Attachment 6. Letter from City of Soperton regarding water supply.

June 16, 2020

Mr. Brad Hayes
EH&S Manager
LanzaTech Freedom Pines Biorefinery
535 Commerce Drive
Soperton, GA 30457

Dear Mr. Hayes,

We are pleased to learn of the plans to develop a new Alcohol to Jet facility at your Freedom Pines Biorefinery location. The City of Soperton supplies water to the Freedom Pines Biorefinery site from a city-owned well with the approximate capacity of 500,000 gallons per day. With this letter, I would like to confirm that the City of Soperton can supply up to 100,000 gallons per day in support of the planned facility, with the potential for additional supply upon request.

Sincerely,

Mitchell Brantley

Mitchell Brantley

City of Soperton POTW Superintendent

Attachment 7. Map of wetlands impacted by RFSP.

(Excerpted from 2009 RFSP SEA)

3.3 Water Quality

Clearing of the additional 7.0 acres of land would have minor additional impacts to water quality. As discussed in the October 2007 EA, impacts on water quality could result from construction activities that lead to soil disturbance and exposed soil, which can create the possibility of transport of sediment and soil-bound pollutants into streams. Transport could occur downslope or into immediately adjacent waters. Any potential water quality impacts would be temporary and limited to the areas downslope from construction footprints. Implementation and maintenance of BMPs as described in Section 2.1.3 of the original EA would minimize the potential for such impacts and prevent significant construction-related impacts. Turbidity monitoring at stormwater discharge locations would be performed as a condition of the NPDES construction general permit, obtained in 2007, to confirm that no significant adverse impacts to water quality would result.

Post-construction, the additional 7.0 acres of the site would have vegetation removed and be subject to increased runoff rates. Following construction, exposed surfaces would be re-vegetated and final site grading would direct runoff to a stormwater detention pond that would be located in the western portion of the feedstock area. These onsite post-construction stormwater controls would be sufficient to prevent any downstream impacts to water quality.

The encroachment into two wetlands totaling 0.61 acres resulted in a temporary minor impact to water quality from soil disturbance. These impacts ceased after the unauthorized work in wetlands was halted. During construction of the stormwater retention pond, 0.54 acres of one wetland were filled and the associated buffer eliminated. Because this pond prevents runoff into the wetland, the loss of buffer does not impact water quality. A line was cleared through 0.07 acres of another area of the wetland during site preparation. This buffer was replanted to native vegetation and no long-term impacts to water quality will result. Neither encroachment resulted in more than negligible temporary impacts to hydrology.

3.4 Wetlands

During site preparation activities, two wetland areas were impacted (Figure 3-1). Upon discovery of these unauthorized encroachments into wetlands, RF Soperton self-reported the infraction to the U.S. Army Corps of Engineers, Savannah Regulatory District and initiated after-the-fact permitting for the infractions. The Clean Water Act Section 404 Individual Permit was issued on December 2, 2008 and contains the following Special Conditions:

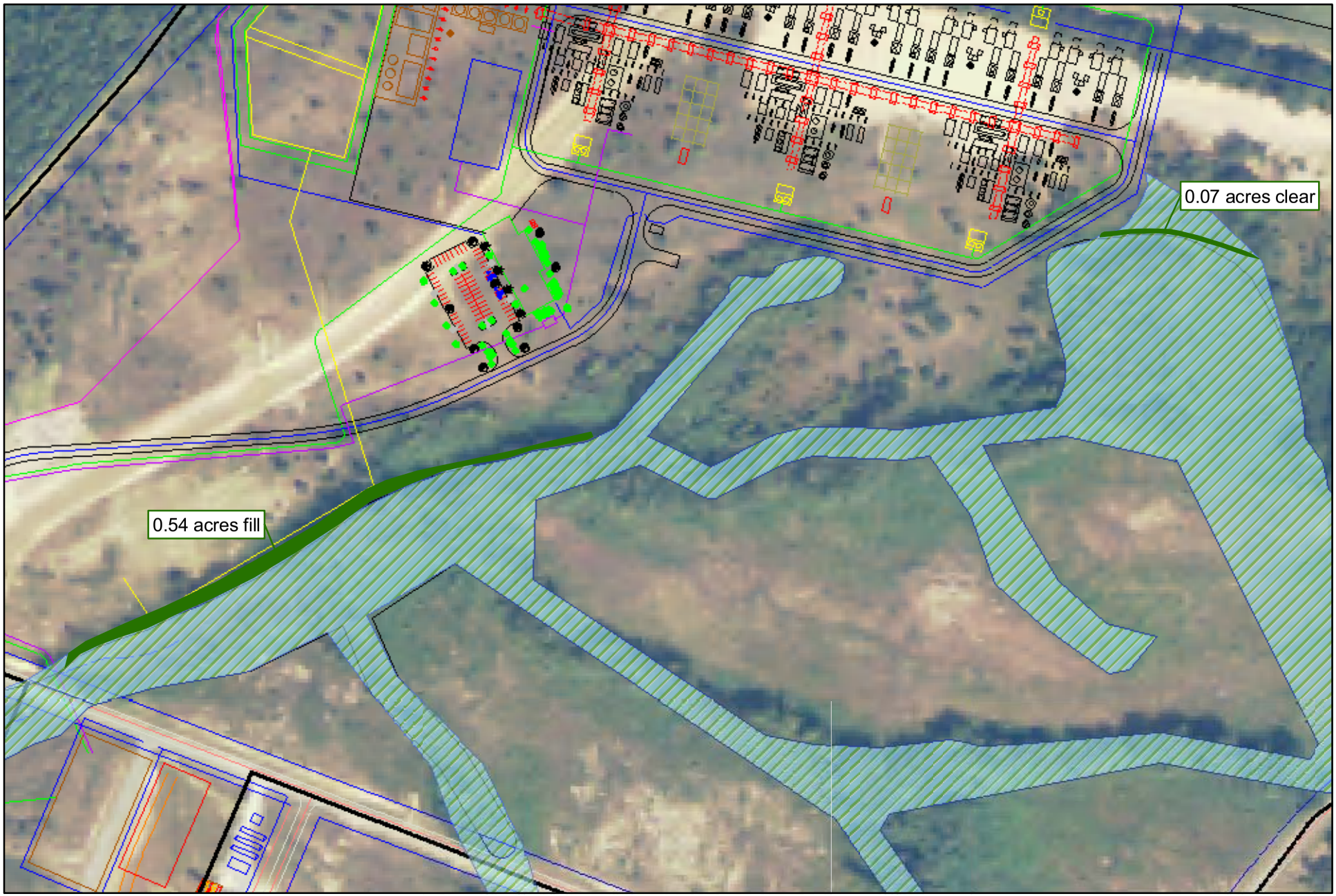
- All work will be performed in accordance with the terms of the permit that shall be maintained at the work site whenever work is being performed. The permittee shall assure that all contractors, subcontractors, and other personnel performing the permitted work are fully aware of the permit's terms and conditions.
- The permittee shall comply with all conditions included in the Section 401 Water Quality Certification issued by the Georgia Department of Natural Resources, for the subject project.

- The permittee shall obtain fill material from a borrow area that is free of contaminants and pollutants.
- All work conducted shall be located, outlined, designed, constructed, and operated with the minimal requirements as contained in the Georgia Erosion and Sedimentation Control Act of 1975, as amended. Utilization of pleas and specifications as contained in the "Manual for Erosion and Sediment Control, Latest Edition", published by the Georgia Soil and Water Conservation Commission or their equivalent will aid in achieving compliance with the aforementioned minimal requirements.
- The permittee shall use appropriate erosion and siltation controls and maintain them in effective operating condition during construction. All exposed soil and other fills shall be permanently stabilized at the earliest practicable date.
- The permittee shall insure that this project complies with all applicable rules, requirements, and/or regulations of the Federal Emergency Management Agency with regard to any activities in designated flood plains.
- The permittee shall purchase 10.39 mitigation credits from Wilkinson-Oconee Mitigation Bank and provide the USACE with proof of purchase.
- Exclusion fencing will be placed around the proposed construction area prior to construction. In the event that a gopher tortoise burrow may be impacted, the Gopher Tortoise Burrow Excavation and Translocation Protocol will be followed.
- In the event the eastern indigo snake is found, United States Fish and Wildlife Services would be notified and an informal consultation would be initiated to avoid impacts and to resolve any concerns.
- The informational pamphlets about the eastern indigo snake, included with permit, will be disseminated to workers prior to construction activities.

