



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 6
1201 ELM STREET, SUITE 500
DALLAS, TEXAS 75270

May 12, 2021

Mr. Parrish Miller
Vice President and Refinery Manager
HollyFrontier Navajo Refining LLC
501 East Main St.
Artesia, NM 88210

Sent via email: parrish.miller@hollyfrontier.com

RE: Clean Air Act Section 114 Information Request
HollyFrontier Navajo Refining LLC, Artesia Refinery

Dear Mr. Miller:

Enclosed is an Information Request ("Request") issued to HollyFrontier Navajo Refining LLC ("Navajo"). This Request is being made pursuant to the authority set forth in Section 114 of the Clean Air Act ("CAA"), 42 U.S.C. § 7414. The purpose of this Request is to obtain information regarding Navajo's Artesia Refinery in Artesia, New Mexico to determine compliance with applicable provisions of the CAA.

Please provide the information requested in Enclosure A, Section III within forty-five (45) days of receipt of this letter. You may direct any technical questions to James Haynes, at haynes.james@epa.gov or (214) 665-8546. If you have any legal questions, or need to request an extension, please contact Arati Tripathi, Assistant Regional Counsel, at tripathi.arati@epa.gov or (214) 665-7404. Thank you for your attention to this matter.

EPA acknowledges that the COVID-19 pandemic may be impacting Navajo's business. If that is the case, please contact us regarding any specific issues you need to discuss.

Sincerely,

A handwritten signature in black ink that reads "Cheryl T. Seager".

Digitally signed by CHERYL SEAGER
DN: c=US, o=U.S. Government,
ou=Environmental Protection Agency,
cn=CHERYL SEAGER,
0.9.2342.19200300.100.1.1=68001003651793
Date: 2021.05.12 09:26:50 -05'00'

Cheryl T. Seager, Director
Enforcement and
Compliance Assurance Division

Enclosures

HollyFrontier Navajo Refining LLC, Artesia Refinery
CAA 114 Information Request

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ENCLOSURE A

INFORMATION REQUEST

The U.S. Environmental Protection Agency (“EPA”), Region 6 is issuing this Information Request (“Request”) to HollyFrontier Navajo Refining LLC (“Navajo”) pursuant to Section 114(a) of the Clean Air Act (“CAA” or “the Act”), 42 U.S.C. § 7414(a), for the purpose of determining compliance with the CAA. Section 114(a) authorizes the Administrator of EPA to require the submission of information. The Administrator has delegated this authority to the Director of the Enforcement and Compliance Assurance Division, EPA Region 6. Therefore, Navajo is required to provide a response to this Request regarding the refinery, located in Artesia, New Mexico (the “Artesia Refinery”).

The information requested must be submitted whether or not you regard part or all of it a trade secret or confidential business information. You may, if you desire, assert a business confidentiality claim on all or part of the information submitted. Any information subsequently determined to constitute a trade secret will be protected under 18 U.S.C. § 1905. Unless you make a claim at the time that you submit the information, it may be made available to the public by EPA without further notice to you. You should read 40 C.F.R. Part 2 carefully before asserting a business confidentiality claim, since certain categories of information are not properly the subject of a claim. Emissions data is exempt from claims of confidentiality under Section 114 of the Act, and the emissions data that you provide may be made available to the public. Information subject to a business confidentiality claim is available to the public only to the extent allowed under 40 C.F.R. Part 2, Subpart B. Failure to assert a business confidentiality claim makes all submitted information available to the public without further notice. **Enclosure B** specifies the assertion and substantiation requirements for business confidentiality claims.

Information submitted in response to this Request must be certified as true, accurate, and complete by an individual with sufficient knowledge and authority to make such representations on behalf of Navajo. We request that a duly authorized officer or agent of Navajo certify your response to this Request by signing the enclosed Statement of Certification, provided in **Enclosure C**, and returning it with your response. A knowing submittal of false information in response to this Request may be actionable under 18 U.S.C. § 1001 and 42 U.S.C. § 7413(c). See also 18 U.S.C. §§ 1341 and 1519. Furthermore, failure to fully comply with this Request may subject Navajo to an enforcement action under Section 113 of the CAA, 42 U.S.C. § 7413. EPA may use any information submitted in response to this request in an administrative, civil, or criminal action.

