

Indiantown Cogeneration, L.P.

Indiantown Cogeneration, L.P.
P.O. Box 1799
13303 SW Silver Fox Lane
Indiantown, FL 34956

772.597.6500
Fax: 772.597.6210

March 13, 2003

Trina Vielhauer, Chief,
Bureau of Air Regulations
Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RECEIVED

MAR 14 2003

BUREAU OF AIR REGULATION

VIA FEDERAL EXPRESS

Re: DEP File No. PA 90-31, PSD-FL-168
Indiantown Cogeneration Facility Temporary Boiler Installation
Public Notice of Intent to Issue PSD Permit Modification

Dear Ms. Vielhauer:

Pursuant to your written request of February 13, 2003, and the requirements of Chapter 50 Florida Statutes, please find attached proof of publication of Public Notice of Intent to Issue Specific Exemption, State of Florida Department of Environmental Protection DEP File No. PA 90-31, PSD-FL-168, Indiantown Cogeneration, L.P., Indiantown Cogeneration Plant, Martin County, printed February 27, 2003 in the Indiantown News. Please contact Nicholas Laryea at 772-597-6500, extension 19, if you have any questions.

Sincerely,



George K. "Chip" Allen
General Manager

Enclosure

cc: Nicholas Laryea
Buck Oven, DEP
File

AFFIDAVIT OF PUBLISHER

Indiantown News
P.O. Box 1080, Indiantown, FL 34956
(561) 597-4243
Published Weekly

PUBLIC NOTICE OF INTENT TO ISSUE SPECIFIC EXEMPTION

STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DEP File No 0850102
Indiantown Cogeneration Facility
Indiantown, Martin County

STATE OF FLORIDA
COUNTY OF MARTIN

Before the undersigned authority personally appeared J.W. Owens who on oath says that he is publisher of the Indiantown News, a newspaper published weekly at Indiantown in Indiantown, Florida:

that the attached copy of advertisement, being a Public Notice of Intent To Issue Specific Exemption

via: Nicholas Larvea
PG&E National Energy Group
Indiantown Generating Plant
P.O. Box 1799
Indiantown, FL 34956

In the _____ Court, was published in said newspaper in the issues of 02/27/2003

Affiant further says that the said Indiantown News is a newspaper published at Indiantown, in said Martin County, Florida, and that said newspaper has heretofore been continuously published in said Indiantown, Florida as a daily, weekly, or bi-weekly and has been entered as second class mail matter at the post office in Indiantown, in said Martin County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that he has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper.

The Department of Environmental Protection (Department) gives notice of its intent to issue an exemption to air construction permitting to Indiantown Cogeneration, L.P. for the Indiantown Cogeneration Facility located at 13301 SW Silver Fox Lane, Indiantown, Martin County. The exemption allows the temporary installation of a small package boiler (less than 100 MMBtu/hr) at the existing facility, for the purpose of providing steam to the adjacent citrus processing facility. A Best Available Control Technology (BACT) determination was not required pursuant to Rule 62-212.400, F.A.C. and 40 CFR 52.21, Prevention of Significant Deterioration (PSD). The applicant's mailing address is: Indiantown Cogeneration, L.P., P.O. Box 1799, Indiantown, Florida 34956.

The temporary package boiler will be authorized for use up to 60 days per calendar year, and may be physically on-site for up to 90 days per calendar year. The exemption is subject to a number of conditions, in order to ensure that a PSD review and BACT determination are unnecessary. Of particular importance, the temporary package boiler will fire natural gas or propane only and cannot be utilized if either the main boiler or both auxiliary boilers are available. This requirement will satisfy the Department's small boiler BACT rule, 62-296.406, F.A.C. An air quality impact analysis was not required, nor conducted, as previously authorized facility-wide emissions will not increase. The Department will issue the Specific Exemption with the attached conditions unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed exemption issuance action for a period of 14 (fourteen) days from the date of publication of this Public Notice of Intent to Issue Specific Exemption. Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed exemption and require, if applicable, another Public Notice.