There has been a change from the Erosion, Sedimentation and Pollution Control Plan (ESPCP) as a result of the encroachment into two wetlands during site preparation. That encroachment failed to meet ESPSP requirement for a 25-foot undisturbed buffer zone around all wetlands, both during and after construction. This change is discussed in Section 3.3. One encroached wetland and its associated buffer has been restored. Appropriate mitigation, as determined by the USACE and the Georgia Standard Operating Procedures for wetland mitigation, has been implemented by RF Soperton through purchase of mitigation credits from a commercial mitigation bank (see Appendix A). With the implemented mitigation, the encroachments are considered to have no net impacts on the wetland.

3.5 Biological Resources

There would be no additional impacts to biological resources from operation of the modified facility. However, there would be additional impacts to biological resources



Impacted Wetland

Existing Wetland Boundary

N

0 200 400 600 Feet

Wetlands Incursions
Range Fuels Biofuels Facility
Soperton, Treutlen County, Georgia

File Path: \\boomer\G\projects2\RangeFuels\MXD\Wetland_Incursions.mxd, Date: May 30, 2008, User: SSmith21

Attachment 8. USFWS consultation.

WENCK

Responsive partner.
Exceptional outcomes.

June 10, 2019

United States Fish and Wildlife Services
Georgia Ecological Services
RG Stephens Jr. Federal Building
355 East Hancock Avenue, Room 320 Athens, GA 30601
gaes_assistance@fws.gov

Re: USDA Biorefinery, Renewable Chemical and Biobased Manufacturing Assistance Program, LanzaTech Freedom Pines Biorefinery Project: Request for Informal Consultation and Concurrence of Not Likely to Adversely Affect Finding

To Whom It May Concern:

USDA Rural Development – Energy Programs is in receipt of an application for financial assistance submitted by LanzaTech Freedom Pines Fuels LLC for the purpose of demonstrating the Company's technology to convert ethanol to renewable jet and diesel fuels. The proposed project site is located in an industrial park near the city of Soperton in Treutlen County, Georgia. Prior to LanzaTech's acquisition of the site, it was designed and developed to host a biorefinery larger than what is proposed for this project and was the subject of multiple environmental reviews that included analyzing potential impacts to threatened and endangered species. Consistent with National Environmental Policy Act implementing protocols, each of the environmental reviews yielded Findings of No Significant Impact. The project will be constructed on previously disturbed ground, will not have an impact on wetlands or streams and will include minimal, if any, tree clearing in order to upgrade an existing haul road from gravel to blacktop. Construction of this project is anticipated to start in the third quarter of 2019 and conclude in the first quarter of 2020.

Based on results from FWS's IPaC planning tool obtained in 2019, the following species and/or habitat may be present in the action area:

Species	Critical Habitat	Status	Notes	ESA Determination
Eastern Indigo Snake (*Drymarchon corais couperi)*	None	Threatened	Mitigation strategies detailed below.	May affect, not likely to adversely affect
Gopher Tortoise (*Gopherus polyphemus*)	None	Candidate	Mitigation strategies detailed below.	May affect, not likely to adversely affect

The determination noted above is based on a multifaceted approach to ensuring current and planned activities on the site do not adversely affect these species and the fact that these species have not been observed on the site. First, to avoid adverse impacts the site was originally designed with a facility layout to avoid direct impact to the identified uninhabited burrows. The nearest disturbed area associated with construction was approximately 200 feet from the nearest burrow. The LanzaTech project will be constructed on land that was disturbed during the original construction activity and prepared for future build out activities and, therefore, is not expected to have an impact. During construction of the project mitigation strategies included installation of exclusion fencing that extended below the ground surface to ensure gopher tortoise did not have access to the construction area, which was verified by routine inspections during construction. Empty burrows were also isolated with exclusion fences and collapsed to prevent reoccupation. Since its acquisition of the site, LanzaTech has not conducted activities on previously undisturbed land and has not observed gopher tortoises or active burrows on or near the developed area. In the event there are sightings, the Company has committed to having a USFWS-permitted subcontractor capture any tortoises in occupied burrows and relocate these tortoises to suitable nearby habitat.

With respect to the eastern indigo snake, during a meeting with the DNR and USFWS conducted prior to construction it was determined that the site is too far north for occurrence of the species, this consultation is noted in the final Environmental Assessment titled Construction and Operation of a Proposed Cellulosic Ethanol Plant as prepared by Range Fuels Inc. and submitted to the US Department of Energy in October of 2007. There have been no confirmed sightings of indigo snakes on the site. Should they be observed LanzaTech has committed to notifying USFWS and an information consultation would be initiated to avoid impacts and resolve any concerns. It is also worth noting that the site includes the preservation of approximately of 200 acres of natural greenspace. Based on the preservation of greenspace, incorporation of design features to avoid impacts and the absence of any instances of observing these species it is expected that any impacts from the LanzaTech project would be negligible, if any.