At this time, EPA Region 6 is not accepting any hard-copy document deliveries. **Therefore, we ask Navajo to upload all required information to a One Drive folder that will be shared with the appropriate Navajo personnel.** Please contact James Haynes, at haynes.james@epa.gov or (214) 665-8546, to make arrangements to submit your response. We ask that Navajo upload the response for each question as it is available rather than aggregating all of the responses for the entire Section before performing the upload. Please email Mr. Haynes once all the responses have been uploaded to receive a confirmation of receipt from EPA.

Please be advised that some companies may qualify as a “small business” under the Small Business Regulatory Enforcement and Fairness Act (“SBREFA”). To help small business owners assess their small business status, the U.S. Small Business Administration (“SBA”) has established a Table of Small Business Size Standards, which can be found at:

http://www.sba.gov/sites/default/files/Size_Standards_Table.pdf. If Navajo qualifies as a small business, please review the SBREFA Information Sheet designed to provide information on compliance assistance to entities that may qualify as small businesses as well as to inform them of their right to comment to the SBREFA Ombudsman concerning EPA enforcement activities. The SBREFA Information Sheet can be found at:

<http://nepis.epa.gov/Exe/ZyPDF.cgi/P100BYAV.PDF?Dockey=P100BYAV.PDF>. Please be aware that SBREFA does not eliminate Navajo’s responsibility to respond in a timely fashion to any complaint or Request that EPA may issue or other enforcement action that EPA may take, nor does SBREFA create any new rights or defenses under the law other than the right to comment to the SBREFA Ombudsman. If you are unable to access the links provided or need a hard copy, please contact the Enforcement Officer listed above.

This Request is not subject to the Paperwork Reduction Act, 44 U.S. C. § 3501 *et seq.*, because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

SECTION I. GENERAL INSTRUCTIONS

1. If information or documents not known or not available to you as of the date of submission of a response to this Request should later become known or available to you, you must supplement your response to EPA. Moreover, should you find at any time after the submission of your response that any portion of the submitted information is false or misrepresents the truth, you must notify EPA of this fact as soon as possible and provide EPA with a corrected response.
2. For each document produced in response to this Request, indicate on the document, or in some other reasonable manner, the number of the question to which it corresponds.
3. Please provide a separate response to each question and subpart of a question set forth in this Request and precede each answer with the number of the question to which it corresponds. If a document is responsive to more than one question, this must be so indicated, and only one copy of the document need be provided. If you have no responsive information or documents pertaining to a particular question or subpart of a question, submit a statement certifying this, along with a detailed explanation for each such question.
4. For each question, identify each person responding to any question contained in this Request on your behalf, as well as each person consulted in the preparation of a response.
5. Please provide copies of documents in searchable electronic format (*e.g.*, pdf).

6. Data should be provided in searchable and editable electronic format (*e.g.*, spreadsheet).
7. When a response is provided in the form of a number, specify the units of measure of the number in a precise manner.
8. Paper documents should be electronically produced, *i.e.*, scanned and legible copies, organized by the number of the question to which it responds. "Paper documents" means (i) documents that exist only in paper form, or (ii) paper version of documents that also exist in electronic form, only in cases where the paper version contains additional information, such as annotations or signatures, that exist only on the paper copy.
9. Please submit confidential business information (CBI) and non-confidential information separately and identify as such. Please mark each page that is CBI as such. To make a CBI claim on electronic copy documents, mark each page that is claimed, by cover sheet, stamp, or other suitable form of notice with language such as "trade secret," "proprietary," or "company confidential." Allegedly confidential portions of otherwise non-confidential documents should be clearly identified and submitted separately to facilitate identification and handling by EPA. The assertion and substantiation requirements for CBI claims are discussed in **Enclosure B**.
10. Indicate the assigned facility-wide federal air program (*e.g.*, AFS) and state (*e.g.*, Agency Interest, Regulated Entity) identification numbers for the Artesia Refinery.
11. Please identify documents consulted, examined, or referred to in the preparation of the response or that contains information responsive to the question, and provide a true and correct copy of each such document if not already provided in response to another specific question. Please indicate the number of the question to which the document corresponds.
12. If information responsive to this Request was previously provided to EPA subsequent to a recent EPA CAA inspection, EPA does not require that such information be submitted again. In lieu of resubmitting such information, please indicate which information was already provided, the date that the information was submitted to EPA, and to whom it was provided. If previously submitted information does not fully and completely respond to a question, Navajo is obligated to provide additional information to fully and completely respond to that question. If Navajo has any questions regarding the responsiveness of previously submitted information, please contact Arati Tripathi at (214) 665-7404.
13. The enclosed Statement of Certification (**Enclosure C**) must be filled out and signed by a responsible corporate official and submitted along with your responses to this Request.

