Post-Public Meeting Notice Date Written Comments

After the public meeting notice date and prior to the conclusion of the public comment period, the DAQ received 1,008 written comments and 18 oral comments. The majority of the written comments were generated by an online program and were repetitive in nature, with most being addressed in the General Response to Comments section. Of the comments received after the Notice of Comment Period which began on June 18, 2025, all but the following are considered either to not require a response or fully responded to in the General Response to Comments Section. Comments that are not directly identified and responded to were determined to be covered by a similar comment, not relevant to the Fundamental application, or an air quality-related issue.

Specific Comments

Q. What written policies and procedures would be in place to prevent diesel fuel from leaking/spilling. What written policies and procedures would be in place to mitigate any leaks or spillage.

A. Permit condition 4.1.16 regulates the design and operating parameters of the 3 diesel storage tanks. Storage tank design and containment does not fall under the authority of the DAQ. The Aboveground Storage Tank Act can be found under WV Code Chapter 22 Article 30 or at the following weblink:

https://dep.wv.gov/WWE/ee/tanks/abovegroundstoragetanks/Pages/default.aspx

Q. Will air pollution be captured for safe disposal, including carbon dioxide (CO_2), carbon monoxide (CO), nitrogen oxide (NOx), sulfur dioxide (SO_2), volatile organic compounds (VOC's), particulate matter (PM), and lead and hazardous air pollutants (HAPs)?

A. The permit requires the combustion turbines to utilize SCR for the reduction of nitrogen oxides and a carbon monoxide catalyst for the reduction of carbon monoxide.

Q. Why are 500 acres needed?

A. The air permit regulates the air emission units at the facility listed in Table 1.0. The DAQ does not have authority over the amount of land that is utilized.

Q. Request to perform independent modeling or air quality impact analysis under worst-case (i.e. diesel-heavy) scenarios prior to permit issuance. The DAQ should model cumulative emissions using continuous full-load operations, especially since the plant is capable of running far beyond the synthetic minor thresholds.

A. An in-depth response regarding air quality modeling was provided in the General Response to Comments - Air Quality Dispersion Modeling section and a response to the air quality impact analysis was provided in the General Response to Comments - Major Source/Class I Area/Notification of FLM/Environmental Impact Assessment section. Any independent

assessments would be performed outside of the scope of the DAQ permit application review, for which the DAQ would have no authority.

Q. Startup and shutdown emissions will result in extended and high levels of emissions, which will push the facility over the major source thresholds.

A. The permit contains conditions (4.1.4 and 4.1.5) to limit the maximum aggregate annual emissions during startups and shutdown periods. Additionally, the permit requires that during these periods that certain operational conditions are performed (4.1.7). Permit condition 4.1.9 requires these periods are continuously monitored, with associated recordkeeping being required in permit condition 4.4.1 and associated reporting being required in permit condition 4.5.4.

Q. No public record can be found of an executed purchase and sale agreement between Fundamental and the land owner.

A. As part of the permit application, item 8 asks if the applicant owns, leases, has an option to buy or otherwise have control over the proposed site. Fundamental states in the permit application that it has an executed purchase and sale agreement signed by both the Seller and Purchaser.

Q. Does the permit only cover the construction?

A. The 45 CSR 13 permit allows construction and operation.

Q. Will interconnecting to the grid require larger transmission lines to be built? Could this affect other power plant future development? It also seems a deficiency in the process and the proponent's transparency that the end use for the power has not been disclosed. I am surprised that the DEP doesn't require it based on what I heard at the meeting. If different end uses would impact or create stricter regulatory processes it seems illogical not to include it in process. Could the DEP not run some speculative end-use cases? Even though that is outside of your strict scope.

A. The permit application was not definitive on the ultimate end user of the power that will be generated from the proposed site. The non-disclosure of the final end use of the power generated is not a cause for denial of the permit. How the power is used will have an impact on whether the permittee is required to obtain an Acid Rain Permit (45 CSR 33) and a Title V Permit (45 CSR 30). However, the process of applying for and receiving an Acid Rain or Title V Permit is independent of the 45 CSR 13 permitting process. These potential requirements are outlined in the permit and the regulatory applicability is discussed in the EE/FS REGULATORY APPLICABILITY section of that document.

Q. Natural gas is often marketed as a "cleaner" fossil fuel, but "cleaner" does not mean clean. It still emits harmful pollutants. And diesel? Diesel is among the dirtiest fuels currently in use. According to the company's permit application, diesel would be burned 30% of the time—nearly a third of the year. That's a significant reliance on a fuel known to be highly toxic.

A. The permit establishes specific hourly emission rates for when natural gas or diesel fuel is utilized (4.1.3). Furthermore, annual emission rates are established to ensure minor source status in permit condition 4.1.5. The permit requires continuous monitoring of the type of fuel that is used and compliance with the annual emission limits requires monitoring and recordkeeping of the individual fuel throughput. The diesel fuel that was utilized as part of these values is ULSD. There is no permit requirement that states diesel is to be burned 30% of the operation time.

Q. How can emissions be realistically projected without knowing the end user and energy demand?

A. The permitted emissions are limited based on enforceable limitations of turbine use, no matter what the power is used for. The emissions associated with this permit include those pollutant-emitting equipment and processes identified under Section 1.0 of this permit. In accordance with the information filed under Permit Application R13-3713, the equipment shall be installed, maintained and operated so as to minimize any fugitive escape of pollutants and the equipment/processes shall use the specified air pollution control devices. The non-disclosure of the final end use of the power generated is not a cause for denial of the permit. How the power is used will have an impact on whether Fundamental is required to obtain an Acid Rain Permit (45 CSR 33) and a Title V Permit (45 CSR 30). However, the process of applying for and receiving an Acid Rain or Title V Permit is independent of the 45 CSR 13 permitting process. These potential requirements are outlined in permit condition 4.1.19 and the regulatory applicability is discussed in the EE/FS REGULATORY APPLICABILITY section of that document. The permit is specific to the emission units contained therein. The DAQ review does not take hypothetical situations into account. If it is determined that permit modifications or administrative updates are required after permit issuance, the procedures for obtaining those are outlined in permit conditions 2.8 and 2.9.

Q. Data centers cannot operate at 28.5% power or accept only 24 hours of backup fuel annually. Any natural gas pipeline outage exceeding one day forces the facility to choose between complete shutdown of critical infrastructure or violating their synthetic minor status.

A. Fundamental is proposing to be permitted as a synthetic minor facility. Fundamental may operate using any combination of natural gas and diesel provided they restrict the total hours of operation as needed to remain under the permitted minor source thresholds. Fundamental will keep records of the total hours of operation for each turbine, including the total number of hours each turbine uses natural gas as a fuel and the total number of hours each turbine uses diesel as a fuel. Fundamental will keep rolling 12-month emission calculations to ensure their emissions remain below any major source thresholds. Pages 57 and 58 of Attachment N of the permit application are provided for illustrative purposes to represent the potential emissions from the proposed facility while combusting natural gas and/or diesel under operational limitations to remain below PSD and Title V permitting thresholds. The hourly values are presented for each fuel source and indicate the worst case operating hours when combusting either fuel on a continuous twelve month basis and does not take into account that the proposed facility intends to utilize diesel as a backup fuel source.

The DAQ does not stipulate anywhere in the permit or EE/FS that the facility can only operate at 28.5% power or accept only 24 hours of backup fuel annually.

Q. The facility has deliberately engineered their emission limits to stay exactly 0.65 tons below the major source threshold—a precision that can only be achieved through regulatory gaming, not legitimate operational design.

A. As stated above, Fundamental has proposed to be permitted as a synthetic minor facility and is subject to the regulatory conditions in the issued permit to ensure the facility remains a minor source.

Q. The permit documents contain inconsistent truck traffic estimates that undermine the reliability of their environmental impact analysis.

- **Haul road analysis claims 2,308 trucks annually**
- **Per 15,000,000 gallons diesel throughput, these are 6,500 gallon trucks**
- **15,000,000 gallons annually only accounts for a 5% capacity factor**
- **28.5% Capacity Factor would require 12,591 trucks annually (34/day)**
- **70% Capacity Factor would require 30,925 trucks annually (85/day)**

These discrepancies call into question the accuracy of NOx and PM emissions calculations that depend on precise truck traffic data. The haul road analysis also significantly understates the noise and traffic impacts to residential neighborhoods immediately adjacent to US-48.

A. The above assumptions are based on capacity factors that do not exist in the permit. The assumptions on which the haul road activities are based on are included in the EE/FS ESTIMATE OF EMISSIONS BY REVIEWING ENGINEER section.

Q. Operating hour limits were removed without explanation from the draft permit despite being specifically proposed in the application, eliminating the only meaningful constraint on their claimed 70% capacity factor operation.

A. Fundamental may operate using any combination of natural gas and diesel such that they restrict the total hours of operation as needed to remain under the permitted minor source thresholds. Fundamental will keep records of the total hours of operation for each turbine, including the total number of hours each turbine uses natural gas as a fuel and the total number of hours each turbine uses diesel as a fuel. Fundamental will keep rolling 12-month emission calculations to ensure their emissions remain below any major source thresholds. Pages 57 and 58 of Attachment N of the permit application are provided for illustrative purposes to represent the potential emissions from the proposed facility while combusting natural gas and/or diesel under operational limitations to remain below PSD and Title V permitting thresholds. The hourly values are presented for each fuel source and indicate the worst case operating hours when combusting either fuel on a continuous twelve month basis and does not take into account that the proposed facility intends to utilize diesel as a backup fuel source.

These hourly values when combusting natural gas or diesel exclusively during a consecutive twelve-month rolling period were added to permit condition 4.1.5. No additional monitoring or recordkeeping is necessary, as the appropriate monitoring and recordkeeping already exists.

Q. If the facility is indeed intended to power data centers - which can be reasonably inferred from the characteristic of the project (extensive backup fuel storage on-site, N+3 redundancy based on 70% CF and 10 turbines, the company name "Fundamental Data", and public correspondence referencing the importance of this facility to AI development and national security) - then there will be no practical way to avoid exceeding PSD thresholds in the event of a full or partial natural gas outage.

A. Permit Application R13-3713 ***did not*** include a data center and was not definitive on the ultimate end user of the power that will be generated from the proposed site. The non-disclosure of the final end use of the power generated is not a cause for denial of the permit. How the power is used will have an impact on whether Fundamental is required to obtain an Acid Rain Permit (45 CSR 33) and a Title V Permit (45 CSR 30). However, the process of applying for and receiving an Acid Rain or Title V Permit is independent of the 45 CSR 13 permitting process. These potential requirements are outlined in permit condition 4.1.19 and the regulatory applicability is discussed in the REGULATORY APPLICABILITY section of this document. As stated previously, the DAQ review does not take hypothetical situations into account. If it is determined that permit modifications or administrative updates are required after permit issuance, the procedures for obtaining those are outlined in permit conditions 2.8 and 2.9.

Q. By allowing synthetic minor classification for a facility of this scale, with no wind analysis or stack height data provided for proper air quality modeling, WVDEP would set a dangerous precedent encouraging other developers to game the system at the expense of community health and environmental protection.

A. Air quality dispersion modeling was not required of this source as discussed above. Section 7 of 45 CSR 13 states that sources required to obtain a permit under 45 CSR 13 may be required to conduct modeling to determine whether the proposed source will interfere with attainment of an applicable ambient air quality standard, cause or contribute to a violation of an applicable air quality increment, or be inconsistent with the intent and purpose of 45 CSR 13 or WV Code 22. The DAQ, as per EPA regulations, has established the metric of 100 tons per year of a regulated pollutant of a minor source to require air dispersion modeling. Therefore, air dispersion modeling for this facility was not required.

Q. The facility is deliberately structured to avoid:

- **Air quality impact analysis required for major sources**
- **Best Available Control Technology (BACT) analysis**
- **Public participation in major source permitting**
- **Environmental justice review for major industrial facilities**

Approving this synthetic minor classification would signal that massive industrial facilities can evade environmental review through emissions accounting manipulation, undermining the entire regulatory framework protecting West Virginia's air quality.

A. An in-depth response to this topic can be found in the General Response to Comments - Major Source/Class I Area/Notification of FLM/Environmental Impact Assessment section.

Q. Is there any consideration from DAQ to force a relocation away from our towns? Could Fundamental be encouraged to move the project site further to the east along the 48 industrial corridor? I would like to see it stay in Tucker County for tax benefits, but Grant County may be an easier sell.

A. The DAQ has no statutory authority over the location chosen.

Q. How can you approve an incomplete permit application for this proposed monstrosity of a facility when your job is to uphold the CAA?

A. An in-depth discussion of all potential regulatory requirements that were reviewed as part of the R13-3713 permit application review process is included in the EE/FS under the REGULATORY APPLICABILITY section. The information contained within the permit application is more than adequate to make the appropriate permitting determinations and can be used to determine compliance with all applicable rules and regulations. This includes establishing the necessary source specific requirements, as well as all necessary monitoring, recordkeeping, reporting, and testing that will be required as part of the permit.

Q. The air permit application states that there will be no impact from the access road. How do they anticipate getting delivery of the millions of gallons of diesel they will be using? In order to maintain their diesel tanks there will be hundreds of trucks on the road monthly.

A. As stated in the permit application and EE/FS there are haul road activities associated with this facility. The assumptions on which the haul road activities are based on are included in the EE/FS ESTIMATE OF EMISSIONS BY REVIEWING ENGINEER section. There are also permit conditions associated with these roads which can be found in permit conditions 4.1.17, 4.2.7 and 4.4.5. Additionally, permit conditions 4.1.15, 4.2.6, and 4.4.6 contain requirements for diesel unloading at the facility.

Q. The ability for facilities to "double dip" and request to exceed allowable emissions was not clear. Can you provide more information?

A. This response attempts to make an assumption of the question and provide the appropriate response. This response assumes the term "double dip" in relation to PSD. PSD does apply to new major sources or major modifications at existing sources in areas that meet the NAAQS. For the purposes of PSD, a major modification occurs when there is a physical or operational change that results in a significant net emissions increase (as defined by rule) of a regulated pollutant. In making this determination, both emissions increases and decreases associated with the project, as well as other contemporaneous changes, are examined.

This process is designed to avoid "double dipping". Meaning that the facility cannot get credit for emissions reductions that are not part of the project or otherwise accounted for. An example would be that the source could not count a reduction that already occurred from a previous project or was required by another regulation as a way to offset a new increase in emissions.

Q. I am comparing the formaldehyde (and other) emissions with the AP-42 (Table 3.1-3 at: AP-42, Vol. I, 3.1: Stationary Gas Turbines). Since we don't know the model of turbine, I have to assume that is what was used to generate the "Potential To Emit", and that is what is indicated on page 9 of the Engineering Evaluation. From Table 3.1-3, I used the emissions rate of 7.1 E-04 lbs Formaldehyde per MMBTU and multiply that time 5,650 MMBTu/hour to calculate emissions of formaldehyde at 4.0115 lbs/hour (= 17.57 tons per year). That is way above the 10 TPY threshold for a single HAP to qualify as a major source, and way above the 9.33 TPY listed in the permit for Total HAPs.

The Table also includes a footnote for facilities with SCONOx of 2.0 E-05 which generates 0.5 TPY (The application indicates SCR, so I do not think this one applies. IS THAT CORRECT?) In either event, I cannot figure out how the Engineering Evaluation generated a figure of 3.86 TPY. What is the correct emissions factor? What am I missing?

A. The permit application utilized manufacturer data for the formaldehyde emissions associated with the combustion turbines when firing natural gas and AP-42 was used when firing diesel. The table on page 9 of the Draft EE/FS does contain an error and incorrectly listed that all HAPS utilized AP-42 as part of the emission calculations. This error has been recognized in the Final Determination document in the EE/FS Errata section. Due to the concern surrounding the formaldehyde emissions and the differences experienced between using the manufacturer data and the potential Title V major source status when using AP-42, a permit condition has been added to the permit which will require Fundamental to conduct an initial performance test to ensure compliance with the hourly formaldehyde value when combusting natural gas.

Q. Please conduct a study regarding the proposed emissions of the power plant. Is there a comparable size plant in the nation where they have measured the air quality before the power plant and after? Is there a comparable plant in an area that has air inversions like Canaan Valley to show carbon dioxide emissions and also if the plant had an effect on the average temperature because it is pumping out hot air?

A. An in-depth discussion of all potential regulatory requirements that were reviewed as part of the R13-3713 permit application review process is included in the EE/FS under the REGULATORY APPLICABILITY section. This includes all necessary monitoring, recordkeeping, reporting, and testing that will be required as part of the permit. The authority of the DAQ is explained in the General Response to Comments - Statutory Authority of the DAQ.

Q. What specifically makes Ridgeline eligible for a minor source permit?

A. As defined in 45 CSR 13 section 2.16, a "Major stationary source" has the meaning ascribed to this term in 45 CSR 14, 45 CSR 19 or 45 CSR 30. 45CSR14 establishes and adopts a preconstruction permit program for the construction and major modification of major stationary sources in areas of attainment with the NAAQS. Tucker County is currently classified as in attainment/unclassifiable with the NAAQS and, therefore, a proposed new “major stationary source” in Tucker County would be subject to the provisions of 45CSR14. The proposed facility is defined as a source listed under §45-14-2.43(a) - “Fossil Fuel-fired Steam Electric Plants of

More than 250 Million Btu/hr Heat Input" - and, therefore, pursuant to 2.4(b), would be defined as a "major stationary source" if any regulated pollutant has a PTE in excess of 100 TPY. The proposed facility, however, does not have PTE of any regulated pollutant in excess of 100 TPY, therefore, not defined as a major stationary source and is not subject to the provisions of 45 CSR 14. 45 CSR 19 applies to sources that are located in areas that are classified as non-attainment with the NAAQS. Tucker County is an attainment/unclassified area, therefore, 45 CSR 19 would not apply.

45 CSR 30 provides for the establishment of a comprehensive air quality permitting system consistent with the requirements of Title V of the Clean Air Act and the state operating permit program requirements of 40 CFR Part 70. Part 70 establishes the Title V Operating Permit Program. The Title V Operating Permit Program has also been incorporated in the West Virginia Code of State Regulations (CSR) 45-30. Under the West Virginia Title V Operating Permit Program, the major source thresholds are 10 tons per year of a single HAP, 25 tons per year of any combination of HAPs, and 100 tons per year for all other regulated pollutants. Fundamental will accept operating limitations on the proposed facility to be a synthetic minor source with respect to the Title V Operating Permit Program. Therefore, Part 70 does not apply. At this time, it has not been determined that Fundamental is subject to 45 CSR 33 due to selection of final power end user. If it is determined that Fundamental is subject to 45 CSR 33, this facility will be subject to Part 70 requirements and will be required to submit a Title V permit application.

As Fundamental is not defined as a major stationary source under 45 CSR 14, 45 CSR 19, or 45 CSR 30, it is deemed as a minor source for each of these rules.

Q. How exactly do air quality standards protect buildings? Some 50 locations in Thomas are on the National Register of Historic Places because of the significant role the community played in America's industrial age, as well as its unique architecture. I believe a review of this application by the West Virginia State Historic Preservation Office is warranted and should be considered, including cemeteries.

A. An in-depth discussion of the local ambient air quality is included in the General Response to Comments - Ambient Air Quality of Tucker County section. As stated in this section, Secondary standards set limits to protect public welfare, including protection against decreased visibility, damage to animals, crops, vegetation and buildings. The EPA Office of Air Quality Planning and Standards (OAQPS) has set NAAQS for six principal pollutants, which are called criteria pollutants: CO, Pb, NOx, Ozone, PM_{10} and $PM_{2.5}$, and SO_2. These secondary standards were developed by EPA and have been determined to be protective of buildings including issues such as corrosion and other effects.

The DAQ does not have statutory authority to require a review by the West Virginia State Historic Preservation Office.

Q. I ask that the U.S. Fish and Wildlife Service review this permit application to make a determination about the presence of endangered species.

A. This topic was addressed in the General Response to Comments - Pollutant Effect on Animals (Bats, Salamanders, Endangered Species) section. The DAQ does not have statutory authority to require a review by the U.S. Fish and Wildlife Service.

Q. How the turbine equipment will be cooled is part of the proprietary information, but there is no water discharge permit application. If water is not used, are additional chemicals required for cooling? If so, the public should have the right to know what those are and how they will be handled.

A. With respect to contact information concerning water/wastewater quality issues/permitting, please see the following:

West Virginia Department of Environmental Protection
Division of Water and Waste Management
601 57th Street SE
Charleston, WV 25304
(304) 926-0495
https://dep.wv.gov/WWE/Pages/default.aspx

Permit condition 4.1.1 states that the Ridgeline Facility shall consist of only the pollutant-emitting equipment and processes identified under Section 1.0 of this permit. If it is determined by Fundamental that additional chemicals are required that will result in additional air emissions, the appropriate permit modifications or administrative updates are required after permit issuance, the procedures for obtaining those are outlined in permit conditions 2.8 and 2.9.

Q. The permit includes 30 million gallons of diesel fuel stored onsite. By EPA standards, this qualifies as a Substantial Harm Facility, and DEP must review it accordingly.

A. The topic referenced is outside of the scope of the DAQ, therefore, the DAQ does not have statutory authority.

Q. After the WVDEP public meeting in Canaan Valley, WV (6/30/25 at 6-11:30pm), I would like to confirm my understanding of the following:

1)the current permit application does not include any language or information pertaining to
a)The Certified Microgrid Development Program
b)a microgrid district
c) Certified High Impact Data Center

A. A word search of the permit application submitted by Fundamental on March 18, 2025 ***did not*** reveal any of these terms. However, in pure transparency, a May 7, 2025 letter from Fundamental to the WVDEP in response to CBI does reference the Power Generation and Consumption Act of 2025.

Q. Additionally, should the power plant be approved and constructed per the current permit application, would the power plant be able to become POST construction a

a) microgrid energy source
b) a microgrid district
c) High Impact Data Center

Thus changing the permitting and regulations into a microgrid district and THEN be dictated under HB2014? ** Reminder HB2014 prohibits:(1) Counties and municipalities, whether by ordinance, resolution, administrative act, or otherwise, from enacting, adopting, implementing, or enforcing ordinances, regulations, or rules which limit, in any way, the creation of, and acquisition, construction, equipping, development, expansion, and operation of any certified microgrid district or certified high impact data center project; and (2) Counties and municipalities from imposing or enforcing local laws and ordinances concerning the creation or regulation of any certified microgrid district or certified high impact data center therein.**

Due to language in HB2014, I have included the Department of Commerce (below) on this email, asking for clarification on the timeline to be declared a microgrid district, energy source, data center, etc. This is pertinent information and critical to not only our understanding as residents opposing this permit but also for DEP/DAQ as it appears to be a new industry challenge that has loopholes to be addressed.

A. As stated in the EE/FS and previously in this document, Permit Application R13-3713 ***did not*** include a data center and was not definitive on the ultimate end user of the power that will be generated from the proposed site. The non-disclosure of the final end use of the power generated is not a cause for denial of the permit. How the power is used will have an impact on whether Fundamental is required to obtain an Acid Rain Permit (45 CSR 33) and a Title V Permit (45 CSR 30). However, the process of applying for and receiving an Acid Rain or Title V Permit is independent of the 45 CSR 13 permitting process. These potential requirements are outlined in permit condition 4.1.19 and the regulatory applicability is discussed in the EE/FS REGULATORY APPLICABILITY section of that document.

Q. I am emailing to let you know that I am disappointed that DEP did not address the following items properly in their presentation:

NOx Emission Control Efficiency Appears Unrealistically High

- **The permit uses 744.9 lb/hr NOx as the uncontrolled rate and 74.49 lb/hr as the controlled rate — implying 90% control efficiency using SCR.**
- **While 90% is on the high end of achievable, it assumes perfect SCR operation at all times, without accounting for ammonia slip, catalyst aging, or variable loads.**

SCR systems in field conditions often average 80–85% NOx control depending on load and catalyst condition. Achieving 90% consistently, especially with backup diesel firing, is optimistic.

A. Permit condition 4.3.2 requires Fundamental to conduct performance testing to demonstrate compliance with the hourly emission rates in permit condition 4.1.3.

Q. Formaldehyde Emissions Significantly Underestimated

- **Formaldehyde PTE is given as 3.86 tons/year, using generic AP-42 factors for gas turbines.**
- **Real-world data (e.g., from Title V facilities in NY, CA, TX) show formaldehyde emissions up to 3–5x higher for similar installations.**

Concern: AP-42 underpredicts HAPs for modern turbines. Formaldehyde is a toxic air contaminant with low reference exposure levels (RELs). The lack of dispersion modeling exaggerates the safety of this estimate.

The methods used to calculate formaldehyde emissions are based on manufacturer's data that is significantly lower than AP-42 methods and EPA studies on actual gas turbine operation. No basis is given for how the redacted manufacturer intends to deliver this incredible performance. Using published data, formaldehyde emissions could be 5-10 times higher than shown in the preliminary permit, easily pushing the rate above the 10 tons/year minor source limit.

A. The permit application utilized manufacturer data for the formaldehyde emissions associated with the combustion turbines when firing natural gas and AP-42 was used when firing diesel. The table on page 9 of the Draft EE/FS does contain an error and incorrectly listed that all HAPS utilized AP-42 as part of the emission calculations. This error has been recognized in the Final Determination document in the EE/FS Errata section. Due to the concern surrounding the formaldehyde emissions and the differences experienced between using the manufacturer data and the potential Title V major source status when using AP-42, a permit condition has been added to the permit which will require Fundamental to conduct an initial performance test to ensure compliance with the hourly formaldehyde value when combusting natural gas.

Q. No Ammonia Emissions from SCR Reaction Accounted For

- **The application references 5 ppm ammonia slip, but no associated emissions are calculated or reported.**

Physics Issue: Even at 5 ppmvd @ 15% O_2, across a gas stream of 11,000,000 acfm, this would result in multiple tons per year of ammonia — which can cause secondary PM formation. This omission hides downstream environmental impacts.

The proposed power plant would use 19% aqueous ammonia to control NOx, but nowhere in the application or the preliminary permit is any information on total ammonia emissions, storage tanks or unloading operations. The ammonia "slip" as noted in the application is "5 ppmvd @ 15% O_2" and must be included in the overall emission summary. This is a glaring omission and must be corrected. Ammonia is a highly toxic and noxious gas.

A. As stated in the General Response to Comments - Ammonia (NH_3) Emissions section;

- Ammonia has no NAAQS that has been established for the compound;
- Ammonia is not defined as a Hazardous Air Pollutant (HAP);
- There are no emission thresholds of ammonia that would define a facility as a major source under either New Source Review (NSR) or Title V regulations; and

- Ammonia is not defined as a regulated pollutant under WV Legislative Rule 45 CSR 13 (§45-13-2.20).