The Department will issue the exemption with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below. Mediation is not available in this proceeding.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, Mail Station #35, Tallahassee, Florida, 32399-3000. Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under section 120.60(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, and telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purposes during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by rule 28-106.201

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Department of Environmental Protection
Bureau of Air Regulation
Suite 4, 111 S. Magnolia Drive
Tallahassee, Florida, 32301
Telephone: 850/488-0114
Fax: 850/922-6979

Department of Environmental Protection
Southeast District
400 North Congress Avenue
West Palm Beach, Florida 33416-5125
Telephone: 516-681-6600
Fax: 561/681-0755

The complete project file includes the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Administrator, New Source Review Section, at 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301, or call 850/488-0114, for additional information.
Publsh: 02/27/2003

The Indiantown News

J. W. Owens
J. W. Owens, (Publisher)

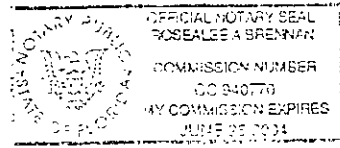
Sworn to and subscribed before me

this 27th day of February

A.D. 2003

Rosealee A. Brennan

(SEAL) Notary Public



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MAR 14 2003

BUREAU OF AIR REGULATION

Indiantown Cogeneration, L.P.

Indiantown Cogeneration, L.P.
P.O. Box 1799
13303 SW Silver Fox Lane
Indiantown, FL 34956

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March 4, 2003

Trina Vielhauer, Chief,
Bureau of Air Regulations
Department of Environmental Protection
Twin Towers Office Building
2600 Blair Stone Road
Tallahassee, Florida 32399-2400

RECEIVED

MAR 05 2003

BUREAU OF AIR REGULATION

VIA FEDERAL EXPRESS

Re: *DEP File No. PA 90-31, PSD-FL-168*
Indiantown Cogeneration Facility Temporary Boiler Installation
Public Notice of Intent to Issue PSD Permit Modification

Dear Ms. Vielhauer:

Pursuant to your written request of February 13, 2003, and the requirements of Chapter 50 Florida Statutes, please find attached proof of publication of Public Notice of Intent to Issue Specific Exemption, State of Florida Department of Environmental Protection DEP File No. PA 90-31, PSD-FL-168, Indiantown Cogeneration, L.P., Indiantown Cogeneration Plant, Martin County, printed February 20, 2003 in the Stuart News. Please contact Nicholas Laryea at 772-597-6500, extension 19, if you have any questions.

Sincerely,



George K. "Chip" Allen
General Manager

Enclosure

cc: A. A. Linero
Mike Halpin, DEP
Buck Oven, DEP
File

Indiantown Cogeneration, L.P.

Indiantown Cogeneration, L.P.
P.O. Box 1799
13303 SW Silver Fox Lane
Indiantown, FL 34956

772.597.6500
Fax: 772.597.6210

March 03, 2003

Mr. Al Linero
Florida Department of Environmental Protection
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RECEIVED

MAR 05 2003

BUREAU OF AIR REGULATION

Subject: Indiantown Cogeneration, L.P.
Permit PSD-FL-168 – Temporary Boiler

Dear Mr. Linero:

Indiantown Cogeneration, L.P. (ICLP) needs to bring a package boiler to ICLP's site on a temporary basis. ICLP's Auxiliary Boiler B is down for repairs and will not be available for approximately two weeks. ICLP needs to have the package boiler available on site, as an alternate or backup supply of steam, in the event that ICLP's main (PC) boiler malfunctions or otherwise is unable to provide steam to ICLP's steam host (Louis Dreyfus Company).

On February 13, 2003, the Department gave notice of its intent to issue a specific exemption to ICLP for the temporary use of package boilers, subject to certain conditions. Consistent with the Department's Condition No. 3, ICLP hereby gives notice of ICLP's intent to bring a package boiler to ICLP's site. If the package boiler is used, it will be operated in compliance with all of the Department's applicable conditions (i.e., Conditions 1 – 8).

More specifically, with regard to the package boiler:

- It is a trailer mounted Tampella Boiler, which has low-NOx burners and provides flue gas recirculation;
- The boiler manufacturer guarantees that the boiler is capable of meeting a NOx emission limit of 0.15 lb/MMBtu when firing natural gas or propane;
- The boiler will fire natural gas or propane only;
- The boiler's maximum rated heat input is 91.8 MMBtu/hr, which is much smaller than the maximum rated heat input for Auxiliary Boiler B (179 MMBtu/hr);
- Operating hours and fuel usage will be tracked, separately identified, and attributed to the annual totals for the auxiliary boilers; and

Mr. Al Linero
FDEP
March 2003

2

- The package boiler shall not be operated when the main (PC) boiler is operating or when both auxiliary boilers are operating.

