." *See* 40 CFR 52.21(b)(5) and (6); *see also* 51.165(a)(1)(i) and (ii), and 51.166(b)(5) and (6).[1] Therefore for PSD purposes, three criteria need to be met in order for the facilities to be considered the same stationary source These criteria are:

[1] In its August 7, 1980, preamble, the EPA explained that a PSD source "must approximate a common sense notion of 'plant'" and "must avoid aggregating pollutant-emitting activities that as a group would not fit within the ordinary meaning of 'building,' 'structure,' 'facility,' or 'installation.'" 45 FR 52676, 52694-95 (August 7, 1980).

1. whether the facilities are located on one or more contiguous or adjacent properties;
2. whether the facilities are under the control of the same person (or persons under common control); and,
3. whether the facilities share the same two-digit (major group) Standard Industrial Classification (SIC) code (or one facility is considered a support facility to the other).[2]

Based on the information submitted by PowerSecure in its January 25, 2010, letter to Georgia EPD, the company agrees that the first and third conditions above are met. The proposed PowerSecure facility will be located on land leased by Houston County Landfill to FEMC, and subleased by FEMC to PowerSecure. Additionally, the landfill's SIC Code is 4953, which is the code for refuse systems, and the SIC code for FEMC and PowerSecure is 4911, which is the code for electric services. (Major group 49 covers electric, gas, and sanitary services.) This leaves the remaining issue of common control.

In assessing common control, the EPA first determines whether the facilities are commonly owned, e.g., one company is a parent company to the other or one company owns part of the other company. Common control can also be established if an entity has the power to direct or cause the direction of the management and policies of another entity. This direction could be as a result of the ownership of stock, or voting rights, by the existence of a contract, lease, or other type of agreement between the facilities, or through another means.[3] For examples of the types of information that are instructive in the process of determining whether common control exists, see the May 11, 2009, Letter from Ronald J. Borsellino, Acting Director, Division of Environmental Planning and Protection, U.S. EPA Region 2, to Scott Salisbury, President, Manchester Renewable Power Corp./LES and Lawrence C. Hesse, President, Ocean County Landfill Corp.

A common control relationship is presumed when one company locates on another's property. Once a presumption of common control has been established, the facilities in question can provide information which rebuts the presumption. However, the rebuttal of the presumption is the burden of the facilities. If the presumption is not rebutted, then the facilities in question are determined to be under common control. In this case, common control is presumed because PowerSecure, under subcontract to FEMC, has located on Houston County Landfill's property. Because of this action, a common control relationship between Houston County Landfill, PowerSecure, and FEMC is presumed.

[2] It is important to note that the two-digit SIC code (or support facility test) is not used in aggregating hazardous air pollutant emissions under Section 112 of the Act, including the Section 112 major source definition in title V. Rather, these emissions are aggregated without regard to the two-digit SIC code or the support facility test. *See* Sections 112(a)(1) and 501(2) of the Clean Air Act and National Mining Assoc. v. EPA, 59 F.3d 1351, 1356 (D.C. Cir. 1995).

[3] The phrase "common control" is not defined in the Clean Air Act, or in EPA's regulations that pertain to title V or PSD. In an early NSR rulemaking, however, EPA rejected a simplified test of control based on some specified voting share, instead stating that "[c]ontrol can be a difficult factual determination, involving the power of one business entity to affect the construction decisions or pollution control decisions of another business entity" and further explained that EPA would "be guided by the general definition of control used by the Securities and Exchange Commission, [in which] control 'means the possession, direct or indirect, of the power to direct or cause the direction of the management and policies of a person (or organization or association) whether through the ownership of voting shares, contract, or otherwise.'" 45 Fed. Reg. 59874, 59878 (September 11, 1980) (quoting 17 C.F.R. § 210.1-02(g)). This definition is echoed in other Securities and Exchange Commission regulations, such as in 17 C.F.R. § 230.405, which defines "control" as including the term "under common control with" and as meaning "the possession, direct or indirect, of the power to direct or cause the direction of the management and policies of a person, whether through the ownership of voting securities, by contract, or otherwise." *See also* 17 C.F.R. § 240.12b-2.

