

September 30, 2016

Ms. Paige Morris  
North Carolina Department of Commerce  
Utilities Commission  
4325 Mail Service Center  
Raleigh, North Carolina 27699-4325

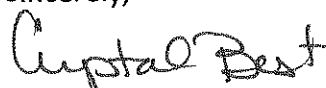
**Re: SCH File # 17-E-4600-0119; Application of NTE Carolinas II, LLC for Certificate to construct a 500 MW Natural Gas-Fueled Merchant Power Plant in Rockingham Co. Docket # EMP-92, Sub 0.**

Dear Ms. Morris:

The above referenced environmental impact information has been reviewed through the State Clearinghouse under the provisions of the North Carolina Environmental Policy Act.

Attached to this letter are comments made in the review of this document. Because of the nature of the comments, it has been determined that no further State Clearinghouse review action on your part is needed for compliance with the North Carolina Environmental Policy Act. The attached comments should be taken into consideration in project development.

Sincerely,



Crystal Best

State Environmental Review Clearinghouse

Attachments  
cc: Region G



PAT MCCRORY  
Governor

DONALD R. VAN DER VAART  
Secretary

MEMORANDUM

To: Crystal Best  
State Clearinghouse Coordinator  
Department of Administration

From: Lyn Hardison *LBH*  
Division of Environmental Assistance and Customer Service  
Environmental Assistance and Project Review Coordinator

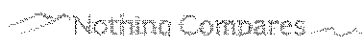
RE: 17-0119  
Environmental Review –Application of NTE Carolinas II, LLC for the Certificate to  
construct a 500-MW Natural Gas-Fueled Merchant Power Plant  
Rockingham County

Date: September 22, 2016

The Department of Environmental Quality has reviewed the proposal for the referenced project. Based on the information provided, several of our agencies have identified permits that may be required and offered some valuable guidance to minimize impacts to the natural resources, aquatic and terrestrial wildlife resources within and around the project area. The comments are attached for the applicant's review.

If the applicant has any questions pertaining to NCDEQ permitting processes, please suggest to the applicant to contact Marcia Allocca, Permit Assistance Coordinator, in the Department's Mooresville Regional Office, (704) 663-1699. The proposed project is located within her geographic working territory. Thank you for the opportunity to respond.

Attachment





## North Carolina Wildlife Resources Commission

Gordon Myers, Executive Director

### MEMORANDUM

TO: Lyn Hardison, Environmental Assistance and SEPA Coordinator  
NCDEQ Division of Environmental Assistance and Customer Services

FROM: Gabriela Garrison  
Eastern Piedmont Coordinator  
Habitat Conservation *Gabriela Garrison*

DATE: September 21, 2016

SUBJECT: Comments on NTE Carolinas II, LLC Natural Gas Power Plant Facility in Rockingham County; Project Number 17-0119.

Biologists with the North Carolina Wildlife Resources Commission (NCWRC) have reviewed the proposed project description. Comments are provided in accordance with certain provisions of the North Carolina Environmental Policy Act (G.S. 113A-1 through 113A-10; 1 NCAC 25) and the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 et seq.).

NTE Carolinas II, LLC proposes to construct a 500 MW natural gas fueled merchant power plant in Rockingham County. The site would be located at 4781 NC Highway 65 North, west of Reidsville. A map of the proposed location (provided with the application materials) suggests the project is sited on primarily forested land. Clearing trees from this site will displace wildlife species. Constructing on previously cleared and disturbed land will have less impact and is therefore the preferred option. Projects should be sited to avoid impacts to wetlands, streams, riparian buffers and priority wildlife habitat.

Aerial images and maps indicate Little Jacobs Creek bisects the proposed project site. The NCWRC offers the following recommendations to minimize impacts to aquatic and terrestrial wildlife resources:

1. Maintain or establish a minimum 100-foot undisturbed, native forested buffer along each side of perennial streams and 50-foot undisturbed, native forested buffer along each side of intermittent streams and wetlands. Forested riparian buffers provide habitat areas and travel corridors for wildlife species. In addition, forested riparian buffers protect water quality by stabilizing stream banks and filtering stormwater runoff.
2. The project footprint should be surveyed for wetlands and streams to ensure there are no impacts to surface waters. In addition to providing wildlife habitat, wetland areas and streams aid in flood control and water quality protection. United States Army Corps of Engineers Section 404 Permits and NC Division of Water Resources Section 401 Certifications are required for any impacts to jurisdictional streams or wetlands.

