

Dear Jean,

Thank you for the email. Sorry for the delay in answering your questions, it was certainly not my intention to be dishonest, we were focused on getting through the SEPA process and hopeful that many of your questions would be answered in due course through the SEPA and other permitting processes. We remain committed to showing concerned citizens this is a project that is both good for the environment and the local community, including Agriculture.

A little background and industry information on Anaerobic Digestion (“AD”) might be helpful context in answering many of these questions. AD dates back to before the 1800’s. In the early 1800’s the presence of methane in the gases produced by cattle manure was proven. Today, there are over 20,000 medium and large-scale digesters operating around the world, most of them in the European Union. The EU, and specifically the UK, adopted aggressive climate change goals long before the U.S. and AD is one of their “go to” technologies for addressing both the organic waste streams from society, including agriculture, and climate change.

Also, while the U.S. has developed many “on-farm” digesters, the AD industry in Europe continues to move away from that model in favor of community digesters (such as the proposed Sunnyside RNG project) where feedstock is delivered to a central plant and co-digested; there are many benefits to this.

Consequently, most of the really good information on AD is found in Europe, as it’s just simply a bigger market today than the U.S. Here are some resources (both attached documents and website links below) that I think you and those copied on this email will appreciate and should answer a lot of your questions.

Sincerely,

Harrison Pettit
Pacific Ag/Pacific Ag Renewables.

1. [World Biogas Association | Making biogas happen](#) – Website Link
 - a. See attached “WBA global report”. The entire report is very informative, but particularly page 8 and 9 for AD benefits, the list is long. Also good is section 7; “Results and conclusions.”. This is one of the most concise reports we’ve come across and has cited research throughout, it’s not just an opinion piece.
 - b. Our feedstock, manure and crop residue, are featured on page 43 as two of the largest sources of potential energy. Quote, “Livestock manure and crop residues have the greatest energy generation potential, followed by energy crops...”
 - c. Also attached is their “WBA SDG Biogas Report” saying there are 20k medium and large-scale AD systems in the world. (page 4). It is also a good overview of AD.
2. [AgSTAR: Biogas Recovery in the Agriculture Sector | US EPA](#) – Website Link
 - a. See attached Agstar Handbook. This is from the EPA and USDA, released in 2020. Our engineering firm, Tetra-tech, which is a global engineering firm with 450 offices

and 20K+ employees, was one of the key authors of this document on their behalf. It is a compilation of the latest industry knowledge.

3. [Anaerobic Digestion | The Official Information Portal on Anaerobic Digestion \(biogas-info.co.uk\)](http://biogas-info.co.uk) – Website Link
 - a. A public private partnership in the UK to serve as a resource in AD.
 - b. They have a great FAQ page [FAQs | Anaerobic Digestion \(biogas-info.co.uk\)](http://biogas-info.co.uk) listing some of your questions below and answers, including questions about smell, digestate, benefits of AD, and even drawbacks.
 - c. They also have some great case studies.
4. [European Biogas Association](http://EuropeanBiogasAssociation.org) – Website Link
 - a. A great website with a lot of information, some is free, some for paid members only, but a good white paper source.
5. [ScienceDirect.com | Science, health and medical journals, full text articles and books.](http://ScienceDirect.com) – Website Link
 - a. This is an incredible treasure trove of information and scientific articles on AD, our team loves this website.

Hopefully this public information helps answer some of your questions, but in the meantime, below are some of our own answers in bold CAPS.

I suggest we set up a time to meet in person and go over these questions in greater detail where I can have some team members there to answer the more technical questions. The week of February 12th or 19th would work well for us.

Q&A:

Here are the answers to your questions:

1. Several people in the audience at Thursday night’s meeting asked about impacts from the RNG digestate when it is spread on the land. If I recall correctly, you replied that there is testing of the influent and the digestate. To be more specific:
APPLIED AT AGRONOMIC RATES THE DIGESTATE IS VERY BENEFICIAL TO SOIL CARBON HEALTH. COMPARED TO UNDIGESTED INPUTS, THE DIGESTATE IS HOMOGENOUS WITH REDUCED PATHOGEN LEVELS AND GREATER PLANT AVAILABLE NUTRIENTS. WE HAVE SOME INFORMATION WE CAN SHARE WITH YOU ON THIS WHEN WE MEET. MANY OF THE WEBSITE LINKS ABOVE ARE GREAT RESOURCES IN ANSWERING QUESTIONS ABOUT DIGESTATE.
2. Where will you test manure? On the farm or at the digester site?
AT THE DIGESTER SITE GIVEN THE SPECIALIZED EQUIPMENT. GENERALLY, AG PROCESSING FACILITIES TEST MATERIAL ON ARRIVAL.
3. Where will you test hay and crop residue? On the farm or at the digester site?
AT THE PLANT SITE, WHICH IS THE INDUSTRY STANDARD FOR DELIVERIES WE MAKE
4. How often will you test manure and crop residue?
 - **DAILY, UPON ARRIVAL**