The DAQ does not require potential ammonia emissions to be quantified and included in the facility's PTE and does not require ammonia emissions mitigation requirements. However, the DAQ will, using the authority under WV Legislative Rule 45 CSR 4 - "To Prevent and Control the Discharge of Air Pollutants Into the Open Air Which Causes or Contributes to and Objectionable Odor or Odors", respond to complaints involving objectionable odors from ammonia if confirmed while the facility is operating, and may require mitigation at that time to reduce the odor potential of the ammonia source. An objectionable odor must be determined by the DAQ in the course of an inspection or investigation of an actual odor, and is possible to prove quantitatively, pursuant to 45 CSR 4, that an objectionable odor will be present before a facility is in operation. In addition, concerns (acute irritation, explosion risk, etc.) over the effects of ammonia handling and storage within the plant boundary are beyond the authority of the DAQ to regulate (see Statutory Authority of the DAQ above).

The permit does require Fundamental within 180 days of startup to determine the optimal injection rate of aqueous ammonia into each SCR for each fuel source and then operate the SCR at the determined optimal injection rate. Monitoring and recordkeeping of this injection rate is required.

Q. NOx Emissions: The methods used to calculate NOx emissions are highly optimistic and do not adequately reflect startups, shutdowns, catalyst aging, higher diesel fuel usage, or other potential operational upsets. Any one of these events would increase the emissions above 100 tons/year and trigger a Major Source Permit.

A. The application used manufacturer data for NOx emissions. The permit does establish emission limits during normal operations and periods of startup and shutdowns. Additionally, the permit requires continuous monitoring of the turbine operations including fuel and operation type. Furthermore, the permit contains performance testing requirements for NOx.

Q. Startup/Shutdown Emissions Severely Underplayed

- **Only 1 startup and 1 shutdown per day are assumed, and per-event emissions are extremely low (e.g., 12.7 lb NOx per start). No accounting is made for cold starts, upset conditions, or back-to-back restarts.**

Concern: In real gas turbine operations, emissions during startup and shutdown can exceed 2–3 hours of steady-state emissions, especially for NOx and CO. Manufacturer data likely underrepresents worst-case conditions.

A. The permit contains conditions (4.1.4 and 4.1.5) to limit the maximum aggregate annual emissions during startups and shutdown periods. Additionally, the permit requires that during these periods that certain operational conditions are performed (4.1.7). Permit condition 4.1.9 requires these periods are continuously monitored, with associated recordkeeping being required in permit condition 4.4.1 and associated reporting being required in permit condition 4.5.4.

Q. Inadequate Compliance Monitoring Requirements: The preliminary permit requires only minimal monitoring of operating conditions and fuel usage to verify compliance, and a one-time stack test. Modern power plants routinely install Continuous Emission Monitoring Systems for critical pollutants such as NOx, CO, SO_2 and particulate matter. This should be required as a minimum for the Fundamental Data facility to ensure compliance and protection of our communities.

A. The permit requires continuous monitoring of fuel throughput, fuel type (natural gas/diesel), and operation type (steady state or startup/shutdown) in permit condition 4.1.8. 40 CFR 60 Subpart KKKK, specifically, section §60.4340(b) allows an alternative to the annual performance testing requirement by installing, calibrating, maintaining and operating a continuous parameter monitoring system. These requirements are found in permit conditions 4.2.4 and 4.4.4. The regulation does not require in-stack continuous emission monitoring systems.

Q. Multiple reasons why this permit should be classified as a Major Source: The reasoning behind permitting this power plant as a synthetic minor source is deeply flawed. This plant would be the one of the largest power generators in the state. Inclusion of ammonia emissions, increased formaldehyde emissions, inaccurate NOx emission assumptions and the impacts of startups and shutdowns would easily push this into a Major Source. Fundamental Data's vague assertions about how often diesel fuel would be burned, as well as minimal required reporting and recordkeeping, indicate that emissions from diesel burning would be much higher than anticipated. All these reasons indicate that the draft permit must be reevaluated as a Major Source.

A. These topics have been addressed in the General and Specific Response to Comments regarding ammonia, and in the Specific Response to Comments regarding formaldehyde and NOx. Additionally, the explanation as to why this source is properly characterized as a minor source can be found in the General Response to Comments - Major Source/Class I Area/Notification of FLM/Environmental Impact Assessment section.

Q. At the meeting I asked whether any of the redacted information is subject to a patent or patents. I made this inquiry on account of 45 CSR 31, which governs "confidential information." R.2.3 therein defines "trade secrets." Fundamental Data specifically asserts that the redacted information qualifies as "trade secrets" in its permit application. According to that rule:

2.3. "Trade Secrets" may include, but are not limited to, any formula, plan, pattern, process, tool, mechanism, compound, procedure, production data, or compilation of information which is not patented which is known only to certain individuals within a commercial concern who are using it to fabricate, produce or compound an article or trade or a service or to locate minerals or other substances, having commercial value, and which gives its users an opportunity to obtain business advantage over competitors.

At the meeting, I further expressed curiosity on account that Fundamental Data has redacted information regarding the identification of individual turbines and turbine

control devices. While there may very well be other applicable information redacted, those two items stood out to me since Fundamental Data does not build turbines or their componentry. Further, these items are very likely subject to patents. This raises at least two issues: 1) whether patented information is being wrongfully classified as "trade secrets," and 2) whether Fundamental Data is improperly asserting another entity's intellectual property as their "trade secret."

The text of Rule 2.3 seems very clear to me. It makes further sense in that patented information or products have inherent protection and do not need to be kept secret from competitors. That's the whole point of obtaining a patent.

A. An explanation of the confidential business information is included in the General Response to Comments - Confidential Business Information (CBI) section. Furthermore, this particular request is part of an appeal that will be addressed before the West Virginia Air Quality Board (AQB). Additionally, as the plaintiff's attorney (not identified as such at the public meeting when asking your question) concerning this appeal, please direct any additional questions concerning CBI questions to the WVDEP OGC.

Q. During the Q&A, 1 lady made a point that no large plants in the US are within 1 mile of a "town". I grew up in Poca, WV right across the river from John Amos, so I'll call BS on that. I did a quick data search on large, coal/gas/diesel power plants and found many to be very close to or directly adjacent to nearby towns. I think the lady at the meeting (who was very eloquent and polite) may have been using data that refers to larger towns not being that close. Maybe it's a matter of town size definition?

A. The DAQ can not speculate as to the source of information on which the commenter at the public meeting based their comment.

Q. Based on the discussion, I am a bit confused about the emissions numbers that were being tossed out. It seemed to me that the audience felt like the proponent was trying to stay just under the emissions level in its proposal to avoid "large" status and more regulatory hurdles. I have not looked at the application in detail and apologize if the answer I seek is there. I would like to see 3 emissions cases run, "best", "worst", and "most likely". Best would be if the plant used only natural gas for a full year without having to use back-up fuel. Worst would be if the plant used diesel fuel for a full year (I know that is not possible with their proposed facility, but this is to establish end-points and is not reality). Most likely would be a case where the facility used diesel as a back-up fuel for a short period of time, limited in time by the capacity of their diesel facility. As a local, I am most interested in the range between most-likely and best.

A. The emissions included in the EE/FS and permit are those that exist with the operational restrictions that are placed on the facility. This is accomplished through the MRRT that is established in the permit through federally enforceable permit requirements. Page 57 of the permit application includes the emissions experienced when the turbines are combusting natural gas. These include the unrestricted hourly emission rates and the unrestricted and restricted

annual emission rates. Page 58 includes the same information when diesel fuel is combusted in the turbines.

Q. It seems to me that doing a local dispersion model is a no-brainer for this project. The technology is available and you just need to provide an independent consultant with the data necessary to make the runs (FDC or DEP would be advised to get an independent entity to make the runs). If I was running a company that was proposing a project this big, I would proactively seek this analysis be done and pay for it 100%. It is budget dust in the big picture. Some locals seemed willing to help pay for such a study, but that seems inappropriate to me. The results would either provide some comfort to locals or increase the opposition, depending on the numbers.

A. A detailed response to this topic was included in the General Response to Comments - Air Dispersion Modeling.

Q. Someone needs to reach out to Fundamental and get them more engaged. I am sympathetic to the CBI redactions, but that has really raised suspicions. A more engaged Fundamental could possibly mitigate that area of concern.

A. The permit application process does not require the permit applicant to interact with the general public. However, the DAQ has encouraged Fundamental from the time of the permit application submittal in March 2025 to reach out to the public concerning this permitting action.

Q. I am seeking clarification on why WVDEP is treating individual turbine emission rates and turbine count as confidential when federal regulations and industry practices require such information to be publicly disclosed. Specifically, EPA's NEEDS database, EIA-860 forms, and federal NSPS requirements (40 CFR Part 60 Subpart KKKK) mandate that individual unit emission data be publicly reported. Major manufacturers like GE publicly disclose emission specifications for specific turbine models, and states such as Texas, California, and New York require individual turbine specifications in public permit applications.

What regulatory authority allows WVDEP to withhold information that federal law requires to be publicly disclosed and that is standard commercial data in the power generation industry?

A. 40 CFR § 60.4375 requires the following reports:

(a) For each affected unit required to continuously monitor parameters or emissions, or to periodically determine the fuel sulfur content under this subpart, you must submit reports of excess emissions and monitor downtime, in accordance with § 60.7(c). Excess emissions must be reported for all periods of unit operation, including start-up, shutdown, and malfunction.

(b) For each affected unit that performs annual performance tests in accordance with § 60.4340(a), you must submit a written report of the results of each performance test before the close of business on the 60th day following the completion of the performance test.

As discussed in detail in the EE/FS REGULATORY APPLICABILITY section, the combustion turbines located at the proposed facility meet the emission standards found in Subpart KKKK. Fundamental will be using SCR systems to reduce NOx emissions. Since Fundamental is not using water or steam injection to control NOx emissions, they are required to perform initial and annual performance testing to demonstrate compliance. §60.4340(b) allows an alternative to the annual performance testing requirement by installing, calibrating, maintaining and operating a continuous parameter monitoring system. These requirements are found in permit conditions 4.2.4 and 4.4.4 of the permit.

In place of the alternatives, annual performance testing is not required, therefore, § 60.4375(b) would not apply.

Fundamental is subject to initial performance testing for NOx emissions as required under §60.8 and §60.4400, and to demonstrate compliance with permit condition 4.1.3 (compliance demonstration is on a per combustion turbine basis). The initial performance test will be conducted within 60 days after achieving the maximum production rate, but not later than 180 days after initial startup. The performance test must be done at any load condition within plus or minus 25 percent of 100 percent of peak load. Separate performance testing is required for natural gas and diesel fuel.

As discussed previously in the General Response to Comment Section - CBI, all information submitted to WVDEP, regardless of the regulatory context, and includes, but is not limited to, information submitted in the permitting, enforcement, and emission inventory contexts.

Q. I am concerned about the permit application's use of different emission calculation methodologies for various pollutants, seemingly to remain below major source thresholds. The application uses "EPA AP-42 Emission Factors" for some pollutants while claiming others are "taken from manufacturer provided data for turbine with SCR", allowing selective reporting to achieve the precise 99.35 tons/year NOx limit.

Federal guidance requires consistent emission calculation methodologies under 40 CFR 51.165(a)(3). How does WVDEP's acceptance of this approach comply with federal requirements?

A. Under the CAA emissions calculations must be done using established calculation methodologies. Examples of these methodologies include the use of source-specific data, utilization of emission factors when source-specific data is unavailable, and material balance. It is critical that the most accurate emission data that is available is utilized for each emission source. Using inappropriate or inaccurate values can lead to incorrect values. The emission calculations must also account for any air pollution control device that may be used.

Q. With the passage of HB2014, which eliminates local building code enforcement and environmental oversight, I am concerned about how WVDEP will ensure continued compliance with synthetic minor limits. The law's elimination of local oversight directly affects ongoing permit compliance monitoring, especially since the facility's synthetic

minor status depends on precise emission calculations that could be invalidated by any equipment changes or operational modifications.

Combined with the facility's open-loop control system lacking continuous emissions monitoring, unauthorized modifications could occur without detection. With Tucker County prohibited from enforcing building codes or environmental ordinances, and WVDEP's limited inspection resources, what mechanisms are in place to prevent emissions from exceeding synthetic minor thresholds?

I urge you to explain how WVDEP plans to address this challenge.

A. The DAQ's position on HB 2014 has been presented in the EE/FS. Additionally, a detailed explanation of the C/E role in this process was discussed in the General Response to Comments section, and the mechanisms in place to ensure compliance were discussed in the EE/FS MRRT.

Q. Why do both the permit application and draft permit show "TBD" (To Be Determined) for all critical stack specifications when this information is essential for air quality modeling? Stack height, diameter, exit velocity, and emission coordinates are all undetermined, preventing assessment of pollution dispersion patterns.

A. As discussed previously, air quality modeling is not required for minor sources. The stack height parameters referenced in this question are not required as part of any permit condition, nor for the calculation of any emissions associated with this permit.

Q. How does WVDEP justify waiving air quality modeling requirements for a utility-scale power plant in a sensitive airshed?

A. As discussed previously, air quality modeling is not required for minor sources. Please refer to the General Response to Comments - Air Quality Dispersion Modeling section.

Q. Standard practice requires an impact analysis for facilities of this size, but WVDEP waived modeling using synthetic minor classification—creating circular logic that avoids analysis revealing impacts, requiring major source review. Air models were based on data from Elkins, not Canaan Valley, Davis, or Thomas. Air dispersion works differently up here. Can you re-do the modeling based on data from Canaan Valley, Davis, and Thomas?

A. As discussed previously, air quality modeling is not required for minor sources. The location of the emission data was discussed at length in the General Response to Comments - Meteorological Conditions Used in Estimating Emissions section.

Q. Specifically, how can the WVDEP consider this permit application complete when technical specifications essential for air quality assessment and practical enforceability are marked "TBD"? Please address the critical missing specifications including the following which include multiple "TBD" parameters:

- Stack/Emission Parameters: stack heights and diameters for all emission points, exit gas temperatures and velocities, UTM coordinates for turbine stacks and diesel tank emissions, volumetric flow rates at operating conditions

A. As discussed previously, air quality modeling is not required for minor sources. The stack height parameters referenced in this question are not required as part of any permit condition, nor for the calculation of any emissions associated with this permit.

- Control Device Specifications: SCR design operating temperatures, gas volumes, and pressure drops, operating temperature ranges for SCR and oxidation catalysts, pressure differentials across catalyst beds

A. This information is part of the CBI.

- Storage Tank Parameters: average liquid heights for 10-million-gallon diesel tanks, deck seam specifications and areas for internal floating roof tanks, various operational parameters for emission calculations

A. All necessary data that is required to estimate storage tank emissions in EPA TANKS 5.1 and ProMax were provided.

Q. Federal regulations (40 CFR 70.6) require permit conditions to be "practically enforceable," meaning they must be specific enough to enable regulatory agencies and the public to determine compliance. What regulatory authority allows WVDEP to issue permits based on undefined technical specifications that fail the practical enforceability standard and cannot be inspected, monitored, or enforced?

A. Each permit condition has the necessary MRRT to make it practicably enforceable. The draft permit was also reviewed by EPA and deemed as such.

Q. Ultimately, the public is being denied due process because the redacted and incomplete permit hamstrings meaningful public participation. The affected communities in Thomas, Davis, and Canaan Valley in particular are being prevented from providing meaningful public comment because we are not being allowed access to critical information about the proposed power plant and ultimate end user. Our communities are facing potential harm, but residents and other stakeholders have to guess at the information to which both the permit applicant and the WVDEP have full access. How can we provide meaningful public comment on air quality impacts, emergency procedures, or health risks to our communities when the WVDEP allows Fundamental Data to withhold basic operational criteria that are essential for any analysis of the proposed plant's impact? True due process and a valid public comment procedure would require Fundamental Data to provide actual data instead of the numerous "TBD" deflections in the current permit.

A. Each of these topics have been previously responded to in the General Response and Specific Response to Comments sections.

Q. If the turbines they say they are putting up are already built, they don't have patent secrecy and the data should not be redacted. Not if they are a new turbine being state of the art and is patent pending, then I agree.

A. The CBI has been reviewed by the DEP OGC and it has been determined to meet all requirements of 45 CSR 31 and has been deemed confidential.

Q. When diesel is a back-up for emergency use in emergency power situations, like at hospitals, the diesel is burned in a pad mounted engine - essentially a diesel truck engine. I know that they must be tested. You want to know that when the power fails, the engine will start and all the transfers work as designed so the power is "uninterrupted", or only off for a short break. My concern is that this power plant will have a similar protocol to test their diesel back-up. My question is - How often? Quarterly? Monthly? Weekly? Has this been factored in the emissions that you are reviewing? Diesel is one of the most noticeable odors - even a trace in the air and a person downwind recognizes the small (truck stop). We live in Davis and when the wind is right on occasion, we do small the landfill. The attendees at the informational meeting expressed their worry that the application was not appropriately submitted as a "minor" designation and the diesel consumption was (too) conveniently just below the threshold to bump it up to a higher level of review, requiring a full EIS. I would like to know if regular testing was included in the diesel usage numbers.

A. The diesel pad mounted engine referenced in the question is entirely different from a combustion turbine. There is no necessary requirement to periodically test a combustion turbine with diesel fuel if the natural gas supply is being used continuously. The diesel fuel would be utilized if the natural gas supply is not available. The emission limits in the permit take into account the use of either fuel.

Q. Some questions arise about what backup means in this context: What are the criteria for this plant to switch to using diesel? Is it emergency use only? What is the definition of backup? Emergency backup?

A. As stated in the EE/FS, the turbines will primarily use natural gas as fuel. However, the turbines will also be permitted to use diesel as a backup fuel source when necessary, such as during a natural gas pipeline failure. It is the intention of Fundamental to operate the turbines solely on natural gas. Permit condition 4.1.9 contains the appropriate turbine operating limitations.

Q. What are the safety plans for mitigation of any air quality impact from leaks, spills, fires or explosions? Does Tucker County have the resources to protect the population from these harms and emissions from them? These impacts are all things that the community would like to see in models of air quality impacts.

A. The DAQ does not have statutory authority over the local Emergency Services departments. You should contact your local officials, such as the mayor, city council, county commission, etc. The DAQ has no control or influence over these matters.

Q. I would like to ask that as a condition of this emission permit, the State require a professional wind/wake analysis of the emissions from the Powerplant when it is running under natural gas power, and when it is running under diesel power, and a report of the predicted impact on Davis (and Thomas and other nearby) residents.

I can attest that the impact of the dump is severe when the wind is moving towards Davis. The close proximity of this proposed powerplant to the dump suggests the powerplant's emissions could also strongly impact Davis and other nearby residents.

In my professional career I have many times engaged the services of a professional to analyze the possible impact(s) of emissions, and it would not be proper for the State of WV to issue this permit without the knowledge that can be readily provided by the results of a professional study, especially since the powerplant is proposed to in close proximity to the second largest population aggregation in Tucker County. With such results the State could understand actual predicted impacts of this emission source, and whether it is found to be of concern, or predicted to be of no concern. Even though the applicant suggests the emissions will satisfy the standards qualifying the facility as a small emitter, the special nature of this proposed site and facility, being so close to a major (relative) center of population within the county, it would be inappropriate for the State to approve this application without the information that can be readily provided by the above suggested study.

A. The DAQ does not have the statutory authority to require a wind/wake analysis. As discussed previously, the DAQ does not require air quality modeling of facilities that are minor sources. The items referenced in this question are not required as part of any permit condition, nor for the calculation of any emissions associated with this permit.

Q. I am concerned about the completeness of the permit application regarding the specifications of the control devices, particularly the Selective Catalytic Reduction (SCR) system. The application lists critical operating parameters such as design operating temperature, gas volume, pressure drop, and operating temperature range as "TBD" (to be determined). Additionally, no manufacturer performance guarantees are provided for NOx reduction efficiency or oxidation catalyst destruction efficiency.

A. The information in question is considered CBI. The CBI has been reviewed by the DEP OGC and it has been determined to meet all requirements of 45 CSR 31 and has been deemed confidential.

Q. While Section 29 of the permit application form only requires filling out the Air Pollution Control Device Sheet, the application confirms that "Air Pollution Control Device Manufacturer's Data Sheet included? No ☒". This leaves WVDEP without essential technical specifications needed to establish enforceable permit conditions and deprives the public of the ability to meaningfully review and comment on the proposed control technology performance claims. Could you please explain how WVDEP can establish technically sound emission limits under these circumstances?

A. The information in question is considered CBI. The CBI has been reviewed by the DEP OGC and it has been determined to meet all requirements of 45 CSR 31 and has been deemed confidential. All emission values were properly accounted for and the permit conditions contain federally and practicably enforceable permit requirements.

Q. I am writing to question the approval of an emission control system that operates as an open loop without real-time performance feedback. The facility relies on an "alternative monitoring scenario" under 45 CSR 40 Section 6.6 instead of continuous stack emissions monitoring, and all manufacturer-specified catalyst operating parameters are listed as "TBD".

A. As provided in the EE/FS REGULATORY DISCUSSION section and permit condition 4.1.18, the permit conditions are in compliance with all regulatory requirements. The information in question is considered CBI. The CBI has been reviewed by the DEP OGC and it has been determined to meet all requirements of 45 CSR 31 and has been deemed confidential.

Q. There is a contradiction in the application: it states that catalyst temperature and pressure drop monitoring is "not required per 40CFR63 Subpart ZZZZ", while the draft permit mandates this monitoring under 40CFR60 Subpart KKKK. This setup means the system cannot detect catalyst degradation or failure, cannot be tuned or audited in real time, and provides no immediate warning when emissions exceed permitted levels. This is particularly concerning given that the facility claims to emit precisely 0.7% less than the PSD threshold, a margin that demands continuous oversight for public health protection.

Could you please justify how WVDEP can approve such a control system configuration?

A. 40 CFR 63 Subpart ZZZZ applies to reciprocating internal combustion engines located at major and area sources of HAP emissions. There are no reciprocating internal combustion engines located at the facility; therefore, Subpart ZZZZ does not apply. The permit contains all applicable conditions of 40 CFR 60 Subpart KKKK.

Q. I was told you do not have the metrics to do cancer analysis studies at the in person meeting. I'd like to know why that is, especially since those studies are recommended by the EPA regardless of weather or not its a major source, when the build would be located in a sensitive area. IE HOMES AND SCHOOL!!!!

A. The DAQ has provided an extensive discussion of all regulatory requirements that apply to this facility in the EE/FS REGULATORY DISCUSSION section. These include the regulations that do apply to the facility as well as those that were reviewed that do not apply to the facility with rationale for each. Furthermore, the DAQ provided an analysis of non-criteria regulated pollutants in the EE/FS. This section provided information on those pollutants that are not classified as “regulated pollutants”. Other pollutants of concern, although designated as non-criteria and without national air quality standards, are regulated through various state and federal programs designed to limit their emissions and public exposure. These programs include federal source-specific HAP regulations promulgated under 40 CFR 61 and 40 CFR 63 (NESHAPS/MACT), and WV Legislative Rule 45 CSR 27 that regulates certain HAPs as Toxic

Air Pollutants (TAPs). Any potential applicability to these programs were addressed in the EE/FS REGULATORY APPLICABILITY section.

Q. I write as a frequent visitor to Canaan Valley who plans to retire there within the next decade. While residing in Virginia, this region has become my second home through countless skiing and backpacking adventures. I am affiliated with Tucker United and have participated in public meetings representing valley residents who will bear the direct consequences of this industrial development—consequences I understand firsthand.

During the June 30, 2025 public meeting, I provided extensive testimony about temperature inversions and their potential health impacts in this unique topography, drawing from my personal experience with respiratory damage from industrial pollution exposure in Utah's Salt Lake Valley, where similar mountain valley topography creates comparable temperature inversion conditions that amplify public health impacts from industrial emissions. Having already experienced the health consequences of inadequate air quality protections in similar terrain, I formally requested air dispersion modeling to assess these site-specific risks. The technical concerns I raised at that meeting, combined with my subsequent analysis of the permit application, reveal significant contradictions and missing data that merit careful examination.

I submit these comments to highlight technical inconsistencies in permit application R13-3713 that raise serious questions about compliance with federal and state air quality protections designed to safeguard human health and the wilderness areas that define this region's character.

STATISTICAL IMPOSSIBILITY: REGULATORY GAMING THROUGH FALSE PRECISION IN EMISSION CALCULATIONS

The most glaring evidence of regulatory manipulation appears in the facility's claimed nitrogen oxide emissions of exactly 99.35 tons per year—precisely 0.65 tons below the 100-ton federal threshold that would trigger major source classification. This false precision indicates regulatory gaming rather than legitimate operational planning, as such exact emissions cannot be guaranteed without continuous monitoring, which would be appropriate for a facility claiming to operate so close to the threshold.

A. Permit condition 4.1.5 establishes the maximum aggregate total annual emissions (including startup and shutdown emissions) from the combustion turbines/HRSG when combusting either fuel. Furthermore, permit condition 4.1.9 requires the operating hours of each combustion turbine/HRSG, the throughput of each type of fuel (natural gas/diesel), and operation type (steady state or startup/shutdown) to be continuously monitored and recorded. Each of these conditions also have the necessary MRRT conditions in order for the aggregate annual emission limits to be federally and practicably enforceable.

The false precision referenced above enables Fundamental Data to claim to propose an operational and statistical impossibility: a utility-scale power facility classified as a

synthetic minor source through mathematical manipulation rather than legitimate operational constraints.

A. As stated previously, the permit conditions provide the necessary mechanism for compliance. The permit contains the necessary conditions for compliance when combusting either fuel.

Q. Research of all 78 active fossil power plants over 250 MW in surrounding states (WV, VA, MD, PA, OH, KY, TN, NJ, DE) reveals that every single facility operates as a major source under Prevention of Significant Deterioration review. WV DEP's own engineering analysis classifies this facility as a "fossil fuel-fired steam electric plant" over 22 times the 250 MMBtu/hr threshold that typically triggers major source requirements, yet the application claims false precision to achieve what no other utility-scale power plant in the region has accomplished—avoiding major source classification through false precision rather than superior engineering. This mathematical precision to 0.01% accuracy (99.35 vs 100.00) reveals manipulation rather than legitimate operational forecasting, as genuine operational planning would include safety margins and uncertainty ranges.

Specific Request: I formally request that WV DEP explain the specific technical and regulatory basis for accepting that this facility can achieve what no other utility-scale power plant in the region has accomplished, and provide documentation of the emission verification standards, precedent analysis, and regulatory authority relied upon for synthetic minor classification of facilities at this scale, as required for public accountability under the Clean Air Act's public participation provisions.