Based on the above analysis, we conclude that financial assistance for this project may affect, but is not likely to adversely affect any listed or proposed species or result in the adverse modification of any designated or proposed critical habitat. With this letter, we request your participation in information consultation per Section 7 of the Endangered Species Act and seek your concurrence with our finding. We respectfully request a response within 30 days. Please contact Patrick Ahlm with Wenck Associates with any questions or concerns at 952.567.0943 with any questions or concerns.

Sincerely,

Patrick D. Ahlm

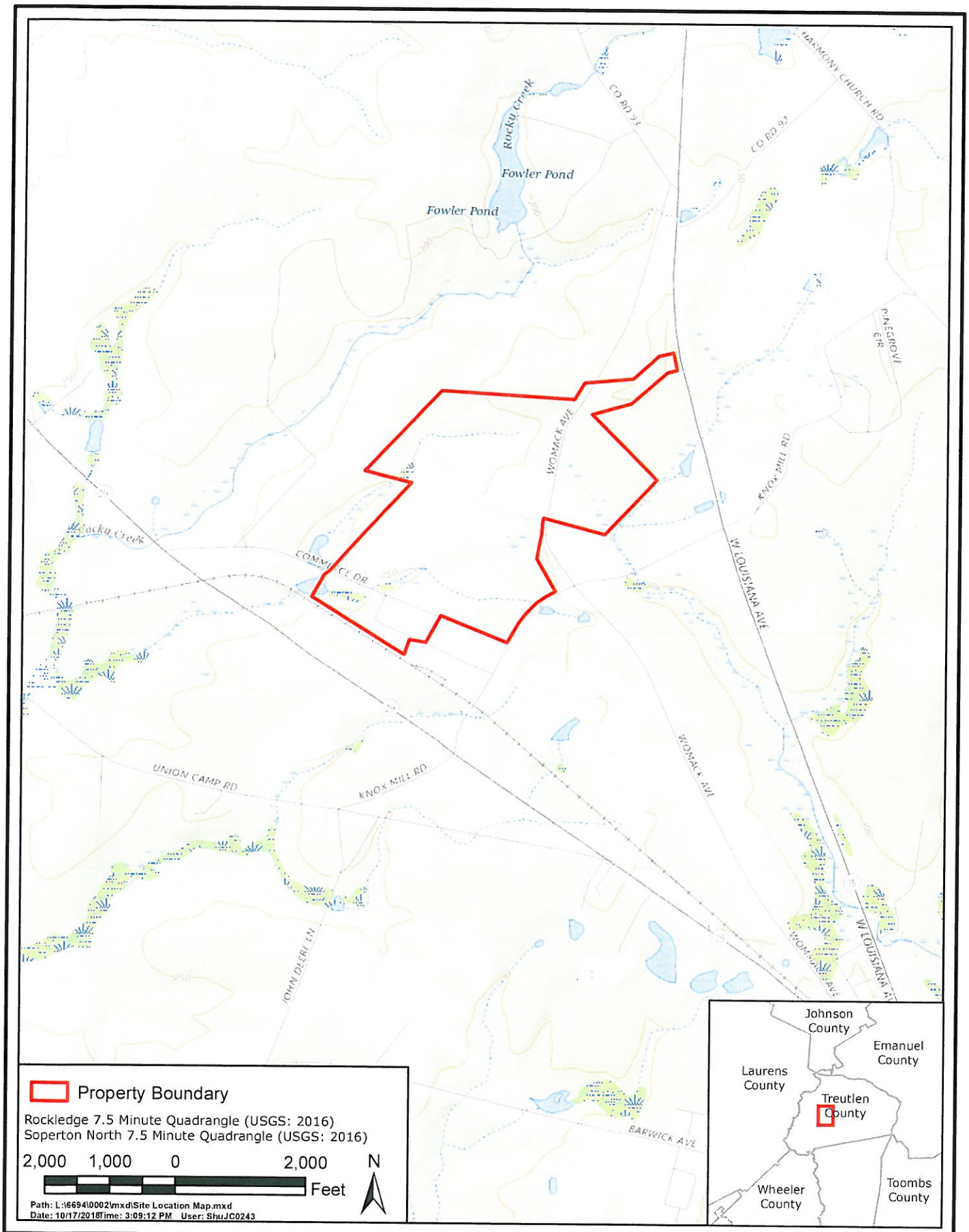
Patrick Ahlm

Attachments:

1. Project Site Map
2. USDA Designation of Nonfederal Representative Letter

Attachment 1: Site Map

(Remainder of page intentionally left blank.)