5. Will you test for:
 - a. Pesticides? Which ones?
 - b. Pesticide coated seeds?
 - c. Veterinary pharmaceuticals? Which ones?
 - d. Bacteria? Coliform? Salmonella? Shigella? Campylobacter? Leptospira? Protozoa? Cryptosporidium? Giardia?
 - e. Antibiotic resistance?

FEEDSTOCKS WILL BE TESTED FOR PHYSICAL CHARACTERISTICS AT RECEIPT. FURTHER TESTING WILL BE DEFINED BASED ON OPERATIONAL PROTOCOLS AND CUSTOMER REQUIREMENTS. WASHINGTON DEPARTMENT OF AGRICULTURE WAS CONSULTED REGARDING SPECIFIC PATHOGENIC CONCERNS, NONE WERE IDENTIFIED. WE ARE NOT AN ENFORCEMENT AGENCY ON THE CONTENTS OF MANURE AND WON'T TAKE THAT ROLE, NOR IS IT APPROPRIATE FOR US TO. THAT IS BEST HANDLED UNDER EXISTING STATE AND FEDERAL AGENCIES

6. Will you provide guidelines for farmers telling them how to apply digestate in ways that minimize leaching to groundwater and emission of greenhouse gasses such as nitrous oxide?

AGAIN, THIS IS NOT OUR ROLE, WE ARE NOT AN ENFORCEMENT AGENCY, BUT WE WANT TO BE HELPFUL TO DAIRIES FOR THE PROPER APPLICATION OF DIGESTATE AND THE AD PROCESS SUPPORTS THAT. THIS IS WELL DOCUMENTED AND AVAILABLE IN SOME OF THE RESEARCH LINKS WE'VE PROVIDED ABOVE. WAC 173-350-250 DEFINES DIGESTATE DISPOSITION REQUIREMENTS. OVERALL, GREENHOUSE GASES ARE DRAMATICALLY REDUCED THROUGH THIS PROCESS AND THAT IS WELL DOCUMENTED AND RESEARCHED BY THE EPA, USDA, AND WORLD INDUSTRY RESOURCES PROVIDED ABOVE.

7. It is our understanding that digestion takes place because specific microbes are introduced into each tank and these microbes digest the manure and crop residue in steps. It is our understanding that the staff must keep a close eye on the tank contents to make sure conditions such as temperature, moisture, and pH are optimal for digestion, that workers make sure the desired microbes proliferate and other microbes do not. These questions relate to the digestion process.

THIS IS TRUE, MONITORING WILL TAKE PLACE 24 HOURS A DAY, 365 DAYS A YEAR. HOWEVER, THERE ARE NO MICROBES INTRODUCED. THE MICROBES ARE ONLY WHAT IS NATURALLY AVAILABLE IN MANURE AND STRAW.

- a. What is the volume of each tank?

THIS IS PROPRIETARY AT THE MOMENT, PREFER NOT TO SHARE BUT HAPPY TO TALK ABOUT THIS IN PERSON. THE BIOLOGICAL PROCESS IS NOT VOLUME CONSTRAINED.

- b. How long does it take to fill a tank?

THE FIRST TIME FILLING THE TANKS TAKES SOME TIME, DEPENDS ON INFLOW RATE, BUT AFTER THAT IT'S A CONTINUOUS FLOW IN, AND OUT, OF THE DIGESTERS.

- c. How long does it take to empty a malfunctioning tank?

THIS SHOULD TAKE LESS THAN A WEEK, IF NOT DAYS. THE BENEFIT OF HAVING MANY TANKS IS THAT IF THERE IS A TANK MALFUNCTION, WE DON'T HAVE TO TAKE THEM ALL OFFLINE, ONLY THE ONE THAT MALFUNCTIONED. WE'VE SPECIFICALLY DESIGNED

THE FACILITY TO ALLOW FOR EASY ACCESS TO EACH TANK AND SERVICE VEHICLES FOR THIS PURPOSE.

