

45CSR23
CONTROL OF AIR POLLUTION FROM MUNICIPAL SOLID WASTE LANDFILLS
RESPONSE TO COMMENTS

The WV Department of Environmental Protection (DEP), Division of Air Quality (DAQ) commenced the public comment period for proposed legislative rule 45 C.S.R. 23 on June 26, 2020. The public comment period concluded July 28, 2020 after satisfying the minimum 30-day period. The public hearing was held virtually to prevent the spread of COVID-19 in accordance with the Governor's Safer at Home Order and the WV DEP COVID-19 Policy on July 28, 2020. to accept oral and written comments on the proposed revisions to legislative rule 45 C.S.R. 23. Any comments received after this time are considered ex parte communications and cannot be considered in accordance with West Virginia Code Chapter 29A Article 3.

One written comment was received for the proposed revisions to rule 45 C.S.R. 23 and zero attendees of the public hearing provided verbal comments. A summary of the written comment received is provided below along with the response. The original written comment and the public hearing transcript are provided as part of the formal rulemaking record.

There was one change made to 45 C.S.R. 23 as a result of the comments and it is identified below in RESPONSE A.

Commenter 1: James Kotcon, Conservation Chair, WV Chapter of Sierra Club (written and verbal comments)

COMMENT A: Paragraph 7.6.a.4. appears to have a typo. The deletion creates an incomplete sentence and makes the wording unclear.

RESPONSE A: Paragraph 7.6.a.4. has been revised to include the phrase "is known" to the end of this first sentence. The revised wording for the Agency Approved version of the rule is:

The owner or operator shall use Equation 2 if ~~it knows~~ the actual year-to-year solid waste acceptance rate is known. . .



**SIERRA
CLUB**

Sierra Club

West Virginia Chapter

P.O. Box 4142
Morgantown, WV 26504

July 27, 2019

Sandra Adkins
WVDEP – Division of Air Quality
601 57th St., SE
Charleston, WV 25304
Via e-mail to: dep.comments@wv.gov

Re: Comments on Air Quality draft rules, 45-CSR-23, MSW Landfills; 45-CSR-33, Acid Rain Program; and 45-CSR-44, Control of Greenhouse Gas Emissions From Existing Coal-Fired Electric Utility Generating Units

Dear Ms. Adkins:

Please accept the following comments on behalf of the WV Chapter of Sierra Club, and our approximately 2600 members.

45-CSR-23. MSW Landfills;

Paragraph 7.6.a.4. appears to have a typo. The deletion creates an incomplete sentence and makes the wording unclear.

45-CSR-33. Acid Rain Program.

We oppose the revision to 45-CSR-33 which proposes to implement an EPA rule addressing the effect of Covid-19 on an operator's testing program. This proposed rule allows the facility to continue to report their actual monitored data if the data would otherwise be considered valid and the delay is due to Covid-19 precautions. The EPA rule amends 40-CFR-Part 75 regarding Continuous Emissions Monitoring Systems, and the Part 75 amendment expires 180 days after the effective date (April 22, 2020).

Since the amendment to 45-CSR-33 is being proposed for 2021, the parallel EPA rule regarding the Part 75 COVID-19 waiver for monitoring requirements is likely to no longer be in effect when the DAQ rule becomes effective. Yet the Statement of Circumstances for the proposed rule emphasizes this as a justification for the rule change.

The Part 75 rule for monitoring is intended to assure accurate monitoring of emissions, especially those involved in the Acid Rain trading program. If operators do not test the accuracy of their emissions monitoring, the original Part 75 rule required them to assume higher emissions rates, and to acquire emissions trading credits for those higher emissions rates. This created a strong incentive to assure accurate monitoring. Allowing operators to delay testing to verify the accuracy of their emissions monitoring creates a significant incentive to allow higher emissions, and to allow their monitoring program to under-report those emissions.