Please contact Nick Laryea at 772-597-6500, extension 19, if you have any questions about the package boiler. Thank you for your assistance with this matter.

Sincerely,



George K. Allen
General Manager

Cc: Tom Fromm, PG&E NEG
David Dee, Landers & Parsons
Nicholas Laryea, ICLP



SCRIPPS TREASURE COAST PUBLISHING COMPANY

The Stuart News
The Port St. Lucie News

1939 S. Federal Highway, Stuart, FL 34994

AFFIDAVIT OF PUBLICATION

STATE OF FLORIDA

COUNTY OF MARTIN; COUNTY OF ST. LUCIE

Before the undersigned authority personally appeared, S. Darlene Mailing, who on oath says that she is Classified Inside Sales Manager of the Stuart News and the Port St. Lucie News, a daily newspaper published at Stuart in Martin County, Florida: that the attached copy of advertisement was published in the Stuart/Port St. Lucie News in the following issues below. Affiant further says that the said Stuart/Port St. Lucie News is a newspaper published in Stuart in said Martin County, Florida, with offices and paid circulation in Martin County and St. Lucie County, Florida, and that said newspapers have heretofore been continuously published in said Martin County, Florida, daily and distributed in Martin and St. Lucie County, Florida, for a period of one year next preceding the first publication of the attached copy of advertisement; and affiant further says that she has neither paid nor promised any person, firm or corporation any discount, rebate, commission or refund for the purpose of securing this advertisement for publication in the said newspaper. The Stuart News has been entered as second class matter at the Post Offices in Stuart, Martin County, Florida and Ft. Pierce, St. Lucie County, Florida and has been for a period of one year next preceding the first publication of the attached copy of advertisement.

<u>Ad #</u>	<u>Customer Name</u>	<u>Pub Date</u>	<u>Copyline</u>	<u>PO #</u>
2636488	PG&E NATIONAL	02/20/2003	Indiantown Cogenerat	

Subscribed and sworn to me before this date:

02/20/2003

S. Darlene Mailing

Linda Rufo

Notary Public



Linda Rufo
Commission # CC 967202
Expires Oct. 22, 2004
Bonded Thru
Atlantic Bonding Co., Inc.

SEAL

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MAR 05 2003

BUREAU OF AIR REGULATION

PUBLIC NOTICE OF INTENT TO ISSUE SPECIFIC EXEMPTION
STATE OF FLORIDA
DEPARTMENT OF ENVIRONMENTAL PROTECTION
DEP File No. 0850102
Indiantown Cogeneration Facility
Indiantown, Martin County

The Department of Environmental Protection (Department) gives notice of its intent to issue an exemption to air construction permitting to Indiantown Cogeneration, L.P. for the Indiantown Cogeneration Facility located at 13301 SW Silver Fox Lane, Indiantown, Martin County. The exemption allows the temporary installation of a small package boiler (less than 100 MMBtu/hr) at the existing facility, for the purpose of providing steam to the adjacent citrus processing facility. A Best Available Control Technology (BACT) determination was not required pursuant to Rule 62-212.400, F.A.C. and 40 CFR 52.21, Prevention of Significant Deterioration (PSD). The applicant's mailing address is: Indiantown Cogeneration, L.P., P.O. Box 1799, Indiantown, Florida 34956.

The temporary package boiler will be authorized for use up to 60 days per calendar year, and may be physically on-site for up to 90 days per calendar year. The exemption is subject to a number of conditions, in order to ensure that a PSD review and BACT determination are unnecessary. Of particular importance, the temporary package boiler will fire natural gas or propane only and cannot be utilized if either the main boiler or both auxiliary boilers are available. This requirement will satisfy the Department's small boiler BACT rule, 62-296.406, F.A.C. An air quality impact analysis was not required, nor conducted, as previously authorized facility-wide emissions will not increase. The Department will issue the Specific Exemption with the attached conditions unless a response received in accordance with the following procedures results in a different decision or significant change of terms or conditions.

The Department will accept written comments concerning the proposed exemption issuance action for a period of 14 (fourteen) days from the date of publication of this Public Notice of Intent to Issue Specific Exemption. Written comments should be provided to the Department's Bureau of Air Regulation at 2600 Blair Stone Road, Mail Station #5505, Tallahassee, FL 32399-2400. Any written comments filed shall be made available for public inspection. If written comments received result in a significant change in the proposed agency action, the Department shall revise the proposed exemption and require, if applicable, another Public Notice.