- d. How would you dispose of the tank contents in a situation where the wrong microbes are growing?

THE MICROBES ARE NATURALLY OCCURRING IN BOTH MANURE AND IN STRAW. NO SUPPLEMENTAL MICROBES ARE BEING INTRODUCED INTO THE TANKS. THIS PROCESS IS ESSENTIALLY THE SAME AS A COW STOMACH. THE CLEANOUT CONTENTS OF THE TANK WOULD BE HANDLED THE SAME AS THE DIGESTATE.

- e. What can go wrong?

WITH ANY OPERATION THERE ARE RISKS OF EQUIPMENT MALFUNCTION. HOWEVER, OUR TANK MANUFACTURER HAS THOUSANDS OF TANKS AROUND THE WORLD IN OPERATION, WE'VE SEEN DOZENS OF THEM IN PERSON THAT HAVE BEEN OPERATING FOR DECADES. IN ADDITION, WE TOOK THEIR STANDARD DESIGN AND ASKED FOR FURTHER REDUNDANCIES JUST TO BE SURE. THE HEALTH AND SAFETY OF OUR EMPLOYEES IS PARAMOUNT, IT COMES FIRST, AND WE WILL HAVE VERY DETAILED TRAINING AND SAFETY MANUALS FOR THE EMPLOYEES, FOLLOWING INDUSTRY BEST PRACTICES. MANY OF THE LINKED RESOURCES ABOVE, INCLUDING THE AMERICAN BIOGAS COUNCIL, PROVIDE TRAINING SEMINARS.

- f. Are there potential chemical and biological processes that might produce gases other than carbon dioxide and methane?

THE BIOGAS CAPTURED IS PRIMARILY METHANE, CARBON DIOXIDE, AND WATER VAPOR, WITH OTHER CONSTITUENTS (HYDROGEN SULFIDE) IN THE PPM RANGE OF LESS THAN 1%. HYDROGEN SULFIDE WILL BE TREATED THROUGH A BIOLOGICAL SCRUBBER AND ACTIVATED CARBON BEDS, AS DESCRIBED IN THE AIR PERMIT APPLICATION PUBLICLY AVAILABLE FOR REVIEW AS A SUPPLEMENT TO SEPA#2023-0200. THIS HAPPENS PRIOR TO THE BIOGENIC CARBON DIOXIDE BEING VENTED TO THE ATMOSPHERE. KEEP IN MIND, THESE GAS CONSTITUENTS ARE BEING PRODUCED AND EMITTED TODAY DIRECTLY INTO THE ATMOSPHERE, IT IS FAR SUPERIOR PROCESS TO CAPTURE THIS GAS USING WIDELY ACCEPTED INDUSTRY AD PROCESSES.

- g. Please name all the desired microbes that do the work inside the tanks

THERE ARE THOUSANDS OF ARTICLES ON THE INTERNET ABOUT MICROBE ACTIVITY, WE'D POINT YOU TO THE ONE ATTACHED (Microbiological insights into anaerobic digestion for biogas, hydrogen or volatile fatty acids (VFAs): a review)

- h. Please name all the undesired microbes that might interfere with digestion

GENERALLY, THE ONES THAT DON'T HELP DIGEST THE CARBON AND CREATE GAS.

- i. Is there a potential for increased pressure inside a tank due to production of undesired gasses?

NO. THESE ARE NOT HIGH-PRESSURE TANKS. THE TANKS HAVE A DOUBLE MEMBRANE COVER FOR REDUNDANCY AND SAFETY, WITH THE INTERNAL MEMBRANE FLOATING DEPENDING ON THE BIOGAS PRODUCTION RATE. BIOGAS COLLECTION PIPES, INCLUDE BLOWERS, ACTIVELY TRANSPORT THE BIOGAS FROM THE TANKS WITHOUT RELYING ON INTERNAL PRESSURE TO PUSH THE BIOGAS TO THE GAS UPGRADER. THERE ARE PRESSURE SENSORS, INDICATORS, AND ALARMS DESIGNED TO MONITOR EACH TANK. AGAIN, THESE ARE NOT HIGH-PRESSURE TANKS, BUT IN THE

EVENT OF OVERPRESSURE, SAFETY VALVES BUILT INTO THE TANKS ALLOW PRESSURE RELEASE. AS MENTIONED BEFORE, THERE ARE 1000'S OF TANKS IN THE INDUSTRY AND THESE SAFETY STANDARDS HAVE BEEN WELL DEVELOPED OVER THE LAST 20 YEARS.