A. The reference to this facility being 22 times greater than the threshold is taken out of context. The statement made in the EE/FS was provided to indicate that a NGCC with a total heat input of more than 250 MMBtu/hr is one of the 28 listed sources that would be subject to the 100 tons/year major source threshold. The purpose of a synthetic minor is to take physical and/or operational restrictions to stay below major source thresholds. A source of any kind can voluntarily take any restriction they choose to accomplish this. The permit contains federally and practicably enforceable limitations for this facility to be considered a minor source. An individual’s opinion on how a facility chooses to operate in comparison to other facilities is not a reason for denial.

Q. The application's formaldehyde emission data directly contradicts recent EPA findings that documented modern gas turbines emit 18-190 times higher than AP-42 predictions. EPA's 2024 findings established a clear pattern where every measured modern turbine exceeded AP-42 estimates, yet Fundamental Data claims performance substantially below these already-conservative factors. This discrepancy has direct regulatory consequences. Using standard AP-42 Table 3.1-3 factors for the proposed facility size yields formaldehyde emissions that would exceed the 10 tons per year single hazardous air pollutant major source threshold, invalidating the synthetic minor determination that forms the basis of this entire permit application.

WV DEP received no manufacturer's data sheet, no performance guarantees for formaldehyde control efficiency, and no actual operating parameters. All critical SCR

specifications are listed as "TBD" in the application. The application explicitly confirms "Air Pollution Control Device Manufacturer's Data Sheet included? No ☒" and "Provide manufacturer data? No ☒," while listing Design Operating Temperature, Design gas volume, Operating temperature range, and Pressure drop as "TBD."

Without manufacturer-verified catalyst conditions designed to control formaldehyde, without any performance guarantee specific to formaldehyde reduction, and with contradictory monitoring requirements that rely on parameters never provided, WV DEP cannot satisfy their regulatory charter to enforce federal EPA standards and protect human health while approving synthetic minor status.

Specific Requests: I respectfully request that WV DEP require independent verification of all emission claims that deviate from EPA-established factors, particularly formaldehyde emissions that contradict EPA's 2024 findings, and mandate that corrected emission calculations be provided and subject to additional public comment before any permit approval.

A. The permit application utilized manufacturer data for the formaldehyde emissions associated with the combustion turbines when firing natural gas and AP-42 was used when firing diesel. This manufacturer data is part of the CBI. The table on page 9 of the Draft EE/FS does contain an error and incorrectly listed that all HAPS utilized AP-42 as part of the emission calculations. This error has been recognized in the Final Determination document in the EE/FS Errata section. Due to the concern surrounding the formaldehyde emissions and the differences experienced between using the manufacturer data and the potential Title V major source status when using AP-42, a permit condition has been added to the permit which will require Fundamental to conduct an initial performance test to ensure compliance with the hourly formaldehyde value when combusting natural gas.

Q. The permit application contains systematic gaps in essential technical information required for meaningful regulatory review. Critical SCR specifications necessary for emission verification are listed as "TBD" rather than redacted, representing explicit omissions rather than confidentiality claims.

These undefined specifications include Design Operating Temperature, Design gas volume, Operating temperature range, and Pressure drop—fundamental parameters required to verify the emission control performance that forms the basis of synthetic minor classification. Without these specifications, the monitoring requirements referenced in the permit become meaningless, as they rely on operational parameters that have never been provided.

This incomplete application approach prevents both regulators and the public from conducting the technical verification necessary to ensure actual compliance with major source thresholds. The absence of manufacturer data sheets and performance guarantees means that the claimed emission reductions have no enforceable basis in verified equipment capabilities.

Specific Requests: I request that WV DEP require a complete application with all critical specifications defined before permit approval, and extend the public comment period to allow adequate technical review once the missing information is provided. Essential technical data cannot remain undefined in a permit that relies on specific equipment performance claims.

A. The redacted and confidential permit applications were both reviewed and deemed to be complete by the DAQ on April 9, 2025. All necessary data needed for application review and to draft a permit with federally and practicably enforceable permit conditions were present. The CBI has been reviewed by the DEP OGC and it has been determined to meet all requirements of 45 CSR 31 and has been deemed confidential.

Q. Both the formaldehyde calculations and the precisely-calibrated 99.35 ton NOx emissions demonstrate clear examples of systematic regulatory avoidance designed to circumvent major source review protections. The application reveals a coordinated strategy of selective methodology application—using "EPA AP-42 Emission Factors" for some pollutants while claiming other emissions are "taken from manufacturer provided data for turbine with SCR," selecting whichever method produces lower calculated emissions.

This methodological inconsistency undermines the integrity of emission calculations that form the basis for all subsequent permit conditions and public health protections. Such selective approach allows the facility to claim benefits of pollution controls through manufacturer data for some emissions while using uncontrolled baseline factors for others, artificially manipulating total calculated emissions to achieve the precise synthetic minor limits.

The pattern extends beyond individual calculations to encompass the fundamental classification approach. No comparable facility in the region has ever successfully avoided major source classification through emission manipulation, yet this application attempts to establish a precedent that would effectively exempt utility-scale facilities from the comprehensive environmental review that Congress intended through the Clean Air Act's major source provisions.

Specific Requests: I request that WV DEP require consistent emission calculation methodology across all pollutants, using the most conservative and verifiable approach, and provide written documentation of the regulatory authority and precedent analysis supporting synthetic minor classification for utility-scale power facilities of this magnitude.

A. Under the CAA emissions calculations must be done using established calculation methodologies. Examples of these methodologies include the use of source-specific data, utilization of emission factors when source-specific data is unavailable, and material balance. It is critical that the most accurate emission data that is available is utilized for each emission source. Using inappropriate or inaccurate values can lead to incorrect values. The emission calculations must also account for any air pollution control device that may be used.

As stated previously, the purpose of a synthetic minor is to take physical and/or operational restrictions to stay below major source thresholds. A source of any kind can voluntarily take any restriction they choose to accomplish this. The permit contains federally and practicably enforceable limitations for this facility to be considered a minor source. An individual's opinion on how a facility chooses to operate in comparison to other facilities is not a reason for denial.

Q. The community and environmental protections that these regulations were designed to provide require either denial of this application or proper classification as a major source with comprehensive Prevention of Significant Deterioration review. The residents of Tucker County, the protected wilderness areas of Canaan Valley, and the integrity of West Virginia's air quality regulations deserve full compliance with established environmental protections. The technical evidence presented demonstrates that this facility cannot legitimately operate as a synthetic minor source and that approval based on the current application would establish a dangerous precedent undermining federal air quality protections throughout the region.

A. The EE/FS contains all applicable and potentially applicable regulations and rationale for compliance for each. Each permit condition has the necessary MRRT to make the permit federally and practicably enforceable. This permit was also reviewed by EPA and deemed as such.

As stated previously, the purpose of a synthetic minor is to take physical and/or operational restrictions to stay below major source thresholds. A source of any kind can voluntarily take any restriction they choose to accomplish this. The permit contains federally and practicably enforceable limitations for this facility to be considered a minor source. An individual's opinion on how a facility chooses to operate in comparison to other facilities is not a reason for denial.

The facility meets all applicable regulatory requirements and emission standards. These standards are explained in detail in the EE/FS REGULATORY DISCUSSION section of that document.

Q. How does this apply to an air quality permit? Fungi (including lichen) are incredibly sensitive to air quality. Hence why species of lichen, in the Genus Usnea, are often considered 'bio-indicators' of good air quality. Mycorrhizal (root associated) fungi, exchange nutrients with their plant host for sugars from photosynthesis. This process of nutrient exchange, makes them especially sensitive to nitrogen deposition, soil acidification, and the subsequent binding up and leaching of nutrients; leaving the fungi fragile and unable to perform their roles in the ecosystem. The loss of forests fungal diversity has a cascading detrimental effect on the ecosystem, from insect and amphibian lifecycles, to tree health and resilience.

A. An in-depth discussion regarding the ambient air quality of Tucker County and compliance with the NAAQS was provided in the General Response to Comments section. The EPA establishes two distinct kinds of standards for acceptable concentrations of specific pollutants in the ambient (outdoor) air. Primary standards establish limits to protect public health, including the health of sensitive populations, such as children, the elderly and those with asthma.

Secondary standards set limits to protect public welfare, including protection against decreased visibility and damage to animals, crops, vegetation and buildings. Such standards have been established for six principal pollutants:

- ground-level ozone (O_3)
- particulate matter (PM_{10} and $PM_{2.5}$)
- sulfur dioxide (SO_2)
- carbon monoxide (CO)
- nitrogen dioxide (NO_2)
- lead (Pb)

Furthermore, West Virginia Code §22-5-1, et. seq. - which states, under §22-5-1 ("Declaration of policy and purpose"), that:

> It is hereby declared the public policy of this state and the purpose of this article to achieve and maintain such levels of air quality as will protect human health and safety, and to the greatest degree practicable, prevent injury to plant and animal life and property, foster the comfort and convenience of the people, promote the economic and social development of this state and facilitate the enjoyment of the natural attractions of this state.

Pursuant to §45-13-5.7, the DAQ shall issue a permit unless:

> a determination is made that the proposed construction, modification, registration or relocation will violate applicable emission standards, will interfere with attainment or maintenance of an applicable ambient air quality standard, cause or contribute to a violation of an applicable air quality increment, or be inconsistent with the intent and purpose of this rule or W. Va. Code §22-5-1 et seq., in which case an order denying such construction, modification, relocation and operation shall be issued. The Secretary shall, to the extent possible, give priority to the issuance of any such permit so as to avoid undue delay and hardship.

Q. A key aspect of highland weather dynamics is in the cloud layers that form and sit on the mountains and highland valleys. This 'cloud forest' of sorts, wicks moisture and offers climactic refuge for many species. (This is part of why many people like to come to Tucker County in the summertime) This is also exactly what puts the highland forest at much greater risk to air pollution.. As a concerned citizen and community scientist, I am asking that you lead a much more comprehensive environmental impact study, which not only looks at the effects of air quality on human health and economies, but one that takes into consideration the potential impacts on the myriad of species within their ecosystem and their place in a dynamic and rapidly changing world.

A. In response to a comprehensive environmental impact study, please see the response in the General Response to Comments - Major Source/Class I Area/Notification of FLM/Environmental Impact Assessment section. In response to impacts on the potential impacts on animal species and its relation to the NAAQS, please see the response in the General Response to Comments - Pollutant Effect on Animals (Bats, Salamanders, Endangered Species) section.

Q. I understand that the developers have stated that the noise level will not exceed that set out by Occupational Safety and Health Administration. I would suggest that when people get ready for a night's sleep and slip under the covers they do not do so at their work site at their place of employment. This is an astoundingly irrelevant standard to be used. Similarly, even other noise levels that are often characterized as the level of normal speech, if they are unrelentingly constant, are noise levels that will interfere with having dinner on a deck or otherwise enjoying citizen's property outside the walls of their residence.

A. The General Response to Comments - Statutory Authority of the DAQ section outlines the authority of the DAQ. Based on the language under §22-5-1, et. seq., the DAQ, in making determinations on issuance or denial of permits under WV Legislative Rule 45 CSR 13 (45 CSR 13), does not take into consideration substantive non-air quality issues such as noise.

Q. Many times people have told me that the biggest annoyance and inconvenient from a well pad, some times even more than noise, is the lack of darkness at night. Even when the agreement calls for lights to be on the outside of the pad pointing in and down (particularly during construction), enough light reflects from what is in the atmosphere to cause skyglow that spills light onto their land. Window shades are not enough to get back to the natural atmosphere that they wanted when they bought their homes, and the lack of a true night sky is considerable loss of enjoyment for a home or even a business.

A. The General Response to Comments - Statutory Authority of the DAQ section outlines the authority of the DAQ. Based on the language under §22-5-1, et. seq., the DAQ, in making determinations on issuance or denial of permits under WV Legislative Rule 45 CSR 13 (45 CSR 13), does not take into consideration substantive non-air quality issues such as this.

Q. Even just the construction phase will bring in population and business entities that are not complementary to what is going on in this area. Even many of those in Mason County who were at first happy to have the new Nucor steel mill have regretted what it has done to their communities and their ability to purchase homes etc. in their area.

A. The General Response to Comments - Statutory Authority of the DAQ section outlines the authority of the DAQ. The DAQ has no authority to take into consideration non-air quality issues such as these.

Q. The proposed gas fired power plant would emit significant levels of nitrogen oxides (NO_x) and sulfur dioxide (SO_2), which:
· Contribute to acid rain, directly harming the sensitive red spruce forests of the Cheat Mountain Salamander (Threatened).
·Increase ground level ozone formation, damaging local vegetation and public health.
·Add to regional haze and visibility problems that threaten the unique natural character of Monongahela National Forest and Canaan Valley National Wildlife Refuge.
· In addition, the plant's greenhouse gas emissions would contribute to climate change, which is a significant threat to high elevation, range restricted species like the Cheat Mountain Salamander and the Northern Flying Squirrel.

A. In response to endangered species, please see the response in the General Response to Comments - Pollutant Effect on Animals (Bats, Salamanders, Endangered Species) section. Additionally, a discussion on potential Acid Rain regulations was included in the EE/FS - REGULATORY APPLICABILITY section. In response to the damage to local vegetation and public health and regional haze, please see the response in the General Response to Comments - Ambient Air Quality of Tucker County section. In response to the GHG emissions, please see the response in the General Response to Comments -GHG Emissions section.

Q. The proposed facility risks direct and indirect harm to several listed species:

·Virginia Big eared Bat (Endangered): Caves and roosting areas could be disturbed by construction noise, increased traffic, and nighttime light pollution.

· Big Sandy Crayfish (Threatened): Any accidental runoff, sedimentation, or thermal pollution from the facility's cooling processes could degrade sensitive streams the species depends on.

· Cheat Mountain Salamander (Threatened): Air pollution impacts, habitat fragmentation, and acid rain threaten its already limited range.

· Additional cave dwelling invertebrates in the area may also be at risk from construction and emissions.

A. In response to endangered species, please see the response in the General Response to Comments - Pollutant Effect on Animals (Bats, Salamanders, Endangered Species) section.

Q. I am concerned that the current draft air quality permit:

·Does not sufficiently account for cumulative impacts to air quality and critical habitat especially trying to classify as a "minor source" of pollution when all other similar facilities are classified as major.

· Fails to ensure that the facility will comply with the federal Clean Air Act's mandate to protect not only human health but also public welfare which explicitly includes wildlife, soils, water, and forests.

· Does not demonstrate how the project will avoid "takes" under the ESA or address the need for Section 7 consultation and mitigation measures.

A. The explanation as to why this source is properly characterized as a minor source can be found in the General Response to Comments - Major Source/Class I Area/Notification of FLM/Environmental Impact Assessment section. Please see the response in the General Response to Comments - Ambient Air Quality of Tucker County section on NAAQS compliance with both the primary and secondary standards.

Q. Another issue for me is the storage and consumption of 30 million gallons of diesel fuel. Sources tell me that diesel fuel has a shelf life of about a year unless additives are used.

Therefore, they are likely going to have to burn diesel fuel way more than they account for on the permit application. Ever smell diesel fuel exhaust from a single passing truck?

A. In response to the shelf life comment, please see the response in the General Response to Comments - Above Ground Storage Tanks section. In response to the odors comment, please see the response in the General Response to Comments - Potential Odors section.

Q. Synthetic minor status allows a facility with major source potential to emit (PTE) to operate as a minor source through enforceable emission limits (EPA Office of Inspector General, 2021). Under the CAA, major sources exceed 100 tons per year (tpy) for criteria pollutants like NOx, particulate matter (PM), carbon monoxide (CO), or volatile organic compounds (VOCs), or 10/25 tpy for hazardous air pollutants (HAPs). The Ridgeline Facility admits to exceeding these thresholds without restrictions—e.g., NOx at 3,261 tpy—yet proposes caps like 61,320 hours/year for natural gas and 25,000 hours/year for diesel to claim synthetic minor status. These limits, however, are impractically high and questionably enforceable, especially given the facility's NOx-dominant emissions profile.

I request detailed responses to the following:

- **How does the WVDEP justify synthetic minor classification for a facility with a PTE of 3,261 tpy NOx, when comparable NGCC plants are routinely treated as major sources?**
- **What empirical data supports the enforceability of the proposed operational hour limits, and how will deviations be detected without continuous emission monitoring systems (CEMS)?**
- **What additional modeling has been conducted to assess long-term atmospheric deposition from NOx and its alignment with CAA thresholds?**

A. The purpose of a synthetic minor is to take physical and/or operational restrictions to stay below major source thresholds. A source of any kind can voluntarily take any restriction they choose to accomplish this. The permit contains federally and practicably enforceable limitations for this facility to be considered a minor source. An individual’s opinion on how a facility chooses to operate in comparison to other facilities is not a reason for denial. The permit contains all source specific requirements as well as the necessary MRRT to be considered federally and practicably enforceable and has been reviewed by EPA as well. Please see the response in the General Response to Comments - Air Quality Dispersion Modeling section.

Q. What targeted interventions will mitigate health risks from NOx emissions in vulnerable populations, such as schoolchildren and pregnant individuals, and how will these be monitored?

A. The permit requires SCR air pollution control devices for the combustion turbines to control NOx emissions. In response to the vulnerable population, please see the response in the General Response to Comments - Ambient Air Quality of Tucker County section.

Q. How will the WVDEP quantify and prevent the amplification of oxidative stress in residents with preexisting lung conditions during inversion events (Xing et al., 2016)?

A. The General Response to Comments - Statutory Authority of the DAQ section outlines the authority of the DAQ. The DAQ has no authority to mandate health surveillance protocols. An in-depth discussion of the ambient air quality of Tucker County and its relationship to the NAAQS is provided in the General Response to Comments section.

Q. What health surveillance protocols will be mandated to track long-term impacts from NOx and PM2.5 (Hamra et al., 2014)?

A. The General Response to Comments - Statutory Authority of the DAQ section outlines the authority of the DAQ. The DAQ has no authority to mandate health surveillance protocols. An in-depth discussion of the ambient air quality of Tucker County and its relationship to the NAAQS is provided in the General Response to Comments section.

Q. How will the WVDEP assess and prevent impacts on endangered species from NOx emissions?

A. This topic is addressed in the General Response to Comments - Pollutant Effect on Animals (Bats, Salamanders, Endangered Species) section.

Q. What atmospheric modeling (e.g., CALPUFF) will evaluate NOx contributions to regional haze in Class I areas?

A. This topic is addressed in the General Response to Comments - Air Quality Dispersion Modeling section.

Q. In the context of thermal inversions, what contingency measures will address amplified effects on biodiversity, such as algal blooms from nitrogen deposition?

A. A discussion of NAAQS secondary standards is provided in the General Response to Comments - Ambient Air Quality of Tucker County section.

Q. Given NOx's proximity to thresholds, how will minor operational variances be prevented from triggering major source reclassification?

A. This topic is addressed in the General Response to Comments - Major Source/Class I Area/Notification of FLM/Environmental Impact Assessment section.

Q. What justifies exempting dispersion modeling under 40 CFR 51.160(f)?

A. This topic is addressed in the General Response to Comments - Air Quality Dispersion Modeling section.

Q. How will redacted CBI be reconciled with public participation rights, enabling independent verification of emission calculations?

A. This topic is addressed in the General Response to Comments - Confidential Business Information (CBI) section.

Q. What economic impact assessments incorporate health costs from emissions on low-income residents (Kermani et al., 2016)?

A. The General Response to Comments - Statutory Authority of the DAQ section outlines the authority of the DAQ.

Q. How will community engagement address air quality concerns, including public access to real-time NOx data?

A. As discussed at the June 30, 2025 public meeting, access to real-time emissions data will not be available. All correspondence between DEP and Fundamental, including any emission report data, will be made available on the DEP AE website.

Q. What measures mitigate tourism losses from visibility and ecosystem damage?

A. The General Response to Comments - Statutory Authority of the DAQ section outlines the authority of the DAQ.

Q. What validates formaldehyde rates, and how do they align with AP-42?

A. The permit application utilized manufacturer data for the formaldehyde emissions associated with the combustion turbines when firing natural gas and AP-42 was used when firing diesel. The table on page 9 of the Draft EE/FS does contain an error and incorrectly listed that all HAPS utilized AP-42 as part of the emission calculations. This error has been recognized in the Final Determination document in the EE/FS Errata section. Due to the concern surrounding the formaldehyde emissions and the differences experienced between using the manufacturer data and the potential Title V major source status when using AP-42, a permit condition has been added to the permit which will require Fundamental to conduct an initial performance test to ensure compliance with the hourly formaldehyde value when combusting natural gas.

Q. How will undefined SCR parameters be resolved to ensure compliance with 40 CFR 70.6?

A. Permit condition 4.2.4 and 40CFR§60.4340(b)(iii) requires the installation of SCR systems on each turbine to control NOx emissions. The parameters of the SCR systems must be continuously monitored to verify proper operation. The permittee shall monitor each catalyst bed inlet temperature and pressure differential across each catalyst bed to indicate proper operation.

Q. What post-permit mechanisms monitor emissions?

A. All required monitoring is included in Section 4.2 of the permit.

Q. There is an inadequate definition of Emission Units (Section 1.0). Additional equipment will also be needed for operation and are not included in the application or draft permit.

A. As regulated under permit condition 4.1.1, the facility shall consist of only the pollutant-emitting equipment and processes identified under Section 1.0 of this permit and identified in permit application R13-3713. In accordance with the information filed under Permit Application R13-3713, the equipment shall be installed, maintained and operated so as to minimize any fugitive escape of pollutants and the equipment/processes shall use the specified air pollution control devices. As of the issuance of this permit, a combustion powered fire pump as inquired about in several public comments is not covered. If Fundamental plans to install a combustion powered fire pump or any other equipment that would emit regulated air pollutants (ammonia is not, please see General Response to Comments - Ammonia Emissions section), the appropriate permitting action would be required.

Q. The application states that the facility would operate on natural gas for up to 61,320 hours per year and diesel for 25,000 hours per year. These operating limits are not included in the draft permit.

A. The emissions included in the EE/FS and permit are those that exist with the operational restrictions that are placed on the facility. This is accomplished through the MRRT that is established in the permit through federally enforceable permit requirements. Page 57 of the permit application includes the emissions experienced when the turbines are combusting natural gas. These include the unrestricted hourly emission rates and the unrestricted and restricted annual emission rates. Page 58 includes the same information when diesel fuel is combusted in the turbines. These two hourly values are not additive.

These hourly values when combusting natural gas or diesel exclusively during a consecutive twelve-month rolling period were added to permit condition 4.1.5. No additional monitoring or recordkeeping is necessary, as the appropriate monitoring and recordkeeping already exists.

Q. Permit condition 4.1.10 allows 180 days to optimize the ammonia injection system for NOx control. In the meantime, the public could be exposed to elevated NOx and ammonia slip levels. Six months is excessive for an industry standard process.

A. Permit condition 4.2.4 and 40CFR§60.4340(b)(iii) requires the installation of SCR systems on each turbine to control NOx emissions. The parameters of the SCR systems must be continuously monitored to verify proper operation. The permittee shall monitor each catalyst bed inlet temperature and pressure differential across each catalyst bed to indicate proper operation. This federal regulation requires the parameters including the ammonia injection system to be monitored continuously to verify proper operation. As stated previously in this document, ammonia is not a regulated pollutant.

Q. Permit condition 4.1.14 allows unlimited emissions during startup and shutdown periods because pollution control systems are not fully operational.

A. Permit condition 4.1.14 states that the combustion turbines/HRSGs shall use the air pollution control devices in Section 1.0 and permit condition 4.1.6 at all times when in operation except during periods of startup and shutdown when operating temperatures do not allow for proper use of the air pollution control devices. Permit condition 4.1.14 limits the annual emissions during these times, so permit condition 4.1.14 does not allow unlimited emissions as the comment states.

Q. Permit condition 4.1.15 contains a maximum annual throughput rate of 15,000,000 gallons per year of diesel fuel to the storage tanks. At a diesel use rate of 32,872 gallons per hour, this would permit only 456 hours of diesel operations. It is not clear if this is included in the total aggregate emissions.

A. Pages 57 and 58 of Attachment N of the permit application are provided for illustrative purposes to represent the potential emissions from the proposed facility while combusting natural gas and/or diesel under operational limitations to remain below PSD and Title V permitting thresholds. The hourly values are represented for each fuel source and indicate the worst case operating hours when combusting either fuel on a continuous twelve month basis and does not take into account that the proposed facility intends to utilize diesel as a backup fuel source. The permit does limit the maximum annual throughput to the diesel storage tanks to 15,000,000 gallons per year.

Q. There are no emission limits for diesel truck unloading, even though it is listed as an emission unit in Section 1.0.

A. The emissions associated with diesel truck unloading are included in the EE/FS and determined to be small and addressed in the General Response to Comments - Diesel Unloading section. Permit conditions 4.2.6 and 4.4.6 address diesel unloading at the facility.

Q. The permit only requires minimal monitoring of operating conditions and fuel usage, and a one-time stack test. Modern power plants routinely install CEMS. CEMS should be a minimum requirement.

A. The permit contains all necessary MRRT and is considered federally and practicably enforceable. The rationale supporting the one-time stack test can be found in the EE/FS REGULATORY APPLICABILITY section for 40 CFR 60 Subpart KKKK. CEMS is not a regulatory requirement under this rule for these units.

Q. The Ridgeline Facility would be located near sensitive and protected areas. These natural areas are not just abstract dots on a map, they form the backbone of Tucker County's tourism and outdoor recreation economy. Visitors come for clean air, dark skies, and natural tranquility. A project of this magnitude poses risks to all those values. Increased air pollution can lead to smog and haze that diminishes scenic views. Nitrogen

deposition can affect high-elevation forests and streams. Around-the-clock operation means noise and light pollution that would carry into normally quiet, dark environments.

A. The General Response to Comments - Statutory Authority of the DAQ section outlines the authority of the DAQ. An in-depth discussion of the ambient air quality of Tucker County and its relationship to the NAAQS is provided in the General Response to Comments section, as well as tourism, noise and light topics.

Q. The proposed site lies near federally protected areas including Dolly Sods, Otter Creek, Blackwater Falls, and Canaan Valley. These areas are vulnerable to air pollution, visibility degradation, and ecological harm. Yet the synthetic minor permit classification has allowed the applicant to avoid required analyses such as dispersion modeling or Federal Land Manager consultation.

A. The purpose of a synthetic minor is to take physical and/or operational restrictions to stay below major source thresholds. A source of any kind can voluntarily take any restriction they choose to accomplish this. The permit contains federally and practicably enforceable limitations for this facility to be considered a minor source. Please see the section in General Response to Comments - Major Source/Class I Area/Notification of FLM/Environmental Impact Assessment section.

Q. West Virginia is subject to the "Regional Haze Program" created by Congress. Nationwide, 98% of national public lands suffer hazy sky pollution, losing up to 50 miles of visibility, including the Dolly Sods Wilderness in the Canaan Valley. The pollutants from the applicant caught in an inversion in Dolly Sods would add to the haze and diminish the air quality in the Canaan Valley. The additional contribution to diminished air quality already affected by the nearby Mt. Storm Power Plant should be determined, so that this information is available to WV DEP DAQ when determining whether to grant this permit application.