The presumption of common control is explained in the September 18, 1995, Letter from William A. Spratlin, Director, Air, RCRA, and Toxics Division, U.S. EPA Region 7, to Peter R. Hamlin, Chief, Air Quality Bureau, Iowa Dept. of Natural Resources. Page 1 of the Spratlin Letter states:

> Typically, companies don't just locate on another's property and do whatever they want. Such relationships are usually governed by contractual, lease, or other agreements that establish how the facilities interact with one another. Therefore, we presume that one company locating on another's land establishes a 'control' relationship.

In addition to the presumption of common control between Houston County Landfill, PowerSecure, and FEMC, the following factors[4] from the landfill gas purchase and sales agreement between Houston County Landfill and FEMC support a determination of common control between these three entities:

(a) FEMC, which purchases the landfill gas, is not permitted to sell, redirect, transport or market the landfill gas, or any portion thereof to any third party;

(b) FEMC is only permitted to use the landfill gas for electricity generation at the processing site; and

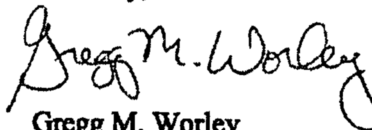
(c) The landfill gas purchase and sales agreement provides for specific performance; namely, that each party can require that the other party comply with the terms and conditions of the agreement as written.

It should be noted that this list of factors reflecting the common control relationship between Houston County Landfill, PowerSecure, and FEMC is not exhaustive, nor is it intended to be. It is intended only to further illustrate the common control relationship that exists between these entities.

For the reasons specified above, the EPA concurs with the Georgia EPD that it is appropriate to find that Houston County Landfill, PowerSecure, and FEMC are one stationary source under PSD.

If you have any questions regarding the above, please contact Heather Ceron at (404)562-9185 or ceron.heather@epa.gov.

Sincerely,



Gregg M. Worley
Chief
Air Permits Section

cc: Mark Huncik, PowerSecure Inc.

[4] The term "factor" in this letter refers to a feature of the relationship between Houston County Landfill, PowerSecure, and FEMC that EPA finds indicative of a common control relationship.

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 7
901 N. 5th STREET
KANSAS CITY, KANSAS 66101

AIR PERMITTING AND
COMPLIANCE BRANCH

December 6, 2004

James Pray
Brown, Winick, Graves, Gross,
Baskerville and Schoenebaum, P.L.C.
666 Grand Avenue, Suite 2000
Des Moines, Iowa 50309-2510

Dear Mr. Pray:

During a recent visit in Des Moines, and in a subsequent letter dated October 15, 2004, you asked EPA Region 7 to carefully consider whether the "support facility" concept should be applied to country grain elevators that are located near value-added agricultural industries such as ethanol plants. The concern is that if a new ethanol plant locates too closely to an existing country grain elevator or series of elevators throughout the local grain supply network, the owners and operators of the grain cooperatives may inadvertently be drawn into the PSD (Prevention of Significant Deterioration) permitting program or may otherwise be co-located with the ethanol plant for permitting purposes. If PSD is triggered, you suggest that the result can be economically devastating for a country elevator because it may have to install hundreds of thousands of dollars of control equipment that would never otherwise be required.

As an alternative to a "support facility" finding, you asked EPA to consider a common sense approach that would factor in the historical relationship between elevators and their local farmers and the notion that grain and other ethanol feed stocks are commodities which can be bought, sold, and traded on the open market. Since corn and other commodity feed stocks are available anywhere there is a production network (e.g. farms, elevators, and transportation), you suggest that it is not necessary to tie an ethanol plant to any one or more of these entities, thus preserving the independence of the country elevator system.

While we understand the elegance of a simple, straightforward determination that independent country elevators should not universally be considered a support facility for a new ethanol plant locating nearby, such a general finding is not possible given the unique circumstances that may exist at each installation. The determination of whether two activities are within the scope of a single source is a case-by-case determination that depends on several criteria set forth in regulations and the facts of each situation.