- j. What are your emergency plans in case of a tank explosion?
WE WILL FOLLOW ALL THE FEDERAL, STATE, AND LOCAL LAWS REGARDING EMERGENCY PLANS AND THIS WILL BE WELL DOCUMENTED. THE TANK VOLUME WILL PRIMARILY BE FILLED WITH SLURRY WHICH IS NOT FLAMMABLE. METHANE IS FLAMMABLE AT CONCENTRATIONS BETWEEN 4 AND 15% IN AIR. THE BIOGAS OCCURRING IN THE HEAD SPACE OF THE DIGESTERS, AND THROUGHOUT THE FACILITY, WILL NOT BE IN THIS FLAMMABLE RANGE. REGARDLESS, WE WILL HAVE EMERGENCY PLANS AND HAPPY TO SHARE THOSE WITH YOU WHEN COMPLETE.
 - k. Do your emergency plans include a protocol for evacuating neighbors?
SEE ABOVE COMMENT
 - l. What is the maximum potential range of aerial distribution of materials from a tank in the event of an explosion?
THESE ARE NOT HIGH PRESSURE TANKS. SO, IN THE UNLIKELY EVENT OF OVERPRESSURIZATION AND RUPTURE, THIS WILL BE A VERY SHORT DISTANCE, BUT WE WILL CHECK WITH THE ENGINEERS AND REVERT.
 - m. Please describe protective measures for emergency management personnel assigned to combat fires and explosions at the digester.
AS DESCRIBED IN THE SEPA SELF CONTAINED BREATHING APPARATUS (SCBA) ARE REQUIRED PROTECTION FOR FIREFIGHTERS.
 - n. What is the expected life of a digester tank? Of pipes that transport methane, manure, and other digester components?
APPROXIMATELY 30 YEARS. THE TANKS AND GAS PIPING ARE STAINLESS STEEL. SOME COMPONENTS SUCH AS PUMPS, MIXERS, AND MEMBRANE COVERS HAVE SHORTER LIFESPANS AND PLANNED REPLACEMENT SCHEDULES BASED ON VENDOR SPECIFICATIONS.
 - o. Does the Sunnyside RNG digester include add-ons that capture and process excess ammonia, hydrogen sulfide, and phosphorous?
HYDROGEN SULFIDE WILL BE TREATED THROUGH A BIOLOGICAL SCRUBBER AND ACTIVATED CARBON BEDS, AS DESCRIBED IN THE AIR PERMIT APPLICATION, UNLESS THE ISSUED PERMIT SPECIFIES OTHERWISE. SEPA QUESTION #7 ASKS ABOUT FUTURE ADDITIONS AND OUR RESPONSE WAS: "There is designated space for future tank digesters, possible digestate filtration, CO2 capture, and other equipment. None are currently scheduled or planned." THEIR USE IS NOT NECESSARY FOR THE SAFETY AND OPERATION OF THE PLANT BUT CONSIDERED AS A FUTURE GROWTH OPPORTUNITY.
 - p. How will Sunnyside RNG manage ammonia and hydrogen sulfide that is produced by digestion?
BOTH WILL BE MANAGED IN COMPLIANCE WITH THE FACILITY'S AIR PERMIT.
8. What size and type of trucks will transport cellulosic materials and manure?

A TYPICAL TRACTOR TRAILER (LIKE A FREIGHTLINER) WITH A PROPRIETARY TANK DESIGN FOR SECURE LOADS. MANURE TANKERS RESEMBLE MILK TRUCKS AND WILL BE SEALED TO PREVENT ODOR AND MATERIAL RELEASES.

