



December 5, 2018

Darrell Nitschke, Executive Secretary
North Dakota Public Service Commission
600 East Broadway, Department 408
Bismarck, ND 58502

Mr. Nitschke,

E3 Environmental (E3) on behalf of Hiland Partners Holdings LLC submits the enclosed documents for the Roosevelt Gas Plant Expansion Project (PU-17-277.)

Should you need any additional information or have questions please contact me at 651-282-0652 or via email at kschmidt@go2e3.com.

Regards,

A handwritten signature in blue ink that reads 'Katie Schmidt'.

Katie Schmidt
Sr. Environmental Consultant
E3 Environmental, LLC

Enclosures:

Preconstruction Meeting Minutes
McKenzie County CUP Amendment Letter

61 **PU-18-277** Filed: 12/5/2018 Pages: 19
Preconstruction meeting minutes, amendment to conditional use permit

E3 Environmental, LLC
Katie Schmidt

Meeting Notes

Date: 11/27/2018

Re: Case No. Pu-18-277_Filed 11/26/2018_Certificate of Site
Compatibility

Purpose: Pre-construction meeting between State of North Dakota
Public Service Commission as authorizing agency, and Hiland Partners
Holdings LLC as permit holder

Project: Roosevelt Gas Plant Expansion Project

Project Location: McKenzie County, North Dakota

Attendances and Responsibilities:

Scott Bare; Kinder Morgan Project Mgmt. VP

Richard Jones; Kinder Morgan Project Mgr.

Travis Springer; Saulsbury Ind.

George Stuckers; Kinder Morgan Roosevelt Plant Manager

Shirley Tyson; Kinder Morgan Project Coordinator (Meeting Notes)

Patrick Fahn; North Dakota Public Service Commission

Land Owner Contacts

Steve Lindquist ; KM ROW Agent

George Stuckers; Kinder Morgan Superintendent (Secondary contact for Land Owners)

Verbal Summary

Patrick: "Will be by reviewing the Certificate of Site Compatibility to insure that all understand and if anyone has any question; please ask."

1. Read
2. Read
3. Read
 - a. Remarks: Richard Jones; "If document/permits submitted with application do we need to re-submit?" Patrick ; " was the Storm Water Permit submitted with application?" Richard : "Yes, it was." Patrick: "No, need to re-submit if sent with application."
4. Read
5. Read (Records)
 - a. Remarks: Richard Jones: "Are records to be maintained on site or corporate office?" Patrick: "Where ever you decide to maintain them, so long as they are available for inspection by (PSC) Commission."
6. Read

Construction:

7. What we are doing today is a Pre-Construction conference to ensure that all parties understand the conditions set forth in Commission's order.
8. Read
9. Read

- a. Richard: "Topsoil removal is not applicable for this project. This project is to be built on an existing site." Patrick; "Ok, very good."

10. Read (Reports and Notifications)

- a. Richard: "How do you want that reported, on a Monthly Report?" Patrick: "Yes, a monthly report. That will be emailed to: NDPSC@nd.gov and cc Patrick- pfahn@nd.gov. Also for our record keeping folks keep a one and one-half inch margin at the bottom of the first page of the reports." Richard: "Do you have a standard format?" Patrick: "No, standard form, and if you want an example I will send one to you." Richard: "Send it to Shirley Tyson at Shirley_tyson@kindermorgan.com."
- b. Who will your Construction guy contact...or your inspector?" Patrick: "Whoever's contact information you give me. Who will that be?" Richard: "Richard Jones, Richard_jones@kindermorgan.com and my phone number will be 303-229-6129." Patrick: "that will be our contact for our 3rd party inspector."
- c. Richard: "Will the minutes of this meeting indicate the start of construction or will you be sending notification this year?" Richard; "Will the request for start of construction will go to the 3rd party inspector and as soon as we notify him, but we would like to start ASAP." Patrick: "You do not need to notify our 3rd party inspector, because he will not be out there in the beginning". Richard: "Ok, who do we notify?" Patrick: "You would inform the Commission and copy me. E-mail to: ndpsc@nd.gov and cc Patrick- pfahn@nd.gov." Richard: "Do we need to wait for a

response or can we just start?" Patrick: "I will at least let you know I got the e-mail."