Given that air pollution emissions exacerbate susceptibility to the coronavirus that causes COVID-19, and that many West Virginians that have already died from that disease, the West Virginia Sierra Club advocates for a rule that adopts the CDC's recommendations for critical infrastructure workers in the manufacturing sector. These recommendations include health screening for employees prior to entering the workplace, regular monitoring of employees for symptoms, wearing masks or cloth face coverings, social distancing, and regular sanitizing of the workspace. These recommendations are based on current knowledge of how diseases spread. They are similar to the "universal precautions" that medical personnel have used for decades. If testing personnel and plant employees are required to follow the CDC recommendations, they will be able to carry out their duties safely, just as doctors and nurses do. Employees will remain safe and testing deadlines will not be missed due to Covid-19.

Importantly, operators will not have a significant financial incentive to allow increased emissions, thereby protecting all West Virginians.

And coincidentally, given that the EPA rule change is set to expire before the proposed WV rule takes effect, operators will not be faced with uncertainty over which monitoring rules apply.

45-CSR-44. Control of Greenhouse Gas Emissions From Existing Coal-Fired Electric Utility Generating Units

This proposed rule falls short in several important ways and should be amended to fully comply with the Clean Air Act. In particular, the proposed rule, like the EPA Affordable Clean Energy rule (ACE) on which it is based, fails to adequately address climate change, the very reason for the rule's existence. The emissions reductions that would be achieved are negligible, and fail to protect the health of West Virginians, and the health of our environment.

It is becoming increasingly evident that the climate crisis is much more serious than was believed even a few years ago, and requires rapid reductions in greenhouse gas emissions. Emissions of greenhouse gases are cumulative, and delays today mean we must take much more draconian steps in the near future. Thus, the proposed rule falls well short of the emissions reductions needed in this decade. This creates a significant potential for even more drastic disruptions of our energy industries in the near future, as we struggle to catch up with required emissions reductions.

Like the ACE, the proposed rule fails to account for indirect health benefits from more stringent emissions reductions. In fact, by upgrading power plants, the proposed heat rate improvements may actually increase total greenhouse gas emissions, and likewise increase the emissions of harmful fine particulates, NO_x, SO₂ and other pollutants compared to no rule at all. The Clean Air Act requires an emissions reduction, not just an emissions rate reduction.

Importantly, the rule fails to define the minimum emissions reduction levels that must be achieved. The proposed rule ignores co-firing with less-emitting fuels, carbon capture and sequestration technologies, or reductions in use of higher-emitting facilities; indeed, the rule explicitly prohibits emissions averaging or co-firing as emissions reduction approaches. By focusing on reducing the emissions rate, rather than total emissions reductions, the rule omits consideration of approaches that might reduce emissions much more cost-effectively than can be achieved with ACE, and allows scenarios that may actually increase emissions.

The proposed rule, like ACE, wrongly deregulates gas and oil-fired power plants. This is particularly egregious given that gas has replaced coal as the largest source of electric power generation in the US.

Specific issues with the proposed rule include the following:

1) The rule (Section 1.1.a) arbitrarily omits major sources of greenhouse gases by focusing solely on coal-fired electric utility generating units. Other major sources need to be included, including gas-fired electric generating facilities, compressor stations, and other fossil-fuel fired industrial boilers. This is implicit in defining “fossil fuel” (section 2.23) and “natural gas” (Section 2.31), among others.

2) The rule arbitrarily limits the permit requirements, performance standards, monitoring, etc. (Section 1.1.b, 1.1.c, etc.) for the “Best System of Emissions Reductions” to heat rate improvements, neglecting a wide range of alternative technologies that would reduce greenhouse gas emissions in West Virginia.

3) The rule limits the definition of “greenhouse gas” (section 2.24) to carbon dioxide, and omits methane, nitrous oxide, ozone, and other relevant greenhouse gases. As such, this definition is scientifically indefensible, and will not achieve the reductions in greenhouse gases needed to protect human health and the environment. The most relevant definitions are readily available in the literature and are normally expressed as carbon dioxide equivalents (CO₂e). The Federal Register definitions section does not define “greenhouse gases” as only carbon dioxide, thus this provision appears to make West Virginia’s rule significantly weaker than even the very weak federal ACE rule.