SECTION II. DEFINITIONS

All terms used in the Request will have their ordinary meaning unless such terms are defined in the CAA, other CAA implementing regulations, or otherwise defined herein:

1. The term “Artesia Refinery” refers to Navajo’s Artesia Refinery located at 501 E Main St., Artesia, New Mexico.
2. The terms “document,” “documents,” and “documentation” means any object that records, stores, or presents information, and includes writings, memoranda, records, or information of any kind, formal or informal, whether wholly or partially handwritten or typed, whether in computer format, memory, or storage device, or in hardcopy, including any form or format of these, in Navajo’s possession, custody, or control or to which Navajo has or has had access. If in computer format or memory, each such document shall be provided in translation to a form useable and readable by EPA, with all necessary documentation and support. All documents should also include all attachments to or enclosures for the document provided.
3. The term HollyFrontier Navajo Refining LLC (“Navajo”) includes any officer, director, agent, or employee of Navajo, including any merged, consolidated, or acquired predecessor or parent, subsidiary, division, or affiliate thereof.
4. The terms “person” or “persons” shall have the meaning set forth in Section 302(e) of the Act, 42 U.S.C. § 7602(e), and includes an individual, corporation, partnership, association, State, municipality, political subdivision of a State, and any agency, department, or instrumentality of the United States and any officer, agent or employee thereof.
5. The terms “you” or “yours” means all companies or corporations with which Navajo is affiliated, including its subsidiaries, division, affiliates, predecessors, successors, assigns, and its former and present officers, directors, agents, employees, representatives, attorneys, consultants, accountants and all other persons acting on its behalf.
6. Words in the masculine shall be construed in the feminine, and vice versa, and words in the singular shall be construed in the plural, and vice versa, where appropriate in the context of a particular question or questions.

SECTION III. CLEAN AIR ACT COMPLIANCE QUESTIONS

Using the Instructions and Definitions set forth in Sections I and II of Enclosure A, please provide responses to the following Questions about the Artesia Refinery.

1. If the New Mexico Environment Department (“NMED”) has taken enforcement action in response to information responsive to this Request, please provide the Notice of Violation and/or relevant enforcement documents.
2. For all tanks where EPA observed emissions using the FLIR infrared camera during the October 2019 inspection and December 2019 site visit (*i.e.*, T-11, T-12, T-108, T-109, T-124, T-401, T-411, T-415, T-417, T-431, T-432, T-433, T-434, T-1225), provide documentation of any investigations, inspections, sampling of product, analysis of

product, and/or maintenance conducted since EPA's September 15, 2020 Clean Air Act Section 114 Information Request.