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**Mailing Address:** Habitat Conservation • 1721 Mail Service Center • Raleigh, NC 27699-1721  
**Telephone:** (919) 707-0220 • **Fax:** (919) 707-0028

September 21, 2016  
NTE Carolinas II, LLC  
DEQ Project No. 17-0119

3. Use bridges for all permanent roadway crossings of streams and associated wetlands to eliminate the need to fill and culvert, where practicable. If culverts must be used, the culvert should be designed to allow aquatic life passage. Fords may be appropriate and preferred for intermittent stream crossings or where crossings will be used only once or twice a year. For fords, crossings in riffles are preferred with the banks lowered upstream and downstream of the crossing. Stabilize the stream bottom with geo-textile fabric and rock; concrete should not be used for bed stabilization.
4. Re-seed disturbed areas with seed mixtures that are beneficial to wildlife. Avoid fescue-based mixtures as fescue is invasive and provides little benefit to wildlife. A list of wildlife-friendly plants is available upon request. In addition, the use of non-invasive, native species is recommended. Using native species instead of ornamentals should reduce the need for water, fertilizers and pesticides.
5. If pesticides or chemicals will be used for site maintenance, stormwater runoff from the site should be funneled to bio-retention areas prior to discharge to streams or wetlands. Pesticides, fertilizers and other chemicals should not be used in wetland areas or near streams.
6. Sediment and erosion control measures should be installed prior to any land clearing or construction. The use of biodegradable and wildlife-friendly sediment and erosion control devices is strongly recommended. Silt fencing, fiber rolls and/or other products should have loose-weave netting that is made of natural fiber materials with movable joints between the vertical and horizontal twines. Silt fencing or similar materials that have been reinforced with plastic or metal mesh should be avoided as they impede the movement of terrestrial wildlife species. Excessive silt and sediment loads can have detrimental effects on aquatic resources including destruction of spawning habitat, suffocation of eggs and clogging of gills.

Thank you for the opportunity to review and comment on this project. If I can be of further assistance, please contact me at (910) 409-7350 or [gabriela.garrison@ncwildlife.org](mailto:gabriela.garrison@ncwildlife.org).



PAT MCCRORY

*Director*

DONALD R. VAN DER VAART

*Deputy Director*

MICHAEL SCOTT

*Director*

September 20, 2016

To: Michael Scott, Director  
Division of Waste Management

From: Bill Hunneke, Eastern Region Compliance Supervisor,  
Compliance Branch, Hazardous Waste Section

Subject: Hazardous Waste Section Comments on Application of NTE Carolinas II, LLC for Certificate  
to construct a 500 MW Natural Gas Fueled Merchant Power Plant  
(Rockingham County)  
Project Number: 17-0119

The Hazardous Waste Section (HWS) has reviewed the environmental review for the Application of NTE Carolinas II, LLC for a Certificate to construct a 500 MW Natural Gas Fueled Merchant Power Plant in Rockingham County.

Any hazardous waste generated from the demolition, construction, operation, maintenance, and/or remediation (e.g. excavated soil) from the proposed project must be managed in accordance with the North Carolina Hazardous Waste Rules. The demolition, construction, operation, maintenance, and remediation activities conducted will most likely generate a solid waste, and a determination must be made whether it is a hazardous waste. If a project site generates more than 220 pounds of hazardous waste in a calendar month, the HWS must be notified, and the site must comply with the small quantity generator requirements. If a project site generates more than 2200 pounds of hazardous waste in a calendar month, the HWS must be notified, and the facility must comply with the large quantity generator requirements.

Should any questions arise, please contact me at 252-364-8977.

Kind regards,

William Hunneke  
Eastern Region Compliance Supervisor



Waste Management  
ENVIRONMENTAL QUALITY

PAT MCCRORY  
*Assistant Secretary*

DONALD R. VAN DER VAART  
*Secretary*

MICHAEL SCOTT  
*Assistant Secretary*

Date: September 6, 2016

To: Michael Scott, Director  
Division of Waste Management

Through: Dave Lown, Head  
Federal Remediation Branch

From: Harry Zinn, Federal Remediation Branch

Subject: SEPA Project #17-0119-Application of NTE Carolinas II, LLC for Certificate to construct a 500 MW Natural Gas-Fueled Merchant Power Plant in Rockingham County, NC.