A. The air quality monitors discussed in the General Response to Comments - Ambient Air Quality of Tucker County, are federally operated air monitoring sites located in Tucker County that are used to assist with regional haze assessments. These air monitoring sites have provided information on the components of particulate matter and other aspects of pollutants contributing to haze. These sites, in conjunction with federal rules, have helped West Virginia and the country improve visibility and reduce haze even ahead of federal timelines.

Q. One example of where the lack of information is apparent is regarding the real possibility of weather inversions in the Canaan Valley trapping air pollutants. The proposed site is located near Thomas/Davis, on a ridge looking out over the Canaan Valley. The Canaan Valley is a unique landscape, consisting of state public lands, federal wildlife reserves, and private land trust holdings. At the meeting, it was mentioned that the smokestacks would not be visible from the roadway. Therefore, in effect, the release of pollutants would be at about 3,200 feet elevation, where most of the population lives, and above the level of the Canaan Valley bowl. The effect would be that pollutants would be trapped in inversions in the Canaan Valley, with poor air quality affecting the state and

national public lands in the area - and the importance of these lands to recreation and tourism. The Forest Service determined in 1995 that the Blackwater River' is eligible for designation as a Wild & Scenic River. Since that time, the Forest Service has provided extra care for managing the Blackwater (and 15 other waterways determined to be eligible for designation). The Blackwater flows through the Canaan Valley. The air quality impacts from pollutants trapped in a weather inversion would impact this Wild and Scenic eligible river. Moreover, we note that the negative impacts of air pollution on water resources are well known from many studies of atmospheric deposition in the Appalachian mountains and elsewhere.

A. As stated previously, please see the response provided in the General Response to Comments - Air Quality Dispersion Modeling.

Q. There is no effective air monitoring system in the area, either to provide baseline information or to be used for enforcement of air quality violations. The monitors are (as stated at the meeting) 5 to 10 miles away, and do not measure some of the pollutants that would be released if the permit were granted.

A. Please see General Response to Comments - Ambient Air Quality of Tucker County section.

Q. The applicants propose to store up to 30 million gallons of diesel fuel on-site, and these tanks could release substantial quantities of volatile organic carbons into the air under normal operations (application page 35, Table 1). However, the applicants do not define the emissions point type for these storage tanks, nor do they provide their calculations for the expected emission amounts. Moreover, DEP requires VOCs to be speciated in the application (e.g., separating benzene and formaldehyde etc.), but this step was not taken by the applicants (application page 35, Table 1) and therefore the application is incomplete and cannot be fully evaluated by DEP or the public.

A. Please see the response in the General Response to Comments - Above Ground Storage Tanks section for an explanation of how the calculations were performed. The permit application did include emission calculations for the tanks in Attachment N. It was conservatively estimated that all VOCs were also HAPs.

Q. The proposed method of applying a 12 month rolling average will grossly distort the actual emissions impact on the community. For starters it will be 12 months into operations of the unit before the first meaningful data is obtained. But worse, averaging over such a large period of time would completely mask large short-term discharges of harmful pollutants as long as it is offset by periods of relatively low discharge.

I strongly urge our elected officials to require the facility to meet the Minor Source requirements using a much shorter averaging time interval. Using a monthly or weekly average will increase transparency and provide the public with data that reflects a more accurate picture of emissions.

Section 3.2.1 establishes that compliance with emissions limits will be based on a 12-month

rolling average. This approach will allow exceedances to be averaged over a lengthy compliance period. As you should be aware, due to the frequency of temperature inversions and the unique pristine environment of the Canaan Valley, these occasional exceedances will have a disproportionate impact on public health, the Tucker County economy, and the environment. We recommend that the compliance period be based on a 7-day rolling average, and that it includes emissions during startups, shutdowns and malfunctions. Although the number of startups and shutdowns (as well as the number of turbines) was redacted in the application and draft permit, a realistic Potential To Emit should assume these occur every week, which would justify use of a 7-day rolling average.

A. Permit condition 4.1.9 requires the operating hours of each combustion turbine/HRSG, the throughput of each type of fuel (natural gas/diesel), and operation type (steady state or startup/shutdown) will be ***continuously*** monitored and recorded. The fuel consumption of the combustion turbines are required to be monitored on an hourly basis to show compliance with the permitted limits. This data is required to be monitored on a much shorter time than the 12 months that the comment implies.

Q. Fundamental has applied for a permit as a "synthetic minor source" of emissions. I understand that this means that the project is subject to much less thorough study of environmental impacts than would be the case if it were classified as a major source, so Fundamental is highly incentivized to claim that status. But serious questions have arisen regarding the plausibility of the data it has submitted in claiming to be able to operate as a synthetic minor source. For example, as another commenter has pointed out, every single one of the currently operating natural gas-fueled power plants in West Virginia and adjacent states, including many that are considerably smaller than the proposed power plant, are major sources. Fundamental, without explanation or verification of any sort, asserts that somehow it can operate differently than all of these other power plants. Commenters have also raised technical questions about specific assumptions and calculations included in the permit application that appear to contradict each other or to depart from accepted industry norms, as well as critical information left "TBD," making thorough analysis impossible–both for DEP and for interested members of the public. Surely DEP, in diligently evaluating the application, cannot accept questionable claims and incomplete data at face value, without demanding additional evidence and analysis to demonstrate that Fundamental is eligible for the light-touch regulatory treatment it is seeking. The surrounding circumstances–the fact that Fundamental is a shell company concealing the true parties in interest; the extreme lack of transparency reflected in the extensively redacted and incomplete application; the poor corporate citizenship evidenced by Fundamental's ongoing failure to engage in any way with the affected community; even the data center industry itself, which seems to have more than its share of high-profile scofflaws–suggest that a reasonable decision-maker would meet Fundamental's claims with skepticism and not give the benefit of the doubt to data that is unsubstantiated, contradictory, outside of expected norms and values, or incomplete.

A. That is incorrect. All applicable and potentially applicable regulations are analyzed and can be found in the EE/FS REGULATORY APPLICABILITY section. The purpose of a synthetic minor is to take physical and/or operational restrictions to stay below major source thresholds. A

source of any kind can voluntarily take any restriction they choose to accomplish this. The permit contains federally and practicably enforceable limitations for this facility to be considered a minor source. An individual's opinion on how a facility chooses to operate in comparison to other facilities is not a reason for denial. The permit contains all source specific requirements as well as the necessary MRRT to be considered federally and practicably enforceable and has been reviewed by EPA as well. Under the CAA emissions calculations must be done using established calculation methodologies. Examples of these methodologies include the use of source-specific data, utilization of emission factors when source-specific data is unavailable, and material balance. It is critical that the most accurate emission data that is available is utilized for each emission source. Using inappropriate or inaccurate values can lead to incorrect values. The emission calculations must also account for any air pollution control device that may be used.

Q. Has DEP appropriately taken into account all of the relevant facts? The position of DEP's representatives at the June 30 meeting was that they had no idea what the intended use of the power plant was, because the application was silent on that point. In case this remains a gap in your deliberative record, I attach a May 21 Wall Street Journal article in which a representative of Fundamental is quoted as saying that the Ridgeline project would be "among the largest data center campuses in the world." This fact seems highly relevant to your evaluation of the plausibility of Fundamental's operating projections and estimates and would seem to necessitate significant further information-gathering if you have not previously taken it into account.

A. The EE/FS and permit take into account all pollutant-emitting equipment and processes identified under Section 1.0 of this permit. In accordance with the information filed under Permit Application R13-3713, the equipment shall be installed, maintained and operated so as to minimize any fugitive escape of pollutants and the equipment/processes shall use the specified air pollution control devices. The non-disclosure of the final end use of the power generated is not a cause for denial of the permit. How the power is used will have an impact on whether Fundamental is required to obtain an Acid Rain Permit (45 CSR 33) and a Title V Permit (45 CSR 30). However, the process of applying for and receiving an Acid Rain or Title V Permit is independent of the 45 CSR 13 permitting process. These potential requirements are outlined in permit condition 4.1.19 and the regulatory applicability is discussed in the REGULATORY APPLICABILITY section of this document.

Q. Has DEP prejudged the decision to grant the permit, without taking into account input from the notice and comment process? The defensive posture exhibited by DEP representatives at the meeting made it sound like the decision had already been made. The fact that DEP never refuses an air quality permit–a fact of which Mr. Kessler, the program manager for the Division of Air Quality, seemed strangely proud–certainly reinforces that impression. And I was not the only person in attendance who came away thinking that this is a done deal. The headline for the article covering the meeting in Country Roads News, a publication by a local journalist, was "State Officials Appear Almost Certain to Approve Power Plant Air Permit."

A. The DAQ does take into account all comments and questions received during the public review procedures as outlined in §45-13-8. As given in this document, and pursuant to

§45-13-8.8, all relevant comments received during the public comment period have been reviewed and appropriately addressed in this document. All air quality permit applications are reviewed to determine whether or not applicable air quality regulations are met. If it is determined during that review that a regulation will not be met, the DAQ does contact the applicant to notify them of any deficiencies and inform the applicant that they need to provide the appropriate information to indicate compliance with the regulation in question. The DAQ will not move forward with the permit application until compliance can be shown.

Q. Does DEP intend to vigorously uphold existing law? Mr. Kessler tried to downplay community concerns about the minor source designation on the basis that the 100-ton threshold applicable to power plants is lower than the threshold for other emission sources, implying that this legally mandated threshold was somehow arbitrary or inappropriate or that exceeding it would not be that big a deal. If that is his view, one can't help but wonder how vigilant DEP intends to be in policing that requirement, whether in the context of considering the permit or, later, in enforcing against violations.

A. The DAQ never tried to diminish the major source threshold. The DAQ's intent was to provide information on what constitutes a major source under the PSD regulations and to point out there was a difference between listed sources and non-listed sources. All permit conditions are subject to C/E review as provided in the General Response to Comments - DAQ C/E Procedures section.

Q. Is DEP evaluating the Ridgeline project impartially? I can well understand the importance of constructive engagement between regulator and regulated. But the record suggests that DEP is acting less like the impartial referee that it should be and more like an advocate. For example, DEP representatives repeatedly told us at the meeting that the scope of their authority was narrow and limited to air quality issues, so comments on other issues should be directed elsewhere. But the DEP engineering report on the Ridgeline project gratuitously offers the opinion that "it is not anticipated that any noise and/or viewshed issues would be encountered." This kind of advocacy (which is in any case beyond the Division of Air Quality's purview and expertise) is hard to square with DEP's mission and legal duties.

A. The DAQ does not have authority over noise and/or viewshed issues. It is common practice of DAQ engineers to provide information they find during their site inspections in the EE/FS SITE INSPECTION section. This document was clear that the permit application review only includes the air quality elements afforded to the DAQ under West Virginia State Code. However, upon viewing the proposed remote location, it was the opinion of the engineer that any noise and/or viewshed issues would not be encountered.

Q. Redacting basic information in the publicly available air permit application is a clear violation of WV Code 22-5-10. While we recognize the need to protect trade secrets, the redaction of the number and model of turbines defies the logic of a free market, especially for equipment already protected by patents (see 45-CSR-31-2.3), and interferes with the ability of citizens to assist WV-DAQ in evaluating permit applications. Manufacturers

typically want to advertise their equipment model and attributes, so they can sell more product and boast about their turbine efficiency or other attributes. Claiming this information is a trade secret is contrary to any logical business marketing plan and is instead an attempt to deny West Virginians the information they need to determine what the public health impacts will be of a neighboring gas plant. The precedent set by WV-DAQ with the Fundamental Data application is made all the more egregious by two other recent applications, those of the Adams Fork Data Center in Mingo County (Draft Permit R13-3715) and the Adams Fork Harless Data Center in Logan County (Draft Pert R-13-3714). The applications for those permits clearly illustrate the number and size of gas engines to be used, stack height, the number of startup and shutdown events, and other important information. WV-DAQ should take its public notice and comment process seriously and give West Virginians the basic information (size, scale and scope) they need to make informed comments on a gas plant that will impact their lives and community.

A. Please see the response in the General Response to Comments - Confidential Business Information (CBI) section.

Q. If this critical information does not become available, we request that the comment period be extended for an additional 30 days to allow citizens a more extended opportunity to evaluate the permit. In addition, the virtual public hearing held July 17 was disrupted by thunderstorms and power outages in Tucker County. Over half the people who registered in advance to speak were unable to participate, for this or other reasons. At a minimum, we request that WV-DAQ accept written comments for an additional seven days so those who intended to speak have a chance to file their comments in writing. We recognize that WV-DAQ has statutory deadlines to meet, but an extension to accommodate those who intended to speak, but who were unable due to no fault of their own, does not preclude WV-DAQ from preparing responses to the comments already received.

A. Please see the response in this document regarding the Comment Period Extension Request.

Q. If operated as proposed, this would be the third largest power plant in West Virginia. The conclusion that a facility of this size is a minor source defies logic. As documented below, the permit fails to consider several sources of emissions that result in the facility exceeding the threshold for a major source. Furthermore, designation of this facility as a major source would invoke a number of regulatory protections that would better protect the people and environment of Tucker County. We urge WV-DAQ to reconsider this determination and find that this facility is a major source.

A. The purpose of a synthetic minor is to take physical and/or operational restrictions to stay below major source thresholds. A source of any kind can voluntarily take any restriction they choose to accomplish this. The permit contains federally and practicably enforceable limitations for this facility to be considered a minor source. An individual's opinion on how a facility chooses to operate in comparison to other facilities is not a reason for denial. The permit contains all source specific requirements as well as the necessary MRRT to be considered federally and

practicably enforceable and has been reviewed by EPA as well. Under the CAA emissions calculations must be done using established calculation methodologies. Examples of these methodologies include the use of source-specific data, utilization of emission factors when source-specific data is unavailable, and material balance. It is critical that the most accurate emission data that is available is utilized for each emission source. Using inappropriate or inaccurate values can lead to incorrect values. The emission calculations must also account for any air pollution control device that may be used.

Q. The permit allows use of diesel as a substitute fuel when natural gas is unavailable. Because of pipeline constraints, gas is most likely to be limiting during prolonged cold spells in winter. Diesel use during these periods would produce the highest levels of harmful emissions precisely under the weather conditions (temperature inversions) most likely to trap pollutants in the Valley for long periods. WV-DAQ should withhold issuance of a permit, and if necessary deny it, until site-specific dispersion modeling can be submitted to properly evaluate the real threats to human health and the environment.

A. Please see the response in the General Response to Comments - Air Quality Dispersion Modeling section.

Q. Section 1.0 (Emissions Units) fails to include multiple types of necessary equipment. First, the applicant did not include any fire suppression equipment such as an independently powered water pump, emergency generator, or similar equipment. Second, while Selective Catalytic Reduction (SCR) is proposed, no ammonia storage tank is listed, nor are there any limits on ammonia discharges from such a tank, or from operation of the SCR. In addition, there are no cooling towers or cooling equipment for any associated end user (the data center). Since these three types of equipment were not included in the application, their associated emissions were likewise not included. If the application had included this required equipment, and the associated emissions for that equipment, it would push this facility into the major source category. Based on a failure to include the proper fire suppression, ammonia storage tank and cooling equipment, the draft permit must be denied and the applicant must submit a revised application with all proper equipment and associated emissions.

A. As regulated under permit condition 4.1.1, the facility shall consist of only the pollutant-emitting equipment and processes identified under Section 1.0 of this permit and identified in permit application R13-3713. In accordance with the information filed under Permit Application R13-3713, the equipment shall be installed, maintained and operated so as to minimize any fugitive escape of pollutants and the equipment/processes shall use the specified air pollution control devices. A combustion powered fire pump as inquired about in several public comments is not covered. If Fundamental plans to install a combustion powered fire pump or cooling equipment that produce air emissions, the appropriate permitting action would be required.

In response to an ammonia storage tank, please see the response in the General Response to Comments - Ammonia Emissions section.

Q. Section 4.1.1 specifies the use of air pollution control equipment "in accordance with the information filed under Permit Application R13-3713, ..." However, many of the key parameters for operating SCR, are listed as "TBD." Sections 4.2.4 and 4.4.3 are similarly vague and allow the applicant to identify the terms of operation. As such, the permit is unenforceable and essentially hands a blank check to the applicant. The permit must be revised to specify the operating parameters of the SCR, including operating at the optimal control efficiency (operating temperature, residence time and related parameters). The permit for a smaller plant (R14-0038) includes such detailed parameters. Lastly, the application indicates 90 % control of NOx, however, better control efficiencies are achieved routinely and should be required. For example, the Adams Fork draft permit (R13-3714) assumes 99 % control during normal operations.

A. All items surrounding CBI have been previously discussed and included in the General Response to Comments - Confidential Business Information (CBI) section. Permit conditions 4.2.4 and 4.4.2 are regulatory requirements for these types of units directly taken from 40 CFR 60 Subpart KKKK and referenced in the permit appropriately. These conditions require the installation of SCR systems on each turbine to control NOx emissions. The parameters of the SCR systems must be continuously monitored to verify proper operation. The permittee shall monitor each catalyst bed inlet temperature and pressure differential across each catalyst bed to indicate proper operation.

Q. The Draft Permit contains multiple instances of emission factor inconsistencies requiring immediate correction. First, Section 4.1.3 limits Hazardous Air Pollutants (HAPs), when using natural gas, to 3.04 lb/hr and 5.64 lb/hr when using diesel (steady state conditions). For gas, 3.04 lb/hr is equivalent to 13.3 tons per year (TPY). However, Section 4.15 (which includes both steady state and startup/shutdown conditions) limits HAPs for gas to only 9.33 TPY.

Second, the Engineering Evaluation indicates emissions factors were taken from AP-42, and Table 3.1-3 shows an Emissions factor for formaldehyde of 7.1 E-04 lb/MMBTu.4 Multiplying that factor times 5,650 MMBTu/hr generates an emissions rate of 4.01 lb Formaldehyde per hour. In contrast, the Engineering Evaluation lists only 1.26 lb formaldehyde per hour, possibly for both gas and diesel, however the engineering evaluation is unclear on this point. The Draft Permit indicates that an oxidation catalyst will be required for carbon monoxide control, and AP-42 in Section 3.1.3.4 states that "[t]he performance of these oxidation catalyst systems on combustion turbines results in 90-plus percent control of CO and about 85 to 90 percent control of formaldehyde." That implies an emissions rate of 0.4 to 0.6 lb formaldehyde per hour. Using the emissions factor of 2.8 E-04 for distillate oil in AP-42, Table 3.1-4, the uncontrolled emissions rate is 1.582 lb formaldehyde per hour (not 1.26 lb/hr listed in the Engineering Evaluation), or controlled emissions of 0.16 to 0.24 lb formaldehyde per hour. If the emissions rates in the permit are based on uncontrolled emissions factors from AP-42, formaldehyde emissions would exceed 17 TPY, and therefore exceed the threshold for HAPs and would be required to be permitted as a major source. If the emissions factors assume controlled emissions, the allowed formaldehyde emissions rates should be substantially lower than the 1.26 lb/hr

listed in the Engineering Evaluation. Similar adjustments are needed for Total HAPs, and the permit limits for HAPs must be adjusted accordingly.

A. All items surrounding CBI have been previously discussed and included in the General Response to Comments - Confidential Business Information (CBI) section.

Permit condition 4.1.3 includes the maximum aggregate hourly emissions during steady state operations, excluding startups and shutdowns, and does not include an annual value as the comment states.

The permit application utilized manufacturer data for the formaldehyde emissions associated with the combustion turbines when firing natural gas and AP-42 was used when firing diesel. The table on page 9 of the Draft EE/FS does contain an error and incorrectly listed that all HAPS utilized AP-42 as part of the emission calculations. This error has been recognized in the Final Determination document in the EE/FS Errata section. Due to the concern surrounding the formaldehyde emissions and the differences experienced between using the manufacturer data and the potential Title V major source status when using AP-42, a permit condition has been added to the permit which will require Fundamental to conduct an initial performance test to ensure compliance with the hourly formaldehyde value when combusting natural gas.

Q. Section 4.1.4 of the Draft Permit estimates 4.54 tons NOx per year from startups and shutdowns using gas, and 6.22 TPY using diesel fuel. However, neither the Draft Permit, nor the Engineering Evaluation, provide any justification for these estimates The limit of 61,320 hours of turbine operation would allow for up to seven (7) turbines operating continuously. However, because this permit is a synthetic minor, the applicant may be planning to install 8 or more turbines. Because of the number of turbines is redacted it is impossible to determine the operational characteristics of the plant, including the number of startups and shutdowns that might be expected, and the practical operational restrictions imposed by the annual pollution limits in the permit. Since the number of startups is redacted, a maximum Potential To Emit cannot be calculated. However, assuming three hours per startup, and 45-100 lbs NOx per hour during startups, 5 and eight turbines, each turbine would be operating continuously for several months at a time. Additional turbines would result in an even greater cumulative amount of time in startup. The permit must be based on a conservative estimate of the maximum Potential To Emit, rather than optimistic assumptions from the applicant. The draft permit for Adams Fork (R-13-3714) indicated that emissions during startups and shutdowns represent over half of the annual emissions, whereas this draft permit implies that they represent less than 5 % (for gas, 4.54 tons NOx/year out of a total 99.35 (draft permit at 4.14 and 4.15). Even a moderate increase in emissions allocated for startups and shutdowns would indicate that this facility is a major source. Furthermore, Draft Permit Section 4.1.7.b offers only the mild suggestion of minimizing the number of startups, a vague and unenforceable provision. The permit should not assume optimistic performance when estimating Potential To Emit and should be revised to indicate the hourly maximum, the total, emissions during startups as well as the number of startups allowed per year. This inevitably will result in higher emissions; and therefore, the facility should be permitted as a major source.

A. All items surrounding CBI have been previously discussed and included in the General Response to Comments - Confidential Business Information (CBI) section. The permit contains conditions (4.1.4 and 4.1.5) to limit the maximum aggregate annual emissions during startups and shutdown periods. Additionally, the permit requires that during these periods that certain operational conditions are performed (4.1.7). Permit condition 4.1.9 requires these periods are continuously monitored, with associated recordkeeping being required in permit condition 4.4.1 and associated reporting being required in permit condition 4.5.4.

Q. Draft Permit Section 4.1.9 states that monthly emissions shall be calculated using the daily emissions from the hours of steady-state operations times the number of hours of such operation each day, and "... adding the appropriate startup and shutdown emission from permit condition 4.1.4."6 However, section 4.1.4 only provides annual totals, not hourly estimates, and without specifying the number of such events, it is impossible to determine an enforceable value. As stated in Comment 7, the Draft Permit should be revised to specify maximum hourly emissions and total emissions permitted for each startup and shutdown. More importantly, we recommend that emissions should be monitored directly to determine compliance with permit limits, rather than assuming emissions based on hours of operation.

A. All items surrounding CBI have been previously discussed and included in the General Response to Comments - Confidential Business Information (CBI) section. The permit contains conditions (4.1.4 and 4.1.5) to limit the maximum aggregate annual emissions during startups and shutdown periods. Additionally, the permit requires that during these periods that certain operational conditions are performed (4.1.7). Permit condition 4.1.9 requires these periods are continuously monitored, with associated recordkeeping being required in permit condition 4.4.1 and associated reporting being required in permit condition 4.5.4.

Permit condition 4.2.2 has been revised to require the monitoring of aggregate fuel consumption on an hourly basis.

Q. Section 4.1.11. specifies emissions limits for NOx of either 1.2 lb NOx/MW-hr, or 25ppm @ 15 % O2. This limit is much higher than what is currently required for much smaller gas plants. For example, the permit for the Mountain State Clean Energy facility (R-14-0038) limits NOx to 0.43 lb NOx/MW-hr or 2 ppm @ 15 % O2. Neither the Draft Permit nor the Engineering Evaluation provide a justification for an arbitrarily high NOx limit. WV-DEQ must either lower the NOx limit, consistent with other permits it has issued, or provide a reasonable basis for allowing this facility to emit three times as much NOx as the Mountain State Clean Energy Facility.

A. The regulatory requirements included in the comment are applicable requirements under 40 CFR 60 Subpart KKKK. As stated in permit condition 2.5.2, the permittee has the duty to comply with all conditions of the permit. The NOx emission limits contained in permit condition 4.1.3 are more restrictive than those found in 40 CFR 60 Subpart KKKK. All appropriate MRRT is contained in this permit to provide for federally and practicably enforceable permit conditions.

Q. While the applicant proposes to use SCR, no provisions to limit ammonia slip are included in the Draft Permit. Since ammonia is a highly noxious gas, WV-DAQ should require provisions at least as stringent as those written into the permit (R14-0038) for the Mountain State Clean Energy facility: "The SCR system shall be designed, constructed, and operated to achieve compliance with the NOx BACT limit for NOX emissions with a concentration of ammonia (ammonia slip) of no greater than 5 ppm corrected to 15% oxygen on a 3-hour averaging period basis from the outlet of the SCR."

A. Please see the response provided in the General Response to Comments - Ammonia Emissions section.

Q. Section 4.1.13 specifies limits for sulfur emissions, however, no actual monitoring to verify these limits is required. While section 4.4.4 requires the applicant to keep "records of the fuel characteristics in a current, valid purchase contract, tariff sheet or transportation contract ...", this shifts the responsibility from the emitter to the fuel supplier. The permittee, as the operator of the facility, must be required to produce independent fuel tests, or provide continuous emissions monitoring to verify sulfur emissions. Since high levels of sulfur can act as a catalyst poison in SCR, testing would help assure that the SCR works as intended.

A. The combustion turbines are subject to 40 CFR 60 Subpart KKKK, which establishes SO_2 emission requirements which can be found in permit condition 4.1.13. Additionally, 40 CFR 60 Subpart KKKK requires an initial performance test for SO_2, which can be found in permit condition 4.3.3. 40 CFR 60 Subpart KKKK provides an exemption from monitoring the total sulfur content of the fuel and can be found under 40 CFR §60.4365(a). Permit condition 4.4.4 establishes the requirements needed to determine compliance with this section.

Q. Section 4.1.19 implies that an Acid Rain Permit and other permits may be required. This decision should not be left to some future determinations, as it is to everyone's benefit to understand the regulatory requirements before construction is authorized. Use of "after the fact" permits undermine the rationale for regulations in the first place and precludes public involvement in the decisions that impact our lives and the environment. This is especially true as Fundamental Data has publicly announced its intention for this plant to be part of an integrated data center microgrid.7 It further indicates this intent in communications with the Department.8 We recommend that this determination be made, and be included in the Draft Permit, before any construction permits are issued.

A. As stated in the EE/FS REGULATORY APPLICABILITY section, details surrounding a potential Acid Rain permit were addressed.

