



Jeremiah W. (Jay) Nixon, Governor • Harry D. Bozoian, Director

## DEPARTMENT OF NATURAL RESOURCES

dnr.mo.gov

October 21, 2016

**CERTIFIED MAIL: 7011 2970 0002 6816 0088**

Dan Scannell  
President, Nevada Division  
Custom Drying Solutions, LLC  
3000 Industrial Parkway  
Nevada, MO 64772

RE: Abatement Order No. APO-2016-011

Dear Mr. Scannell:

On September 2, 2016, and October 19, 2016, the Missouri Department of Natural Resources' Southwest Regional Office conducted inspections of the NF Protein, LLC, facility located at 3000 Industrial Parkway, Nevada, MO. During the inspections, violations of Missouri Air Conservation Regulation 10 CSR 10-6.165, "*Restriction of Emission of Odors*" and 10 CSR 10-6.060, "*Construction Permits Required*" were noted. The Regional Office issued a Letter of Warning on September 28, 2016, to document the violations noted during the September 2, 2016, inspection.

Enclosed, please find Abatement Order No. APO-2016-011, outlining corrective actions the Department requires as a result of the violations documented during the two aforementioned inspections. In addition, please also find attached Notice of Violation No. SW16474, documenting the violations noted during the October 19, 2016, inspection.

If you have any questions regarding this letter or enclosed order, please contact Mr. Richard Swartz at the Department's Air Pollution Control Program, P.O. Box 176, Jefferson City, MO 65102-0176, or by telephone at (573) 751-4817. Thank you for your cooperation.

Sincerely,

DIVISION OF ENVIRONMENTAL QUALITY

Leanne Tippet Mosby  
Director

Enclosures

LTM:rsc

c: Nutra-Flo Company, Inc.  
Kay-Dee Feed, LLC  
NF Protein, LLC  
Tanya Turner, Southwest Regional Office  
File: 217-0051

**BEFORE THE MISSOURI DEPARTMENT OF NATURAL RESOURCES**

**In the Matter of:** )  
 )  
 **Nutra-Flo Company, Inc.** )  
 **Kay-Dee Feed, LLC** )  
 **NF Protein, LLC** )  
 **Custom Drying Solutions, LLC** ) **Order No. 2016-011**  
 **3000 Industrial Parkway** )  
 **Nevada, Missouri 64772** )  
 )  
 **Proceeding under the** )  
 **Missouri Air Conservation Law** )

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**ABATEMENT ORDER**

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SERVE BY CERTIFIED MAIL –7011 2970 0002 6816 0088; 7011 2970 0002 6816 0095; 7011 2970 0002 6815 7583; 7011 2970 0002 6815 7958; 7011 2970 0002 6815 7965  
RETURN RECEIPT REQUESTED

TO: Nutra-Flo Company, Inc.  
c/o National Registered Agents, Inc., Registered Agent  
400 E. Court Ave  
Des Moines, IA 50309

Kay-Dee Feed, LLC  
c/o Crary, Huff, Ringgenberg, Hartnett, & Storm, PC, Registered Agent  
614 Pierce St  
Sioux City, IA 51101

NF Protein, LLC  
c/o Business Filings International, Inc., Registered Agent  
120 South Central Avenue, Suite 400  
Clayton, MO 63105

Custom Drying Solutions, LLC  
Randi Scannell, Registered Agent  
388 W. 100 N.  
Valparaiso, IN 46385

AND: Dan Scannell  
President, Nevada Division  
Custom Drying Solutions, LLC  
3000 Industrial Parkway  
Nevada, MO 64772

You are hereby notified that on this date the Missouri Department of Natural Resources (“Department”) has issued this Abatement Order (“Order”) to Nutra-Flo Company, Inc., Kay-Dee Feed, LLC, NF Protein, LLC, and Custom Drying Solutions, LLC (“Respondents”) under the Missouri Air Conservation Law, Chapter 643 of the Revised Statutes of Missouri (“RSMo”), specifically sections 643.060 and 643.080 RSMo.

Failure to comply with this Order is, by itself, a violation of the Missouri Air Conservation Law under section 643.151 RSMo. Continued noncompliance may result in the Department pursuing legal action for injunctive relief, penalties of up to ten thousand dollars (\$10,000.00) per day for each day or part thereof of noncompliance, a surcharge of 15% of the penalty described herein, 10% interest on any amounts owed, attorney fees and costs, and/or any other remedy authorized by law, including but not limited to sections 643.080 and 643.085 RSMo.