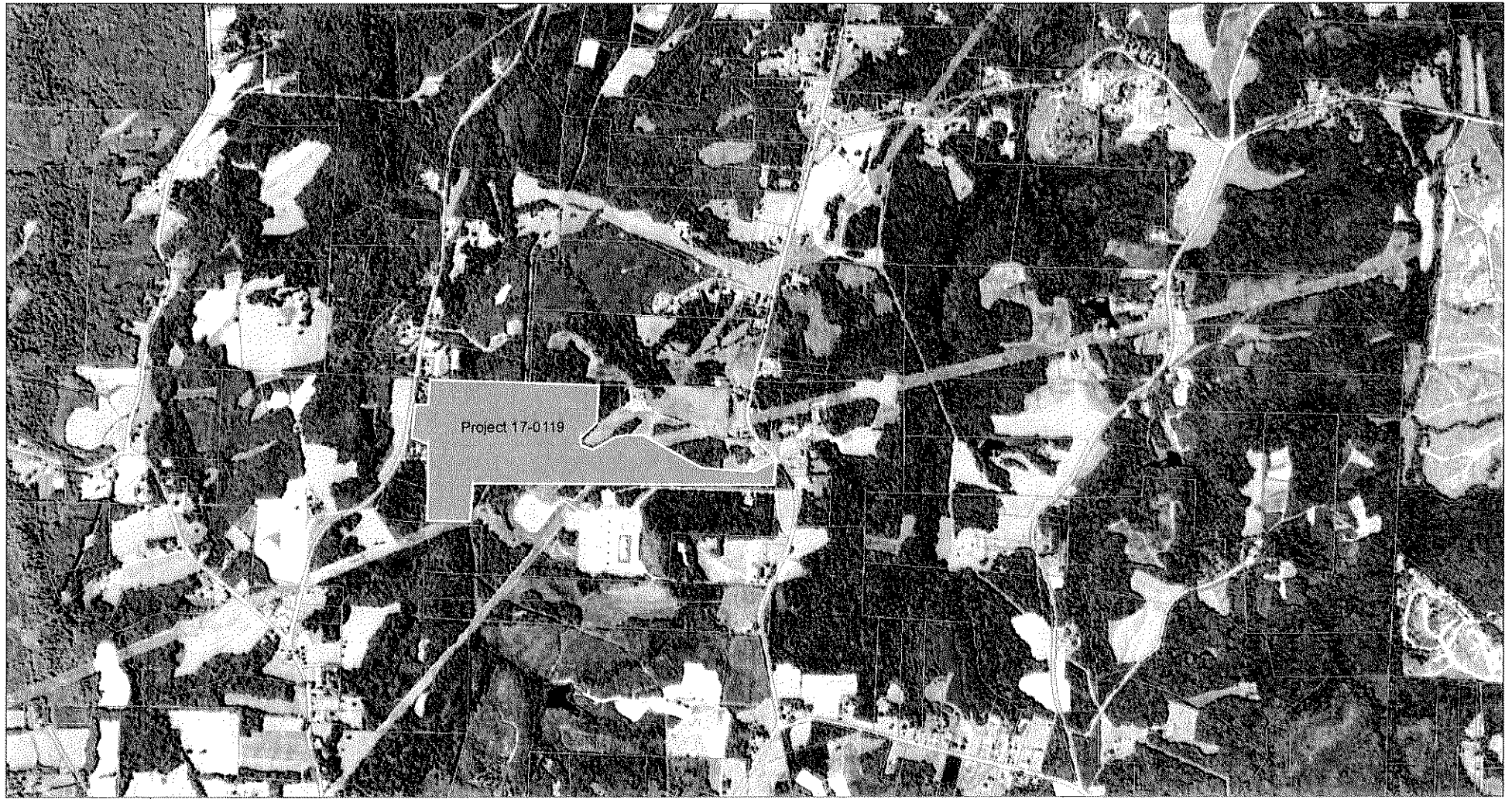
The Superfund Section has reviewed the proximity of CERCLIS and other sites under their jurisdiction to the construction of a 500 MW Natural Gas-Fueled Merchant Power Plant in Rockingham County, NC.

No sites were identified within one mile of the project as shown on the attached map.