The SIP-approved PSD regulations of the Iowa Department of Natural Resources adopt the EPA's PSD regulation by reference [Iowa Administrative Code § 567-22.4(455B)]. Thus, even though Iowa operates a SIP-approved PSD program, the

regulations at 40 C.F.R. § 52.21 (as amended through March 12, 1996) are applicable to sources in attainment or unclassifiable areas in Iowa. The determination of the scope of a stationary source subject to the PSD program in Iowa is therefore governed by the definitions in sections 52.21(b)(5) and 52.21(b)(6). In accordance with these definitions, a stationary source is a building, structure, facility or installation, which is, in turn, defined as follows:

> All of the pollutant-emitting activities which belong to the same industrial grouping, are located on one or more contiguous or adjacent properties, and are under the control of the same person (or persons under common control). Pollutant-emitting activities shall be considered as part of the same industrial grouping if they belong to the same "Major Group" (i.e. which have the same first two digit code) as described in the Standard Industrial Classification Manual.

Thus, pollutant-emitting activities are generally considered part of a single stationary source when these activities are (1) part of the same industrial grouping (as determined by applicable SIC codes), (2) contiguous or adjacent, and (3) under common control. In several guidance documents, EPA has recognized that one or more of these criteria can be satisfied when an emissions unit is a "support facility" or serves in a supporting role for a primary activity at a nearby location.

One approach to separating sources is to find that they are neither adjacent or contiguous to each other. In the general scenario you present, it is unclear whether this is a typical circumstance or not. Generally, the closer two facilities are the more likely they may be considered contiguous or adjacent. In addition, the existence of a dedicated pipeline or transportation link for moving materials between two facilities may also be relevant to this determination.

Once two sources are found to be contiguous or adjacent by virtue of their proximity and interaction with one another, the focus may shift to the nature of that interaction and how they may control or support each other. This usually requires a case by case evaluation to determine if common control is present. Even where facilities have separate legal owners, EPA has found that common control may be established on the basis of a contract which creates a support or dependency relationship between the facilities.[1]

In a related example, we would not typically connect a fuel oil supplier to an adjacent industrial site just because the company fires oil, another widely-traded commercial product, in its boilers. Instead, we would first determine whether "common control" exists between the two entities. As long as the oil supply vendor and industrial facility do not "exercise restraining or directing influence over," "have power over,"

[1] Letter from Richard R. Long, EPA Region 8 to Julie Wrend, Colorado Department of Public Health regarding "Single Source Determination for Coors/TriGen" (Nov. 12, 1998) <http://www.epa.gov/Region7/programs/artd/title5/t5memos/coorstri.pdf>

"have power of authority to guide or manage," or "regulate economic activity over" each other[2], based on the various factors described in previous EPA guidance, it is likely that the common control link would be broken and the two sources would not be considered a single source for permitting purposes.

Similarly, based on the general scenario you present, we agree that if an ethanol plant is purchasing grain on the open market and accepts delivery from a number of different suppliers in minority proportions, then there would typically be no basis for a common control determination. Therefore, as long as the traditional commodity transactions between the country elevators and the ethanol plant occur at arms length, the grain suppliers would likely not be considered to be under common control for permitting purposes. On the other hand, if a grandfathered grain elevator executes a contractual agreement with an adjacent or contiguous greenfield ethanol plant to provide the bulk of its output, then it may be more difficult to demonstrate that the two entities are not under common control.

If the facts of a case-by-case evaluation show the common control of two contiguous or adjacent plants, we would then turn our attention to whether the installations share a common standard industrial classification code. In most cases where they operate independently, the ethanol plants and grain suppliers are not likely to share a common standard industrial classification (SIC) code. Ethanol plants are typically found in Group 28 for chemical manufacturing. Grain handling is typically found in Groups 20 or 51 depending on the nature of the operation. However, a support facility may be considered to be a part of the same major group as the primary facility it supports even if the support facility would be classified in a separate group when operated independently.[3] Thus, in the case of a grain elevator and an ethanol plant, the single source determination could hinge on a determination of whether one facility was a support facility for another.