### **FINDINGS OF FACT**

1. Nutra-Flo Company, Inc. is an Iowa corporation. The Department’s Air Pollution Control Program issued Construction Permit No. 112014-004 on November 10, 2014, to Nutra-Flo Company, Inc., to install an animal feed ingredient processing plant in Nevada, Missouri.
2. On February 5, 2015, the Department’s Air Pollution Control Program amended Construction Permit No. 112014-004 to account for the addition of a second baghouse. This permit amendment is identified as Construction Permit No. 112014-004A.
3. The Respondents have been issued additional permits by the Department, that are unrelated to the violations described herein. The Department’s Water Protection Program issued Missouri State Operating Permit to Nutra-Flo-Company, Inc., and Custom Drying Solutions,

LLC, an Indiana Corporation, on February 1, 2015. The Department's Air Pollution Control Program issued Construction Permit No. 012016-005 on January 11, 2016, to Kay-Dee Feed, LLC and NF Protein, LLC. Kay-Dee Feed, LLC is an Iowa corporation that serves as the parent company for NF Protein, LLC, registered with the Missouri Secretary of State as a foreign corporation whose home state is Iowa.

4. The Respondents own and operate the animal feed processing plant that is the subject of the above listed permits, located at 3000 Industrial Parkway, Nevada, Vernon County, Missouri 64772 ("Facility"). Dan Scannell is the President of the Nevada division of Custom Drying Solutions, LLC. The facility processes condensed porcine solubles (CPS), soy oil, and soy flour to produce dried porcine solubles (DPS). The CPS and soy flour is initially mixed in a 150 gallon agitated mix tank and then dried in three double drum dryers. The exhaust from the dryers is vented through a Verantis HRP cross-flow, packed scrubber, followed by a biofilter for odor control. The entire conveying system and every process downstream from the dryer is totally enclosed and vented to a baghouse.

5. On September 2, 2016, staff from the Department's Southwest Regional Office inspected Respondent's Facility in response to odor concerns the Department received. During the inspection, Department staff observed violations of the Missouri Air Conservation Law, including: failure to control odors below the required dilution-to-threshold ration of 7:1 and failure to comply with special conditions in Construction Permits No. 112014-004 and 112014-004A regarding Respondents' operations of the baghouse, scrubber, and biofilter equipment at the Facility, specifically Special Condition 2.B., which requires Respondents to operate the their equipment in accordance with the manufacturer's specifications.

6. On September 28, 2016, the Department issued a Letter of Warning to

Respondents that identified the odor and construction permit violations discovered during the September 2, 2016 inspection. The inspection report enclosed with the Letter of Warning identified required actions for the Respondents to take to address the violations. As of the date of this Order, respondents have not taken the required actions.

7. On October 19, 2016, staff from the Department's Southwest Regional Office inspected Respondents' Facility in response to odor concerns the Department received. During the inspection, Department staff observed a violation of the Missouri Air Conservation Law, specifically the failure to control odors below the required dilution-to-threshold ratio of 7:1. The city of Nevada recently ceased accepting the Facility's process water due to high ammonia levels. As a result, the facility was using an evaporator to evaporate their process water and venting emissions from this process through the scrubber and biofilter. Based on the Department's observations during the inspection on October 19<sup>th</sup>, the operation of the evaporator is likely contributing to or causing the recent increase in odors.

8. Additionally, on this date, the Department is issuing the attached Notice of Violation, NOV#SW16474, that identifies the violations discovered during the Department's October 19, 2016, inspection of Respondents' Facility. The inspection report enclosed with the Notice of Violation identifies required actions for the Respondents to take to address the violations.

9. As of the date of this Order, Respondents have not corrected or addressed the violations of the Missouri Air Conservation Law and its implementing regulations, or their applicable Air Pollution Control permits.

10. This Order is necessary to compel compliance and/or to prevent or eliminate threats to human health or the environment.

## STATEMENT OF VIOLATIONS

Respondents have violated the Missouri Air Conservation Law and its implementing regulations as follows:

11. Failure to control odors in violation of 10 CSR 10-6.165, "*Restriction of Emission of Odors*".
12. Failure to operate and maintain the scrubber in accordance with manufacturer specifications as required in Missouri Air Conservation Commission Construction Permit Nos. 112014-004, 112014-004A, and in violation of 10 CSR 10-6.060, "*Construction Permits Required*". Specifically, the plant was operating the scrubber at a flow rate of 10,000 to 12,000 cubic feet per minute while the scrubber is only designed to handle 9,000 cubic feet per minute.