Please contact me at 919.707.8374 if you have any questions.

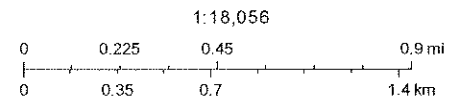


# Superfund Section SEPA Review 17-0119



September 6, 2016

NC1Map\_Parcels\_Features - Parcels



Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AEX, Getmapping, Aerogrid, IGN, IGP, swisstopo, and the GIS User Community

Web AppBuilder for ArcGIS  
USDA FSA, Microsoft |





PAT MCCRORY

*Director*

DONALD R. VAN DER VAART

*Deputy Director*

MICHAEL SCOTT

*Assistant Director*

DATE: September 21, 2016

TO: Michael Scott, Division Director through Sharon Brinkley

FROM: Deb Aja, Western District Supervisor - Solid Waste Section

RE: SEPA Review Project #17-0119, Rockingham County, N.C.  
NTE Carolinas II, LLC Proposed Power Plant Construction

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The Solid Waste Section has reviewed the Application of NTE Carolinas II, LLC (redacted version) for Certificate to construct a 500 MW Natural Gas Fueled Merchant Power Plant located at the Reidsville Energy Center in Rockingham County, North Carolina. The review has been completed and has seen no adverse impact on the surrounding community and likewise knows of no situations in the community, which would affect this project from a solid waste perspective.

During construction, every feasible effort should be made to minimize the generation of waste, to recycle materials for which viable markets exist, and to use recycled products and materials in the development of this project where suitable. Any waste generated by this project that cannot be beneficially reused or recycled must be disposed of at a solid waste management facility approved to manage the respective waste type. The Section strongly recommends that any contractors are required to provide proof of proper disposal for all waste generated as part of the project. The nearest permitted facility to the project is the Rockingham County Landfill, a lined MSW landfill, Rockingham County, North Carolina.

Please contact Susan Heim, Environmental Senior Specialist, for with any questions regarding solid waste management. Ms. Heim may be reached at (336)-776-9672 or by email at [susan.heim@ncdenr.gov](mailto:susan.heim@ncdenr.gov).

Cc: Jason Watkins, Field Operations Branch Head  
Susan Heim, Environmental Senior Specialist  
Sarah Rice, Compliance Officer



State of North Carolina  
Department of Environment and Natural Resources  
INTERGOVERNMENTAL REVIEW - PROJECT COMMENTS

Reviewing Office: WSRO

Project Number 17-0119 Due Date: 9/21/2016  
County Rockingham

After review of this project it has been determined that the ENR permit(s) and/or approvals indicated may need to be obtained in order for this project to comply with North Carolina Law. Questions regarding these permits should be addressed to the Regional Office indicated on the reverse of the form. All applications, information and guidelines relative to these plans and permits are available from the same Regional Office.