9. What is the anticipated weight of each incoming truckload?
THE TRUCKS WILL BE UNDER THE LEGAL LIMIT IN WA
10. Will the SS RNG ask for an overweight exemption? **NO, SINCE IT IS NOT REQUIRED TO ACCOMMODATE OUR VEHICLES.**
11. Will truck drivers possess Commercial Drivers Licenses (CDLs) or will the SS RNG use the agricultural exemption for drivers who transport agriculture goods? **CDL**
12. What air monitoring will be installed? Inside the facility? At the fence line?
THE AIR MONITORING WILL BE DICTATED BY THE AIR PERMIT AND STANDARDS USED IN THE INDUSTRY ON THOUSANDS OF DIGESTERS IN THE U.S. HAPPY TO SHARE THE ACTUAL DEVICE INFORMATION WHEN WE PICK A VENDOR.
13. Which air emissions will be monitored and where? Ammonia? Hydrogen sulfide? Methane? Carbon dioxide? Particulate matter? Other?
THE AIR MONITORING WILL BE DICTATED BY THE AIR PERMIT, WE ARE NOT ASKING FOR ANY VARIANCE TO EMISSION STANDARDS
14. What is the predicted composition of the tail gas that is vented to the atmosphere?
CARBON DIOXIDE AND WATER VAPOR. IT'S IMPORTANT TO REMEMBER, OVERALL EMISSIONS ARE REDUCED BY THIS RNG PLANT DUE TO THE CAPTURE OF MANURE BEFORE IT ENTERS A LAGOON AND THE PLANT ITSELF DOESN'T CREATE ANY ADDITIONAL EMISSION THAT AREN'T ALREADY PRESENT TODAY.
15. Will there be fenceline monitoring to provide early warning if leaks pose a danger to neighbors?
MONITORING WILL BE IN COMPLIANCE WITH THE ISSUED AIR PERMIT. IN ADDITION, THERE WILL BE MONITORS THROUGHOUT THE PROPERTY
16. What system will be in place to detect significant methane leaks within the plant at the earliest moments?
METHANE MONITORS WILL BE INSTALLED THROUGHOUT THE PROPERTY.
17. Why is there only one flare, as opposed to five flares in earlier plans? **IT HAS BEEN DEEMED SAFER**
18. What emergency management and firefighting protocols will be in place? Would you share the protocols?
ABSOLUTELY WE WILL SHARE THEM. THE TEAM WILL BE BUILDING THE SAFETY MANUALS SOON. AGAIN, THERE ARE 20K AD PLANTS IN THE WORLD, SO THERE IS REALLY GOOD EXISTING WORK AND BEST PRACTICES TO PULL FROM.
19. What equipment, training, alarms, will be used to address potentially dangerous levels of methane, hydrogen sulfide, and other air contaminants on the site?
INDUSTRY STANDARD EQUIPMENT, WITH REDUNDANCY. WE CAN GET YOU EXACT SPECIFICATIONS ONCE ENGINEERING HAS DECIDED.
20. How long will the digesters operate in the mesophilic range? How long will the digesters operate in the thermophilic range? This makes a difference in how many pathogens are destroyed by digestion. (Mesophilic digests at 86 to 115 degrees Fahrenheit. Thermophilic digests at 115 to 140 degrees Fahrenheit. Water boils at 212 degrees Fahrenheit.)

CONTINUOUS MESOPHILIC DIGESTION IS CURRENTLY PLANNED.