Q. Section 4.1.19 also indicates that permits may be required pursuant to 40 CFR 60 Subpart TTTTa (Standards of Performance for Greenhouse Gas Emissions for Modified Coal-Fired Steam Electric Generating Units and New Construction and Reconstruction Stationary Combustion Turbine Electric Generating Units). While we recognize that EPA is proposing rule changes, those have not been finalized and have not even completed the public comment process. Furthermore, legal appeals of such a proposal are virtually

certain, therefore the current law of the land must be enforced until such time as 40 CFR 60 Subpart TTTTa is revoked or revised. We believe that climate change is the single most important issue surrounding proposed fossil fuel facilities, and the permit application indicates unrestricted emissions as much as 3,262,720.98 tons CO2e per year. As such, we recommend that the permit include emissions limits for greenhouse gases consistent with the current federal requirements.

A. Please see the response in the General Response to Comments - Greenhouse Gas Emissions section.

Q. Sections 4.2.1 through 4.2.9 specify monitoring requirements, however, no actual in-stack monitoring of emissions is required. The monitoring is based entirely on records of fuel use and operating conditions. While section 4.3 specifies initial performance testing, these tests are only required one time. We recommend Continuous Emissions Monitoring Systems (CEMS) be required for NOx, carbon monoxide, SO2 and all particulate categories (Total Particulates, PM10 and PM 2.5). We also recommend that section 4.3 be amended to require performance testing for HAPs, and that all performance testing be repeated annually.

A. The permit contains all necessary MRRT and is considered federally and practicably enforceable. The rationale supporting the one-time stack test can be found in the EE/FS REGULATORY APPLICABILITY section for 40 CFR 60 Subpart KKKK. CEMS is not a regulatory requirement under this rule for these units.

Q. There is no provision in either the permit or the Engineering Evaluation for stack height and location. The Application lists these as TBD.9 Given the frequency of temperature inversions in Canaan Valley, a discharge anywhere near ground level is certain to trap pollutants in the Valley. No permit should be issued until these parameters are specified, and the public has an opportunity to make informed comments. If, as we believe, the facility has to be regulated as a major source, dispersion modeling will be needed to verify compliance with ambient air quality standards and Class I Air Quality Area standards.

A. As discussed previously, air quality modeling is not required for minor sources. The stack height parameters referenced in this question are not required as part of any permit condition, nor for the calculation of any emissions associated with this permit.

Q. As I understand it, the facility would be fueled by natural gas with diesel fuel as a backup. In the past few years, most seriously in the 2021 Texas power crisis, there have been failures of natural gas fueled power generating facilities during protracted periods of extreme cold weather. There are few locations in West Virginia with a greater probability of extreme cold weather in the winter than the Davis/Thomas area. I think it is reasonable to expect that the proposed facility will be forced to turn to diesel backup fuel for protracted periods in the winter, with a resulting increase in harmful air pollution affecting the surrounding communities of Davis and Thomas.
Inversions are also more likely in the winter and those could seriously degrade air quality in Canaan Valley and Blackwater Canyon with negative impacts to a National Wildlife

Refuge, the Monongahela National Forest, two state parks, a wildlife management area, and numerous businesses and private homeowners. For these reasons, I oppose approval of the air quality permit for the Ridgeline Facility with the proposed fueling design in this general area of the state. I also have other serious concerns, i.e., water and noise, that are not germane to the air quality application but that would also strongly argue against construction of this facility in the proposed Tucker County location.

A. The combustion turbines/HRSGs are limited to the annual emissions found in permit condition 4.1.5, regardless of the fuel type being consumed. The other topics in this comment have been addressed in the applicable General Response to Comments sections.

Q. The co-location of the Tucker County landfill, the Ridgeline fossil-fueled power plant, and the proposed data center complex creates a concentrated industrial zone with overlapping emissions of PM2.5, VOCs, HAPs, and other pollutants. Under 40 CFR §51.160(b) and EPA's Title VI guidance, permitting authorities must consider whether emissions from a proposed source, in combination with nearby sources, may cause or contribute to a violation of National Ambient Air Quality Standards (NAAQS) or impose disproportionate burdens on overburdened communities. The Ridgeline permit application fails to identify the landfill as an adjacent source or assess cumulative impacts, despite its known emissions of methane, VOCs, and leachate-related compounds. This omission is inconsistent with the intent of 45CSR13 and Appendix W of 40 CFR Part 51, which requires site-specific dispersion modeling that accounts for topographic and meteorological conditions—especially critical in the Canaan Valley, a known cold-air sink with frequent inversions.This omission is a procedural failure under both federal and state permitting frameworks.

A. As stated in the EE/FS SOURCE AGGREGATION section, a "Building, structure, facility, or installation" is defined as all the pollutant emitting activities which belong to the same industrial grouping, are located on one or more contiguous and adjacent properties, and are under the control of the same person. Fundamental does have control of the proposed site. There are no other emission units located on contiguous or adjacent properties with the Ridgeline Facility. Therefore, the emissions from the proposed facility should not be aggregated in determining Title V or PSD status.

Q. Under WVDEP Rule 45-CSR-13, emissions estimates submitted for NSR permitting must be based on realistic, verifiable assumptions that reflect the actual and representative operation of the proposed source. The Fundamental Data LLC application relies on an unconfirmed assumption of continuous access to natural gas via pipeline, despite no evidence of an existing contract or infrastructure to support this claim. This assumption directly affects the facility's potential to emit (PTE) and may result in an underestimation of emissions from alternative fuel use (e.g., diesel or propane), which would significantly alter the emissions profile and potentially the facility's classification under 45-CSR-13. In the absence of a confirmed natural gas supply, it is reasonable to conclude that the facility will rely on diesel fuel, which would result in significantly higher emissions. This scenario must be evaluated, as it could cause the facility's potential to emit (PTE) to exceed major source thresholds, particularly for NO_x, PM, and greenhouse gases. Failure to include this

contingency in the emissions inventory constitutes a procedural deficiency under 45-CSR-13 §5.1, which requires that permits include all conditions necessary to assure compliance with applicable requirements.

A. The combustion turbines/HRSGs are limited to the annual emissions found in permit condition 4.1.5, regardless of the fuel type being consumed. Under the CAA emissions calculations must be done using established calculation methodologies. Examples of these methodologies include the use of source-specific data, utilization of emission factors when source-specific data is unavailable, and material balance. It is critical that the most accurate emission data that is available is utilized for each emission source. Using inappropriate or inaccurate values can lead to incorrect values. The emission calculations must also account for any air pollution control device that may be used. Each permit condition has the necessary MRRT to make it practicably enforceable. The draft permit was also reviewed by EPA and deemed as such.

Q. Under 45-CSR-13 §2.1, "actual emissions" must include emissions from all activities associated with the normal operation of a source, including those from material handling and transport. The permit application for Fundamental Data LLC fails to account for fugitive emissions generated by heavy diesel tanker traffic on the ungraded gravel access road to WV Route 32. These emissions are predictable, quantifiable under EPA AP-42 §13.2.2, and directly attributable to facility operations. This omission violates 45-CSR-13 §5.1, which requires permits to include all conditions necessary to assure compliance with applicable requirements. It also undermines enforceability under 40 CFR §70.6(c)(1), which mandates sufficient monitoring and reporting. If properly included, these emissions could elevate the facility's potential to emit (PTE) for PM10 and PM2.5 above the 100 tons/year threshold, triggering PSD review under 45-CSR-14. WVDEP should require a revised emissions inventory that includes fugitive dust and vehicle emissions from road traffic, or emissions from paving if dust mitigation is pursued.

A. The EE/FS and permit establish the permit conditions associated with the plant roads. Permit condition 2.5.1 states that the permitted facility shall be constructed and operated in accordance with the plans and specifications filed in Permit Application R13-3713 and any modifications, administrative updates, or amendments thereto. If it is determined that permit modifications or administrative updates are required after permit issuance, the procedures for obtaining those are outlined in permit conditions 2.8 and 2.9.

Q. The company appears to be using a "phased construction" approach to avoid triggering major source thresholds all at once. This is a known regulatory avoidance tactic and can be challenged under aggregation rules.

A. As stated in the EE/FS SOURCE AGGREGATION section, a "Building, structure, facility, or installation" is defined as all the pollutant emitting activities which belong to the same industrial grouping, are located on one or more contiguous and adjacent properties, and are under the control of the same person. There are no other emission units located on contiguous or adjacent properties with the Ridgeline Facility. Therefore, the emissions from the proposed facility should not be aggregated in determining Title V or PSD status. If it is determined through compliance

testing, future modifications, or other mechanisms that Fundamental becomes a "major source" for PSD, Fundamental would be required to submit the appropriate PSD permit application. Pursuant to §45-14-19.7, and as stated in the General Response to Comments section, if modifications to the existing equipment would cause Fundamental to become a "major source", Fundamental would be required to submit the appropriate PSD application. Any future new construction at the site once operating would be reviewed according to all applicable rules and regulations including guidance on determining if any action was taken for purposes of circumvention of major source permitting.

Q. Engineers on DEP staff in the public meeting in Canaan Valley on June 30 admitted "we all know this is for a data center". The Ridgeline Facility is part of a multi-phase, multi-acre data center campus. If emissions from future phases or co-located units are not considered together, this will violate EPA's aggregation rule, which requires that functionally related sources under common control be treated as a single source for permitting purposes. EPA guidance (e.g., Summit Petroleum Corp. v. EPA, 6th Cir. 2012) and subsequent policy memos emphasize that geographic proximity and functional interdependence are key to determining whether sources should be aggregated. The Ridgeline project appears to meet both criteria. Given the scale, phased development, and shared infrastructure of the Ridgeline Facility: It is unreasonable to treat each phase as a separate minor source. The facility likely meets the functional and temporal linkage criteria for aggregation. WVDEP and EPA should require a comprehensive emissions analysis across all planned phases.

A. As stated in the EE/FS SOURCE AGGREGATION section, a "Building, structure, facility, or installation" is defined as all the pollutant emitting activities which belong to the same industrial grouping, are located on one or more contiguous and adjacent properties, and are under the control of the same person. Fundamental does have control of the proposed site. There are no other emission units located on contiguous or adjacent properties with the Ridgeline Facility. Therefore, the emissions from the proposed facility should not be aggregated in determining Title V or PSD status. As stated in the General Response to Comments section, if modifications to the existing equipment would cause Fundamental to become a "major source", Fundamental would be required to submit the appropriate PSD application. Any future new construction at the site once operating would be reviewed according to all applicable rules and regulations including guidance on determining if any action was taken for purposes of circumvention of major source permitting.

Q. The assertion that the proposed Ridgeline facility "meets DEP standards" does not equate to an absence of public health risk. Under 45 CSR 13 §5.1 and 40 CFR §51.160–164, WVDEP is obligated to ensure that permitted sources do not cause or contribute to violations of the National Ambient Air Quality Standards (NAAQS) and that permits include enforceable conditions sufficient to demonstrate ongoing compliance. This includes adequate monitoring, recordkeeping, and reporting provisions. However, WVDEP staff have acknowledged on the record that, due to staffing limitations, the agency would only be able to conduct on-site compliance inspections approximately once every two years. This frequency is inconsistent with the intent of 45 CSR 13 and the EPA-approved West Virginia State Implementation Plan (SIP), which require that monitoring be sufficient to ensure that

emissions limits are met and that public health is protected on a continuous basis—not merely at infrequent intervals. Furthermore, the engineer's statement that "it seems like a lot of pollution, but it's not, really, in comparison" reflects a misunderstanding of cumulative risk science. Under EPA's Integrated Science Assessments for Particulate Matter, the health effects of air pollution—particularly fine particulate matter (PM2.5)—are non-threshold in nature. That is, there is no known safe level of exposure below which adverse health effects do not occur. Risk increases with total cumulative exposure, not just with short-term spikes. This is especially relevant in the context of the Ridgeline facility's location: within a topographically enclosed airshed prone to temperature inversions, in proximity to the Tucker County landfill, which emits leachate and landfill gases, and near residential areas and sensitive populations including children and the elderly. The failure to conduct a cumulative impact analysis—as required under EPA's Title VI Interim Guidance (2023) and 40 CFR §51.160(b)—represents a procedural deficiency. The permit application does not assess the combined health burden of emissions from the proposed facility and adjacent sources, nor does it account for chronic exposure scenarios that are well-documented in the public health literature to increase risks of asthma, cardiovascular disease, and premature mortality. Finally, air quality standards such as NAAQS are policy thresholds, not biological guarantees of safety. They are designed to limit harm, not eliminate it. The population-level effects of even modest increases in pollution—especially in already overburdened communities—can be substantial.

A. Please see the response in the General Response to Comments - Ambient Air Quality of Tucker County section on NAAQS compliance with both the primary and secondary standards.

Q. Fundamental Data LLC claimed Confidential Business Information (CBI) for nearly all technical details related to turbine configuration, emission units, and pollution control devices. As a result, the public cannot verify the type, efficiency, or adequacy of emissions controls. The permit does not clearly outline continuous emissions monitoring systems (CEMS) or stack testing requirements for pollutants like NO_x, SO_2, or PM2.5. There is no detailed plan for recordkeeping, reporting, or compliance verification, which are standard. There has also been insufficient disclosure about how emissions from the landfill and power plant will be monitored, mitigated, or reported as cumulative emissions. Without a full Environmental Impact Statement (EIS), this permit risks violating the Clean Air Act's intent to protect public health.

A. Please see the response in the General Response to Comments - Confidential Business Information (CBI) section. Each permit condition has the necessary MRRT to make it practicably enforceable. This draft permit was also reviewed by EPA and deemed as such.

Q. The air quality permit application submitted by Fundamental Data LLC for the proposed Ridgeline Facility (R13-3713) represents a significant departure from the regulatory norms and procedural standards typically upheld by the West Virginia Department of Environmental Protection (WVDEP), Division of Air Quality (DAQ). These redactions obscure critical information necessary for public and regulatory evaluation of compliance with 45 CSR 13, NSPS Subparts GG and KKKK, and NESHAP applicability.

According to WVDEP's own General Counsel, these redactions likely violate 45 CSR 31 §6.1 and §2.4, which explicitly exclude "types and amounts of air pollutants discharged" from CBI protection. The Ridgeline application contains no enforceable monitoring plan. This omission violates the intent of 45 CSR 13 §5.1, which requires that permits include "conditions necessary to assure compliance with applicable requirements." Without defined monitoring and testing protocols, the permit cannot be considered enforceable or protective of public health. When compared to contemporaneous applications—such as Adams Fork Energy (R13-3715)—the deficiencies in transparency, emissions control disclosure, and monitoring protocols in the Ridgeline application are both substantive and disqualifying. In contrast, the Adams Fork application includes detailed descriptions of air pollution control devices (e.g., SCR systems, oxidation catalysts) and their expected performance. The permit includes specific monitoring, recordkeeping, and testing plans to demonstrate compliance with emissions limits. These include stack testing schedules, operating parameter monitoring, and reporting intervals. Adams Fork's application contains a regulatory applicability discussion and outlines how the facility will comply with Title V, NSPS, and NESHAP standards. The level of opacity and regulatory evasion in this application is unprecedented in recent WVDEP permitting history. In contrast, the Adams Fork Energy permit (R13-3715) provides a model of transparency, technical completeness, and regulatory compliance. The Ridgeline application's failure to meet these standards—combined with its location in a topographically sensitive airshed prone to temperature inversions and pollution trapping—renders it incompatible with the public interest and the Clean Air Act's core objectives.

A. The EE/FS contains an in-depth analysis regarding 40 CFR 60 Subparts GG and KKKK, and NESHAP (40 CFR 63 Subpart YYYY) applicability.

Please see the response provided in General Response to Comments - Confidential Business Information (CBI) for a specific response to the Fundamental permit application.

Q. WVDEP staff have acknowledged that the facility would be inspected approximately once every two years due to staffing limitations. This is inadequate to ensure compliance with synthetic minor source limits, especially given the facility's use of dual fuels (natural gas and diesel), reliance on rolling 12-month emissions calculations, and proximity to a sensitive environmental receptor (the landfill). This undermines the enforceability of the permit under 45 CSR 13 §5.1 and 40 CFR §70.6(c)(1), which require that permits include conditions sufficient to assure compliance.

A. DAQ staff stated that facilities that were designated as synthetic minor facilities must be inspected once every two years. However, DAQ staff specifically stated that oftentimes depending on the type of facility and potential issues, that these facilities are inspected more frequently. Sometimes, as frequently as weekly.

Q. Under EPA's SPCC Rule (40 CFR Part 112), the facility qualifies as a non-transportation-related site (i.e., a power plant) with an aggregate aboveground oil storage capacity exceeding 1,320 U.S. gallons. This includes diesel tanks used for emergency backup generators, whether standalone or integrated belly tanks. The facility is

located just 0.4 miles from Pendleton Creek, which has been designated a Water of the United States (WOTUS) by the U.S. Army Corps of Engineers. According to WVDEP's own records, obtained via a FOIA request fulfilled July 14, 2025, there have been 246 significant incidents involving regulated above-ground fuel storage tanks in West Virginia since 2015. This clearly demonstrates that the risk of discharge is real and ongoing. These facts trigger the applicability of the 2024 CWA Hazardous Substance Facility Response Plans Rule, which requires the facility to: prepare and implement a SPCC Plan certified by a Professional Engineer (PE), include secondary containment, inspection protocols, and spill response procedures, submit a Substantial Harm Certification Form, and review and update the plan every 5 years or after significant operational changes. These requirements are directly relevant to the air quality permit because the storage and handling of diesel and other hazardous substances are integral to the facility's operation and emissions profile. The engineer's evaluation and permit documentation fail to address these obligations, representing a regulatory oversight and raising serious concerns about the completeness of the environmental review. I urge WVDEP to reevaluate the permit in light of the facility's obligations under the SPCC Rule and the 2024 CWA Hazardous Substance Rule, require documentation of SPCC compliance as a condition of permit approval, and ensure that the public is informed of all spill prevention and response measures associated with this facility.

A. The EE/FS REGULATORY APPLICABILITY section contained all state and federal air regulations that apply to this facility. Please see an explanation of the statutory authority of the DAQ in the General Response to Comments section.

Q. The Ridgeline facility will store diesel and other hazardous substances in quantities exceeding 1,320 gallons, triggering SPCC requirements. The Tucker County landfill is a known source of leachate, which can mobilize contaminants in the event of a spill or stormwater overflow. The permit application does not evaluate the hydrological connectivity between the facility and the landfill, nor does it address secondary containment or spill response coordination—a requirement under 40 CFR §112.7(a)(3)(iii). The failure to disclose or assess the landfill's emissions and its proximity to the Ridgeline site obscures the full environmental burden on nearby residents. This may constitute a procedural violation under EPA's Interim Environmental Justice and Civil Rights in Permitting Guidance (2023).This is a critical oversight, particularly given the documented history of leachate migration from landfills in West Virginia and the 246 significant above-ground tank incidents reported by WVDEP since 2015.

A. The EE/FS REGULATORY APPLICABILITY section contained all state and federal air regulations that apply to this facility. Please see an explanation of the statutory authority of the DAQ in the General Response to Comments section.

Q. On April 25, 2025, WVDEP's Office of General Counsel (OGC) informed Fundamental Data LLC that its CBI claims may not qualify under WV Legislative Rules 45-CSR-31, 31a, and 31b. Specifically, the OGC noted that the redacted information likely falls under the category of "Types and Amounts of Air Pollutants Discharged", which is explicitly excluded from CBI protection under §45-31-6 and §45-31-2.4. Despite these concerns, by

May 12, 2025, WVDEP accepted Fundamental Data's CBI claims and allowed the redactions to stand. The final determination was made without a transparent explanation of how the original legal concerns were resolved. This abrupt reversal, especially in light of hundreds of public comments requesting disclosure, raises questions about procedural consistency and fairness. The redacted information reportedly includes technical specifications of combustion turbines and control devices, which are directly related to pollutant emissions. Under both state law and EPA Title VI guidance, emissions data is not eligible for CBI protection. WVDEP's acceptance of these redactions violate public right-to-know provisions and procedural transparency, especially in an environmental justice context.

A. The May 12, 2025 response letter to Fundamental did include an explanation of the OGC's review and final determination. Additionally, the EE/FS contained a detailed explanation of the CBI associated with this permit application. This is also included in the General Response to Comments - Confidential Business Information (CBI) section.

Q. The assertion that Permit Application R13-3713 does not include a data center and is therefore unrelated to HB 2014 overlooks both the practical context and regulatory implications of the project. While the application may not explicitly name a data center, the public record, project scale, and infrastructure design strongly indicate that the facility is intended to support a high-energy-use operation consistent with a data center. This is further supported by the project's classification as a natural gas-powered microgrid, a structure directly incentivized and streamlined under HB 2014. HB 2014, while not altering the text of 45-CSR-13, creates a parallel regulatory framework that accelerates approval and shields microgrid projects from deeper scrutiny. By enabling certification of "high-impact" data centers and microgrid districts, HB 2014 effectively narrows the scope of environmental review and limits the ability of agencies and the public to assess cumulative impacts. HB 2014 centralizes authority at the state level, limiting the ability of local governments or planning commissions to block or modify projects based on community concerns. As a result, communities like those in Tucker County are denied procedural protections and cannot challenge harmful siting decisions, even when projects are located near schools and residential area. The bill reduces opportunities for public comment and judicial review, especially for communities without legal or technical resources. This disproportionately affects rural and low-income communities, like those in Tucker County, who may already face barriers to participation. The permit evaluation's narrow reading of the application and HB 2014 ignores the real-world function of the project and the systemic regulatory gap that now prevents communities from meaningfully protecting themselves. This is not merely a procedural oversight—it is a continuing violation of civil rights and environmental justice principles.

A. Please see responses to this comment in the General Response to Comments for data centers and HB 2014.

Q. We believe this permit raises serious concerns under Title VI of the Civil Rights Act due to its disproportionate impact on vulnerable populations. The public was not provided with sufficient information to meaningfully participate in the decision-making process. The lack

of transparency and community engagement has had a disparate impact on residents who may already face barriers due to age, income, geographic isolation, and limited access to legal or technical resources. These groups are more susceptible to air pollution and less able to relocate or mitigate exposure. These conditions already affecting the area, co-mingled air pollution with the landfill, and the topographical factors related to air dispersion concentrate exposure to these vulnerable populations.. The DEP allowed for simple descriptions such as the height of a smokestack to remain redacted. People who live within a mile of the proposed power plant could not understand if they will be able to see the stacks, or if the pollution will blow directly into their windows. This indicates the WVDEP failed to: provide accessible, easily comprehensible, and complete information about the facility's operations and potential emissions to those populations most vulnerable; and to failure to consider cumulative environmental and health burdens.

A. A response concerning the CBI can be found in the General Response to Comments - Confidential Business Information (CBI) section. Additionally, all potential state and federal air regulations were provided in the EE/FS REGULATORY APPLICABILITY section.

Q. The plan calls for a coal plant and a diesel-powered back-up generator using 90,000 gallons of diesel fuel onsite. The effort to designate this as having minimal impact is ludicrous. Both coal plants and diesel generators cause their own forms of pollution of sound, light, air and water. Both coal plants and diesel generators are noisy. There is no coal produced at the site. The coal and diesel will both be trucked on site. The amount of truck traffic will be another source of environmental degradation to say nothing of the wear and tear on the roads. During last year's drought, both Davis and Thomas were short on water. Adding a coal plant and diesel generators will make the water situation worse. Where is the coal ash waste being deposited, in the city dump? Coal Ash waste ponds and dump sites are associated with chronic diseases and exposure many hazardous compounds including arsenic, mercury, and radium.

This facility will be extensively lit. This will cause light pollution for Thomas and Davis and destroy Blackwater State Park's designation as a Dark Sky site. Modern power plants are highly automated. The usual defense of bringing jobs to the area is a lie.

Burning Coal:
Coal burning pollutants in the air include sulfur dioxide, nitrogen oxides, mercury, and particulate matter. This burning also releases pollutants on the water and can lead to unsafe drinking water. Clean coal has never been achieved.

A. This facility is not a coal plant, nor does it have a diesel-powered back-up generator. This facility consists of combustion turbines with the ability to combust natural gas or diesel fuel. A process description detailing the operations can be found in the EE/FS. As discussed in the General Response to Comments, the DAQ does not have statutory authority to regulate light.

Q. My comment is to insist that the air quality measurements you take to determine compliance with the standards must be from the spot of the proposed project. You informed us that the measurements were taken from Elkins, which is a completely different

climate and elevation and wind pattern place than the top of the mountain where this is proposed. It is not our problem that this will take time to get the proper measurements, that is the burden of the permit seeker. The law and your mandate requires you to do whatever is necessary and take the time necessary to conduct the proper evaluation of the actual air quality statistics and measurements caused by the proposal, and those need to be taken from the area proposed, nto a different area. Data from Elkins is inaccurate and will be challenged in court.

A. The DAQ did not state that measurements used were taken from Elkins. The DAQ provided an in-depth explanation at the June 30, 2025 public meeting regarding the above ground storage tank emissions and the combustion turbine emissions. This explanation can be found in the General Response to Comments sections titled above ground storage tanks and meteorological conditions used in estimating emissions.

Q. Needless to say, I was very disappointed to see HB2014 signed into law. That piece of legislation has paved the way for data center's and the way it allows for them does not garner trust from the people. Environmental groups such as the West Virginia Highlands Conservancy (WVHC) have expressed emissions concerns at length. These views should be considered seriously. Some comments by the WVHC I find concerning are:

- **"The preliminary permit requires only minimal monitoring of operating conditions and fuel usage to verify compliance, and a one-time stack test."**
- **"Fundamental Data's vague assertions about how often diesel fuel would be burned, as well as minimal required reporting and recordkeeping, indicate that emissions from diesel burning would be much higher than anticipated."**

A. HB 2014 is addressed in the General Response to Comments - HB 2014 section. The rationale supporting the one-time stack test can be found in the EE/FS REGULATORY APPLICABILITY section for 40 CFR 60 Subpart KKKK. Each permit condition has the necessary MRRT to make it practicably enforceable. This draft permit was also reviewed by EPA and deemed as such.

Q. Blackwater Falls State Park and the Monongahela National Forest, which includes the Otter Creek and Dolly Sods Wilderness Areas, lie within 2 miles of the proposed facility. These public lands attract over a million people per year to Tucker County, acting as an economic driver for the local community. Tourists, from both in and out of state, come because of the area's pristine wilderness, gorgeous landscapes, and clean air.

Unfortunately, this proposed facility will negatively affect Tucker County's largest industry, which employs 25% of Tucker County's working population. Blackwater Falls State Park is applying for a Dark Sky Certificate, which will be ruined by this facility's nearby around-the-clock-lighting. Canaan Valley State Park and the federal National Wildlife Refuge will be smothered by this power plant, as temperature inversions will likely trap emitted smog in the valley. The quaint towns of Thomas and Davis will permanently be disrupted by flashing lights, noise pollution, and worsened air quality. Furthermore, this power plant is proposed to be built near the North Fork of the Blackwater River, a river about to be treated for its Acid Mine Drainage (AMD) pollution. The Ridgeline facility significantly increases chances of polluting this natural asset.