11. Read
12. Read (48" cover on buried pipelines)
 - a. Richard: "Does this include existing lines or is this for new pipelines?" Patrick: "I am assuming that you have connecting pipelines" Richard: "We have." Patrick: "Some of those pipelines are at the plant above ground." Richard: "Do you want everything in the plant pad buried to 48 inches or are is this for pipeline construction off of the pad... off of our property?" Patrick: "It is for pipeline construction. Unless you have pipeline on the property." Richard: "We do have pipeline on the property." Patrick: "Is it buried?" Richard: "Some of it is and some is not." Patrick: "The intent of this is for cross county pipeline construction" . Richard: "For Saulsbury this permit does not include any cross county pipeline construction or does it?" Patrick: "It does not; the facility is only covered by the order." Richard: "Then this doesn't apply for what we are doing."
 - b. Patrick: "We are not worried about Top Soil." Richard: " No it is all on an existing site, no top soil."
13. Read
 - a. Patrick: "do you have anything like that?" Richard: " No we are strictly on a pad."
14. Read
 - a. Patrick: "Are there any Staging areas or equipment that is owned by someone other than Highland?" Richard: "We will try to stay within the pad; but if need be we will negotiated with landowners/follow this guide line."
15. Read
16. Read (Damage to public properties)

- a. Patrick: "This project is all on company own property."
Richard: "We will have permitted loads coming in on public road, we guess you have Frost Laws that we need to follow."
Patrick: "Yes so this would apply to you."
- 17. Read (Stop Work Authority)
 - a. Richard: "Will we receive written notification or how that would come." Patrick: "If we receive a report or if we were out at the site doing inspection the Commission would issue a document". Richard: "Would there be a corrective period allowed to us, where we would stop and correct immediately. That is what we would like to do." Patrick: "That certainly can be done."
- 18. Read
- 19. Read
- 20. Read
 - a. Patrick: "I don't think you will have any of this, but if you did it would be handled in accordance to the Natural Resources Conservation Service recommendations and approved by the Commission."
 - b. Richard: "I guess that's if a landowner was involved."
Patrick: "That is if you had a laydown yard where you would negotiate with a landowner." Richard: "Yes"
- 21. Read
- 22. Read
 - a. Patrick: " n/a"
- 23. Read
- 24. Read
 - a. Patrick: "No trees involved" Richard: " N/A"
- 25. Read (Electrical Noise)
 - a. Richard: "I don't understand what that is saying. Do we need to take baseline to make sure that they are not already

having interference? How does it work if they come to us with something that is preexisting? Has this ever been an issue before?" Patrick: "no is has not, should we receive a complaint we would try to resolve it with the owner."

26. Read
27. Read
28. Read
29. Read (Incident reporting)
 - a. Patrick: "This doesn't include first aid case." Richard: "So only recordable. Does this include the existing plant or just the new construction?" Patrick: "New construction, unless working on existing related to new construction."
30. Read
31. Read
 - a. Richard: "Do you want job book? Patrick: "No, mostly Plot showing equipment." Richard: "We can provide that."
32. Read
33. Read
 - a. Richard: "Do you have an example of this type of publication?" Patrick: "You provide that, if requested by landowner and send us a copy." Richard: "Ok." Patrick: "used for your communication with landowner." Richard: "Are you saying to be proactive rather than reactive?" Patrick: "Yes, Sir." Richard: "I will get with you for examples, we may do that." Patrick: "Ok."
34. Read
 - a. Patrick: "This will go to project contact information submitted to me for Landowners complaints." Richard: "We will provide information for

- i. Steve Lindquist KM/Highland ROW Agent – Cell Phone 701-648-0246 Email: steve_lindquist@kindermorgan.com
- ii. George Stuckers KM/Highland Manager-Ops at the Roosevelt Plant. – Cell Phone: 701-609-2461 Email: george_stuckers@kindermorgan.com
- iii. Richard Jones KM Project Mgr. Cell Phone 303-229-6129 Email: Richard_jones@kindermorgan.com

35. Read

- a. Richard: “This is only if construction is modified?” Patrick- this is for anything not listed on your application or any change to the plot plan.”