LANZATECH INC.	WENCK Responsive partner. Exceptional outcomes.	OCT 2018
Site Location Map		Figure 1

Attachment 2: USDA Designation Letter

(Remainder of page intentionally left blank.)

USDA

United States Department of Agriculture

Rural Development

Bette Brand
Administrator

Rural Business-Cooperative Service
1400 Independence Ave, SW
Room 5803-S
Washington, D.C. 20250

Telephone: (202) 690-4730

February 14, 2019

US Fish and Wildlife Service Ecological Field Office
Coastal Georgia Sub Office
4890 Wildlife Drive NE
Townsend, GA 31331

Re: USDA-RBS Improvement Project LanzaTech Freedom Pines Fuels: **Designation of Nonfederal Representative**

Dear USFWS,

USDA – Rural Business-Cooperative Service is in receipt of an application for financial assistance submitted by LanzaTech for the purpose of producing renewable jet fuel located in Soperton, Treutlen County, Georgia. This project may affect listed or proposed species and/or designated or proposed critical habitat. Species potentially present in the action area include the Eastern Indigo Snake and the Gopher Tortoise.

To facilitate Section 7 consultation, we are designating LanzaTech and/or their consultant as our nonfederal representative for the purpose of initiating informal consultation with your office. The role of the nonfederal representative includes conducting studies, attending meetings, participating in telephone and email contact, developing draft biological assessments, etc., in support of our eventual Endangered Species Act determination. The authority for making Endangered Species Act determinations remains with USDA-RBS.

The USDA-RBS contact for this project is Peggy Wade, who can be reached at peggy.wade@wdc.usda.gov or 202-875-3572.

Sincerely,

Peggy Wade
Senior Environmental Protection Specialist
USDA – Rural Development

cc: LanzaTech Fredom Pines Fuels LLC

Patrick Ahlm, Wenck

Re: [EXTERNAL] Consultation Request - LanzaTech Inc. Project in Soperton, GA

gail_martinez@fws.gov
on behalf of
GAES Assistance, FW4 <gaes_assistance@fws.gov>
Tue 7/9/2019 12:05 PM

To: Patrick D. Ahlm <pahlm@wenck.com>

Mr. Ahlm,

I was able to find the previous consultation for this project. You stated in your letter that the proposed project is on existing disturbed land. Based on the information provided, the proposed action is not expected to significantly impact fish and wildlife resources under the jurisdiction of the U.S. Fish & Wildlife Service.

Please feel free to contact me with any questions or concerns.
Thank you,
Gail Martinez

Georgia Ecological Services
US Fish and Wildlife Service
RG Stephens, Jr. Federal Building
355 East Hancock Avenue, Room 320, Box 7
Athens, GA 30601

On Thu, Jun 20, 2019 at 2:44 PM Patrick D. Ahlm <pahlm@wenck.com> wrote:

> Good Afternoon:
>
> In hopes of expediting the Division's response to the extent possible I wanted to email the attached letter regarding a project in Soperton, GA being pursued by LanzaTech Inc. to demonstrate their renewable fuel technology on a previously developed and reviewed site.
>
> Please let me know if you have any questions.

Best Regards,

pat

Patrick D. Ahlm

Sustainability Affairs & Renewable Energy Consultant

pahlm@wenck.com | C 952.567.0943

1802 Wooddale Drive | Woodbury, MN 55125

Freedom Pines Fuels

Gopher Tortoise Relocation Protocol

If a gopher tortoise is found on the construction site within the disturbed area silt fence or anywhere else on the construction site:

- Protect the tortoise from ongoing construction activity.
- Place the tortoise, with gloves on, carefully into a bucket or box for transport.
- Take tortoise to relocation area. If possible, try to determine the area the tortoise likely came from and return to that area.
- Place tortoise anywhere within designated relocation area, again with gloves on. If it cannot be determined which burrow the tortoise belongs in (tortoise burrows match the size of the tortoise) attempt to find an unused burrow and place the tortoise in that burrow so that it will be afforded protection from weather and predators.
- Monitor the tortoise. It probably will not stay in the burrow in which it was placed if it is just a substitute burrow and will attempt to return to its own burrow.
- Try to determine where the tortoise got through the silt fence barrier and repair any breaches.