	PERMITS	SPECIAL APPLICATION PROCEDURES or REQUIREMENTS	Normal Process Time (statutory time limit)
<input type="checkbox"/>	Permit to construct & operate wastewater treatment facilities, sewer system extensions & sewer systems not discharging into state surface waters.	Application 90 days before begin construction or award of construction contracts. On-site inspection. Post-application technical conference usual.	30 days (90 days)
<input type="checkbox"/>	NPDES - permit to discharge into surface water and/or permit to operate and construct wastewater facilities discharging into state surface waters.	Application 180 days before begin activity. On-site inspection. Pre-application conference usual. Additionally, obtain permit to construct wastewater treatment facility-granted after NPDES. Reply time, 30 days after receipt of plans or issue of NPDES permit-whichever is later.	90-120 days (N/A)
<input type="checkbox"/>	Water Use Permit	Pre-application technical conference usually necessary	30 days (N/A)
<input type="checkbox"/>	Well Construction Permit	Complete application must be received and permit issued prior to the installation of a well.	7 days (15 days)
<input type="checkbox"/>	Dredge and Fill Permit	Application copy must be served on each adjacent riparian property owner. On-site inspection. Pre-application conference usual. Filling may require Easement to Fill from N.C. Department of Administration and Federal Dredge and Fill Permit.	55 days (90 days)
<input type="checkbox"/>	Permit to construct & operate Air Pollution Abatement facilities and/or Emission Sources as per 15 A NCAC (2Q.0100 thru 2Q.0300)	Application must be submitted and permit received prior to construction and operation of the source. If a permit is required in an area without local zoning, then there are additional requirements and timelines (2Q.0113).	90 days
<input type="checkbox"/>	Permit to construct & operate Transportation Facility as per 15A NCAC (2D.0800, 2Q.0601)	Application must be submitted at least 90 days prior to construction or modification of the source.	90 days
<input type="checkbox"/>	Any open burning associated with subject proposal must be in compliance with 15 A NCAC 2D.1900	N/A	60 days (90 days)
<input type="checkbox"/>	Demolition or renovations of structures containing asbestos material must be in compliance with 15 A NCAC 20.1110 (a) (1) which requires notification and removal prior to demolition. Contact Asbestos Control Group 919-707-5950.		
<input type="checkbox"/>	Complex Source Permit required under 15 A NCAC 2D.0800		
<input checked="" type="checkbox"/>	The Sedimentation Pollution Control Act of 1973 must be properly addressed for any land disturbing activity. An erosion & sedimentation control plan will be required if one or more acres to be disturbed. Plan filed with proper Regional Office (Land Quality Section) At least 30 days before beginning activity. A fee of <b>\$65</b> for the first acre or any part of an acre. An express review option is available with additional fees.		20 days (30 days)
<input type="checkbox"/>	Sedimentation and erosion control must be addressed in accordance with NCDOT's approved program. Particular attention should be given to design and installation of appropriate perimeter sediment trapping devices as well as stable stormwater conveyances and outlets.		(30 days)
<input type="checkbox"/>	Mining Permit	On-site inspection usual. Surety bond filed with ENR Bond amount varies with type mine and number of acres of affected land. Any acre mined greater than one acre must be permitted. The appropriate bond must be received before the permit can be issued.	30 days (60 days)
<input type="checkbox"/>	North Carolina Burning permit	On-site inspection by N.C. Division Forest Resources if permit exceeds 4 days	1 day (N/A)
<input type="checkbox"/>	Special Ground Clearance Burning Permit - 22 counties in coastal N.C. with organic soils	On-site inspection by N.C. Division Forest Resources required "if more than five acres of ground clearing activities are involved. Inspections should be requested at least ten days before actual burn is planned."	1 day (N/A)
<input type="checkbox"/>	Oil Refining Facilities	N/A	90-120 days (N/A)
<input type="checkbox"/>	Dam Safety Permit	If permit required, application 60 days before begin construction. Applicant must hire N.C. qualified engineer to: prepare plans, inspect construction, certify construction is according to ENR approved plans. May also require permit under mosquito control program. And a 404 permit from Corps of Engineers. An inspection of site is necessary to verify Hazard Classification. A minimum fee of \$200.00 must accompany the application. An additional processing fee based on a percentage of the total project cost will be required upon completion.	30 days (60 days)

February 11, 2015

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Sep 30 2016

County <u>Rockingham</u>		Project Number: <u>17-0119</u>	Due Date: <u>09/21/2016</u>	Normal Process Time (statutory time limit)
PERMITS		SPECIAL APPLICATION PROCEDURES or REQUIREMENTS		
<input type="checkbox"/>	Permit to drill exploratory oil or gas well	File surety bond of \$5,000 with ENR running to State of NC conditional that any well opened by drill operator shall, upon abandonment, be plugged according to ENR rules and regulations.		10 days N/A
<input type="checkbox"/>	Geophysical Exploration Permit	Application filed with ENR at least 10 days prior to issue of permit. Application by letter. No standard application form.		10 days N/A
<input type="checkbox"/>	State Lakes Construction Permit	Application fee based on structure size is charged. Must include descriptions & drawings of structure & proof of ownership of riparian property.		15-20 days N/A
<input checked="" type="checkbox"/>	401 Water Quality Certification	N/A		60 days (130 days)
<input type="checkbox"/>	CAMA Permit for MAJOR development	\$250.00 fee must accompany application		55 days (150 days)
<input type="checkbox"/>	CAMA Permit for MINOR development	\$50.00 fee must accompany application		22 days (25 days)
<input type="checkbox"/>	Several geodetic monuments are located in or near the project area. If any monument needs to be moved or destroyed, please notify: N.C. Geodetic Survey, Box 27687 Raleigh, NC 27611			
<input type="checkbox"/>	Abandonment of any wells, if required must be in accordance with Title 15A. Subchapter 2C.0100.			
<input checked="" type="checkbox"/>	Notification of the proper regional office is requested if "orphan" underground storage tanks (USTS) are discovered during any excavation operation.			
<input type="checkbox"/>	Compliance with 15A NCAC 2H 1000 (Coastal Stormwater Rules) is required.			45 days (N/A)
<input type="checkbox"/>	Catawba, Jordan Lake, Randalman, Tar Pamlico or Neuse Riparian Buffer Rules required.			
<input checked="" type="checkbox"/>	Plans and specifications for the construction, expansion, or alteration of a public water system must be approved by the Division of Water Resources/Public Water Supply Section prior to the award of a contract or the initiation of construction as per 15A NCAC 18C .0300 et. seq. Plans and specifications should be submitted to 1634 Mail Service Center, Raleigh, North Carolina 27699-1634. All public water supply systems must comply with state and federal drinking water monitoring requirements. For more information, contact the Public Water Supply Section, (919) 707-9100.			30 days
<input checked="" type="checkbox"/>	If existing water lines will be relocated during the construction, plans for the water line relocation must be submitted to the Division of Water Resources/Public Water Supply Section at 1634 Mail Service Center, Raleigh, North Carolina 27699-1634. For more information, contact the Public Water Supply Section, (919) 707-9100.			30 days