The Department will issue the exemption with the attached conditions unless a timely petition for an administrative hearing is filed pursuant to sections 120.569 and 120.57 F.S., before the deadline for filing a petition. The procedures for petitioning for a hearing are set forth below. Mediation is not available in this proceeding.

A person whose substantial interests are affected by the proposed permitting decision may petition for an administrative proceeding (hearing) under sections 120.569 and 120.57 of the Florida Statutes. The petition must contain the information set forth below and must be filed (received) in the Office of General Counsel of the Department at 3900 Commonwealth Boulevard, mail Station #35, Tallahassee, Florida, 32399-3000.

Petitions filed by the permit applicant or any of the parties listed below must be filed within fourteen days of receipt of this notice of intent. Petitions filed by any persons other than those entitled to written notice under section 120.6(3) of the Florida Statutes must be filed within fourteen days of publication of the public notice or within fourteen days of receipt of this notice of intent, whichever occurs first. Under section 120.60(3), however, any person who asked the Department for notice of agency action may file a petition within fourteen days of receipt of that notice, regardless of the date of publication. A petitioner shall mail a copy of the petition to the applicant at the address indicated above at the time of filing. The failure of any person to file a petition within the appropriate time period shall constitute a waiver of that person's right to request an administrative determination (hearing) under sections 120.569 and 120.57 F.S., or to intervene in this proceeding and participate as a party to it. Any subsequent intervention will be only at the approval of the presiding officer upon the filing of a motion in compliance with Rule 28-106.205 of the Florida Administrative Code.

A petition that disputes the material facts on which the Department's action is based must contain the following information: (a) The name and address of each agency affected and each agency's file or identification number, if known; (b) The name, address, the telephone number of the petitioner, the name, address, and telephone number of the petitioner's representative, if any, which shall be the address for service purpose during the course of the proceeding; and an explanation of how the petitioner's substantial interests will be affected by the agency determination; (c) A statement of how and when petitioner received notice of the agency action or proposed action; (d) A statement of all disputed issues of material fact. If there are none, the petition must so indicate; (e) A concise statement of the ultimate facts alleged, including the specific facts the petitioner contends warrant reversal or modification of the agency's proposed action; (f) A statement of the specific rules or statutes the petitioner contends require reversal or modification of the agency's proposed action; and (g) A statement of the relief sought by the petitioner, stating precisely the action petitioner wishes the agency to take with respect to the agency's proposed action.

A petition that does not dispute the material facts upon which the Department's action is based shall state that no such facts are in dispute and otherwise shall contain the same information as set forth above, as required by rule 28-106.301.

Because the administrative hearing process is designed to formulate final agency action, the filing of a petition means that the Department's final action may be different from the position taken by it in this notice. Persons whose substantial interests will be affected by any such final decision of the Department on the application have the right to petition to become a party to the proceeding, in accordance with the requirements set forth above.

A complete project file is available for public inspection during normal business hours, 8:00 a.m. to 5:00 p.m., Monday through Friday, except legal holidays, at:

Department of Environmental Protection
Bureau of Air Regulation
Suite 4, 111 S. Magnolia Drive
Tallahassee, Florida, 32301
Telephone: 850-488-0114
Fax: 850-922-6979

Department of Environmental Protection
Southeast District
400 North Congress Avenue
West Palm Beach, Florida 33416-5425
Telephone: 561-681-6600
Fax: 561-681-6755

The Complete project file includes the information submitted by the responsible official, exclusive of confidential records under Section 403.111, F.S. Interested persons may contact the Administrator, New Source Review Section, at 111 South Magnolia Drive, Suite 4, Tallahassee, Florida 32301, or call 850-488-0114, for additional information.

Published: February 20, 2003

2636488

RECEIVED

MAR 05 2003

BUREAU OF AIR REGULATION

Indiantown Cogeneration, L.P.

Indiantown Cogeneration, L.P.
P.O. Box 1799
13303 SW Silver Fox Lane
Indiantown, FL 34956

772.597.6500
Fax: 772.597.6210

January 21, 2003

Mr. Al Linero
Florida Department of Environmental Protection
Bureau of Air Regulation
2600 Blair Stone Road
Tallahassee, FL 32399-2400

RECEIVED

JAN 27 2003

BUREAU OF AIR REGULATION

**Subject: Indiantown Cogeneration., L.P.
Permit PSD-FL-168 – Temporary Boiler**

885 0109 - 006 - AC

Dear Mr. Linero:

Indiantown Cogeneration, L.P. (ICLP) would like to modify its air permits to allow operation of a temporary rental boiler in the event that ICLP's main pulverized coal (PC) boiler and the auxiliary boilers are unavailable. This letter proposes a framework for permit modifications; we are requesting Department guidance before proceeding with the formal permits application process.