Reviewed

Page 4 & 5 #16 (1), (2), & (3) - read

Richard: “(3) talks about reasonable noise levels. What is that, 50DBA? Patrick: “that is the commission’s benchmark. Richard: “ok we are going to do a baseline noise study at the receptor areas. To ensure we can meet the benchmark, if they are already above that 50 DBA there is no way we can meet that.” Patrick: “That is why it’s a good reason to take that baseline.” Richard- We will be following up by periodically with noise surveys to see where we stand.” Patrick: “Good idea.”

Page 6 #19 – read

(iv) Richard: “We do have a permit to construct 108043.

Patrick: “Ok.”

(v) Patrick: “N/A”

(vi) Patrick: “N/A”

Page 6 #21 – read

Richard: "Travis do we have that?" Travis: "Yes" Richard: "Will you send that to me, so I may forward to NDPSC?" Patrick: "That would be great."

Page 6 #22 – read

Patrick: "That would be based on the equipment in the plant/plan noise level." Richard: "Once we obtain a baseline at the nearest receptor, since noise is accumulative we can model what the additive noise would be." Travis: "Richard this is something we can talk about."

Page 6 #23 – read

Richard: "That has jurisdiction." Patrick: "Oh that is a good point."

Page 6 #25 – read

Page 7 #26 – read

Patrick: "We don't have that now." Richard: "It will be similar to the existing one you have now." Patrick: "So that would be filed with us as well."

Page 7 #27 – read

Patrick: "The commission believes that the engineering is finalized complete before the start of construction." Richard: "design/engineering is complete at the end of the PHA.(Process Hazard Analysis) Construction will begin March of next year. Scott: "Construction of the piping and equipment will, but we will be doing some pile and support work right Richard." Richard: "Yes, engineering will be finalized before setting of those above ground items. Patrick:

“ok that when those items would be due.” Richard: “Ok thank you.”

Conclusions of Law

4. Read

Order

6. Read

7. Read

Patrick: “Utility work is not your responsibility.”

Patrick: “Demo of Tanks to be done this year. Richard: “yes it will, to clear the way.”

Summary of Requirements

Permits and documents related to project to be submitted to NDPSC@nd.gov. and PFAHN@nd.gov.

Request for construction to be sent to NDPSC@nd.gov and PFAHN@nd.gov to send acknowledgement of receipt.

Spill notifications within 24 hours and incident notifications to be submitted to NDPSC@nd.gov. and PFAHN@nd.gov.

Monthly report to be sent to NDPSC@nd.gov and PFAHN@nd.gov

(First page 1.5” bottom margin)

30 day report starts day of construction.

Land owner contacts:

- i. Steve Lindquist KM/Highland ROW Agent – Cell
Phone 701-648-0246 Email:
steve_lindquist@kindermorgan.com

- ii. George Stuckers KM/Highland Manager-Ops at the Roosevelt Plant. – Cell Phone: 701-609-2461 Email: george_stuckers@kindermorgan.com

Construction Contact

Richard Jones KM Project Mgr. Cell Phone 303-229-6129 Email: Richard_jones@kindermorgan.com

PSC third party construction inspection: TBD

Kinder Morgan
C/O Michael Preble-Saulsbury Industries
2951 E Interstate 20
Odessa, TX 79766

November 27, 2018

RE: Amendment to Conditional Use Permit 0068-14

This letter is to inform you that at the November 20, 2018 meeting, the McKenzie County Board of Commissioners approved the request for an Amendment to Conditional Use Permit 0068-14. There is an existing gas processing facility on the property and they will be building a second train including a cryogenic gas processing facility with a stabilizer unit, residue compression and overhead compression. IT 2908 portion of the SW1/4SE1/4 of Section 30, Township 149-N, Range 98-W, McKenzie County, North Dakota.

The following conditions were placed on this permit:

1. The applicants shall obtain building permits and/waivers for the proposed structures within the proposed development.
2. The applicant shall not deposit any snow or water onto the neighboring properties and dispose of storm water onsite through an approved engineering method. Additionally, the applicants shall design the storm water and culvert system to convey a 25 year event.
3. The applicant shall post the address clearly onsite and provide a project sign (4' by 8') onsite to identify the project.
4. The Conditional Use Permit will be reviewed annually for conformance with the conditions of approval; if conditions are not adhered to then the permit can be placed on the Planning Commission agenda for revocation.
5. The applicant shall paint all site improvements in an earth tone scheme to better blend in with the surroundings.
6. The applicant shall adhere to all Federal, State and local laws, regulations and conditions for the operation of the proposed facility.
7. The applicants shall share all final approvals, and continuing approvals/reviews with the County/State/Federal agencies as they are obtained or altered, along with any violations as it relates to this Conditional Use approvals for the CUP file.
8. The applicant shall install a cattle guard at the entrance of the gate to the facility and lay gravel/scoria, 4 inches in depth, in the truck parking/staging area, the cattle guard shall be the length of the gate opening and 8 feet wide.
9. All security lighting on site shall be downward facing and shall not glare on adjacent property owners or the public travel way.
10. The applicant shall provide onsite parking/staging for a minimum of four (4) semi-trucks onsite.
11. The applicant shall submit a bond equaling 150% of an engineer's estimate to remediate/reclaim the site when the use is not planned to be utilized any further. The bond shall be in to the County Planning and Zoning department within thirty (30) days of County Commission approval and shall be kept current and up to date.

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That may surprise you...

www.McKenzieCounty.net

12. The applicant shall complete all required site improvements by June 30, 2020.
13. Prior to being operational the facility shall be inspected by the County Fire Inspector for fire compliance and there shall be an annual fire inspection thereafter.
14. Any changes in area or volume will require an amendment to the existing Conditional Use Permit per Section 5.8.5 of the McKenzie County Zoning Ordinance.

Sincerely,



Jim Talbert, Director
McKenzie County Planning and Zoning

**AIR POLLUTION CONTROL
PERMIT TO CONSTRUCT**

Pursuant to Chapter 23.1-0.6 of the North Dakota Century Code, and the Air Pollution Control Rules of the State of North Dakota (Article 33.1-15 of the North Dakota Administrative Code), and in reliance on statements and representations heretofore made by the permittee designated below, a Permit to Construct is hereby issued authorizing such permittee to construct and initially operate the source unit(s) at the location designated below. This Permit to Construct is subject to all applicable rules and orders now or hereafter in effect of the North Dakota Department of Health and to any conditions specified below:

I. General Information:

A. Permit to Construct Number: PTC18043

B. Source:

1. Name: Hiland Partners Holdings LLC
2. Location: Roosevelt Gas Plant
12527 Spring Creek Road
Watford City, ND 58854
SW ¼, SE ¼, Sec. 30, T149N, R98W
McKenzie County, North Dakota
3. Source Type: Natural Gas Processing
4. Existing equipment at the Facility:

Emission Unit Description	Emission Unit (EU)	Emission Point (EP)	Air Pollution Control Equipment
Waukesha L7044 GSI (4SRB) natural gas-fired compressor engine rated at 1,680 bhp manufactured November 2013 (JJJJ)	1	1	Dual Catalytic Converter
Waukesha L7044 GSI (4SRB) natural gas-fired compressor engine rated at 1,680 bhp manufactured October 2014 (JJJJ)	2	2	Dual Catalytic Converter
Waukesha L7044 GSI (4SRB) natural gas-fired compressor engine rated at	3	3	Dual Catalytic Converter

Comment [CK(1) 801] was replaced in June 2018 with an engine manufactured in November 2018.

Emission Unit Description	Emission Unit (EU)	Emission Point (EP)	Air Pollution Control Equipment
1,680 bhp manufactured October 2014 (JJJJ)			
Devco HELIFLO natural gas-fired hot oil heater rated at 20.25 MMBtu/hr (Dc)	4	4	None
Tulsa natural gas-fired regeneration heater rated at 10.67 MMBtu/hr (Dc)	5	5	None
Emergency Flare	6	6	None
400 bbl condensate storage tank	7	7	Submerged Fill Pipe (SFP)
400 bbl condensate storage tank	8	8	SFP

5. New equipment to be added to the facility:

Emission Unit Description	Emission Unit (EU)	Emission Point (EP)	Air Pollution Control Equipment
Tulsa SHO2000 natural gas-fired hot oil heater rated at 24.09 MMBtu/hr (Dc)	9	9	Combustion Management System (CMS) with O ₂ Combustion Controller (CC)
Tulsa SHO1750 natural gas-fired hot oil heater rated at 18.22 MMBtu/hr (Dc)	10	10	Burners with Enhanced Induced Flue Gas Recirculation (IFGR)
Tulsa SHO500 natural gas-fired regeneration heater rated at 6.30 MMBtu/hr	11	11	Burners with IFGR and CMS with O ₂ CC
Emergency Flare	12	12	None
Various methanol storage tanks	Various	Various	SFP