Attachment 9. Anticipated noise impacts from RFSP.

(Excerpted from 2007 RFSP EA)

Plans to locate a station to provide EMS and fire services to the Industrial Park and the surrounding community will allow that facilities north of the railroad tracks in the Industrial Park will not be limited by the possibility of a passing train delaying the arrival time of emergency responders.

3.9 Noise

3.9.1 Existing Environment

Noise, in the context of this analysis, refers to sounds generated by activities that could affect employees of the facility, employees of nearby commercial operations, residents near the proposed facility, or wildlife. Noise levels typically are expressed in terms of decibels (dB), a measure of the sound pressure generated. The decibel scale is logarithmic rather than linear because humans perceive sound as the logarithm of the sound pressure rather than the actual sound pressure (USEPA, 1974; Danish Wind Industry Association, 2004).

For determination of impacts to human receptors, noise measurements are weighted to increase the contribution of noises within the normal range of human hearing and decrease the contribution of noises outside the normal range of human hearing. For humans, this is considered an A-weighted scale (dB_a). When sound pressure doubles, the dB_a level increases by three. Psychologically, most humans perceive a doubling of sound as an increase of 10 dB_a (USEPA, 1974; Danish Wind Industry Association, 2004). Sound pressure decreases with distance from the source. Typically, the amount of sound energy is halved as the distance from the source doubles (USEPA, 1974; Danish Wind Industry Association, 2004).

Additionally, people tend to exhibit differing sensitivity to noises generated by time of day, with noise at night being more disturbing than daytime noise. Therefore, a Day-Night Average Noise Level (LDN) is used to determine whether noise would be perceived as an adverse impact. USEPA developed an index as a standard descriptor for noise impacts from a variety of sources. Where LDN values exceed 65 dB_a, residential development is not recommended (USEPA, 1974).

Noise levels within the Treutlen County Industrial Park are variable, depending on truck and train traffic in the area. While no specific data have been compiled for the Treutlen County Industrial Park, background noise levels in these areas would be expected to range from 40 dB_a to 75 dB_a, with occasional upward spikes related to rail and road traffic. A rural home typically has an interior noise level of approximately 40 dB_a when quiet and between 55 dB_a and 60 dB_a when watching television (The Engineering Toolbox, 2007; USEPA, 1974).

3.9.2 Consequences of Proposed Action

Heavy equipment such as bulldozers, graders, backhoes, excavators, dump trucks, and cement trucks would generate noise that could affect the onsite workers. Construction equipment typically emits noise in the 86- to 94-dB range. Construction workers would use hearing protection and would follow OSHA standards and procedures.

Construction sites are located within 1,500 feet of existing buildings, with the closest residence approximately 1,500 feet from the proposed facility. Construction would occur during daylight hours, up to six days a week. Nearby employees and residents could notice

construction-related noise, which would be above background levels but confined to daytime hours. Direct exposure would be temporary, limited to times when personnel were traveling between vehicles and buildings or among buildings. Temporary and minor construction-related noise impacts would occur between fall 2007 and winter 2009.

The chipper that Range Fuels has planned for the facility would be partially enclosed and would be surrounded by a permanent buffer of approximately 91.9 acres of trees to the west, north, and east to reduce the potential noise impacts to the surrounding area. Facility operation would occur around the clock and noise from operations would be fairly continuous with the exception of chipping equipment. Chipping operations would run for 16-18 hours daily and not operate overnight.

Noise levels from facility operation including the wood chipping would be approximately 56 dB_a at 1,500 feet from the chipping operations, absent the buffer of trees (Table 3-3). The nearest off-site receptor is 1,500 feet from the facility and separated by the tree buffer. Pine forest typically reduces noise levels by 5 dB_a per 100 feet, with the reduction diminishing with distance (Aylor, 1972). While the buffer would not be as effective as solid forest, due to the presence of roads which would allow some sound to travel unimpeded, it would cause some reduction in the noise reaching the nearest residence. For analysis purposes, a 5 dB_a reduction (equal to 100 feet of pine forest) is assumed, resulting in outdoor noise levels of 51 dB_a reaching the nearest residence.