A. The General Response to Comments - Statutory Authority of the DAQ section outlines the authority of the DAQ as it pertains to tourism. Additionally, the DAQ has no statutory authority in regards to AMD.

Q. The proposed Ridgeline facility will potentially have negative effects on critically endangered and threatened species, many of which are on Tucker County's public lands. These species are the Cheat Mountain Salamander, the Northern Flying Squirrel, the Virginia Big-eared Bat, the Indiana Bat, the Northern Long-eared Bat, and the Tri-colored Bat. This power plant's noise and light pollution will disrupt wildlife within a large radius, and its emissions will degrade the air these already-sensitive species depend on. For example, the terrestrial Cheat Mountain Salamander breathes through its skin, and could easily be harmed by large quantities of PM and NOx.

A. Please see the response in the General Response to Comments - Pollutant Effect on Animals (Bats, Salamanders, Endangered Species) section.

Oral Questions/Comments Received at Public Meeting

Oral Questions

During the question/answer portion of the public meeting on June 30, 2025, many questions were asked. DAQ staff engaged directly with the public for approximately five hours answering questions. Those questions believed not to be fully responded to in the General Response to Comments section or at the public meeting are included in the Specific Response to Comments section. The specific questions received at the public meeting in which the DAQ stated they would provide a later response regarded the formaldehyde emissions and CBI patent issue. Both of these topics have been addressed in this document.

Oral Comments

There were 18 oral comments presented at the public meeting. All of the comments were generally in opposition of the proposed facility, or were similar to the written comments submitted via e-mail by the party in questions (that were addressed above either in the General or Specific Response to Comments Sections). Those comments not to be believed fully responded to in the General Response to Comments section are included in the Specific Response to Comments section.

A video of the virtual public meeting to accept oral comments can be found at the following web link:

https://drive.google.com/file/d/1PYO-Dd7NPbHQa3fgihBBcH5Xt5t1dOgC/view

RESPONSE TO COMMENTS CONCLUSION

As given in this document, and pursuant to §45-13-8.8, all relevant comments received during the public comment period have been reviewed and appropriately addressed in this document. A full listing of all persons that submitted a written comment is included as Appendix A and the actual comments received are available on the DAQ's website. Appendix B includes a list of attendees at the June 30, 2025 public meeting and Appendix C includes a list of attendees at the July 17, 2025 virtual public meeting. See the "Final Determination" for discussion of the final determination regarding Permit Application R13-3713. This document will be made available on the DEP AE website, the DAQ Permitting website, and emailed to all commenters who provided a legible email address.

APPENDIX A - LIST OF PERSONS WHO SUBMITTED WRITTEN COMMENTS

Comment	Date	Commenter
1	3/29/2025	Linda Cooper
2	4/9/2025	Pamela Moe
3	4/9/2025	Cinthia Ramsey
4	4/10/2025	Judy Rodd
5	4/11/2025	Kathleen Nelson
6	4/11/2025	Alan Tomson
7	4/13/2025	Nathan Baker
8	4/13/2025	Meghan Olson
9	4/13/2025	Gunnar Olson
10	4/13/2025	Josephine Pregley
11	4/13/2025	Campbell Moore
12	4/13/2025	Unsigned
13	4/13/2025	Evelyn Olson
14	4/14/2025	Colleen Laffey
15	4/14/2025	Robin McLintock
16	4/14/2025	John Rosine
17	4/14/2025	Rod R. Jones
18	4/14/2025	Joy Kurtz
19	4/14/2025	Ronald Ulle
20	4/14/2025	Michael Goss
21	4/14/2025	Amy Margolies
22	4/14/2025	John Morehead
23	4/14/2025	Josh Nease
24	4/14/2025	Lenore Howell
25	4/14/2025	John Gasper
26	4/14/2025	Nikki Forrester
27	4/14/2025	Judy Williamson
28	4/14/2025	Dan Curry
29	4/14/2025	Brent Carminati
30	4/14/2025	Cara Sedney
31	4/14/2025	Brian Gill
32	4/14/2025	Hanna Tierney
33	4/15/2025	Michael Goss
34	4/15/2025	Jennifer Sisney and John E. Williams

35	4/15/2025	Sean Tierney
36	4/15/2025	Sarah Litzau
37	4/15/2025	Chris Wade
38	4/15/2025	Zina Raye
39	4/15/2025	Meghan Olson
40	4/15/2025	Charles C. Walbridge
41	4/15/2025	Susanne Coffield
42	4/15/2025	Keith Strausbaugh
43	4/15/2025	Thomas Stout
44	4/15/2025	Shannon McCann
45	4/15/2025	Judd Culver
46	4/15/2025	Christy Barber
47	4/15/2025	Trina Taylor
48	4/15/2025	Annlee Boutwell
49	4/15/2025	Joseph W. Dumire
50	4/15/2025	Robert Sagraves
51	4/15/2025	Paula Stahl
52	4/15/2025	Dare Johnson Wenzler
53	4/15/2025	Deborah L. McHenry
54	4/15/2025	Christine Kozan
55	4/15/2025	Cory Ash
56	4/15/2025	Teri Stother
57	4/15/2025	Lisa Porter
58	4/15/2025	Karen McIntyre
59	4/15/2025	Amy Margolies
60	4/15/2025	Campbell Moore
61	4/15/2025	Jerry Payne
62	4/15/2025	Frank Anderson
63	4/16/2025	Sandra Duran-Blyth
64	4/16/2025	Jim Plitt
65	4/16/2025	Heather Robertson
66	4/16/2025	Pete Johnson
67	4/16/2025	Anna Boarman
68	4/16/2025	Kathryn Kahler
69	4/16/2025	Katherine Francis
70	4/16/2025	Caitlin Ware
71	4/16/2025	Juliana Kimbrell and Jane Birdsong
72	4/16/2025	Brent Morrow

73	4/16/2025	Shelia Devilder
74	4/16/2025	Nancy Mammarella
75	4/16/2025	Dylan Jones
76	4/16/2025	Taylor Ambrose
77	4/16/2025	Barbara Brown
78	4/16/2025	Sarah Gilliland
79	4/16/2025	Jessica Johnson
80	4/16/2025	Monica Williams
81	4/16/2025	John Fisher
82	4/16/2025	James Kotcon
83	4/16/2025	I. Elaine Moore
84	4/16/2025	Ruth Bullwinkle
85	4/16/2025	Nicholas Brittingham
86	4/16/2025	Lindsay Knotts
87	4/17/2025	Carolyn Culver
88	4/17/2025	Anne Farmer
89	4/17/2025	Emily Carlson
90	4/17/2025	Robert Sagraves
91	4/17/2025	Peter Clifford
92	4/17/2025	Dena Beckner
93	4/17/2025	Martin Williams
94	4/17/2025	Maggie Lutz
95	4/17/2025	Kathleen Salter
96	4/17/2025	Joshua Saville
97	4/18/2025	Juliana Serafin
98	4/18/2025	Ali Printz
99	4/18/2025	Monica S. Pearl
100	4/18/2025	Luanne McGovern
101	4/19/2025	Matt Hauger
102	4/19/2025	Ekaterina Gibiansky
103	4/20/2025	Susan Coffield
104	4/20/2025	Jamie Jacobs
105	4/20/2025	Gina Palmer
106	4/20/2025	Alexey Belkin
107	4/20/2025	Liubov Zaritskaya
108	4/20/2025	Leonid Gibiansky
109	4/21/2025	Alan Tomson
110	4/21/2025	Jodi Jones

111	4/21/2025	Olivia Miller
112	4/21/2025	Stan DeGarmo
113	4/21/2025	David Bailey
114	4/21/2025	Janice Helmstetter
115	4/21/2025	Marc Imlay
116	4/21/2025	Randy Kesling
117	4/21/2025	Cathy Hamilton
118	4/21/2025	Fletcher Hutcheson Jr
119	4/21/2025	Kelly Weaver
120	4/21/2025	Joe Webb
121	4/21/2025	Linda Jacknowitz
122	4/21/2025	Hanna Tierney
123	4/21/2025	Patty Schleiff
124	4/21/2025	Tim Walsh
125	4/21/2025	Hunter Stape
126	4/21/2025	Rick Miller
127	4/21/2025	John Richard
128	4/21/2025	Mike Povroznik
129	4/21/2025	Janis Boury
130	4/21/2025	Eric Baumann
131	4/21/2025	Sean Tierney
132	4/21/2025	David Brown
133	4/21/2025	Tom Degen
134	4/21/2025	William Murray
135	4/21/2025	Amber Hobday
136	4/21/2025	Theophilus Griswold
137	4/21/2025	Norah Neale
138	4/21/2025	Teresa Stone
139	4/21/2025	Nancy Luscombe
140	4/21/2025	Anna Boarman
141	4/21/2025	Claire Davis
142	4/21/2025	Dena Beckner
143	4/21/2025	Mark Moody
144	4/21/2025	Nancy Mammarella
145	4/21/2025	Jesse Medley
146	4/21/2025	Meghan Stone Olson
147	4/21/2025	Sara Zecca
148	4/21/2025	Linda Shaffer

149	4/21/2025	Amy Gross
150	4/21/2025	Merrily Taylor
151	4/21/2025	Debbie Huber
152	4/21/2025	Beth Mankins
153	4/21/2025	Charles Walbridge
154	4/21/2025	Philip Sundstrom
155	4/21/2025	Carrie Nestor
156	4/21/2025	Keith Collins
157	4/21/2025	Madelene Blackwood
158	4/21/2025	Brent Carminati
159	4/21/2025	Donald Criss
160	4/21/2025	Nicholas Hall
161	4/21/2025	Michelle Hudson
162	4/21/2025	Mark Belcher
163	4/21/2025	Gary Boyce
164	4/21/2025	Martha Cusick
165	4/21/2025	Stephen Bodnar
166	4/21/2025	Darlene Carson
167	4/21/2025	Mark Muse
168	4/21/2025	Karen Everett
169	4/21/2025	Noelle Robinson
170	4/21/2025	Hoye Carr
171	4/21/2025	Shirley Carr
172	4/21/2025	Rachelle Davis
173	4/21/2025	Nancy Sweigart
174	4/21/2025	Molly Pinkas
175	4/21/2025	Shaena Crossland
176	4/21/2025	Bret Rosenblum
177	4/21/2025	Tyler Nielson
178	4/21/2025	L Leon Okes
179	4/21/2025	Jim Baczuk
180	4/21/2025	Jim Baczuk
181	4/21/2025	Jacqueline DeScisciolo
182	4/21/2025	Anna Boarman
183	4/21/2025	Erica Brown
184	4/21/2025	Kathryn Ortt
185	4/21/2025	Deana Ritchey
186	4/21/2025	Sally Gagne

187	4/22/2025	Carol Milam
188	4/22/2025	Carol Frederick
189	4/22/2025	Donna Kain
190	4/22/2025	Janice Hudnall
191	4/22/2025	John Mullins
192	4/22/2025	Jessica Luscombe
193	4/22/2025	Alexey Belkin
194	4/22/2025	Blake Huber
195	4/22/2025	Kristin Winebrenner
196	4/22/2025	Jay Rowan
197	4/22/2025	Patricia Bates
198	4/22/2025	Melissa Borowitz
199	4/22/2025	Anne Farmer
200	4/22/2025	Kimberly Boyce
201	4/22/2025	Margaret Staudinger
202	4/22/2025	Jackie Mullins
203	4/22/2025	Cris Parque
204	4/22/2025	Leonid Gibiansky
205	4/22/2025	Brad Moore
206	4/22/2025	Mark Skubis
207	4/22/2025	Danielle Luscombe
208	4/22/2025	Lois Ludwig
209	4/22/2025	Nikki Forrester
210	4/22/2025	William Peterson
211	4/22/2025	Judy Cronauer
212	4/22/2025	Edward Kachmarek
213	4/22/2025	Matt Marcus
214	4/22/2025	David Esch
215	4/22/2025	John Rogers
216	4/22/2025	Andy FitzGibbon
217	4/22/2025	Kristine Jordan
218	4/22/2025	Clare Buckle
219	4/22/2025	Dylan Jones
220	4/22/2025	Anne Romance
221	4/22/2025	Lindsay Knotts
222	4/22/2025	Randall Martin
223	4/22/2025	Elwood Groves II
224	4/22/2025	Laura Wagner

225	4/22/2025	Shannon McCann
226	4/22/2025	Amanda Leverett
227	4/22/2025	Annlee Boutwell
228	4/22/2025	Ryan Sincavage
229	4/22/2025	John Richard
230	4/22/2025	Rick Williams
231	4/22/2025	Hilary Goehausen
232	4/22/2025	Michael Loranty
233	4/22/2025	Jeffrey Gilday
234	4/22/2025	Emily Carton
235	4/22/2025	Robert Samors
236	4/22/2025	Joy Malinowski
237	4/22/2025	Rebecca Shipe
238	4/22/2025	J Keith Wade
239	4/22/2025	Christine Beecher
240	4/22/2025	Mike Safran
241	4/23/2025	Kristen Behrens
242	4/23/2025	Susanne Coffield
243	4/23/2025	Ken Shanes
244	4/23/2025	Taylor Ambrose
245	4/23/2025	Sherman Ludwig
246	4/23/2025	Emily Moore
247	4/23/2025	Jane Browning
248	4/23/2025	Elizabeth Ludwig
249	4/23/2025	Sean Tierney
250	4/23/2025	Bonni Mckeown
251	4/23/2025	Ronald Para
252	4/23/2025	Kathleen Para
253	4/23/2025	Mary Quattro
254	4/23/2025	Richard Margolies
255	4/23/2025	Penelope Gobar
256	4/23/2025	Jude Gillespie
257	4/23/2025	Jason Gillespie
258	4/23/2025	Casey King
259	4/23/2025	Karina Moser
260	4/23/2025	Linda Reeves
261	4/23/2025	Sarah Wheedleton
262	4/23/2025	Sandra Frank

263	4/23/2025	Emily Moore
264	4/23/2025	Robby McClung
265	4/23/2025	Cindy Phillips
266	4/23/2025	Susan Ruether
267	4/23/2025	Nellie Davis
268	4/23/2025	Becky Ray
269	4/23/2025	Maggie Lutz
270	4/23/2025	Josh Nease
271	4/23/2025	William Murray
272	4/23/2025	Elizabeth Boehme
273	4/23/2025	Kelly Stadelman
274	4/23/2025	Jess Tucker
275	4/23/2025	Betty Arenth
276	4/24/2025	Victor Pompa
277	4/24/2025	Ashley Sheffel
278	4/24/2025	Jeanne Boury
279	4/24/2025	Tamara and Alexander Erchov
280	4/24/2025	Matthew Taylor
281	4/24/2025	Alex Goddard
282	4/24/2025	Elizabeth Rodman
283	4/24/2025	Jim and Beverly Triplett
284	4/24/2025	Madison Ball
285	4/24/2025	Paul Young
286	4/24/2025	Marissa Clingen
287	4/24/2025	Katherine Warner
288	4/24/2025	Kimberly Holmes
289	4/24/2025	Betsy Lawson
290	4/24/2025	Jon Carnill
291	4/24/2025	Nicko Margolies
292	4/24/2025	Robert Thompson
293	4/24/2025	John Lutz
294	4/24/2025	Charles Walbridge
295	4/24/2025	Pamela Lutz
296	4/24/2025	Victoria Weeks
297	4/24/2025	Diana Vera
298	4/24/2025	Linda Christine Nutter
299	4/24/2025	Doreen Lietzow
300	4/24/2025	Jay Lietzow

301	4/24/2025	Lisa Robinson
302	4/24/2025	Linda C Nutter
303	4/24/2025	Nancy Tracey
304	4/24/2025	Hanna Tierney
305	4/24/2025	Gina Palmer
306	4/24/2025	Mallory Anderson Ulizio
307	4/25/2025	Rachelle Thorne
308	4/25/2025	Mary Kibler
309	4/25/2025	No name provided
310	4/25/2025	Quinn Doyle
311	4/25/2025	Katie Russell
312	4/25/2025	Melanie Ambrose
313	4/25/2025	Marilynn Cuonzo
314	4/25/2025	Ekaterina Gibiansky
315	4/25/2025	Chelsea Faulknier
316	4/25/2025	Kurt Johnson
317	4/25/2025	Vanessa Shaffer
318	4/25/2025	Tess Meinert
319	4/25/2025	Sarah Anderson
320	4/25/2025	PJ Snow
321	4/25/2025	Michael McClintock
322	4/25/2025	David Blockstein
323	4/25/2025	PJ Hallberg
324	4/25/2025	Steve Pearson
325	4/25/2025	Josh Stevens
326	4/25/2025	Tracey Slaughter
327	4/25/2025	Debra Prybyla
328	4/25/2025	Kimberly White
329	4/25/2025	Kelly Stadelman
330	4/25/2025	Mary Kibler
331	4/25/2025	Lucas Warner
332	4/25/2025	Marjorie Keatley
333	4/25/2025	Robert Young
334	4/25/2025	Karen Jacobson
335	4/25/2025	Tarah Clark
336	4/25/2025	Mary E. Waters
337	4/25/2025	Denice Reese
338	4/25/2025	Unsigned

339	4/25/2025	Madison Ball
340	4/26/2025	Tim Popov
341	4/26/2025	Donald Deering
342	4/27/2025	Peggy King
343	4/27/2025	Ron Taylor
344	4/28/2025	Shirley Carr
345	4/28/2025	Jennifer Olinger
346	4/29/2025	Sue Dodds
347	4/29/2025	Julie Dzaack
348	4/29/2025	William Ross
349	5/1/2025	Albert Colaianni
350	5/1/2025	Sarah Sundstrom
351	5/1/2025	Rachel Stevens
352	5/4/2025	AJ Cho
353	5/4/2025	Kate Symons
354	5/6/2025	Erin Sheehy
355	5/6/2025	Cindy Bertaut
356	5/10/2025	The Colyer Family (Christine Schoellhorn)
357	5/12/2025	Richard Owens
358	5/13/2025	Carolyn Culver
359	5/13/2025	Mike Lucas
360	5/13/2025	Olivia Miller, Marilyn Shoenfeld
360 (same letter as above)	5/13/2025	Olivia Miller, Marilyn Shoenfeld
361	5/13/2025	Lois Ludwig
364	5/13/2025	Justin Harrison
362	5/14/2025	Jainnie Koon
363	5/14/2025	Richard Mier
365	5/14/2025	Ian Thompson
366	5/14/2025	Cory Ash
367	5/14/2025	Kelly Campbell
368	5/14/2025	Merri Collins
369	5/14/2025	Emma Hall
370	5/14/2025	Paula Stahl
371	5/14/2025	Ian Thompson
372	5/14/2025	Jennifer Coyne
373	5/14/2025	Fredric Salstrom

374	5/14/2025	Amanda Taylor
375	5/14/2025	Kimberly White
376	5/14/2025	Alice Tekavec
377	5/14/2025	Shaena Crossland
378	5/14/2025	Cynthia Phillips
379	5/14/2025	Carolyn Culver
380	5/14/2025	Tammie Smith
381	5/14/2025	Candace L
382	5/15/2025	Emma Hall
383	5/15/2025	Hunter Stape
384	5/15/2025	Mills Langehans
385	5/19/2025	Sherry Sandruck
386	5/21/2025	Floyd Walters III
387	5/22/2025	Meghan Olson
388	5/22/2025	Robert Sagraves
389	5/22/2025	Marti Ritz
390	5/23/2025	Karla King
391	5/24/2025	Don Hibbard
392	5/24/2025	Nikki Forrester
393	5/26/2025	Dare Wenzler
394	5/27/2025	Moriah Munsch
395	5/27/2025	Kristine Jordan
396	5/27/2025	Matt Marcus
397	5/27/2025	Abigail Tyler
398	5/28/2025	Amy Margolies
399	5/28/2025	Hanna Tierney
400	5/28/2025	Crystal Poe
401	5/28/2025	William Murray
402	5/28/2025	Brian Hicks
403	5/28/2025	Joshua Saville
404	5/28/2025	Kelly Franklin
405	5/28/2025	Casey King
406	5/28/2025	Athey Lutz
407	5/28/2025	Karen Wiedemann
408	5/28/2025	Nina Wenzler
409	5/28/2025	Paula Stahl
410	5/28/2025	Diane Rader
411	5/28/2025	Tara Byard

412	5/28/2025	Anna Boarman
413	5/28/2025	Pam Hylbert-Eder
414	5/28/2025	Sue Haywood
415	5/28/2025	Elizabeth Simons
416	5/28/2025	Lisa Collins
417	5/28/2025	Sean Tierney
418	5/28/2025	Andrew FitzGibbon
419	5/28/2025	Pete Johnson
420	5/28/2025	Luanne McGovern
421	5/28/2025	Maggie Lutz
422	5/28/2025	John Gasper
423	5/28/2025	Meghan Stone Olson
424	5/28/2025	Janice Shepherd
425	5/28/2025	Jennifer Coyne
426	5/28/2025	Linda Nutter
427	5/28/2025	Christine Bonner
428	5/28/2025	Erica Reed
429	5/28/2025	Carolyn Culver
430	5/28/2025	Amy Cimarolli
431	5/28/2025	Tim Embree
432	5/28/2025	Jimmy Swann
433	5/28/2025	Bode Shockley
434	5/28/2025	Nicolas Zegre
435	5/28/2025	Carrie Nestor
436	5/28/2025	Katherine Warner
437	5/28/2025	Tiffany King
438	5/28/2025	Erica Brown
439	5/28/2025	Nancy Myers
440	5/28/2025	Jackie Mullins
441	5/28/2025	Daria Jones
442	5/29/2025	Dena Beckner
443	5/29/2025	Shannon McCann
444	5/29/2025	Joe Webb
445	5/29/2025	Jessica Heavner
446	5/29/2025	Sarah Stonesifer
447	5/29/2025	Kevin Heavner
448	5/29/2025	Jesse Tucker
449	5/29/2025	Catherine Fleischman

450	5/29/2025	Sara Litzau
451	5/29/2025	Rebecca Barr
452	5/29/2025	Sharon Harmon
453	5/29/2025	James Van Nostrand
454	5/29/2025	Pamela Lutz
455	5/29/2025	Kathleen Leo
456	5/29/2025	Kristi Crutch
457	5/29/2025	Bonni Mckeown
458	5/29/2025	Mitchel Zemel
459	5/29/2025	Kelly Campbell
460	5/29/2025	Colleen Davies
461	5/29/2025	Shirley Carr
462	5/29/2025	Judy Williamson
463	5/29/2025	Jerry Jordan
464	5/29/2025	Dylan Jones
465	5/29/2025	Kayla Whited
466	5/29/2025	Randall Martin
467	5/29/2025	Jacob Brown
468	5/29/2025	Janice Helmstetter
469	5/29/2025	Penelope Patton
470	5/29/2025	Nancy Luscombe
471	5/29/2025	Amanda Pitzer
472	5/29/2025	Kelly Collins
473	5/29/2025	Gary Boyce
474	5/29/2025	Stan DeGarmo
475	5/29/2025	Janice Helmstetter
476	5/29/2025	Cris Parque
477	5/29/2025	Christoper Downing
478	5/29/2025	Danita Nellhaus
479	5/29/2025	Beth Skubis
480	5/29/2025	Claire Davis
481	5/29/2025	Kimberly Holmes
482	5/29/2025	Jay Rowan
483	5/29/2025	Erica Brown
484	5/29/2025	David Wamsley
485	5/29/2025	David Ferguson
486	5/29/2025	Monica Rumsey
487	5/29/2025	Jerry Carson

488	5/29/2025	Paula Tremba
489	5/29/2025	Joe Hovious
490	5/29/2025	Elizabeth Boehme
491	5/29/2025	Sally Egan
492	5/29/2025	Zina Raye
493	5/30/2025	Rex Burford
494	5/30/2025	William Ross
495	5/30/2025	Megan Easton
496	5/30/2025	Lenore Howell
497	5/30/2025	Anna Smucker
498	5/30/2025	Cynthia Ellis
499	5/30/2025	Carl Bolyard
500	5/30/2025	Shannon Orcutt
501	5/30/2025	Alan Tomson
502	5/30/2025	Haley Schmitz
503	5/30/2025	Hanna Tierney
504	5/30/2025	Carol Frederick
505	5/30/2025	Julie Raffkind
506	5/30/2025	Rachelle Thorne
507	5/30/2025	Richard Margolies
508	5/30/2025	Donna Smith
509	5/31/2025	Robert Nutter
510	5/31/2025	Kristen Behrens
511	5/31/2025	Robert McIntire
512	5/31/2025	Carol Nix
513	5/31/2025	Mary Cunningham
514	5/31/2025	Lucille Elliott
515	6/1/2025	John Balasko
516	6/1/2025	Abigail Tyler
517	6/1/2025	Paul Frederick
518	6/1/2025	Eda McDowell
519	6/1/2025	Megan Heady
520	6/1/2025	Thomas Stout
521	6/1/2025	Kristine Miller
522	6/1/2025	Samantha Daugherty
523	6/1/2025	Diane Beall
524	6/1/2025	Joshua Edwards
525	6/2/2025	Cynthia and Richard Margolies

526	6/2/2025	Nancy Luscombe
527	6/2/2025	Shaena Crossland
528	6/2/2025	Barbara Earl
529	6/2/2025	Mathew Cloak
530	6/3/2025	Joseph Dumire
531	6/3/2025	Lenore Howell
532	6/3/2025	Hannah Snyder
533	6/3/2025	Tom Ackerman
534	6/3/2025	Catherine Fleischman
535	6/3/2025	Emily Moore
536	6/3/2025	Kristin Winebrenner
537	6/3/2025	Jane Browning
538	6/3/2025	Christy Barber
539	6/4/2025	John Lutz
540	6/4/2025	Andrew Cline
541	6/4/2025	Sam Elswick
542	6/4/2025	Hanna Tierney
543	6/4/2025	Anna Cowie
544	6/4/2025	Hilary Freeman
545	6/5/2025	Cynthia Cox
546	6/5/2025	Sean Tierney
547	6/5/2025	Hanna Tierney
548	6/6/2025	Lee Sherline
549	6/6/2025	Richard Rubock
550	6/6/2025	Kris Nessler
551	6/6/2025	Hartley Roberts
552	6/7/2025	Hunter Stape
553	6/7/2025	Rachel Schmitt
554	6/7/2025	Buffy Chahal
555	6/7/2025	Robert Sagraves
556	6/7/2025	Monica Rumsey
557	6/7/2025	Rachel Tripp
558	6/7/2025	Holly Plunkett
559	6/7/2025	Mallory Ulizio
560	6/7/2025	Faith Culver
561	6/8/2025	Tammy Seller
562	6/8/2025	Rachelle Davis
563	6/8/2025	Kristen Behrens