C. Permittee (Permit Applicant):

1. Name: Hiland Partners Holdings LLC
2. Address: 1001 Louisiana Street, Suite 1000
Houston, TX 77002
3. Application Date: November 13, 2018

- II. **Conditions:** This Permit to Construct allows the construction and initial operation of the above-mentioned new or modified equipment at the source. The source may be operated under this Permit to Construct until a Permit to Operate is issued unless this permit is

suspended or revoked. The source is subject to all applicable rules, regulations, and orders now or hereafter in effect of the North Dakota Department of Health and to the conditions specified below.

- A. **Emission Limits:** Emission limits from the operation of the new equipment identified in Item I.B of this Permit to Construct (hereafter referred to as "permit") are as follows. Minor source units not listed are subject to the applicable emission limits specified in the North Dakota Air Pollution Control Rules.

Emission Unit Description	EU	EP	Pollutant/Parameter	Emission Limit
Hot oil heater rated at 24.09 MMBtu/hr	9	9	Opacity	20% ^A
Hot oil heater rated at 18.22 MMBtu/hr	10	10	Opacity	20% ^A
Regeneration heater rated at 6.30 MMBtu/hr	11	11	Opacity	20% ^A
Emergency Flare	12	12	Opacity	20% ^B

^A 40% permissible for not more than one six-minute period per hour.

^B 60% permissible for not more than one six-minute period per hour.

- B. **Fuel Restriction:** The hot oil heaters (EUs 9 and 10) and regeneration heater (EU 11) are restricted to combusting only natural gas containing no more than 2 grains of sulfur per 100 standard cubic feet.

C. **Flaring:**

1. Flaring may not be used to burn waste gas for the purpose of increasing or maintaining well production without prior approval from the Department. When it is necessary to operate the flare during emergency, malfunction or maintenance, all precautions shall be taken to minimize emissions and maintain compliance with the applicable ambient air quality standards as outlined in NDAC 33.1-15-02 and the opacity standard of 20% not to exceed 60% for more than one six-minute period per hour.
2. The flare must be equipped and operated with an automatic ignitor or a continuous burning pilot which must be maintained in good working order as outlined in NDAC 33.1-15-07-02.
3. The presence of a flame shall be monitored using a thermocouple or any other equivalent device approved by the Department.

- D. **Storage Tanks:** All tanks shall be equipped with a submerged fill pipe in accordance with NDAC 33.1-15-07-01.3.

- E. **New Source Performance Standards (NSPS):** The permittee shall comply with

all applicable requirements of the following NSPS subparts, in addition to Subpart A, as referenced in Chapter 33.1-15-12 of the North Dakota Air Pollution Control Rules and 40 CFR 60.

1. 40 CFR 60, Subpart Dc – Standards of Performance for Small Industrial-Commercial-Institutional Steam Generating Units (EUs 9 and 10).
- F. **Organic Compounds Emissions:** The permittee shall comply with all applicable requirements of NDAC 33.1-15-07 – Control of Organic Compounds Emissions.
- G. **Construction:** Construction of the above described facility shall be in accordance with information provided in the permit application as well as any plans, specifications and supporting data submitted to the Department. The Department shall be notified ten days in advance of any significant deviations from the specifications furnished. The issuance of this Permit to Construct may be suspended or revoked if the Department determines that a significant deviation from the plans and specifications furnished has been or is to be made.
- Any violation of a condition issued as part of this permit to construct as well as any construction which proceeds in variance with any information submitted in the application, is regarded as a violation of construction authority and is subject to enforcement action.
- H. **Startup Notice:** A notification of the actual date of initial startup shall be submitted to the Department within 15 days after the date of initial startup.
- I. **Permit Invalidation:** This permit shall become invalid if construction is not commenced within eighteen months after issuance of such permit, if construction is discontinued for a period of eighteen months or more; or if construction is not completed within a reasonable time.
- J. **Fugitive Emissions:** The release of fugitive emissions shall comply with the applicable requirements in NDAC 33.1-15-17.
- K. **Annual Emission Inventory/Annual Production Reports:** The permittee shall submit an annual emission inventory report and/or an annual production report upon Department request, on forms supplied or approved by the Department.
- L. **Source Operations:** Operations at the installation shall be in accordance with statements, representations, procedures and supporting data contained in the initial application, and any supplemental information or application(s) submitted thereafter. Any operations not listed in this permit are subject to all applicable North Dakota Air Pollution Control Rules.