TABLE 3-3
Typical Equivalent Sound Levels (dB_a) from Wood Chipping Facilities
Range Fuels EA

Distance (feet)	Sound levels (dB_a) from Partially Enclosed Chipper [a]
200	74
300	70
400	68
500	66
600	64
800	62
1,000	60
1,200	58
1,500	56
2,000	54
2,500	52
3,000	50

[a] Noise levels are uninterrupted direct line of sight with no intervening structures or vegetation
Source: Resource Systems Engineering, 2007

Outdoor conversation typically experiences mild annoyance when noise levels are above 55 dB_a and significant interference with outdoor conversations at 62 dB_a (USEPA, 1974). Because of the intervening tree buffer, outdoor noise levels at the nearest residence would be below the mild annoyance threshold and no adverse impacts to outdoor activity would be expected.

Typical homes have an effective noise attenuation rating of 15 dB_a, making indoor noise less than the corresponding outdoor noise levels (USEPA, 1974). Allowing for the attenuation of noise from the structure of the house, indoor noise levels at the nearest residence would be 36 dB_a. This is within the typical noise level for such a structure during quiet time and well below the indoor noise level when watching television. No adverse impacts to indoor activities would be expected from operation of the facility.

There is one residence along SR 15 that would be passed by trucks delivering feedstock to Range Fuels. This residence would experience 508 truck passes between 6:00 AM and 10:00 PM Monday through Friday and approximately half that on Saturday, between 9:00 AM and 5:00 PM. This equates to one truck every 1.9 minutes during these periods. Typical noise levels for trucks at highway speed (approximately 55 mph) is approximately 90 dB_a. Trucks passing the residence on SR 15 would be traveling at low speed, having just come off I-16 or just starting toward I-16 after turning onto SR 15, so slightly lower noise levels would be typical, but would still be sufficient to interfere with outdoor conversations at the residence and cause annoyance within the house.

Sleep arousal typically occurs from episodic noise that exceeds background sound levels by 15 dB_a (USEPA, 1974). Because the chipper would not be operating overnight and no truck deliveries would occur overnight, the noise level during normal sleep hours would not cause sleep arousal.

3.10 Meteorology

3.10.1 Existing Environment

Treutlen County is characterized by a warm and humid, temperate climate. Average annual temperature ranges from lows of about 53°F to highs of approximately 78°F. Winter months (December through February) are the coolest with average monthly low temperatures ranging from 37° to 39°F and high temperatures range from 63° to 64°F. The warmest months are the summer months of June through August. During those months average monthly low temperatures range from 66° to 70°F and high temperatures range from 91° to 93°F. Average annual precipitation is approximately 46 inches. September and October are the driest months with average rainfall of 2.3 inches. July and August are the wettest months with an average of 4.8 and 5.4 inches respectively (Southeast Regional Climate Center, 2007).

Treutlen County has a low incidence of tornadoes, which is 3.1 times lower than the national average (City-Data.com, 2007). Only one damaging tornado has occurred since 1950. Maximum wind speeds in Treutlen County are between 90 and 100 miles per hour (ALA, 2005a; 2005b). Georgia has not experienced a major hurricane (Category 2 or greater) since before 1900 (geocities.com, 2007). Because Treutlen County is 90 miles west of the Georgia coast, it is unlikely to experience a direct hit from a hurricane because South Atlantic

Attachment 10. Treutlen County meteorological conditions.

(Excerpted from 2007 RFSP EA)

Outdoor conversation typically experiences mild annoyance when noise levels are above 55 dB_a and significant interference with outdoor conversations at 62 dB_a (USEPA, 1974). Because of the intervening tree buffer, outdoor noise levels at the nearest residence would be below the mild annoyance threshold and no adverse impacts to outdoor activity would be expected.

Typical homes have an effective noise attenuation rating of 15 dB_a, making indoor noise less than the corresponding outdoor noise levels (USEPA, 1974). Allowing for the attenuation of noise from the structure of the house, indoor noise levels at the nearest residence would be 36 dB_a. This is within the typical noise level for such a structure during quiet time and well below the indoor noise level when watching television. No adverse impacts to indoor activities would be expected from operation of the facility.