564	6/8/2025	Richard Rubock
565	6/8/2025	Ahlayla Lazare
566	6/8/2025	Deanna Dearing
567	6/11/2025	Molly Deacon
568	6/11/2025	Denise Weingart Webb
569	6/11/2025	Fredric Salstrom
570	6/11/2025	Kelly Campbell
571	6/11/2025	Sharon Harmon
572	6/11/2025	Mark Muse
573	6/11/2025	Hope Jarkowski
574	6/11/2025	Jerry Carson
575	6/12/2025	Ed Rader
576	6/12/2025	Michael Daryabeygi
577	6/13/2025	Cory Chase
578	6/13/2025	Leah Turgeon
579	6/13/2025	Lisa Di Bartolomeo
580	6/13/2025	Andrea Hubbard
581	6/13/2025	Tinann Hudnall
582	6/13/2025	Andrea Soccorsi
583	6/13/2025	K Cutlip
584	6/13/2025	Joe Whitehouse
585	6/13/2025	Tabitha Butcher
586	6/13/2025	Emily Muttillo
587	6/14/2025	Charles Richard
588	6/14/2025	Vanessa Humphrey
589	6/15/2025	Samantha Mcconaha
590	6/15/2025	Madison Trainer
591	6/15/2025	Robbie Barnaby
592	6/15/2025	Savanna Shriver
593	6/15/2025	Isabelle Hasty
594	6/16/2025	Emily Carlson
595	6/16/2025	Benjamin Scheper
596	6/17/2025	Clara Halfin
597	6/17/2025	Robert Halfin
598	6/18/2055	Taylor Scites
599	6/18/2055	Finley Almond
600	6/18/2025	Joseph Dumire
601	6/18/2025	Emily Zawatski

602	6/18/2025	Joshua Fisher
603	6/19/2025	Emily Peterson
604	6/19/2025	Judith Clister
605	6/19/2025	Stephanie Cussins
606	6/20/2025	Amy Margolies
607	6/20/2025	Taylor Sisk
608	6/20/2025	Orion McClurg
609	6/20/2025	Lyra Lorelei
610	6/20/2025	Deana Ritchey
611	6/20/2025	Orion McClurg
612	6/20/2025	Sean Tierney
613	6/20/2025	Geoff Pohanka
614	6/20/2025	Mykal Williams
615	6/20/2025	Mykal Williams
616	6/20/2025	KM Nelson
617	6/20/2025	Heather Robertson
618	6/20/2025	Annlee Boutwell
619	6/20/2025	Stephanie Cussins
620	6/20/2025	Meghan Stone Olson
621	6/20/2025	Aaron Judy
622	6/20/2025	Linda Brolis
623	6/20/2025	Rachel Tripp
624	6/20/2025	Clare Anderson
625	6/20/2025	Chris Beach
626	6/20/2025	Amy Arnett
627	6/21/2025	Sharon Harmon
628	6/21/2025	Sharon Harmon
629	6/21/2025	Hanna Tierney
630	6/21/2025	Will Evans
631	6/22/2025	Luanne McGovern
632	6/22/2025	Paige Smith
633	6/22/2025	Nancy Myers
634	6/22/2025	Zina Raye
635	6/23/2025	Shaena Crossland
636	6/24/2025	Cory Ash
637	6/24/2025	Howard Murphy
638	6/24/2025	Emma Hall
639	6/24/2025	Debora Mattingly

640	6/24/2025	Nikki Forrester
641	6/24/2025	Nikki Forrester
642	6/24/2025	Christina Hallam
643	6/25/2025	Patrice Nielson
644	6/25/2025	Gary Szpatura
645	6/27/2025	Brian Bennett
646	6/27/2025	Reed Davis
647	6/27/2025	Shannon McCann
648	6/27/2025	Judy Byrd
649	6/27/2025	Alan Tomson
650	6/27/2025	Barbara Earl
651	6/27/2025	Kate Long
652	6/27/2025	Baylor Jarkowski
653	6/27/2025	Hope Jarkowski
654	6/27/2025	Catherine Hallam
655	6/27/2025	Kelsea Smith
656	6/27/2025	Zina Raye
657	6/28/2025	Thomas Stout
658	6/28/2025	Emily Moore
659	6/28/2025	Peter Barnwell
660	6/28/2025	Rebecca Cantrell
661	6/28/2025	Jeanne Tinsman
662	6/28/2025	Kristen Behrens
663	6/28/2025	Tammy Seller
664	6/28/2025	Jamie Jacobs
665	6/28/2025	Tyler Nielson
666	6/28/2025	William Conrad
667	6/29/2025	J Keith Wade
668	6/29/2025	Ryan Lefever
669	6/29/2025	Susan Haywood
670	6/30/2025	Zina Raye
671	6/30/2025	Dr. John Janousek
672	6/30/2025	Dylan Jones
673	6/30/2025	Antonina Wenzler
674	6/30/2025	Carrie Hawkins
675	6/30/2025	Amelia Walker
676	6/30/2025	Eda McDowell
677	7/1/2025	Taylor Campbell

678	7/1/2025	Debra Bockrath
679	7/1/2025	Sara Litzau
680	7/1/2025	Mitchel Zemel
681	7/1/2025	James Fazzalore
682	7/1/2025	Debra Bockrath
683	7/1/2025	Corey Wilder
684	7/1/2025	Hanna Tierney
685	7/2/2025	Taylor Campbell
686	7/2/2025	Karen Jacobson
687	7/2/2025	Jim Kotcon
688	7/2/2025	Janice Helmstetter
689	7/2/2025	Susan Eason
690	7/2/2025	Jane Blevin
691	7/3/2025	John Richard
692	7/4/2025	Janice DePollo Lantz
693	7/4/2025	Brooke Bronowicz
694	7/5/2025	Catherine Fleischman
695	7/5/2025	Joanne Abbruzzesi
696	7/5/2025	Jennifer Walker
697	7/6/2025	Catherine Fleischman
698	7/6/2025	Lisa Schooling
699	7/7/2025	Clare Anderson
700	7/7/2025	Danielle Conaway
701	7/7/2025	Emily Moore
702	7/8/2025	Sharon Harmon
703	7/8/2025	Juliana Serafin
704	7/8/2025	Clarissa Lebo
705	7/8/2025	Jodi Jones
706	7/8/2025	Erin Hudnall
707	7/8/2025	Rachelle Hill
708	7/8/2025	Rachel Talty
709	7/8/2025	Christopher Nichols
710	7/8/2025	Meaghan Nichols
711	7/8/2025	Shelby Floyd
712	7/8/2025	Julia Auch
713	7/9/2025	Logan Annett
714	7/9/2025	Noah Cranmer
715	7/9/2025	Jennifer Bunner

716	7/9/2025	Cheryl Nicholson
717	7/9/2025	Michael Thomas
718	7/9/2025	Paul Valachovic
719	7/9/2025	Julia Amedro
720	7/9/2025	Traci Mannino-Cantrell
721	7/9/2025	John Amedro
722	7/9/2025	Thomas Culligan
723	7/9/2025	Maisie Gore
724	7/9/2025	Matthew McCay
725	7/9/2025	Justin Miller
726	7/9/2025	Hilary Kinney
727	7/9/2025	Kimberly White
728	7/9/2025	Beth Lowe
729	7/9/2025	David Barnett
730	7/9/2025	Karl Imhoff
731	7/9/2025	Madeline Warnick
732	7/9/2025	Linda Nutter
733	7/9/2025	Kayla Neeley
734	7/9/2025	Matt Hauger
735	7/9/2025	Bill Bissett
736	7/9/2025	Amanda Styers
737	7/9/2025	Eva Cicci
738	7/9/2025	Rachel Cicci
739	7/9/2025	George Cicci
740	7/9/2025	Dare Johnson Wenzler
741	7/9/2025	Timothy Huguenin
742	7/9/2025	Becky Cantrell
743	7/9/2025	Susan Schmitt
744	7/9/2025	Molly Deacon
745	7/9/2025	Sara Ruff
746	7/9/2025	Kay Kelly
747	7/9/2025	Theresa Cross
748	7/9/2025	Julie Coraccio
749	7/9/2025	Hunter Stape
750	7/9/2025	Emily Calvert
751	7/9/2025	David Phillips
752	7/10/2025	Danielle Conaway
753	7/10/2025	Mary Imhoff

754	7/10/2025	Sandra Feather
755	7/10/2025	Stephanie Munoz
756	7/10/2025	Sue Lewis
757	7/10/2025	Brent Easton
758	7/10/2025	Sue Lewis
759	7/10/2025	Michael Gatens
760	7/10/2025	Carrie Hawkins
761	7/10/2025	Joseph Connelly
762	7/10/2025	James Quinn
763	7/10/2025	Russell Giovanetti
764	7/10/2025	Barbara Brown
765	7/10/2025	Marc Levine
766	7/10/2025	Joann Harrah
767	7/10/2025	Cassidy Evrick
768	7/10/2025	Denise Swiger
769	7/10/2025	Jonathan Lacocque
770	7/10/2025	Ekaterina Gibiansky
771	7/10/2025	Leonid Gibiansky
772	7/10/2025	Heather Openshaw
773	7/11/2025	Mikala Betlet
774	7/11/2025	Judy Williamson
775	7/11/2025	Nikki Forrester
776	7/11/2025	Owen Mulkeen
777	7/11/2025	Dave Rause
778	7/11/2025	Joseph Holmes
779	7/11/2025	Jennifer Walker
780	7/11/2025	Betsy Lawson
781	7/11/2025	Becky Daiss
782	7/11/2025	Craig Reger
783	7/11/2025	Rupert Cutler
784	7/11/2025	David Saab
785	7/11/2025	Shannon McCann
786	7/11/2025	Michael Oatney
787	7/11/2025	Dina Hornbaker
788	7/11/2025	Charles Walbridge
789	7/11/2025	Lois Ludwig
790	7/11/2025	Mark Blumenstein
791	7/11/2025	Dana Stinson

792	7/11/2025	Mark Blumenstein
793	7/11/2025	Robert Goldberg
794	7/11/2025	Robin Talbert
795	7/11/2025	Karen Lane
796	7/11/2025	Donna Weems
797	7/11/2025	Michael Ferguson
798	7/11/2025	Kelly Campbell
799	7/11/2025	Jillian Welsh
800	7/11/2025	Hayley Carpenter
801	7/11/2025	John McCann
802	7/11/2025	Jeremy Horner
803	7/11/2025	Jeanna Crockett
804	7/11/2025	Jay Rowan
805	7/11/2025	Sidney Harring
806	7/11/2025	Kimberly Holmes
807	7/11/2025	Michael Povroznik
808	7/11/2025	Margaret Hutchison
809	7/11/2025	Mike Lucas
810	7/11/2025	Mary Mastro
811	7/11/2025	Jesse Tucker
812	7/11/2025	John Slocomb
813	7/11/2025	James Kirby
814	7/11/2025	Kevin Umbel
815	7/11/2025	Mark Hill
816	7/11/2025	Anna Smucker
817	7/11/2025	Donald Criss
818	7/11/2025	Christine Mitsch
819	7/11/2025	Katie Donnelly
820	7/11/2025	Debra Prybyla
821	7/11/2025	Christine Kozan
822	7/11/2025	Juliana Kimbrell
823	7/11/2025	Carrie Kline
824	7/11/2025	Trudy Phillips
825	7/11/2025	Sally Anderson
826	7/11/2025	Charlotte Miles
827	7/11/2025	Barbara Faris
828	7/11/2025	Darlene Carson
829	7/11/2025	Jerry Carson

830	7/11/2025	Rachel Talty
831	7/11/2025	Sierra DeVito
832	7/11/2025	Bonni Mckeown
833	7/11/2025	Ryan Lambert
834	7/11/2025	Katherine Murdock
835	7/11/2025	Charlotte Hamilton
836	7/11/2025	Claire Murphy
837	7/12/2025	Meghan Stone Olson
838	7/12/2025	Dawn Peck
839	7/12/2025	David Ferguson
840	7/12/2025	Jay Rowan
841	7/12/2025	Kelly Campbell
842	7/12/2025	Joe Webb
843	7/12/2025	Daria Jones
844	7/12/2025	Andrew Liebhold
845	7/12/2025	Vivian Joltes
846	7/12/2025	Nels Darling
847	7/12/2025	Dave Cooper
848	7/12/2025	Janice Hudnall
849	7/12/2025	Mike Safran
850	7/12/2025	Paul Young
851	7/12/2025	Kim Holmes
852	7/12/2025	Cheryll Collins
853	7/12/2025	sheena williams
854	7/12/2025	Tim Krueger
855	7/13/2025	Ryan Walsh
856	7/13/2025	Leslie Cario
857	7/13/2025	Carolyn Helenski
858	7/13/2025	Jacob Rabinovich
859	7/13/2025	Stephanie Hamlin Kunze
860	7/13/2025	Tom Degen
861	7/13/2025	Thomas Stout
862	7/13/2025	Danita Nellhaus
863	7/13/2025	Michael Brady
864	7/13/2025	Margaret Staudinger
865	7/13/2025	Herbert Staudinger
866	7/13/2025	Franklin Anderson
867	7/13/2025	Roger Zakariasen

868	7/14/2025	William Ross
869	7/14/2025	Joy Kurtz
870	7/14/2025	Kim White
871	7/14/2025	Sean Tierney
872	7/14/2025	Krista Noe
873	7/14/2025	Dylan Jones
874	7/14/2025	Fred Frost
875	7/14/2025	Claire Davis
876	7/14/2025	Lori Post
877	7/14/2025	Jesse Deptula
878	7/14/2025	Howard Regal
879	7/14/2025	Greg Duber
880	7/14/2025	Chad Anselmo
881	7/14/2025	Emily Junkin
882	7/14/2025	Hannah Pike
883	7/14/2025	Willa Dvorchak
884	7/14/2025	Travis Hines
885	7/14/2025	Laura Stephens
886	7/14/2025	Brooke Walker
887	7/14/2025	Amy Hannun
888	7/14/2025	William Murray
889	7/14/2025	Ryan Leedom
890	7/14/2025	Clarissa Lebo
891	7/14/2025	Paige Smith
892	7/14/2025	Eleanor Gould
893	7/14/2025	Meir Lewin
894	7/14/2025	Judy Williamson
895	7/14/2025	Murphy Family
896	7/14/2025	Kristine Jordan
897	7/14/2025	Penny Maphis
898	7/14/2025	Dan Fisher
899	7/14/2025	Rhonda Nash
900	7/14/2025	Joshua Stuart
901	7/14/2025	Nick Morales
902	7/14/2025	Elizabeth Vines
903	7/14/2025	Kristy Blackburn
904	7/14/2025	Lillian McKenzie
905	7/14/2025	Cassie K Hubbs

906	7/14/2025	Virginia Thomas
907	7/14/2025	Ron Slabe
908	7/14/2025	Elizabeth Duarte
909	7/14/2025	Isabelle Morrison
910	7/14/2025	Gloria Nelson
911	7/14/2025	Edison Jones
912	7/14/2025	Paula Stahl
913	7/14/2025	Alexis Yost
914	7/14/2025	Stephen Bodnar
915	7/14/2025	Robert Bourdon
916	7/14/2025	Anna Webb
917	7/14/2025	Taylor Kelly
918	7/14/2025	Greg Aucremanne Aucremanne
919	7/14/2025	Joshua Wilson
920	7/14/2025	Andrew Klepeis
921	7/14/2025	Caleb Cunningham
922	7/14/2025	Elizabeth Kail
923	7/14/2025	Alexandra Macia
924	7/14/2025	Jackson Price
925	7/14/2025	C King
926	7/14/2025	Todd Wilson
927	7/14/2025	Griffin Nordstrom
928	7/14/2025	Spencer Nolan
929	7/14/2025	Kelly Stadelman
930	7/14/2025	Kennedi ONeal
931	7/14/2025	Allie Mullins
932	7/14/2025	Joel Davis
933	7/14/2025	Christopher Sprankle
934	7/14/2025	Nolan Brahosky
935	7/14/2025	Kari Harsh
936	7/14/2025	Ryan Dalton
937	7/14/2025	Jamie Saunders
938	7/14/2025	Tiffany Diehl
939	7/14/2025	Holden Young
940	7/14/2025	Melissa Bizich
941	7/14/2025	Christine Bonner
942	7/14/2025	Anna Willis
943	7/14/2025	Robert Nutter

944	7/14/2025	Victoria Chesterfield
945	7/14/2025	Tony Lim
946	7/14/2025	Meghan Braley
947	7/14/2025	Andrea Dalton
948	7/14/2025	Nita Mamas
949	7/14/2025	Brayden Johnson
950	7/14/2025	Corinne Kerwin
951	7/14/2025	April Miller
952	7/14/2025	Jonah Varner
953	7/14/2025	charisma diehl
954	7/14/2025	Brittney Watson
955	7/14/2025	Edie McMillion
956	7/14/2025	Lily Thomas
957	7/14/2025	Gabi Donham
958	7/14/2025	Kristin Newton
959	7/14/2025	Devon Emerick
960	7/14/2025	Amanda Webb
961	7/14/2025	Brenda Benner
962	7/14/2025	Julia Zorn
963	7/14/2025	Emma Samples
964	7/14/2025	Kearsten Adkins
965	7/14/2025	Darin Markus
966	7/14/2025	Kylie Butler
967	7/14/2025	adam bedway
968	7/14/2025	Hannah Wilson
969	7/14/2025	Mary Reinbold
970	7/14/2025	April Childers
971	7/14/2025	Nancy Johnson
972	7/14/2025	Benjamin Dunbar
973	7/14/2025	Katy Shallows
974	7/14/2025	Helen Masters
975	7/14/2025	Dominique Kirl
976	7/14/2025	Hannah White
977	7/14/2025	Ashley Becker
978	7/14/2025	Gabrielle Marshall
979	7/14/2025	Marguerite Kemp-Sherman
980	7/14/2025	Thomas Corley
981	7/15/2025	Andrew Bonner

982	7/15/2025	Britton Van Vleek
983	7/15/2025	Gregory Englehart
984	7/15/2025	Jenna Dickel
985	7/15/2025	London hood
986	7/15/2025	Joshua Bizich
987	7/15/2025	Steven Gunnoe
988	7/15/2025	Brianna Allen
989	7/15/2025	Stacey Levendorf
990	7/15/2025	Joe Reza
991	7/15/2025	Tina Bonner
992	7/15/2025	Leanne Meyer
993	7/15/2025	Ashley Purvis
994	7/15/2025	Meghan Hissam
995	7/15/2025	Miles Chrissy
996	7/15/2025	Laurie Adase
997	7/15/2025	Madi Miro
998	7/15/2025	Nev Hess
999	7/15/2025	Vincent DeGeorge
1000	7/15/2025	Aimee Eisiminger
1001	7/15/2025	William Hollen
1002	7/15/2025	No name provided
1003	7/15/2025	Joleigh Young
1004	7/15/2025	Stephany McGhee
1005	7/15/2025	Chealie Wilson
1006	7/15/2025	Susan Pugh
1007	7/15/2025	Jordan Pugh
1008	7/15/2025	Erica Schleicher
1009	7/15/2025	Cate Johnson
1010	7/15/2025	Jill Descoteaux
1011	7/15/2025	Kevin McCartney
1012	7/15/2025	Amanda Cain
1013	7/15/2025	Samantha Mix
1014	7/15/2025	Kim Wimer
1015	7/15/2025	Tre Tarantini
1016	7/15/2025	Alex Ehlers
1017	7/15/2025	Kyra Dukich
1018	7/15/2025	Holly Brimm
1019	7/15/2025	Casey Ketchem

1020	7/15/2025	Haleh Amanieh
1021	7/15/2025	Cole Pancake
1022	7/15/2025	Kelly McClintic
1023	7/15/2025	Carrie Nestor
1024	7/15/2025	Lydia McDonald
1025	7/15/2025	Brynne Walker
1026	7/15/2025	Sophie Page
1027	7/15/2025	Reed Tuttle
1028	7/15/2025	Ava Reynolds
1029	7/15/2025	Taira Sarfino
1030	7/15/2025	Baxter Beamer
1031	7/15/2025	Jay Condon
1032	7/15/2025	Alec Berry
1033	7/15/2025	Madeleine Jaeck
1034	7/15/2025	Johnathan Ford
1035	7/15/2025	Rachel L Precht
1036	7/15/2025	Eve Firor
1037	7/15/2025	Stephen Campbell
1038	7/15/2025	Austin Young
1039	7/15/2025	Zack Risner
1040	7/15/2025	Katie Sigmon
1041	7/15/2025	Suzanne Dee
1042	7/15/2025	Nellie Davis
1043	7/15/2025	Zach Braden
1044	7/15/2025	Stephanie Thompson
1045	7/15/2025	Kevin Umbel
1046	7/15/2025	Kristin Carroll
1047	7/15/2025	Sarah Blackburn
1048	7/15/2025	Clare Anderson
1049	7/15/2025	Nell Friend
1050	7/15/2025	Pilar Ayala
1051	7/15/2025	Megan Johnson
1052	7/15/2025	Logan Burr
1053	7/15/2025	Jonathan Wimer
1054	7/15/2025	Tracy Bolinger
1055	7/15/2025	Kelly Collins
1056	7/15/2025	Clara Lehmann
1057	7/15/2025	Liz Jernigan

1058	7/15/2025	Braiden Maddox
1059	7/15/2025	Cathy Hamilton
1060	7/15/2025	Jordan Westerfield
1061	7/15/2025	Aspen Prather
1062	7/15/2025	Matthew Kish
1063	7/15/2025	Carlos Edwards
1064	7/15/2025	Catharine Luckett
1065	7/15/2025	Sophia Roberts
1066	7/15/2025	Jocelyn Wyatt
1067	7/15/2025	Haleigh Smith
1068	7/15/2025	Patrick Gates
1069	7/15/2025	Anthony Kolanko
1070	7/15/2025	Morgan King
1071	7/15/2025	Audrey Burchett
1072	7/15/2025	David Medof
1073	7/15/2025	Breece Ferrell
1074	7/15/2025	Danielle Conaway
1075	7/15/2025	Rhea Sublett
1076	7/15/2025	bailey daniels
1077	7/15/2025	Michael Sayre
1078	7/15/2025	Judy Kramer
1079	7/15/2025	Gabrielle Newell
1080	7/15/2025	Samantha Gray
1081	7/15/2025	Ellen Payne
1082	7/15/2025	Cassidy Dickens
1083	7/15/2025	Caitlin Lokant
1084	7/15/2025	Emma Eisenbeiss
1085	7/15/2025	Chasta Ramsey
1086	7/15/2025	Elisha Rush
1087	7/15/2025	Rosalie Haizlett
1088	7/15/2025	meg hamilton
1089	7/15/2025	Paula Kaufman
1090	7/15/2025	Fiona Baker
1091	7/15/2025	Gina Zanarini
1092	7/15/2025	Judith Underwood
1093	7/15/2025	Delaney Ahrens
1094	7/15/2025	Sarah Bailey
1095	7/15/2025	Elizabeth Simmons

1096	7/15/2025	Grayson Cooper
1097	7/15/2025	Ally Beard
1098	7/15/2025	Olivia Frye
1099	7/15/2025	Katie Adase
1100	7/15/2025	Catherine Lebo
1101	7/15/2025	Tabitha Barbarito
1102	7/15/2025	Alisha Cogar
1103	7/15/2025	Adrienne Wilson
1104	7/15/2025	Megan Naughton
1105	7/15/2025	Gabe DeWitt
1106	7/15/2025	Laine Hynes
1107	7/15/2025	Karen Everett
1108	7/15/2025	Will Evans
1109	7/15/2025	Alycen Dodds
1110	7/15/2025	Carolyn Vieland
1111	7/15/2025	Chelsea Rowe
1112	7/15/2025	Rachel Fedders
1113	7/15/2025	Chelsea Franck
1114	7/15/2025	Marta Staudinger
1115	7/15/2025	Christopher Skaggs
1116	7/15/2025	Jordan Peters
1117	7/15/2025	Nadia Bouajila
1118	7/15/2025	Dustin Hamrick
1119	7/15/2025	Samantha Zurbuch
1120	7/15/2025	Taylor Beam
1121	7/15/2025	Chloe Smith-Zimmerman
1122	7/15/2025	Allison Evans
1123	7/15/2025	Elaine Larkin
1124	7/15/2025	Betsy Spellman
1125	7/15/2025	Ilene Evans
1126	7/15/2025	Wesley sanders
1127	7/15/2025	Amy Grogan
1128	7/15/2025	Ro Redfern-Taube
1129	7/15/2025	Hannah Sulver
1130	7/15/2025	Jessica Bright
1131	7/15/2025	Jenny Boyd
1132	7/15/2025	Nate Sell
1133	7/15/2025	Michael Gene Frazier

1134	7/15/2025	Kyra Tolliver
1135	7/15/2025	Katelyn Westfall
1136	7/15/2025	Aaron Kuhn
1137	7/15/2025	Kimberly Lynch
1138	7/15/2025	Rachel Byrne
1139	7/15/2025	Shaina Ott
1140	7/15/2025	Rowan Weiblen
1141	7/15/2025	Chris Belling
1142	7/15/2025	Sydney Johnson
1143	7/15/2025	Alisha Linehan
1144	7/15/2025	Luke taylor
1145	7/15/2025	Andrew Calvetti
1146	7/15/2025	Mariah Majakey
1147	7/15/2025	Debbie Hennen
1148	7/15/2025	Kimberly Trathen
1149	7/15/2025	Sarah Calvetti
1150	7/15/2025	Kelley Galbreath
1151	7/15/2025	Amy Meyer
1152	7/15/2025	Trevor Reichman
1153	7/15/2025	Jen Allen
1154	7/15/2025	suzanne teune
1155	7/15/2025	Sela Suter
1156	7/15/2025	Anya McMurrer
1157	7/15/2025	Desiree Bullard
1158	7/15/2025	Amanda Ranck
1159	7/15/2025	Ashley Dunn
1160	7/15/2025	Cassie Hedrick
1161	7/15/2025	Maria Guarascio
1162	7/15/2025	Sarah Harbert
1163	7/15/2025	Marianne Selby
1164	7/15/2025	Lindsey Long
1165	7/15/2025	Wendy Crumbaugh
1166	7/15/2025	Greg Calvetti
1167	7/15/2025	Jamie Jacobs
1168	7/15/2025	Ciarra fragale
1169	7/15/2025	Sarah Smith
1170	7/15/2025	Hannah Moore Hughes
1171	7/15/2025	William Bower