- M. **Alterations, Modifications or Changes:** Any alteration, repairing, expansion, or change in the method of operation of the source which results in the emission of an additional type or greater amount of air contaminants or which results in an increase in the ambient concentration of any air contaminant, must be reviewed and approved by the Department prior to the start of such alteration, repairing, expansion or change in the method of operation.
- N. **Air Pollution from Internal Combustion Engines:** The permittee shall comply with all applicable requirements of NDAC 33.1-15-08-01 – Internal Combustion Engine Emissions Restricted.
- O. **Recordkeeping:** The permittee shall maintain any compliance monitoring records required by this permit or applicable requirements. The permittee shall retain records of all required monitoring data and support information for a period of at least five years from the date of the monitoring sample, measurement, report or application. Support information may include all calibration and maintenance records and all original strip-chart recordings/computer printouts for continuous monitoring instrumentation, and copies of all reports required by the permit.
- P. **Nuisance or Danger:** This permit shall in no way authorize the maintenance of a nuisance or a danger to public health or safety.
- Q. **Malfunction Notification:** The permittee shall notify the Department of any malfunction which can be expected to last longer than twenty-four hours and can cause the emission of air contaminants in violation of applicable rules and regulations.
- R. **Operation of Air Pollution Control Equipment:** The permittee shall maintain and operate all air pollution control equipment in a manner consistent with good air pollution control practice for minimizing emissions.
- S. **Transfer of Permit to Construct:** The holder of a permit to construct may not transfer such permit without prior approval from the Department.
- T. **Right of Entry:** Any duly authorized officer, employee or agent of the North Dakota Department of Health may enter and inspect any property, premise or place at which the source listed in Item I.B of this permit is located at any time for the purpose of ascertaining the state of compliance with the North Dakota Air Pollution Control Rules. The Department may conduct tests and take samples of air contaminants, fuel, processing material, and other materials which affect or may affect emissions of air contaminants from any source. The Department shall have the right to access and copy any records required by the Department's rules and to inspect monitoring equipment located on the premises.
- U. **Other Regulations:** The permittee of the source unit(s) described in Item I.B of this permit shall comply with all State and Federal environmental laws and rules.

In addition, the permittee shall comply with all local burning, fire, zoning, and other applicable ordinances, codes, rules and regulations.

- V. **Permit Issuance:** This permit is issued in reliance upon the accuracy and completeness of the information set forth in the application. Notwithstanding the tentative nature of this information, the conditions of this permit herein become, upon the effective date of this permit, enforceable by the Department pursuant to any remedies it now has, or may in the future have, under the North Dakota Air Pollution Control Law, NDCC Chapter 23.1-0.6. Each and every condition of this permit is a material part thereof, and is not severable.
- W. **Odor Restrictions:** The permittee shall not discharge into the ambient air any objectionable odor air contaminant which is in excess of the limits established in NDAC 33.1-15-16.

The owner/operator shall not discharge into the ambient air hydrogen sulfide (H₂S) in concentrations that would be objectionable on land owned or leased by the complainant or in areas normally accessed by the general public. For the purpose of complaint resolution, two samples with concentrations greater than 0.05 parts per million (50 parts per billion) sampled at least 15 minutes apart within a two-hour period and measured in accordance with Section 33.1-15-16-04 constitute a violation.

- X. **Sampling and Testing:** The Department may require the permittee to conduct tests to determine the emission rate of air contaminants from the source. The Department may observe the testing and may specify testing methods to be used. A signed copy of the test results shall be furnished to the Department within 60 days of the test date. The basis for this condition is NDAC 33.1-15-01-12 which is hereby incorporated into this permit by reference. To facilitate preparing for and conducting such tests, and to facilitate reporting the test results to the Department, the permittee shall follow the procedures and formats in the Department's Emission Testing Guideline.

FOR THE NORTH DAKOTA
DEPARTMENT OF HEALTH

Date _____

By _____
Terry L. O'Clair, P.E.
Director
Division of Air Quality