4) The definition of “heat rate” (Section 2.25) is excessively wordy. The last two sentences can be omitted, as they do not add to the definition. Similar editing to reduce wordiness can be achieved throughout the rule.

5) The definition of “mechanical output” (section 2.29) can be simplified by changing “745.7” to “0.0007457” and deleting “then dividing by 1,000,000”.

6) It is not clear why the rule (or the ACE rule on which it is based) only applies to facilities “that commenced construction on or before Jan. 8, 2014” (Section 3.1, 3.3.a., etc.). The rule should be amended to include new facilities as well.

7) Likewise, it is not clear why municipal waste or commercial waste incinerators are not included (Section 3.1.g and 3.1.h). The rule should be revised to include these facilities, or a counterpart rule should be established.

8) Typographical. The last line of Section 4.2 refers to “sections 4”. Either another rule section should be cited, or the word should be the singular “section”.

9) Section 4.4 directs the owner or operator of an affected unit to propose a performance standard, but offers no specific criteria that the performance standard must meet. As such, this offers the owners or operators of regulated units the opportunity to essentially offer a voluntary standard. It is essentially a request for the owners to “do what you think is best”, rather than an explicit set of standards that must be met. This approach simply does not acknowledge the seriousness of the climate crisis, or offer an emissions control strategy adequate to address the climate crisis. WV-DEP must set the regulatory standards and the criteria for performance that regulated units must meet. Language in section 4.5 that offers consideration of site-specific factors such as cost, age of the facility, etc. provides additional invitation to propose the weakest possible standard. This also creates an unfair advantage to allow the oldest and dirtiest facilities to continue operating, and presents a competitive disadvantage to those facilities that do adopt more stringent standards. The rule thus creates incentives for a “race to the bottom” that undermines any effort to reduce emissions.

10) Section 4.11 allows the applicant to propose a compliance schedule, and does not impose any firm deadlines, other than the provision in section 5.6.c that the secretary adopt “increments of progress”. This is a prescription for delay, undermining any effort to actually reduce greenhouse gas emissions. The rule must propose a firm deadline for compliance, and be as soon

as practicable, not later than the end of 2022. If warranted, a variance process can be considered, but such a process must have enforceable incentives to achieve significantly enhanced reductions in greenhouse gas emission in exchange for delays in implementation.

11) Section 5.4 allows the secretary to consider the remaining useful life of a unit, but does not indicate what “remaining useful life” is so short as to justify waiver of emissions reduction requirements. The section should be amended to require that no remaining useful life greater than five years would be considered. We support making the shutdown date a permit requirement for this exemption.

Thank you for the opportunity to provide these comments.

Sincerely,

A handwritten signature in cursive script that reads "James Kotcon".

James Kotcon
Conservation Chair
WV Chapter of Sierra Club
jkotcon@gmail.com

45-CSR-8. Ambient Air Standards. Adopts new EPA reference method. No Comments.

45-CSR-16. New Source Standards. (CI-ICE and Wood-burners). Continues and expands the exemption for wood-burning stoves and forced-air furnaces. Oppose?

45-CSR-18. Combustion of Solid Waste. No Comments.

45-CSR-23-MSW Landfills.

Typo. 7.6.a.4. The deletion creates an incomplete sentence and makes the wording unclear.

45-CSR-33. Acid Rain Program. Aileen's comments on EPA's 180-day expiration (from April 22, 2020) means the rule change is not needed, and legislative approval would not take effect before the EPA waiver expires.