1172	7/15/2025	Mark Pugeda
1173	7/15/2025	Sarah Hann
1174	7/15/2025	Chris Sartori
1175	7/15/2025	Althaea Sebastiani
1176	7/15/2025	Abigail Calvetti
1177	7/15/2025	Austin Trask
1178	7/15/2025	Brett Shumaker
1179	7/15/2025	Rachelle Shaw
1180	7/15/2025	Laurie Gundersen
1181	7/15/2025	Ashley Cole
1182	7/15/2025	Sam White
1183	7/15/2025	Allyson Parrish
1184	7/15/2025	Felicia Steenhouse
1185	7/15/2025	Evid Miller
1186	7/15/2025	M Gardner
1187	7/15/2025	Virginia Clemenko
1188	7/15/2025	Brittany Chaber
1189	7/15/2025	Danielle Pisano
1190	7/15/2025	Stuart Gore
1191	7/15/2025	Edward Hart
1192	7/15/2025	Joni Fisher
1193	7/15/2025	Ainslee Wead
1194	7/15/2025	Taylor Stefanko
1195	7/15/2025	Anna Eplin
1196	7/15/2025	Pam Weaver
1197	7/16/2025	Christa Gadd
1198	7/16/2025	Leslie Taylor-Neumann
1199	7/16/2025	Ceili Allder
1200	7/16/2025	Lauren Perez
1201	7/16/2025	Ottilia Murray
1202	7/16/2025	neroli bee
1203	7/16/2025	Hunter Runion
1204	7/16/2025	Sophia Rehak
1205	7/16/2025	Gina Vitale
1206	7/16/2025	Sophia Dansereau
1207	7/16/2025	Leah Gore
1208	7/16/2025	Clay Elkins
1209	7/16/2025	Carrie Kennedy Lightsey

1210	7/16/2025	Jill Watkins
1211	7/16/2025	Henry Walther
1212	7/16/2025	Aaron Hudnall
1213	7/16/2025	Emily Huxford
1214	7/16/2025	Morgan Ruley
1215	7/16/2025	Hayley Simms
1216	7/16/2025	Cynthia Ellis
1217	7/16/2025	Cheryl Brown
1218	7/16/2025	Kaci McCleery
1219	7/16/2025	julie wingard
1220	7/16/2025	Josh Feazell
1221	7/16/2025	S Wrbican
1222	7/16/2025	Robin Blakeman
1223	7/16/2025	Kary McAtee
1224	7/16/2025	Katie Burgess
1225	7/16/2025	Arden Ireland
1226	7/16/2025	Jeremy Zeiders
1227	7/16/2025	Cassy Slover
1228	7/16/2025	Brandy Holmes
1229	7/16/2025	Ann Lewis
1230	7/16/2025	Margot Dormer
1231	7/16/2025	Regan Fox
1232	7/16/2025	Katrina Zielonka
1233	7/16/2025	Bella Hubbard
1234	7/16/2025	Abigail Wiernik
1235	7/16/2025	Alexandra Evans
1236	7/16/2025	kristin staley
1237	7/16/2025	Michelle Mallamo
1238	7/16/2025	Brianna Myers
1239	7/16/2025	Della Moreland
1240	7/16/2025	Erin Gibson
1241	7/16/2025	Maia Leppo
1242	7/16/2025	Emily Wiggers
1243	7/16/2025	Troy Crane
1244	7/16/2025	John Bell
1245	7/16/2025	Grace Ashworth
1246	7/16/2025	Daphne Ashworth
1247	7/16/2025	Robert Barto

1248	7/16/2025	Carol Johnson
1249	7/16/2025	Amanda Leverett
1250	7/16/2025	Tess kennedy
1251	7/16/2025	nancy mornini
1252	7/16/2025	Alexandra Panas
1253	7/16/2025	Katrina Cales
1254	7/16/2025	Laurel Glover
1255	7/16/2025	Samuel Moreland
1256	7/16/2025	Dan Blymyer
1257	7/16/2025	Garrett Rhodes
1258	7/16/2025	Shawn Taylor
1259	7/16/2025	Abbie Adams
1260	7/16/2025	Rochelle Calvetti
1261	7/16/2025	Mary Beth GWYER
1262	7/16/2025	Sinéad Hunt
1263	7/16/2025	Chelsea Hellen
1264	7/16/2025	Chloe Gibson
1265	7/16/2025	Joseph Mornini
1266	7/16/2025	Kelly Weaver
1267	7/16/2025	Catie Cartwright
1268	7/16/2025	Lucca Czukor
1269	7/16/2025	Bruce Ashworth
1270	7/16/2025	Chelsea Gibson
1271	7/16/2025	Doug Manning
1272	7/16/2025	Eric Johnson
1273	7/16/2025	Clara Hazlett
1274	7/16/2025	William Casson
1275	7/16/2025	Matt Jarvis
1276	7/16/2025	Stephanie Hunt
1277	7/16/2025	Bob Brinkman
1278	7/16/2025	Orion Metheny
1279	7/16/2025	Lydia Moreland
1280	7/16/2025	Amanda Parsoms
1281	7/16/2025	Justis Todd Todd
1282	7/16/2025	Chelsea Barnette
1283	7/16/2025	Leah Turgeon
1284	7/16/2025	Drew Clark
1285	7/16/2025	Michael Goss

1286	7/16/2025	Kate Chilko
1287	7/16/2025	Ben Sluzis
1288	7/16/2025	Josh Calvetti
1289	7/16/2025	Lisa Hyde
1290	7/16/2025	Nicole Lesher
1291	7/16/2025	Savannah Ashworth
1292	7/16/2025	Heather Stocking
1293	7/16/2025	Gabrielle Stephens
1294	7/16/2025	Patsy newell
1295	7/16/2025	Katherine Chilko
1296	7/16/2025	Mia Barreda
1297	7/16/2025	Bethanny Johnson
1298	7/16/2025	Margaret DeBolt
1299	7/16/2025	DJ Currence
1300	7/16/2025	Hugh Roy
1301	7/16/2025	James Bruton
1302	7/16/2025	Katelyn Bustim
1303	7/16/2025	Ryan Lattea
1304	7/16/2025	Oliver Artherhults
1305	7/16/2025	Amanda Lent
1306	7/16/2025	David Esch
1307	7/16/2025	Natalie Spaid
1308	7/16/2025	Tucker United
1309	7/16/2025	Cody Grey
1310	7/16/2025	Rachel Clark
1311	7/16/2025	Cassandra Fink
1312	7/16/2025	Rebecca Hinch
1313	7/16/2025	Elizabeth Urse
1314	7/16/2025	Molly Swartzmiller
1315	7/16/2025	Russell W. Johnson
1316	7/16/2025	Doug Hurst
1317	7/16/2025	Justyn Miller
1318	7/16/2025	Josie Peery
1319	7/16/2025	Chris Jackson
1320	7/16/2025	Mitch Lehman
1321	7/16/2025	Justin Doak
1322	7/16/2025	Indigo Baloch
1323	7/16/2025	Heather Mae Pusztai

1324	7/16/2025	Elizabeth Miller
1325	7/16/2025	Sarah Miskovsky
1326	7/16/2025	Emma Hall
1327	7/16/2025	Cecelia Tannous-Taylor
1328	7/16/2025	Lauren McQuistion
1329	7/16/2025	Jonathan Lent
1330	7/16/2025	Josh Chancey
1331	7/16/2025	Rachel Nestor
1332	7/16/2025	Shanti Levy
1333	7/16/2025	Martha and Eric Vermeulen
1334	7/16/2025	Aubrey Metz
1335	7/16/2025	Elizabeth Clever
1336	7/16/2025	Jenna Vanden Brink
1337	7/16/2025	Gina Bondurant
1338	7/16/2025	Susan Wilder
1339	7/16/2025	Joy Malinowski
1340	7/16/2025	RUSSELL W JOHNSON
1341	7/16/2025	Lilly Harris
1342	7/16/2025	Zina Raye
1343	7/16/2025	Celine Roberts
1344	7/16/2025	Lilly Wilder
1345	7/16/2025	Scott Hamrick
1346	7/16/2025	Benjamin Zimmer
1347	7/16/2025	Sam Pounders
1348	7/16/2025	Anna Bickers
1349	7/16/2025	Graham Farbrother
1350	7/16/2025	Brian Bennett
1351	7/16/2025	Hannah Brown
1352	7/16/2025	Shaena M Crossland
1353	7/16/2025	Emma T
1354	7/16/2025	Selena Wiley-Gill
1355	7/16/2025	catherine pipan
1356	7/16/2025	Brian Parsons
1357	7/16/2025	Carly Ralston
1358	7/16/2025	Maura Bainbridge
1359	7/16/2025	Mac OConnor
1360	7/16/2025	Jessica Rudmin
1361	7/16/2025	Jhonel Faelnar

1362	7/16/2025	Allison Johnson
1363	7/16/2025	Nico Rose
1364	7/16/2025	Tiffany Mihaliak
1365	7/16/2025	Tyler Nielson
1366	7/16/2025	Anna Boarman
1367	7/16/2025	Allie Gocsik
1368	7/16/2025	Christine Beecher
1369	7/16/2025	Emily Weinstein
1370	7/16/2025	Rita Chapot
1371	7/16/2025	Abbey Reeves
1372	7/16/2025	Rachel Wilson
1373	7/16/2025	Finnegan Kimber
1374	7/16/2025	Chelsea Faulknier
1375	7/16/2025	Hannah Berg
1376	7/16/2025	Lexi Pletcher
1377	7/16/2025	Alexandra Korshin
1378	7/16/2025	Whitney Colley
1379	7/16/2025	Unique Lawrence
1380	7/16/2025	Sallie McElrath
1381	7/16/2025	Sarai Carter
1382	7/16/2025	Donna Printz
1383	7/16/2025	Claire Showalter
1384	7/17/2025	Maggie Kelleher
1385	7/17/2025	Christina Leas
1386	7/17/2025	Naomi Kosek
1387	7/17/2025	Alivia Abbott
1388	7/17/2025	Alanna Higgins
1389	7/17/2025	Roger Vannoy
1390	7/17/2025	Lucy Clabby
1391	7/17/2025	Hunter Stape
1392	7/17/2025	Tiffany Strange
1393	7/17/2025	Allecia Liberatore
1394	7/17/2025	Alisha Moreno
1395	7/17/2025	Paula Stahl
1396	7/17/2025	Amie Dillon
1397	7/17/2025	Visakha Turner
1398	7/17/2025	Joshua Saville
1399	7/17/2025	Megan Hardy

1400	7/17/2025	sheena williams
1401	7/17/2025	Laura Burkett
1402	7/17/2025	Jim Kotcon
1403	7/17/2025	Wes Chalfant
1404	7/17/2025	Sandra Frank
1405	7/17/2025	Talia Tompkins
1406	7/17/2025	Emily Chiarizio
1407	7/17/2025	Kelsey Sykes
1408	7/17/2025	Chip Chase
1409	7/17/2025	Sandra Brown
1410	7/17/2025	Becca Lewis
1411	7/17/2025	Heather Powers
1412	7/17/2025	Lisa Di Bartolomeo
1413	7/17/2025	Kadra Casseday
1414	7/17/2025	Robert and Clara Halfin
1415	7/17/2025	Teri Chuprinko
1416	7/17/2025	Erin Laffay
1417	7/17/2025	Corey Wilder
1418	7/17/2025	Robert Z Klein
1419	7/17/2025	Cherilyn Strader
1420	7/17/2025	Rachel Gatti
1421	7/17/2025	Sadie Elliott-Hart
1422	7/17/2025	Trina Taylor
1423	7/17/2025	Jane Birdsong
1424	7/17/2025	Julia Clark
1425	7/17/2025	Anya Kulcsar
1426	7/17/2025	Kyle Rooke
1427	7/17/2025	Susan Hicks
1428	7/17/2025	William Brown
1429	7/17/2025	Ed Kachmarek
1430	7/17/2025	Kaela Geschke
1431	7/17/2025	Sara Litzau
1432	7/17/2025	Maggie Lutz
1433	7/17/2025	Cheryl Morrison
1434	7/17/2025	Timothy Huguenin
1435	7/17/2025	Keith Wade
1436	7/17/2025	Mike Povroznik
1437	7/17/2025	Sam Smith

1438	7/17/2025	David B. McMahon
1439	7/17/2025	Kari Rusnak
1440	7/17/2025	Allison Cosby
1441	7/17/2025	Katelynn Miller Webb
1442	7/17/2025	Karen Jacobson
1443	7/17/2025	Andrew FitzGibbon
1444	7/17/2025	Jonathan Evans
1445	7/17/2025	Lisa Smith
1446	7/17/2025	Rebekah Murray
1447	7/17/2025	Lee Sherline
1448	7/17/2025	Lee Sherline
1449	7/17/2025	Susan Moore
1450	7/17/2025	Deborah Smith
1451	7/17/2025	Brianna Bucher
1452	7/17/2025	Nikki Kemp
1453	7/17/2025	Raychelle L.
1454	7/17/2025	Anna Brewer
1455	7/17/2025	Megan Ratajczak
1456	7/17/2025	Susan Moore
1457	7/17/2025	J.B. Leedy
1458	7/17/2025	James Snyder
1459	7/17/2025	Jonathan Lent
1460	7/17/2025	Lucy Thompson
1461	7/17/2025	Zack Eberle
1462	7/17/2025	Anita Swanson
1463	7/17/2025	Jeanna Tinsman
1464	7/17/2025	Amber Crist
1465	7/17/2025	Randy Patrick
1466	7/17/2025	Brian Christie
1467	7/17/2025	Lacy Burdette
1468	7/17/2025	Sierra Moreland
1469	7/17/2025	Phillip Custer
1470	7/17/2025	Lauren Weatherford
1471	7/17/2025	Christopher Wolz
1472	7/17/2025	Caitlin Blankenship
1473	7/17/2025	Luba Zaritskaya
1474	7/17/2025	Alexey Belkin
1475	7/17/2025	Beth Boehme

1476	7/17/2025	Catherine Hambly
1477	7/17/2025	Kathleen Urich
1478	7/18/2025	Brian Hicks
1479	7/18/2025	Carolyn Culver
1480	7/18/2025	Peter Wentzel
1481	7/18/2025	Kelsey Mills
1482	7/18/2025	Shannon Custer
1483	7/18/2025	Eric Eames
1484	7/18/2025	Craig Holberger
1485	7/18/2025	Kendra Sullivan
1486	7/18/2025	Allison Bustin
1487	7/18/2025	Rebecca Iscaro
1488	7/18/2025	Libbey Holewski
1489	7/18/2025	Jennifer Coyne
1490	7/18/2025	Julia Yearego
1491	7/18/2025	Haley Cartwright
1492	7/18/2025	Grace Clark
1493	7/18/2025	Hannah Gaydos
1494	7/18/2025	Zachary Shugars
1495	7/18/2025	Olivia Miller
1496	7/18/2025	Lila Thomas Caldwell
1497	7/18/2025	Peter Iscaro
1498	7/18/2025	Jocelyn Gaujot
1499	7/18/2025	Lindsay Knotts
1500	7/18/2025	Kristen Ross
1501	7/18/2025	Isabelle Arnold
1502	7/18/2025	Mike Povroznik
1503	7/18/2025	Jordan Kennett
1504	7/18/2025	Nathan Music
1505	7/18/2025	Judith Underwood
1506	7/18/2025	Marita Ritz
1507	7/18/2025	Alex Snyder
1508	7/18/2025	elizabeth erickson
1509	7/18/2025	Sidney Harring
1510	7/18/2025	Vernon Haltom
1511	7/18/2025	R. G. Averitt III
1512	7/18/2025	Bethanny Johnson
1513	7/18/2025	C Rogus

1514	7/18/2025	Eleanor Amidon
1515	7/18/2025	Nancy Luscombe
1516	7/18/2025	Eve Firor
1517	7/18/2025	Traci Hickson
1518	7/18/2025	Linda Nutter
1519	7/18/2025	Lisa Di Bartolomeo
1520	7/18/2025	Linda C Nutter
1521	7/18/2025	auvid Momen
1522	7/18/2025	G. Paul Richter
1523	7/18/2025	Billy Joe Peyton
1524	7/18/2025	Nichole Greene
1525	7/18/2025	Davis Tolman
1526	7/18/2025	Chelsea Wilkes
1527	7/18/2025	Lindsay Schmittle
1528	7/18/2025	Karen Wiedemann
1529	7/18/2025	Maple Osterbrink
1530	7/18/2025	Suzanne Maben
1531	7/18/2025	Albert Morriss
1532	7/18/2025	Charley Kelly
1533	7/18/2025	Elena Delach
1534	7/18/2025	Rachelle Thorne
1535	7/18/2025	Mary Miller
1536	7/18/2025	Sundeep Nath
1537	7/18/2025	Pamela Mossed
1538	7/18/2025	John Wilkes
1539	7/18/2025	Mike Jones
1540	7/18/2025	Shannon Lester
1541	7/18/2025	Sarah Williams
1542	7/18/2025	yh Patt
1543	7/18/2025	Phill Brown
1544	7/18/2025	Dannette Parker
1545	7/18/2025	Molsie Petty
1546	7/18/2025	Tracey Slaughter
1547	7/18/2025	Sue Rubenstein
1548	7/18/2025	Robert Rubenstein
1549	7/18/2025	Caitlin Wilkes
1550	7/18/2025	John McCue
1551	7/18/2025	Molly Moore

1552	7/18/2025	Shannon Orcutt
1553	7/18/2025	Aubrey Robinson
1554	7/18/2025	Amelia Williams
1555	7/18/2025	Kieran Paulsen
1556	7/18/2025	Gina Bondurant
1557	7/18/2025	Virginia Rovnyak
1558	7/18/2025	Julia Stevenson
1559	7/18/2025	Carla Beaudet
1560	7/18/2025	Heather Andersen
1561	7/18/2025	Amanda Lent
1562	7/18/2025	Virginia Dawnswir
1563	7/18/2025	Christine Marshall
1564	7/18/2025	Jenna Weatherford
1565	7/18/2025	James Kotcon
1566	7/18/2025	Robert Sagraves
1567	7/18/2025	Janis Boury
1568	7/18/2025	Jodye hall
1569	7/18/2025	Sharon Mersing
1570	7/18/2025	Hunter Lesser
1571	7/18/2025	Sarah Anderson
1572	7/18/2025	Britt Lake
1573	7/18/2025	JoAnn Agnone
1574	7/18/2025	Allisom Boyd
1575	7/18/2025	Katerina Thimnakis
1576	7/18/2025	Charles Hickox
1577	7/18/2025	Kay Reibold
1578	7/18/2025	Meredith Morrison
1579	7/18/2025	John Ring
1580	7/18/2025	Micah Gerasimovich
1581	7/18/2025	Arin Shatto
1582	7/18/2025	Amy Margolies
1583	7/18/2025	Kurt Litzau
1584	7/18/2025	Davis Depot
1585	7/18/2025	Lydia Epp Schmidt
1586	7/18/2025	Pamela Moe
1587	7/18/2025	Susan Sawyer-Litzau
1588	7/18/2025	Ana Young
1589	7/18/2025	Robert N. Haferd

1590	7/18/2025	Justin Hilliard
1591	7/18/2025	Neil Litzau
1592	7/18/2025	Justin Harrison
1593	7/18/2025	Kristine Jordan
1594	7/18/2025	Jay Jordan
1595	7/18/2025	Sara Litzau
1596	7/18/2025	Patrice Nielson
1597	7/18/2025	Denise L Poling
1598	7/18/2025	Joseph Abbate
1599	7/18/2025	Mary Elizabeth Cunningham
1600	7/18/2025	Dianna Kachmarek
1601	7/18/2025	Loki Kern
1602	7/18/2025	Linda Reeves
1603	7/18/2025	Janet Preston
1604	7/18/2025	Diana Vera
1605	7/18/2025	Steve Brown

APPENDIX B - LIST OF ATTENDEES AT JUNE 30, 2025 PUBLIC MEETING

Taylor Ambrose
Jim Baczuk
Ian Beckner
Christy Barber
Kristen Behrens
Gary Berti
Jane Birdsong
Bill Bissett
Jeanne Boury
Jane Browning
Christine Beecher
Elizabeth Boehme
Robert Boutwell
Shaena Crossland
Jacqueline DeScisciioio
Barbara Douglas
Patricia Cooper
Lydia Crawley
Rachelle Davis
Brent Easton
Tim Embree
Carl Feather
Michael Goss
Anne Farmer
Anne Felty
Victor Fickes
Catherine Fleischman
Nikki Forrester
Michael Gatens
Clara Halfin
Robert Halfin
Jason Harper
Jamie Hillegonds
Sharon Harmon
Travis Harmon
Ben Herrick
Libbey Holewski
Jamie Jacobs
Lenore Howell
Alison Isaacs
Jodi Jones
Mike Jones
Kris Jordan
Robin Kalog

Arlene Karesh
Casey King
Anne Levitsky
Sara Litzau
Maggie Lutz
Erica Koster
Janice Lantz
Athey Lutz
Pamela Lutz
Nancy Mammarella
Amy Margolies
Robin McClintock
Michael McClintock
Sallie McElrath
Deborah McHenry
Campbell Moore
Stephen Moore
Elaine Moore
Josh Nease
Tyler Nielson
Dana Nugent
Cris Parque
Bill Murray
Dan Parks
Bradley Phillips
Richard Rubock
Joanne Patterson
Vernon Patterson
Cindy Phillps
Thomas Price
Ed Rader
Maryjane Rayhart
Ted Rayhart
Kyle Rooke
Katie Russell
Tammy Seiler
Anne Smith
Janice Shepherd
Lee Sherline
Marilyn Schoenfeld
Francis Slider
Sharon Smith
Alex Snyder
Kelly Stadelman
Paula Stahl
Alice Tecavec

Patty Snow
Trina Taylor
Ron Taylor
Ronald Ulle
Chris Wade
Hanna Tierney
Sean Tierney
Mary Anne Tomson
Alan Tomson
Kimberly Trathen
Diana Vera
Cat Von Gersdorff
Jeannette Ware
Mary Waters
Dare Wenzler
Karen Wiedermann
Emily Wilson
Mitchel Zemel
Martin Williams
Connie Hochgosany
Nancy Myers
Linda Reeves
Roger Holmes
Barb Slider
Jeff Palmer
Kevin Pennington
Katherine Beall
Jess Tucker
Kelley Lee
Janet Bowman
Stephen Strothers
Ashley Ayers
Charles Richard
Andrew FitzGibbon
Steven Leyh
Wayne Crossland
Brian Hicks
Alyssa Hanna
Selena Wiley-Gill
Kate Francis
Shannon McCann
Erica Brown
Dave Brown
Orion McClurg
Dan Sullivan
Jack Hedrick

Brenda McGahan
Tom McGahan
Sara Litzau
Pete Johnson
Linda Brolis
William Yarley
Kaitlyn Olson
Matthew Shereld
Joe Coyne
Jenny Coyne
Janet Preston
Lydia Epp Schmidt
David Ruediger
Nate Powell
Corey Wilder
Anne Jones
Jacon Bennett
Betsy Otto
Kimberly Holmes
Loki Kern
Judy Rodd
Nancy Luscombe
Madison Ball
Morgan Earp
Rick Nestor
Mike Rosenau
John Lawrence
Beverly Lawrence
Deborah Bennett
Matthew Groves
Sohia Rehak
Juliana Kimbrell
Karen Jacobson
Erin Marks
Nasser Basir
Bryan-Joseph Houle
Ed Kachmarek
Mykal Williams
Patrick McCann
Casey Rucker
Nathan Baker
Maggie Lutz
Ferezie Palmer
Catherine Hallam
Melissa Trimble
Joshua Gambetta

Eriks Brolis
Ina Brolis
Bryce Koukopoulos
Annlee Boutwell
Hawah Kasat
Marti Jefferson
W Wood
Keith Collins
Alice Fleischman
Thomas Ditty
Anne Brown Wardwell
Collen Leffy
Margaret DeBolt
Gina Palmer
Sam Martin
Diane Beall
Jojo Pregley
Kenny Foster
Joseph Holmes
Doug Martin
Sandra Goss
Rachel Tripp
Adeem Mawani
Matt Marcus
Melissa Borowitz
Tony Barnes
Effie McCauley
Vicky Weeks
Bill Peterson
Stephanie McClurg
Zayden McClurg
Ryan Ganjot
Christie Kozan
Liz and David Courtney
Elena Papina
Forest Boyland-Pityo
Kristin Winebrenner
Britt Lake
Vanessa Degrassi
Joan Morgado
Nellie Davis
Sauctra Frank
Laura Harbert
Dylan Jones
James Kotcon
Nick Curran

David Esch
Renee Morris
Pat Pregley
Erin Holmes
Garrett Richardson
April Welsh
Serenity Dobbins
Elizabeth Schell
Jaclyn Ganjot
Holly Plunkett
John Plunkett
Brent Carminati
Lori Haldeman
David Brown
David Cooper
Will Evans
Ellis Sherald
Kendra Curran
Victor Zabolotny
Pam Ruediger
Mike Powell
Katharine Dubansky
Eva Gutierrez
Matt Enders
Kecin Bockrath
Chip Chase
David Downs
Melissa Brown
K.M. Nelson
Amanda Leverett
Judy Cronauer
Matt Hauger
Laurie Little
Kaersten Adkins
Virginia Bush
Claudia Carpio
Elizabeth Simons
Kim Johnson
Andrea Dalton
Debra Bockrath
Justin Greer
Gene Bellia
Rene Crowl
Terry Stone
Phillip Brown
Fred Davis

John Lutz
Ruth Melnick
Sarah Hubbard
Sadie Palmer
Alexis Adkins
Pamela Arnold
William Shockley
Andrew Katona
Chris Barnes
Max Dubansky
John Ryan Brubaker

APPENDIX C - LIST OF ATTENDEES AT JULY 17, 2025 VIRTUAL MEETING

Clare Anderson (commenter)
Joe Blow
Nadia Bouajila
Cory Chase
James Collins (commenter)
Danielle Conaway (commenter)
Carolyn Culver (commenter)
Brian Cuscik
Stephanie Cussins (commenter)
Brent Easton (commenter)
Michael Gatens
Susan Gordon (commenter)
Chris Greenwood
Cat Ham
Stephanie Hammonds
Justin Harrison (commenter)
Matt Hauger (commenter)
Nora Howell
Pam HylbertEder
Carrie Jones
James Kotcon (commenter)
Amanda Lent
Jonathan Lent
Nancy Luscombe
Ed Maguire
Amy Margolies (commenter)
Cynthia Margolies
Lew McDaniel
Sallie McElrath
Meghan Olson
Aaron Parker
Dan Parks
Cris Parque
Zina Raye (commenter)
Linda Reeves (commenter)
Sue Rubenstein
Susan Schmitt
Marilyn Shoenfeld (commenter)
Rachelle Thorne
Hanna Tierney (commenter)
Jeanne Tinsman
Diana Vera (commenter)
Barbara Weaner (commenter)
Sheena Williams (commenter)
Mike Tony
Mitchel Zemel