Background

In May 2002 ICLP was performing scheduled repairs on the main PC boiler when an explosion rendered auxiliary boiler "B" inoperative. ICLP received emergency authorization from the Department to use a rental boiler that was needed to supply steam to our steam host, Louis Dreyfus (formerly Caulkins Indiantown Citrus), for the period until the main boiler came back on-line. While steps have been taken to prevent similar accidents, there is always a possibility that sometime over the plant life another malfunction will limit ICLP's ability to supply steam to our steam host, and a rental boiler will once again be required. Given this possibility, we wish to have a permit in place to address this situation, so that ICLP can meet its contractual steam supply obligations, without jeopardizing ICLP's compliance with environmental regulations.

Proposed Framework

Triggering Event: The new permit conditions would be triggered in the event that a malfunction causes the main PC boiler and at least one auxiliary boiler to be offline simultaneously. The new permit conditions will only be triggered if the steam host needs more steam than can be reasonably supplied with ICLP's existing, operational equipment.

Under such circumstances, the following permit conditions would govern ICLP's use of a temporary boiler. Proposed Conditions:

1. ICLP will promptly notify the Department of the situation and the need for the rental boiler.
2. ICLP will provide the specifications for the rental boiler to the Department. The boiler must meet the minimum specifications established by the Department. (The minimum specifications will be set when the Department approves the permit conditions authorizing the use of the temporary boiler).
3. ICLP will provide calculations to the Department documenting that the full load mass emission rate for the rental boiler will be below the full load mass emission rate for one auxiliary boiler, for all criteria pollutants.
4. The rental boiler will have a NO_x emission rate of 0.15 pounds per million Btu or lower.
5. The rental boiler will be rated at 99 MMBtu/hr or less, and will therefore not be subject to 40 CFR 60 Subpart Db.
6. The rental boiler will fire natural gas and propane only, and will therefore be subject only to simple notification requirements under 40 CFR 60 Subpart Dc.
7. ICLP will issue the notification letters required by 40 CFR 60 Subpart Dc.

8. Steam from the rental boiler will not be used to generate electricity.
9. The rental boiler will not be operated at the same time as the main PC boiler is in normal operation. (I.e. not including startup).
10. The rental boiler will not be operated at the same time as both auxiliary boilers.
11. Fuel use will be tracked and included in the annual totals for the auxiliary boilers.
12. Operating hours will be tracked and included in the annual totals for the auxiliary boilers.
13. Emissions will be tracked and included in the annual totals for the auxiliary boilers. Subject to the Department's approval, emissions will be tracked based on fuel use, vendor data, and emissions factors, or in the alternative, by using the existing emissions monitoring equipment at the facility.
14. Rental boiler operation will be limited to eight operating weeks per calendar year.

PSD Applicability

There are two key reasons why use of the rental boiler does not trigger PSD review:

- The change will not increase the facility's emissions; and
- The change is not a significant change in operation.

The use of the rental boiler will directly replace the use of the (already permitted) auxiliary boiler. Given the permit conditions proposed above, the facility's emissions of criteria pollutants will not increase.

The use of the rental boiler is not a significant change in the overall method of plant operation. Natural gas and propane are still being combusted to produce steam, to supply to the steam host.

The temporary use of the rental equipment does not involve the replacement or reconstruction of facility equipment.

We request that language be added to the PSD and Title V permits so that additional permitting is not needed in the event that a malfunction occurs and a temporary boiler is needed. We would like to address this issue now, as part of a prudent and cooperative planning effort with the Department, rather than waiting for emergency conditions to develop. Prior to moving forward with the permit application, we would appreciate your review and concurrence with our proposed approach. We would be following this letter with a phone call to schedule a meeting with you to further discuss the details of our request.

Please contact Nick Laryea at 772-597-6500, extension 19 if you have any questions. Thank you for your assistance with this matter.

Sincerely,



George K. Allen
General Manager

Cc: Tom Fromm, PG&E NEG
David Dee, Landers & Parsons
AJ Jablonowski, Earth Tech
Nicholas Laryea, ICLP