45-CSR-34. HAPS. No Comments

DEPARTMENT OF ENVIRONMENTAL PROTECTION PUBLIC HEARING

CONTROL OF AIR POLLUTION FROM MUNICIPAL SOLID WASTE LANDFILLS

07/28/2020



"Because your time matters"

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DEPARTMENT OF ENVIRONMENTAL PROTECTION

DIVISION OF AIR QUALITY

PUBLIC HEARING TEXT - VIRTUAL HEARING

PROPOSED 2021 LEGISLATIVE RULES

July 28, 2020 - 6:00 PM

Held via Microsoft TEAMS

45CSR23, Control of Air Pollution from
Municipal Solid Waste Landfills

REALTIME REPORTERS, LLC
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1 45CSR23, Control of Air Pollution from
2 Municipal Solid Waste Landfills

3 -- oOo --

4 MS. JENNINGS: Kristina, are you ready for the
5 next hearing?

6 COURT REPORTER: I am.

7 MS. JENNINGS: Thank you.

8 The public hearing for the proposed
9 Legislative Rule 45CSR23, Control of Air Pollution from
10 Municipal Solid Waste Landfills, will now come to order
11 on this 28th day of July 2020, held virtually to prevent
12 the spread of COVID-19 in accordance with the Governor's
13 Safer at Home Order and the West Virginia Department of
14 Environmental Protection COVID-19 Policy.

15 Comments and testimony will be accepted until
16 the close of this hearing and will be made part of the
17 rule-making record. Any question regarding revisions to
18 the rules should be included with your comments, and any
19 such question will be addressed as part of the response
20 to comments in the rule-making record.

21 The purpose of this public hearing is to
22 accept comments on proposed revisions to Rule 45CSR23,
23 Control of Air Pollution from Municipal Solid Waste
24 Landfills. This rule establishes and adopts standards

1 of performance pursuant to § 111(b) of the Federal Clean
2 Air Act and implements the federal emission guidelines
3 and compliance times pursuant to § 111(d) of the Federal
4 Clean Air Act to control certain designated pollutants
5 from affected municipal solid waste landfills.

6 The rule is being revised to comport with
7 revisions to the "Emission Guidelines and Compliance
8 Times for Municipal Solid Waste Landfills" and
9 "Standards of Performance for Municipal Solid Waste
10 Landfills that Commenced Construction, Reconstruction,
11 or Modification after July 17, 2014," published March
12 26, 2020.

13 Upon authorization and promulgation, 45CSR23
14 will be submitted to the United States Environmental
15 Protection Agency for approval as a component of the
16 Clean Air Act §111(d) State Plan to fulfill federal
17 obligations.

18 Stephanie, has anyone pre-registered to
19 provide comment or testimony in regard to proposed rule
20 45CSR23? If so, please unmute their line & call on them
21 now and ask them to state clearly their name and any
22 affiliation. As a reminder, please limit testimony to
23 one witness for each organization and limit testimony to
24 five minutes for each witness.

1 MS. HAMMONDS: Thanks, Laura. We have no
2 commenters registered. If you did not register to
3 comment but would like to at this time, please use the
4 Raise Your Hand feature or comment in the Chat and we
5 will recognize you to provide your comments.

6 To give you time, let me remind everyone that
7 cross examination of commenters is not allowed. As
8 Laura stated, DAQ will not be responding to comments
9 tonight.

10 MS. JENNINGS: Stephanie, seeing no hands
11 raised and there being nothing further, this public
12 hearing for proposed rule 45CSR23 is concluded.

13 The public hearing for proposed rule 45CSR33
14 will begin momentarily.

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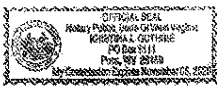
STATE OF WEST VIRGINIA

COUNTY OF KANAWHA, to wit:

I, Kristina Guthrie, Professional Reporter and Notary Public within and for the County and State aforesaid, duly commissioned and qualified, do hereby certify that the foregoing proceedings were duly transcribed by me from stenographic notes taken in the foregoing proceedings to the best of my skill and ability.