## CORRECTIVE ACTIONS

Pursuant to section 643.080 RSMo, the Department hereby orders Respondents to complete each of the following corrective actions:

13. **Corrective Action 1 – Immediately cease odor emissions in excess of the 7:1 dilution-to-threshold ratio.**
14. **Corrective Action 2 - Immediately cease evaporation of the process water and emissions from evaporating process water.** The Respondents must handle process water in a manner that is consistent with the Missouri Clean Water Law.
15. **Corrective Action 3 – Immediately operate and maintain the scrubber in accordance with Missouri Air Conservation Commission Construction Permit Nos. 112014-004, 112014-004A and manufacturer’s specifications.**

16. **Corrective Action 4 - Submit a response to the September 28, 2016, Letter of Warning and the attached October 20, 2016, Notice of Violation.** The Respondents shall submit a written response to the Department's Letter of Warning and Notice of Violation by November 4, 2016. This response shall specifically include:

- a. An identification of the source of the odors leading to the violation.
- b. Actions that will be taken to reduce the odors at the facility and a timeline for those actions.
- c. A plan for future management of process water generated from operations at the facility.
- d. Actions the plant will take to prevent the overloading of the scrubber.
- e. Any additional information in the attached Notice of Violation requiring a response.

#### SUBMISSIONS

17. All documentation submitted to the Department for compliance with this Order shall be submitted within the timeframes specified to:

Richard Swartz  
Missouri Department of Natural Resources  
Air Pollution Control Program  
P.O. Box 176  
Jefferson City, Missouri 65102-0176

and:

Camille Graves  
Missouri Department of Natural Resources  
Southwest Regional Office  
2040 W. Woodland  
Springfield, MO 65807

## OTHER PROVISIONS

18. The Department expressly reserves the right to pursue additional remedies with respect to any violations described herein or otherwise discovered in response to the above mentioned violations.

19. Any request for an extension of time or to otherwise modify this Order may be considered on a case-by-case basis, if Respondents make a written request to the Department within 10 business days of this Order, and otherwise provides appropriate justification and/or documentation to the Department in a timely manner. Any modification of this Order shall be in writing.

20. For any plan or submittal from Respondents that is required by this Order and subject to Department approval under this Order, the Department may approve, disapprove, require revisions, or otherwise modify any such plan or submittal. Any such Department decision shall be conveyed in writing to Respondents. Disapproval may result in further orders or pursuit of other forms of relief by the Department. If the Department requires revisions, Respondents shall submit a revised version of the plan or submittal within 10 business days after receiving notice of the Department's required revisions, or within such other timeframe as the Department may specify. If the Department approves or modifies in writing such plan or submittal, it shall become enforceable under this Order, and Respondents shall commence work and implement such approved or modified plan in accordance with the schedule and provisions contained therein.

21. This Order shall apply to and be binding upon Respondents and any of their agents, subsidiaries, successors, assigns, affiliates, or lessees, including the officers, agents, servants, corporations and any persons acting under, through, or for Respondents. Any changes

in ownership or corporate status, including but not limited to any transfer of assets or real or personal property, shall not relieve Respondents of their obligation to comply with this Order.

**NOTICE OF APPEAL RIGHTS**

22. If you are adversely affected by this decision, you may be entitled to pursue an appeal before the Administrative Hearing Commission (“AHC”) pursuant to 10 CSR 10-1.030 and Sections 643.080, 643.085, 640.013, and 621.250, RSMo. To appeal, you must file a petition or notice of appeal with the AHC within thirty days after the date this decision was mailed or the date it was delivered, whichever date was earlier. If any such petition is sent by registered mail or certified mail, it will be deemed filed on the date it is mailed; if it is sent by any method other than registered mail or certified mail, it will be deemed filed on the date it is received by the AHC. Any appeal must be directed to:

Administrative Hearing Commission  
United States Post Office Building - Third Floor  
131 West High Street  
P.O. Box 1557  
Jefferson City, MO 65102  
Telephone: 573-751-2422  
Fax: 573-751-5018  
Website: [www.oa.mo.gov/ahc](http://www.oa.mo.gov/ahc)