3. For each tank at the Artesia Refinery that has been identified as potentially contributing to elevated fence-line benzene readings, provide documentation of any investigation, inspection, maintenance, and/or root cause failure analysis.
4. Navajo shall conduct testing to determine the vapor pressure of the material stored in the following tanks:
 - a. For tanks containing crude oil:
 - i. Navajo shall test the vapor pressure using an accredited laboratory following ASTM D6377: Standard Test Method for Determination of Vapor Pressure of Crude Oil VPCR_x (Expansion Method) for crude oil expected to exert a vapor pressure between 25 kPa and 159 kPa at a vapor-to-liquid ratio of 4:1. Each vapor pressure test shall be performed at 37.8 degrees Celsius (100 degrees Fahrenheit).
 - b. For tanks containing petroleum products such as gasoline, alkylate, reformate, isomerate, diesel, or naphtha:
 - i. Navajo shall test the vapor pressure using an accredited laboratory following ASTM D6378: Standard Test Method for Determination of Vapor Pressure (VPX) of Petroleum Products, Hydrocarbons, and Hydrocarbon-Oxygenate Mixtures (Triple Expansion Method) for material with boiling points above 0 degrees Celsius (32 degrees Fahrenheit) that exert a vapor pressure between 7 kPa and 150 kPa at a vapor-to-liquid ratio of 4:1. Each vapor pressure test shall be performed at 37.8 degrees Celsius (100 degrees Fahrenheit).
 - c. Navajo shall submit a report documenting the procedures and conditions for testing the vapor pressure, including dates and time of the testing, and tank level during testing. The report shall include all supporting data such as the most recent Reid Vapor Pressure (RVP) or other vapor pressure analysis conducted by the on-site laboratory, any calculations at the time of the testing, and any other measurements and required analysis.
5. For IFR tanks containing desalted water, or petroleum products such as gasoline, alkylate, reformate, isomerate, or naphtha, Navajo shall measure the Lower Explosive Limit (LEL) in the headspace between the IFR and fixed roof tank for each IFR tank, as outlined below in Subparagraph (a).
 - a. Navajo shall follow the procedures below when measuring the LEL in the headspace between the IFR and the fixed roof for each IFR tank:
 - i. The tests shall be conducted by lowering one end of weighted Teflon tubing (the sample inlet) while the opposite end is secured to an LEL meter with data logging capability. The sample inlet must reach within three (3) feet of the top of each IFR and shall be free of any kinks, crimps, or knots during the sampling protocol.

Navajo shall demonstrate that the LEL meter is capable of being successfully calibrated with the length of sample tubing to be used.

- ii. The LEL meter shall be calibrated with methane prior to use, and the date and time shall be set to local time. If the manufacturer of the LEL meter recommends a different calibration gas and/or method, the LEL meter shall be calibrated according to the manufacturer's recommendations.
 - iii. LEL measurements shall be conducted when the wind speed is less than five (5) miles per hour. The wind speed shall be recorded before and after LEL measurements.
 - iv. Data logging of the LEL measurements shall be in no greater than fifteen (15) second intervals and measurements shall be done for thirty-five (35) minutes.
 - v. During sampling, the IFR shall not be in motion and the product temperature shall be recorded.
 - vi. LEL measurements shall be adjusted using LEL correction factor(s) specific to the LEL meter, the calibration gas used, and based on the liquid being stored in the tank (*i.e.*, gasoline).
- b. Navajo shall provide EPA with at least ten (10) days' notice prior to commencement of the LEL testing. In such notice, Navajo shall provide the specific tanks to be tested, a summary description of the procedures to be used for LEL calibration, LEL measurement procedures, data collection and processing procedures, personnel involved, and LEL meter make and model to be used (including the specific correction factors used). If wind conditions are not suitable on the planned test date, Navajo shall confer with EPA, as soon as practicable, on a revised test date based on the weather forecast.
- c. Navajo shall submit a report documenting the procedures, conditions, and results of the LEL testing, including dates and time of the testing, tank fill level during testing, weather conditions during testing (such as wind speed and direction, ambient temperature, product temperature, and precipitation conditions), LEL meter calibrations used, LEL meter location during testing, all supporting data (including the original LEL data log in Microsoft Excel or Native electronic format and any applied correction factors used for the data, if applicable), and any other measurements and required analysis.
6. Navajo shall conduct an evaluation of the EFR and associated deck components for each EFR tank containing sour water and petroleum products such as crude oil, gasoline, alkylate, reformate, isomerate, or naphtha at the Artesia Refinery:
- a. Navajo shall measure and record VOC concentrations (ppm) for each roof fitting and component using EPA Method 21. For example, at vacuum breakers, Navajo shall

measure along the interface of the cover-well interface, at the leg-leg guide interface, and any other potential leak interfaces of the vacuum breaker.

- b. Navajo shall conduct a visual inspection of the secondary seal and measure secondary seal gaps following the procedures in 40 C.F.R. § 63.1063(d)(3)(i) of NESHAP Subpart WW (National Emission Standards for Storage Vessels - Control Level 2) and measure and record VOC concentrations (ppm) along the rim seals using EPA Method 21.
- c. Navajo shall conduct an evaluation of all gasketed components to inspect the condition of the gasket and document any deterioration of the gasket's condition.
- d. For any findings of gasket deterioration or Method 21 measurements above 500 ppm VOC, Navajo shall conduct an investigation/assessment into the operational condition and integrity of the roof fitting, component, rim seal, or gasket.
- e. VOC measurements shall be conducted when the wind speed is less than five (5) miles per hour.
- f. Navajo shall submit a report documenting the procedures, conditions, and results of the evaluations specified in Subparagraphs (a) through (c) above, including dates and start and stop times of each component evaluation, tank fill level during the evaluations, weather conditions during evaluations (wind speed and direction and ambient temperature). Navajo shall include photographs, FLIR video, drawings of monitored locations, documentation of adjustments or repairs, and any other measurements and required analysis.