I do further certify that the said proceedings were correctly taken by me in shorthand notes, and that the same were accurately written out in full and reduced to typewriting by means of computer-aided transcription.

Given under my hand this 4th day of August, 2020.



Kristina Guthrie

Kristina Guthrie, Professional Reporter and Notary Public

<p>1</p> <p>111(b) 3:1 111(d) 3:3 17 3:11</p> <hr/> <p>2</p> <p>2014 3:11 2020 1:10 2:11 3:12 5:15 2021 1:8 25271 1:23 26 3:12 28 1:10 28th 2:11</p> <hr/> <p>3</p> <p>304 344-8463 1:24</p> <hr/> <p>4</p> <p>45CSR23 1:14 2:1, 9,22 3:13,20 4:12 45CSR33 4:13 4th 5:14</p> <hr/> <p>6</p> <p>6:00 1:10</p> <hr/> <p>7</p> <p>713 1:23</p> <hr/> <p>A</p> <p>ability 5:9</p>	<p>accept 2:22 accepted 2:15 accordance 2:12 accurately 5:12 Act 3:2,4,16 addressed 2:19 adopts 2:24 affected 3:5 affiliation 3:22 aforesaid 5:5 Agency 3:15 Air 1:4,14 2:1,9,23 3:2,4,16 allowed 4:7 approval 3:15 August 5:14 authorization 3:13</p> <hr/> <p>B</p> <p>begin 4:14</p> <hr/> <p>C</p> <p>call 3:20 certify 5:6,10 Charleston 1:23 Chat 4:4 Clean 3:1,4,16 close 2:16 Commenced 3:10 comment 3:19 4:3, 4 commenters 4:2,7 comments 2:15, 18,20,22 4:5,8</p>	<p>commissioned 5:5 compliance 3:3,7 component 3:15 comport 3:6 computer-aided 5:13 concluded 4:12 Construction 3:10 control 1:14 2:1,9, 23 3:4 correctly 5:11 County 5:2,4 COURT 2:6 COVID-19 2:12,14 cross 4:7</p> <hr/> <p>D</p> <p>DAQ 4:8 day 2:11 5:14 Department 1:2 2:13 designated 3:4 DIVISION 1:4 duly 5:5,6</p> <hr/> <p>E</p> <p>emission 3:2,7 Environmental 1:2 2:14 3:14 establishes 2:24 examination 4:7</p> <hr/> <p>F</p> <p>feature 4:4</p>	<p>federal 3:1,2,3,16 foregoing 5:6,8 fulfill 3:16 full 5:12</p> <hr/> <p>G</p> <p>give 4:6 Governor's 2:12 guidelines 3:2,7 Guthrie 1:22 5:3, 19</p> <hr/> <p>H</p> <p>HAMMONDS 4:1 hand 4:4 5:14 hands 4:10 hearing 1:6 2:5,8, 16,21 4:12,13 held 1:12 2:11 Home 2:13</p> <hr/> <p>I</p> <p>implements 3:2 included 2:18</p> <hr/> <p>J</p> <p>JENNINGS 2:4,7 4:10 July 1:10 2:11 3:11</p> <hr/> <p>K</p> <p>KANAWHA 5:2 Kristina 1:22 2:4 5:3,19</p>	<p>L</p> <p>landfills 1:14 2:1, 10,24 3:5,8,10 Laura 4:1,8 Lee 1:23 Legislative 1:8 2:9 limit 3:22,23 LLC 1:22</p> <hr/> <p>M</p> <p>made 2:16 March 3:11 means 5:13 Microsoft 1:12 minutes 3:24 Modification 3:11 momentarily 4:14 municipal 1:14 2:1,10,23 3:5,8,9</p> <hr/> <p>N</p> <p>Notary 5:4,20 notes 5:7,11</p> <hr/> <p>O</p> <p>obligations 3:17 order 2:10,13 organization 3:23</p> <hr/> <p>P</p> <p>part 2:16,19 performance 3:1, 9</p>