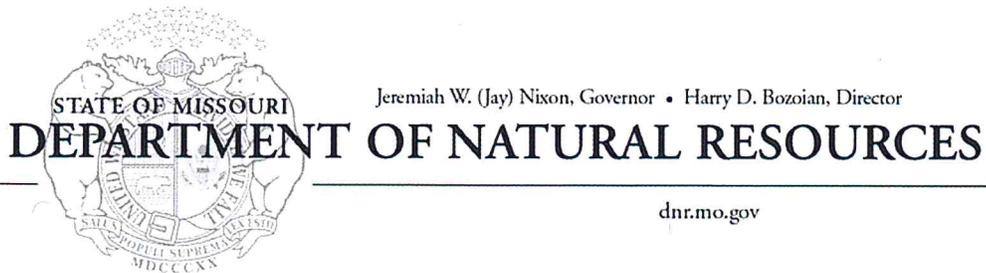
**SIGNATURE AUTHORITY**

SO ORDERED this 21<sup>st</sup> day of October 2016:

MISSOURI DEPARTMENT OF NATURAL RESOURCES

  
By: Leanne Tippet Mosby, Director  
Division of Environmental Quality

c: Camille Graves, Southwest Regional Office  
Tim Duggan, Missouri Attorney General's Office



Jeremiah W. (Jay) Nixon, Governor • Harry D. Bozoian, Director

# DEPARTMENT OF NATURAL RESOURCES

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October 20, 2016

CERTIFIED MAIL #  
RETURN RECEIPT REQUESTED

Mr. Dan Scannell  
NF Protein, LLC  
3000 Industrial Parkway  
Nevada, MO 64772

**REFERRAL NOTICE OF VIOLATION  
Air Pollution Program NOV#SW16474  
RESPONSE REQUIRED**

Dear Mr. Scannell:

An investigation was conducted by Missouri Department of Natural Resources (department) Southwest Regional Office staff pursuant to the Missouri Air Conservation Law, Chapter 643, RSMo and applicable regulations on October 19, 2016.

The enclosed report is being issued with a Referral Notice of Violation (RNOV) SW16474 for the violations identified.

This case has been referred to the department's Air Pollution Control Program for further action. If you have questions regarding the status of the enforcement case or would like to meet with department staff to discuss compliance requirements, please contact Ms. Heather Lehman by calling 573-751-4817, or vial mail at Missouri Department of Natural Resources, Air Pollution Control Program, P. O. Box 176, Jefferson City, Missouri 65102.

Sincerely,

SOUTHWEST REGIONAL OFFICE

Cynthia S. Davies  
Regional Director

CSD/cg21

c: Air Pollution Control Program, Enforcement

Enclosures

217.apcp.NFProteinLLC.0051.x.2016.10.20.fy17.rnov.sw16474x.ccg2.doc

**Missouri Department of Natural Resources  
Southwest Regional Office/Air Pollution Program  
Report of Investigation  
NF Protein, LLC  
Vernon County  
ID 217-0051**

**October 20, 2016**

**Introduction**

A compliance investigation of NF Protein, LLC located at 3000 Industrial Parkway, Nevada, Missouri was conducted by the Missouri Department of Natural Resources (department) Southwest Regional Office on October 19, 2016. The purpose of this investigation was to evaluate the facility's compliance with the Missouri Air Conservation Law, Chapter 643, RSMo and Regulations. Authority for this investigation is provided in the Missouri Air Conservation Law 643.050 RSMo.

The following participants were present for the investigation:

NF Protein, LLC

Dan Scannell, President Nevada Division, 219-242-5121, skanl@comcast.net  
Mark Eaton, Operations Manager, 417-448-5898

Missouri Department of Natural Resources  
Camille Graves Environmental Specialist III

**Facility Description and History**

The facility is a commercial facility which has been issued construction permits 112014-004, 112014-004A, and 012016-005. The facility is located in the Marmaton HUC 8 Watershed.

Our records indicate that the facility has had two air inspections since they began operation. This is the second time the facility has exceeded the 7:1 threshold for odor. The first exceedance occurred on September 2, 2016.

The UTM coordinates for this location are 37.866301, -94.343166

NF Protein, LLC is an animal feed ingredient processing plant, which relocated to Nevada, Missouri from Sioux City, Iowa. The facility processes condensed porcine solubles (CPS), soy oil, and soy flour to produce dried porcine solubles (DPS). The maximum production rate of the plant is 13,632 tons of DPS per year. The CPS and soy flour is initially mixed in a 150 gallon agitated mix tank and then dried in three double drum dryers. The dryers are operated using steam from two 8.4 MMBTU/hr natural gas-fired boilers. Dried product is then transferred through a conveying system to cooling, storage, and packaging. Soy oil is added to the conveying system prior to cooling. A maximum of 5% of the final product is recirculated back to the conveying system. The exhaust from the dryers is vented through a Verantis HRP cross-flow,

packed scrubber, followed by a biofilter for odor control. The entire conveying system and every process downstream from the dryer is totally enclosed and vented to a baghouse.