ENCLOSURE B

CONFIDENTIAL BUSINESS INFORMATION (CBI)
CLAIM ASSERTION & SUBSTANTIATION REQUIREMENTS

Assertion - You may assert a business confidentiality claim covering all or part of the information requested in response to this Request, as provided in 40 C.F.R. § 2.203(b). You may assert a business confidentiality claim covering such information by placing on (or attaching to) the information you desire to assert a confidentiality claim, at the time it is submitted to EPA, a cover sheet, stamped, or typed legend (or other suitable form of notice) employing language such as “trade secret,” “proprietary,” or “company confidential.” Allegedly confidential portions of otherwise non-confidential documents should be clearly identified and submitted separately to facilitate identification and handling by EPA. If confidential treatment is desired up until a certain date or until the occurrence of a certain event, the notice should state this. Information covered by such a claim will be disclosed by EPA only to the extent, and by means of the procedures, set forth in Section 114(c) of the Clean Air Act (CAA) and 40 C.F.R. Part 2.

EPA will construe the failure to furnish a CBI claim with your response to this Request as a waiver of that claim, and the information may be made available to the public without further notice to you. You should read 40 C.F.R. Part 2 carefully before asserting a confidentiality claim, since certain categories of information are not properly the subject of a claim. Emission data is exempt from claims of confidentiality under Section 114 of the CAA. Any emissions data you provide may be made available to the public. Information subject to a confidentiality claim is available to the public only to the extent allowed under 40 C.F.R. Part 2, Subpart B.

Substantiation - All confidentiality claims are subject to EPA verification in accordance with 40 C.F.R. Part 2, Subpart B. The criteria for determining whether material claimed as confidential is entitled to such treatment are set forth at 40 C.F.R. §§ 2.208(a)-(d) and 2.301. These regulations provide that business information is entitled to confidential treatment if: (a) The business has asserted a business confidentiality claim which has not expired by its terms, nor has been waived nor withdrawn; (b) that the business has satisfactorily shown that it has taken reasonable measures to protect the confidentiality of the information and it intends to continue to take such measures; the information is not, and has not been, reasonably obtainable without the business’s consent by other persons (other than governmental bodies) by use of legitimate means (other than discovery based on a showing of special need in a judicial or quasi-judicial proceeding); (d) no statute specifically requires disclosure of the information; and either (e)(1) disclosure of the information is likely to cause substantial harm to your business’s competitive position¹; or (e)(2) the information is voluntarily submitted, and its disclosure would be likely to impair the Government’s ability to obtain necessary information in the future. See 40 C.F.R. §§ 2.208(a)-(e). Emissions data, as defined at 40 C.F.R. § 2.301(a)(2), is expressly not entitled to confidential treatment under 40 C.F.R. Part 2, Subpart B. See 40 C.F.R. § 2.301(e).

¹ You will not be required to show that disclosure of the information is likely to cause substantial harm to your competitive position, in light of the Supreme Court’s decision in *Food Marketing Institute v. Argus Leader Media*, No. 18-481 (U.S. Supreme Court, June 24, 2019). As a result of that decision, EPA will not consider whether there is substantial competitive harm in evaluating your CBI claim.