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<p>Plan 3:16</p> <p>PM 1:10</p> <p>Policy 2:14</p> <p>pollutants 3:4</p> <p>Pollution 1:14 2:1, 9,23</p> <p>pre-registered 3:18</p> <p>prevent 2:11</p> <p>proceedings 5:6, 8,10</p> <p>Professional 5:3, 19</p> <p>promulgation 3:13</p> <p>proposed 1:8 2:8, 22 3:19 4:12,13</p> <p>Protection 1:2 2:14 3:15</p> <p>provide 3:19 4:5</p> <p>public 1:6 2:8,21 4:11,13 5:4,20</p> <p>published 3:11</p> <p>purpose 2:21</p> <p>pursuant 3:1,3</p> <hr/> <p style="text-align: center;">Q</p> <hr/> <p>qualified 5:5</p> <p>QUALITY 1:4</p> <p>question 2:17,19</p> <hr/> <p style="text-align: center;">R</p> <hr/> <p>Raise 4:4</p> <p>raised 4:11</p> <p>ready 2:4</p> <p>REALTIME 1:22</p>	<p>realtime reporters .net 1:24</p> <p>recognize 4:5</p> <p>Reconstruction 3:10</p> <p>record 2:17,20</p> <p>reduced 5:12</p> <p>regard 3:19</p> <p>register 4:2</p> <p>registered 4:2</p> <p>remind 4:6</p> <p>reminder 3:22</p> <p>Reporter 1:22 2:6 5:3,20</p> <p>REPORTERS 1:22</p> <p>responding 4:8</p> <p>response 2:19</p> <p>revised 3:6</p> <p>revisions 2:17,22 3:7</p> <p>rule 2:9,22,24 3:6, 19 4:12,13</p> <p>rule-making 2:17, 20</p> <p>rules 1:8 2:18</p> <hr/> <p style="text-align: center;">S</p> <hr/> <p>Safer 2:13</p> <p>shorthand 5:11</p> <p>skill 5:8</p> <p>Sold 1:14 2:1</p> <p>solid 2:10,23 3:5,8, 9</p> <p>spread 2:12</p> <p>standards 2:24 3:9</p>	<p>state 3:16,21 5:1,4</p> <p>stated 4:8</p> <p>States 3:14</p> <p>stenographic 5:7</p> <p>Stephanie 3:18 4:10</p> <p>Street 1:23</p> <p>submitted 3:14</p> <hr/> <p style="text-align: center;">T</p> <hr/> <p>TEAMS 1:12</p> <p>testimony 2:15 3:19,22,23</p> <p>TEXT 1:6</p> <p>time 4:3,6</p> <p>times 3:3,8</p> <p>tonight 4:9</p> <p>transcribed 5:7</p> <p>transcription 5:13</p> <p>typewriting 5:13</p> <hr/> <p style="text-align: center;">U</p> <hr/> <p>United 3:14</p> <p>unmute 3:20</p> <hr/> <p style="text-align: center;">V</p> <hr/> <p>Virginia 1:23 2:13 5:1</p> <p>VIRTUAL 1:6</p> <p>virtually 2:11</p> <hr/> <p style="text-align: center;">W</p> <hr/> <p>waste 1:14 2:1,10, 23 3:5,8,9</p>	<p>West 1:23 2:13 5:1</p> <p>wit 5:2</p> <p>written 5:12</p> <hr/> <p style="text-align: center;">§</p> <hr/> <p>§111(d) 3:16</p>
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DAQ Public Hearing - Proposed 2021 Legislative Rules
Registration to Virtually Attend - July 28, 2020