Other comments (attach additional pages as necessary, being certain to cite comment authority)

Division	Initials	No comment	Comments	Date Review
DAQ	LDE	<input type="checkbox"/>	Requires an air quality permit - application already submitted	9/6/16
DWR-WQROS (Aquifer & Surface)	GSS	<input type="checkbox"/>	see above	9/8/16 / /
DWR-PWS	EAH	<input type="checkbox"/>	See above comments	9/8/16
DEMLR (LQ & SW)	MEG	<input type="checkbox"/>	See Above comment	9/2/16
DWM - UST	CLK	<input type="checkbox"/>	See Comment Above	9/13/16

**REGIONAL OFFICES**

Questions regarding these permits should be addressed to the Regional Office marked below.

☐ **Asheville Regional Office**2090 US Highway 70  
Swannanoa, NC 28778  
(828) 296-4500☐ **Mooreville Regional Office**610 East Center Avenue, Suite 301  
Mooreville, NC 28115  
(704) 663-1699☐ **Wilmington Regional Office**127 Cardinal Drive Extension  
Wilmington, NC 28405  
(910) 796-7215☐ **Fayetteville Regional Office**225 North Green Street, Suite 714  
Fayetteville, NC 28301-5043  
(910) 433-3300☐ **Raleigh Regional Office**3800 Barrett Drive, Suite 101  
Raleigh, NC 27609  
(919) 791-4200☒ **Winston-Salem Regional Office**450 West Hanes Mill Road, Suite 300  
Winston-Salem, NC 27105  
(336) 771-9800☐ **Washington Regional Office**943 Washington Square Mall  
Washington, NC 27889  
(252) 946-6481

*Mike*

NORTH CAROLINA STATE CLEARINGHOUSE  
DEPARTMENT OF ADMINISTRATION  
INTERGOVERNMENTAL REVIEW

*Wayne Davis*

COUNTY: ROCKINGHAM

H11: ENERGY RELATED  
FACILITIES/ACTIVITIES

STATE NUMBER: 17-E-4600-0110  
DATE RECEIVED: 08/30/2016  
AGENCY RESPONSE: 09/21/2016  
REVIEW CLOSED: 09/26/2016

MS CARRIE ATKINSON  
CLEARINGHOUSE COORDINATOR  
DEPT OF TRANSPORTATION  
STATEWIDE PLANNING - MSC #1554  
RALEIGH NC

**REVIEW DISTRIBUTION**

DEPT OF AGRICULTURE  
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DEPT OF NATURAL & CULTURAL RESOURCE  
DEPT OF TRANSPORTATION  
DNCR - DIV OF PARKS AND RECREATION  
DPS - DIV OF EMERGENCY MANAGEMENT  
PIEDMONT TRIAD REGIONAL COUNCIL

**PROJECT INFORMATION**

APPLICANT: North Carolina Department of Commerce  
TYPE: State Environmental Policy Act  
Environmental Review

DESC: Application of NTE Carolinas II, LLC for Certificate to construct a 500 MW  
Natural Gas-Fueled Merchant Power Plant in Rockingham Co. Docket # EMP-92, Sub 0.  
- View document at  
<http://starw1.ncuc.net/NCUC/portal/ncuc/page/Dockets/portal.aspx>, Type EMP-92 Sub  
0 in the Docket Number search line.