EPA's August 25, 1999, "Oscar Meyer"[4] determination, while not directly relevant to the circumstances you describe, looks at whether the placement of emergency backup generators by the local utility on the Oscar Meyer property constitutes a support facility. EPA notes that it

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[2] Letter from William Spratlin, EPA Region 7 to Peter Hamlin, Iowa Department of Natural Resources re Common Control(September 18, 1995).
<http://www.epa.gov/Region7/programs/artd/air/title5/t5memos/control.pdf>

[3] 45 Fed. Reg. 52695 (Aug. 7, 1980); Letter from Robert B. Miller, EPA Region 5 to William Baumann, Wisconsin Department of Natural Resources regarding Oscar Mayer and Madison Gas & Electric (Aug. 25, 1999) ["Oscar Meyer"]; Memorandum from John S. Seitz, EPA OAQPS entitled "Major Source Determinations for Military Installations under the Air Toxics, New Source Review, and Title V Operating Permit Programs of the Clean Air Act" (Aug. 2, 1996)
<http://www.epa.gov/Region7/programs/artd/air/nsr/nsrmemos/dodguide.pdf>

[4] Letter from Robert B. Miller, EPA Region 5 to William Baumann, Wisconsin Department of Natural Resources cited above.

> ... has provided a great deal of guidance to States and sources regarding support activities since 1980, in which the Agency has emphasized that determinations of this nature are very fact-specific. USEPA provided a detailed summary of the Agency's existing policy in a recent public draft of a proposed rulemaking. See Draft preamble to the Part 70 revisions (notice of availability published June 3, 1997, (62 FR 30289)). In short, where more than 50% of the output or services provided by one facility is dedicated to another facility that it supports, then a support facility relationship is presumed to exist. Even where this 50% test is not met, however, other factors may lead the permitting authority to make a support facility determination. Support facility determinations can depend upon a number of financial, functional, contractual, and/or other legal factors. These include, but are not limited to: (1) the degree to which the supporting activity receives materials or services from the primary activity (which indicates a mutually beneficial arrangement between the primary and secondary activities); (2) the degree to which the primary activity exerts control over the support activity's operations; (3) the nature of any contractual arrangements between the facilities; and (4) the reasons for the presence of the support activity on the same site as the primary activity (e.g., whether the support activity would exist at that site but for the primary activity). Where these criteria indicate a support relationship, permitting authorities may conclude that a support activity contributing more or less than 50% of its output may be classified as a support facility and aggregated with the facility it supports as part of a single source.

Finally, it is important to note that what an ethanol plant can do and what it actually does when making its grain purchase decisions may affect whether common control or a support facility relationship exists or not. For example, if an ethanol plant purchases grain from an array of local country grain elevators, such transactions appear to occur within the commodity scheme you suggest. However, if an ethanol plant has many supply choices but instead opts to enter into contracts to purchase only from the elevator next door, then such transactions may appear to be more like two sources acting as one.

In summary, because of the unique details that each installation presents it is not possible to pre-determine all the circumstances under which a grain supply elevator may be a single source by itself or an included part of a larger stationary source. Nor is it possible to grant a broad commodity-based exception when determining PSD source applicability. In that regard, we encourage you to work closely with your state and local air pollution control agencies to evaluate these site-specific factors. As a final note, even though we encourage SIP-approved PSD states like Iowa to follow EPA guidance to ensure consistency in implementation of the program, such guidance is not legally binding and does not substitute for the controlling regulations. EPA and the states retain the discretion to apply the regulations and to reach different conclusions where appropriate based on differing specific circumstances of particular cases. Further, the

methodology described above is not intended to imply that the three key criteria for a single source determination must be evaluated in any particular order. All three criteria must be satisfied at the same time in order for activities to be considered part of a single source.

We have coordinated this response with EPA's Office of Regional Counsel, Office of General Counsel, Office of Enforcement and Compliance Assurance, and Office of Air Quality, Planning & Standards. If you have any questions, please contact Jon Knodel at (913) 551-7622 or knodel.jon@epa.gov.

Sincerely,

/s/

JoAnn Heiman
Chief
Air Permitting and Compliance Branch

cc: Catherine Fitzsimmons, Iowa Department of Natural Resources
Dave Phelps, Iowa Department of Natural Resources