ID	Start time	Completion time	First Name	Last name	Email Address	Organization (if not affiliated with a group, type "Self")	Street Address	City, State and Zip Code
1	6/15/2020 12:56	6/15/2020 12:56	Stephanie	Hammonds	Stephanie.E.Hammonds@wv.gov	WVDEP-DAQ	601 57th Street, SE	Charleston, WV 25304
2	6/22/2020 17:52	6/22/2020 17:54	Edward	Andrews	edward.s.andrews@wv.gov	WVDEP/Division of Air Quality	601 57th Street, SE	Charleston, WV 25304
3	6/29/2020 11:52	6/29/2020 12:04	Kaitlin	Meszaros	meszaros@pinyon-env.com	Pinyon Environmental, INC.	3222 S. Vance Street, Suite 200	Lakewood, CO 80227
4	7/7/2020 10:44	7/7/2020 10:46	Todd	Shrewsbury	todd.h.shrewsbury@wv.gov	West Virginia Division of Air Quality	601 57th Street SE	Charleston, WV 25304
5	7/7/2020 10:51	7/7/2020 10:53	Laura	Crowder	Laura.M.Crowder@wv.gov	WVDEP DAQ	601 57th Street, SE	Charleston, WV 25304
6	7/7/2020 13:53	7/7/2020 13:54	Laura	Jennings	laura.m.jennings@wv.gov	WV DAQ	601 57th Street, SE	Charleston, WV 25304
7	7/9/2020 16:56	7/9/2020 16:58	Trevor	Galley	trevor_galley@tcenergy.com	TC Energy	1700 MacCorkle Ave SE	Charleston, WV 25314
8	7/13/2020 14:52	7/13/2020 14:54	David	Flannery	dave.flannery@steptoe-johnson.com	Steptoe & Johnson PLLC	Chase Plaza 17th Floor	25302
9	7/20/2020 8:43	7/20/2020 8:45	David	Fewell	david.r.fewell@wv.gov	WVDAQ	601 57th Street, SE	Charleston, WV 25304
10	7/20/2020 16:58	7/20/2020 16:59	Aileen	Curfman	acurfman@gmail.com	West Virginia Sierra Club	1067 Comstock Dr.	Shepherdstown, WV 25443
11	7/27/2020 14:15	7/27/2020 14:16	Aileen	Curfman	acurfman@gmail.com	West Virginia Sierra Club	1067 Comstock Dr.	Shepherdstown, WV 25443
12	7/27/2020 16:34	7/27/2020 16:35	Jason	Wandling	jason.e.wandling@wv.gov	WVDEP	601 57th St. SE	Charleston, WV 25301
13	7/27/2020 17:58	7/27/2020 17:58	Kaitlin	Meszaros	meszaros@pinyon-env.com	Pinyon Environmental, Inc.	3222 S. Vance Street Suite 200	Lakewood, CO 80227
14	7/28/2020 11:08	7/28/2020 11:09	Bev	McKeone	beverly.d.mckeone@wv.gov	WVDEP, DAQ	601 57th Street SE	Charleston WV 25304
15	7/28/2020 11:51	7/28/2020 11:52	David	White	envattorney2013@gmail.com	Appalachian and Atlantic Defense Council	179 Church Street	Chillicothe, Ohio 45601
16	7/28/2020 12:12	7/28/2020 12:13	James	Kotcon	jkotcon@gmail.com	West Virginia Chapter of Sierra Club	PO Box 4142	Morgantown, WV 26504
17	7/28/2020 13:38	7/28/2020 13:40	Sandra	Adkins	sandra.k.adkins@wv.gov	WVDEP	601 57th Street, SE	Charleston, WV 25304
18	7/28/2020 14:23	7/28/2020 14:28	Fred	Tipane	frederick.tipan@wv.gov	WV DEP/DAQ	601 57th ST SE	Charleston, WV 25304
19	7/28/2020 15:35	7/28/2020 15:36	Terry	Fletcher	terry.a.fletcher@wv.gov	WVDEP	123 Swarthmore Ave.	Charleston, WV 25302
20	n/a - Added by LMJ 7/29/20		Angie	Rosser		West Virginia Rivers Coalition	3501 MacCorkle Ave SE #129	Charleston, WV 25304