Pursuant to 40 C.F.R. Part 2, Subpart B, EPA may at any time send you a substantiation request letter (separate from this Request) asking you to substantiate your CBI claim. If you receive a substantiation request letter, you must provide EPA with a response within the time frame set forth in the letter. Failure to submit a response within that time would be regarded as a waiver of your claim, and EPA may release the information. If you receive a substantiation request letter, EPA will ask you to specify which portions of the information you consider CBI. You must be specific by page, paragraph, and sentence when identifying and substantiating the information subject to your claim. Any information not specifically identified as subject to a CBI claim may be disclosed without further notice to you. If you receive a substantiation request letter, for each item or class of information that you identify as being subject, you will be asked to answer the questions below, giving as much detail as possible, in accordance with 40 C.F.R. § 2.204(e):

1. What specific portions of the information do you allege to be entitled to confidential treatment? For what period of time do you request that the information be maintained as confidential, *e.g.*, until a certain date, until the occurrence of a specified event, or permanently? If the occurrence of an event will eliminate the need for confidentiality, please specify the event.
2. Information submitted to EPA becomes stale over time. Why should the information you claim as confidential be protected for the time period specified in your answer to Question #1?
3. What measures have you taken to protect the information claimed as confidential? Have you disclosed the information to anyone other than a governmental body or someone who is bound by agreement not to disclose it? If so, why should the information be considered confidential?
4. Is the information contained in any publicly available material such as the Internet, publicly available databases, promotional publications, annual reports, or articles? Is there any means by which a member of the public could obtain access to the information? Is the information of a kind that you would customarily not release to the public?
5. Has any governmental body made a determination as to the confidentiality of the information? If so, please attach a copy of the determination.
6. For each category of information claimed as confidential, explain with specificity whether release of the information is likely to cause substantial harm to your competitive position. Explain the specific nature of those harmful effects, why they should be viewed as substantial, and the causal relationship between disclosure and such harmful effects. How could your competitors make use of this information to your detriment?

You will not be required to respond to this question in light of the Supreme Court's decision in *Food Marketing Institute v. Argus Leader Media*, No. 18-481 (U.S. Supreme

Court, June 24, 2019). As a result of that decision, EPA will not consider whether there is substantial competitive harm in evaluating your CBI claim.²

7. Do you assert that the information is submitted on a voluntary or a mandatory basis? Please explain the reason for your assertion. If you assert that the information is voluntarily submitted information, explain whether and why disclosure of the information would tend to lessen the availability to EPA of similar information in the future.
8. Any other issue you deem relevant.

Please note emissions data provided under Section 114 of the Act, 42 U.S.C. § 7414, is not entitled to confidential treatment under 40 C.F.R. §§ 2.301(a)(2)(i)(A)-(C). “Emission data” means, with reference to any source of emission of any substance into the air:

(A) Information necessary to determine the identity, amount, frequency, concentration, or other characteristics (to the extent related to air quality) of any emission which has been emitted by the source (or of any pollutant resulting from any emission by source), or any combination of the foregoing;

(B) Information necessary to determine the identity, amount, frequency, concentration, or other characteristics (to the extent related to air quality) of the emissions which, under an applicable standard or limitation, the source was authorized to emit (including, to the extent necessary for such purposes, a description of the manner and rate of source operation); and

(C) A general description of location and nature of source to extent necessary to identify and distinguish from other sources (including, as necessary for such purposes, a description of the device, installation, or operation constituting the source).

If you receive a substantiation request letter from EPA, you bear the burden of substantiating your CBI claim. Conclusory allegations will be given little or no weight in the determination. Pursuant to 40 C.F.R. § 2.205(b)(2), you may request an extension of this deadline specified in a substantiation request letter, should you receive such a letter. EPA will construe your failure to furnish a timely response to a substantiation request letter as a waiver of your confidentiality claim, consistent with 40 C.F.R. § 2.204(e)(1), and EPA may release the information.

² For more information, please visit the Department of Justice’s guidance at: <https://www.justice.gov/oip/exemption-4-after-supreme-courts-ruling-food-marketing-institute-v-argus-leader-media>

ENCLOSURE C

STATEMENT OF CERTIFICATION

**Artesia Refinery
HollyFrontier Navajo Refining LLC
New Mexico**

You are responding to the U.S. Environmental Protection Agency's ("EPA") Information Request, issued pursuant to Section 114 of the Clean Air Act, to determine compliance with the Clean Air Act and its affiliated regulations.

Please sign the certification statement below.

I certify under penalty of law that am familiar with the information submitted in this document and all attachments and that, based on my inquiry of those individuals responsible for obtaining the information, I believe that the information is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine or imprisonment for knowing violations pursuant to Section 113(c)(2) of the Clean Air Act, and 18 U.S.C. §§ 1001 and 1341.

Signature

Printed Name

Title

Executed on _____