Located approximately 90 acre tract located at 4781 NC Highway 65 and bounded by  
NC Highway 65 to the east and New Lebanon Church Road to the west, Reidsville, NC

The attached project has been submitted to the N. C. State Clearinghouse for  
intergovernmental review. Please review and submit your response by the above  
indicated date to 1301 Mail Service Center, Raleigh NC 27699-1301.

If additional review time is needed, please contact this office at (919)807-2425.

AS A RESULT OF THIS REVIEW THE FOLLOWING IS SUBMITTED: ☒ NO COMMENT ☐ COMMENTS ATTACHED

SIGNED BY: \_\_\_\_\_

*Aluminy*

DATE: 9/12/16



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Sep 30 2016

**NORTH CAROLINA STATE CLEARINGHOUSE  
DEPARTMENT OF ADMINISTRATION  
INTERGOVERNMENTAL REVIEW**

**COUNTY:** ROCKINGHAM

**H11:** ENERGY RELATED  
FACILITIES/ACTIVITIES

**STATE NUMBER:** 17-E-4600-0119  
**DATE RECEIVED:** 08/30/2016  
**AGENCY RESPONSE:** 09/21/2016  
**REVIEW CLOSED:** 09/26/2016

MR JOSEPH HUDYNIA  
CLEARINGHOUSE COORDINATOR  
DEPT OF AGRICULTURE  
1001 MSC - AGRICULTURE BLDG  
RALEIGH NC

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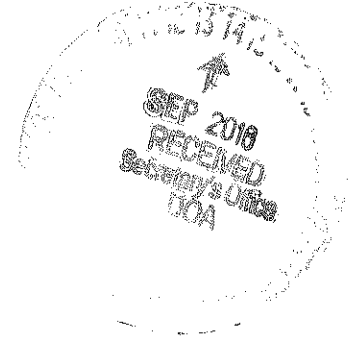
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SIGNED BY: \_\_\_\_\_

DATE: 9/12/2016



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Sep 30 2016



**NORTH CAROLINA STATE CLEARINGHOUSE  
DEPARTMENT OF ADMINISTRATION  
INTERGOVERNMENTAL REVIEW**

COUNTY: ROCKINGHAM

H11: ENERGY RELATED  
FACILITIES/ACTIVITIES

STATE NUMBER: 17-E-4600-0119  
DATE RECEIVED: 08/30/2016  
AGENCY RESPONSE: 09/21/2016  
REVIEW CLOSED: 09/26/2016

MR JUSTIN WILLIAMSON  
CLEARINGHOUSE COORDINATOR  
DNCR - DIV OF PARKS AND RECREATION  
1615 MAIL SERVICE CENTER  
RALEIGH NC

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SIGNED BY:

*Justin Williamson* DPC

DATE:

9-6-16

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Sep 30 2016

NORTH CAROLINA STATE CLEARINGHOUSE  
DEPARTMENT OF ADMINISTRATION  
INTERGOVERNMENTAL REVIEW

SEP 01 2016

COUNTY: ROCKINGHAM

H11: ENERGY RELATED  
FACILITIES/ACTIVITIES

STATE NUMBER: 17-E-4600-0110  
DATE RECEIVED: 08/30/2016  
AGENCY RESPONSE: 09/21/2016  
REVIEW CLOSED: 09/26/2016

MS PAULA CUTTS  
CLEARINGHOUSE COORDINATOR  
DPS - DIV OF EMERGENCY MANAGEMENT  
FLOODPLAIN MANAGEMENT PROGRAM  
4218 MAIL SERVICE CENTER  
RALEIGH NC

**REVIEW DISTRIBUTION**

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indicated date to 1301 Mail Service Center, Raleigh NC 27699-1301.

If additional review time is needed, please contact this office at (919)807-2425.

AS A RESULT OF THIS REVIEW THE FOLLOWING IS SUBMITTED: ☒ NO COMMENT ☐ COMMENTS ATTACHED

SIGNED BY:

*David Helwig*

DATE:

*9/1/16*

*Not in SFHA*



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Sep 30 2016