21. How will settled solids be removed from the digesters, and what is the planned process?
SOLIDS SETTLING HAS BEEN AN OPERATIONAL CONCERN OF OURS FROM THE BEGINNING, WE HAVE MAINTENANCE SCHEDULED TO TAKE INDIVIDUAL TANKS OFFLINE ON A ROUTINE BASIS AND CLEAN THEM OUT, MAINLY SAND. AGAIN, THIS IS STANDARD OPERATING PROCEDURE THE WORLD OVER – WE DON'T HAVE TO INVENT A PROCESS FOR THIS.
22. How much digestate will be stored on site at any given time?
STORAGE CAPACITY WILL NOT BE KNOWN UNTIL ALL CONSTRUCTIONS PERMITS ARE APPROVED. THERE WILL BE AT LEAST ONE STORAGE TANK, A SOLIDS STORAGE BUILDING, AND ADDITIONAL SEALED LAGOONS FOR LIQUID STORAGE. OUR DESIRE IS TO MAXIMIZE THE VOLUME OF STORAGE ON SITE FOR OPERATIONAL FLEXIBILITY.
23. How will the solid fraction of digestate be stored prior to transport?
A COVERED BUILDING IS INCLUDED IN THE CURRENT DESIGN AND INDICATED IN THE SEPA SITE PLAN AS "FIBER STORAGE".
24. How will liquid digestate be transported off site?
IN THE SAME SEALED SECURE TANKER TRAILERS THE MANURE ARRIVES IN.
25. Would Pacific Ag require any testing for soils that receive digestate? For emissions of nitrous oxide during digestate storage, during application to soils, and after application?
AS SAID BEFORE, WE ARE NOT AN ENFORCEMENT AGENCY, NOR DO WE THINK WE SHOULD TAKE THAT ROLE, BUT SUNNYSIDE RNG WILL SIGNIFICANTLY REDUCING OVERALL EMISSIONS.
26. Which rules, regulations and permitting apply to the proposed lagoon?
VARIOUS AGENCIES INCLUDING WASHINGTON DEPARTMENT OF ECOLOGY REGULATE THE LAGOONS WITH POTENTIAL DAM SAFETY REQUIREMENTS BASED ON VOLUMES.
27. Please describe the liner planned for the proposed lagoon
SYNTHETIC LINERS WITH LEAK DETECTION.
28. What are the anticipated emissions from the solid fraction of digestate and how will they be managed?
LESS THAN WHAT IS CURRENTLY BEING EMITTED UNDER CURRENT PRACTICE. SPECIFIC EMISSIONS VALUES ARE AVAILABLE IN RESEARCH LINKED ABOVE.
29. Will liquid and solid digestate transported away from the project be covered or open to air?
COVERED
30. How will dairies store digestate during winter months when they cannot apply it to fields as fertilizer?
WE EXPECT THAT TO BE STORED AT THE INDIVIDUAL DAIRIES AND OTHER LOCATIONS.
31. Are there any requirements in place that ensure digestate will be applied to fields at agronomic rates?
YES, THERE ARE EXISTING STATE REQUIREMENTS.
32. Would the facility have sufficient insurance to compensate the families of workers who might be injured or die in a fire or explosion on the facility? **ABSOLUTELY**
33. What protocols would be in place to ensure proper maintenance as the equipment ages?
WE WILL HAVE A FULL MAINTENANCE PLAN USING THE BEST PRACTICES IN THE INDUSTRY AND AS SPECIFIED BY EQUIPMENT VENDORS, ENGINEERS, AND INDUSTRY EXPERTS. WE

WILL BEGIN BUILDING THE DETAILS OF THAT PLAN SOON, AND COMPLETION IS EXPECTED DURING CONSTRUCTION.

34. How often would the proposed digester be checked for corrosion and weaknesses in the system? **EVERY DAY**

35. Will the proposed RNG facility digest the carcasses of unwanted farm animals?
NOT IN OUR CURRENT PLAN

36. We understand that there are five trains of digesters and that three will digest manure. What are your plans for the other two trains?

THERE WILL BE BOTH MANURE AND STRAW IN THREE OF THE TRAINS, TWO TRAINS WILL BE MANURE ONLY.

37. Who will monitor the facility to ensure that daily operations are conducted in a safe manner, and how will they do this, and how often?

SUNNYSIDE RNG EMPLOYEES WHO ARE ON SITE 24 HOURS A DAY (365) WILL MONITOR THE PLANT, INCLUDING A STATE OF THE ART CAMERA SYSTEM, AIR MONITORING DEVICES MENTIONED ABOVE, AND OTHER MONITORS (PRESSURE, FLOW, ETC). WE CAN GET YOU THE FULL LIST OF MONITORED LOCATIONS FROM THE ENGINEERS, BUT IT WILL BE HUNDREDS OF MONITORS IN TOTAL THROUGHOUT THE FACILITY.

38. Is there any reason why Pacific Ag is opposed to an Environmental Impact Statement?

THE SEPA DETERMINATION DOES NOT REQUIRE IT. AS STATED ABOVE, WHILE MAYBE NEW TO THIS AREA, THIS PLANT WILL BE JUST ONE OF 20,000 IN THE WORLD, AND 2000+ IN THE US. AD IS A NATURAL PROCESS, IT'S ACTUALLY JUST MOTHER NATURE DOING IN A SEALED ENVIRONMENT (TANK) WHAT IT DOES NATURALLY. IT IS A WELL DOCUMENTED FACT THAT AD REDUCES OVERALL EMISSIONS DRAMATICALLY, WHICH IS ONE MAIN REASON THERE ARE 20K OF THEM WORLDWIDE FOR COMBATING CLIMATE CHANGE THROUGH THE SAFE PROCESSING OF WASTE. MOREOVER, WE ARE WITHIN ALL OF THE AIR EMISSION STANDARDS AND IT'S A DIRECT PERMITTED USE.