No operating permit is currently required for this installation.

Since February of 2015 city residents have submitted 34 odor concerns about NF Protein LLC (Nutra-Flo) to SWRO, 27 during the month of October. None of the investigations resulted in an odor violation until September 2, 2016. An inspection was conducted on this same date and found the facility was overloading their scrubber capacity. On October 13, 2016 the city provided SWRO's phone number to residents as a contact number for any further odor events. The department has received 26 calls since Thursday October 13, 2016 from concerned citizens and city staff.

Strong odors have been reported throughout the City of Nevada as a result of activities at the Nutra Flo plant. On September 2, 2016 an odor violation was documented. A Letter of Warning, dated September 28, 2016, was issued to the facility and they were verbally given until November 4, 2016 to respond.

### **Discussion of Inspection and Observations**

This investigation was precipitated by odor concerns the department received on the evening of October 18, 2016 through the morning of October 19, 2016. The investigation was conducted during normal business hours. Prior notification of the investigation was not provided.

Before arriving in Nevada, I checked the weather conditions to determine where I should place myself in order to be downwind from the facility. The wind was out of the northeast at about six mph, with some slight shifting, therefore the plume would be traveling across Industrial Parkway. I kept my windows up and the air intake to the vehicle shut off as I approached Nevada from the south on Interstate 49. I began breathing through the Nasal Ranger with the D/T Dial on Blank as I took Exit 103 off Interstate 49. As I neared the facility, I pulled to the side of the road and switched the D/T Dial to the 7 D/T position. As I drove past the intersection of Industrial Parkway and Militia I traveled approximately 40 feet, putting me immediately west of the facility, where I had my first detection. I put the Nasal Ranger down, backed the vehicle up until I could turn east on Milita, and drove approximately two miles on Militia where I parked on the side of the road to clear my nose and vehicle of odors. I did not observe any other sources of odor west of the facility as I was driving. I returned to the plant, taking a reverse route and received my second detection near the same location as the first. I backed up once again to Militia Road and went into the plant.

I notified Mr. Mark Eaton and Mr. Daniel Scannell of my findings. They stated they were running one drum dryer and the evaporator. They said that since the city of Nevada wouldn't accept their process water due to high ammonia levels, they had been using the evaporator and venting this through the scrubber and biofilter. We discussed the option of having this process

water be used on field crops as fertilizer. They were not familiar with any companies in the area that offer this service but were interested in getting more information about it. I showed them the Nasal Ranger and demonstrated how it was used and how I set up to take readings.

We then walked outside to the front of the building where I noticed the odor had significantly decreased. The odor that I had noticed off site and while walking into the facility, a sweet burnt smell, was no longer present. I questioned the facility if something had changed while I was inside, and I was told that they had shut off the evaporator. We discussed the possibility of this odor being the cause for the violation or possibly accumulated with existing odors. There were two large blowers on the front of the building that exhaust room air from the plant. There was some odor present in this exhaust, but it was faint, and was not the same odor that I had smelled previously on Industrial Parkway or on entrance to the facility. I returned at approximately 12:00 p.m. using the same steps as earlier that morning, and did not get a detection.

### **Sampling and Monitoring**

Instruments were taken on the investigation that were capable of measuring odor.

The Nasal Ranger is an instrument used for odor evaluation, and is capable of sampling odor at various dilution-to-threshold ratios. As outlined in 10 CSR 10-6.165 Restriction of Emission of Odors, when one volume of odorous air is diluted with seven volumes of odor-free air, it is considered one detection. Two separate trials not less than fifteen minutes apart within the period of one hour where odor is detected, results in an excess emission of odors. The results of the field measurements are as follows: Using the dilution-to-threshold ratio of 7:1, the first detection occurred at 10:00 a.m. The second detection occurred at 10:19 a.m., also at a dilution-to-threshold ratio of 7:1 with the Nasal Ranger. Both locations of the detections were taken along Industrial Parkway, immediately due west of the facility.

### **Compliance Determination**

Based upon observations made at the time of the inspection, the facility appears to not be in compliance

### **Referral Notice of Violation (RNOV)**

1. Failed to control odors: 10 CSR 10-6.165 Restriction of Emission of Odors. There was odor leaving the facility property that was strong enough to be detected at a dilution-to-threshold ratio of 7:1 at 8:53 a.m. and again at time 9:16a.m on September 2, 2016. At the time of the inspection, the Facility stated they were overloading their scrubber's design capacity. On October 19, 2016, there was odor leaving the facility property that was strong enough to be detected at a dilution-to-threshold ratio of 7:1 at 10:00 a.m. and again at 10:19 a.m.

**REQUIRED ACTION:** Identify the source of the odor and take necessary action to reduce odor at the facility. Cease running the process water through the evaporator, scrubber, and biofilter and submit a written plan on the management of the process water by **November 4, 2016** describing how you will prevent the overloading of your current scrubber. If your response to overloading the scrubber is to install the new larger capacity scrubber you had mentioned during the site visit on September 2, 2016, submit in writing a timeline by **November 4, 2016** for when your construction permit application will be submitted.

2. Failed to comply with “Special Conditions” of Construction Permit #112014-004A: 10CSR 10-6.060 paragraph (12)(A)10 Conditions Required by Permitting Authority. During the inspection conducted on September 2, 2016, a review of the records showed the facility did not fully comply with Special Conditions 2D, E, and F for the baghouse and did not appear fully aware of these requirements.

**REQUIRED ACTION:** The facility must maintain a copy of the manufacturer’s performance warranty on site and operate within the design conditions specified by the manufacturer for the bag house. All personnel operating the bag house should be aware of the operating pressure drop range for the unit as specified by the manufacturer. The facility must also include more information in their operating and maintenance log for the bag house to include the impact on emissions, duration of event, probable cause and corrective actions for incidents of malfunction. The facility must also document their inspection schedule and include repair actions and replacements. Submit in writing by **November 4, 2016** how the facility plans on documenting these conditions in relation to the operation of the bag house.

2. Failed to comply with “Special Conditions” of Construction Permit #112014-004: 10CSR 10-6.060 paragraph (12)(A)10 Conditions Required by Permitting Authority. During the inspection on September 2, 2016, the facility did not fully comply with Special Conditions 2B, C, D, F, and G for the scrubber and did not appear fully aware of these requirements.

**REQUIRED ACTION:** The facility must maintain a copy of the manufacturer’s performance warranty on site and operate within the design conditions specified by the manufacturer for the scrubber. All personnel operating the bag house should be aware of the operating pressure drop range for the unit as specified by the manufacturer. The facility is monitoring the discharge from the unit, and not the liquid flow rate into the scrubber. The facility must also include more information in their operating and maintenance log for the scrubber to include inspections and repairs, impact on emissions, duration of event, probable cause and corrective actions for incidents of malfunction. Submit in writing by **November 4, 2016** how the facility plans on documenting these conditions in relation to the operation of the scrubber.

3. Failed to comply with “Special Conditions” of Construction Permit #112014-004 10CSR 10-6.060 paragraph (12)(A)10 Conditions Required by Permitting Authority. During the inspection on September 2, 2016, review of records showed that the facility did not fully comply with Special Conditions 3 B, and C for the biofilter, and did not appear to be fully aware of these requirements.

**REQUIRED ACTION:** The facility must maintain a proper temperature and moisture content in the biofilter, as well as any other important operational parameters which impact the survival and growth of the microorganisms and the effectiveness of the filter. The facility must maintain an operating and maintenance log for the bio-filter to include incidents of malfunction, with impact on emissions, duration of event, probable cause, and corrective actions. The facility must also maintain records regarding maintenance activities, with inspection schedule, repair actions, and replacements, etc. for the biofilter. Mr. Eaton stated they were no longer monitoring the biofilter because it was going to be removed. All requirements of the permit conditions must be met until that device is removed. By **November 4, 2016**, the facility must submit in writing the action that they will be taking in regards to the biofilter, and how the facility will document the permit requirements for its operation until it is no longer in service.

All required documents should be submitted to Missouri Department of Natural Resources, Air Pollution Control Program, P. O. Box 176, Jefferson City, Missouri 65102.

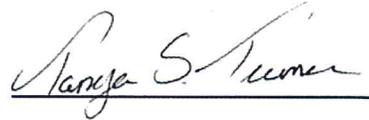
**Signatures**

SUBMITTED BY:



Camille Graves  
Environmental Specialist  
Southwest Regional Office

APPROVED BY:



Tanya Turner, Chief  
Air and Land Unit  
Southwest Regional Office