There is one residence along SR 15 that would be passed by trucks delivering feedstock to Range Fuels. This residence would experience 508 truck passes between 6:00 AM and 10:00 PM Monday through Friday and approximately half that on Saturday, between 9:00 AM and 5:00 PM. This equates to one truck every 1.9 minutes during these periods. Typical noise levels for trucks at highway speed (approximately 55 mph) is approximately 90 dB_a. Trucks passing the residence on SR 15 would be traveling at low speed, having just come off I-16 or just starting toward I-16 after turning onto SR 15, so slightly lower noise levels would be typical, but would still be sufficient to interfere with outdoor conversations at the residence and cause annoyance within the house.

Sleep arousal typically occurs from episodic noise that exceeds background sound levels by 15 dB_a (USEPA, 1974). Because the chipper would not be operating overnight and no truck deliveries would occur overnight, the noise level during normal sleep hours would not cause sleep arousal.

3.10 Meteorology

3.10.1 Existing Environment

Treutlen County is characterized by a warm and humid, temperate climate. Average annual temperature ranges from lows of about 53°F to highs of approximately 78°F. Winter months (December through February) are the coolest with average monthly low temperatures ranging from 37° to 39°F and high temperatures range from 63° to 64°F. The warmest months are the summer months of June through August. During those months average monthly low temperatures range from 66° to 70°F and high temperatures range from 91° to 93°F. Average annual precipitation is approximately 46 inches. September and October are the driest months with average rainfall of 2.3 inches. July and August are the wettest months with an average of 4.8 and 5.4 inches respectively (Southeast Regional Climate Center, 2007).

Treutlen County has a low incidence of tornadoes, which is 3.1 times lower than the national average (City-Data.com, 2007). Only one damaging tornado has occurred since 1950. Maximum wind speeds in Treutlen County are between 90 and 100 miles per hour (ALA, 2005a; 2005b). Georgia has not experienced a major hurricane (Category 2 or greater) since before 1900 (geocities.com, 2007). Because Treutlen County is 90 miles west of the Georgia coast, it is unlikely to experience a direct hit from a hurricane because South Atlantic

hurricanes are extremely unlikely to travel west. Hurricanes that hit the Georgia coast usually do so while traveling north. However, Treutlen County does experience heavy rainfall and high winds from tropical systems that strike the Georgia coast (geocities.com, 2007).

3.10.2 Consequences of the Proposed Action

No aspect of the Proposed Action would affect the climate or weather of the region. No impacts to meteorology would be expected to occur under the Proposed Action.

The wind hazard for Treutlen County is rated as moderate because maximum wind speed may exceed 90 miles per hour (ALA, 2005a; 2005b). Heavy rains would not adversely affect Range Fuels' operations. The shipments of feedstock would likely be disrupted during hurricane evacuation from the Georgia coast as I-16 is converted to eastbound-only traffic in all lanes from Savannah to SR 441 near Dublin during these events (Georgia Navigator, 2007). However, due to the low incidence of tornadoes and low frequency of coastal evacuations along the Georgia coast, the potential for severe weather to adversely impact operations at the Range Fuels facility is considered minor.

3.11 Air Quality

3.11.1 Existing Environment

The CAA requires the USEPA to set National Ambient Air Quality Standards (NAAQS) for pollutants considered harmful to public health and the environment. NAAQS include two types of air quality standards. Primary standards protect public health, including the health of sensitive populations such as asthmatics, children, and the elderly. Secondary standards protect public welfare, including protection against decreased visibility, damage to animals, crops, vegetation, and buildings (USEPA, 2006A). USEPA has established NAAQS for six principal pollutants, which are called "criteria pollutants" (Table 3-4).

TABLE 3-4
NAAQS Criteria Pollutants
Range Fuels EA

Pollutant	Primary Standards [a]	Averaging Times	Secondary Standards
Carbon Monoxide	9 ppm (10 mg/m^3)	8-hour[b]	None
	35 ppm (40 mg/m^3)	1-hour[b]	None
Lead	1.5 µg/m^3	Quarterly Average	Same as Primary
Nitrogen Dioxide	0.053 ppm (100 µg/m^3)	Annual (Arithmetic Mean)	Same as Primary
Particulate Matter PM_{10}	150 µg/m^3	24-hour[b]	Same as Primary
$PM_{2.5}$	15.0 µg/m^3	Annual [c] (Arithmetic Mean)	Same as Primary
	35 ug/m^3	24-hour[d]	Same as Primary
Ozone	0.08 ppm	8-hour[e]	Same as Primary
	0.12 ppm	1-hour[f] (Applies only in limited	Same as Primary

Attachment 11. Correspondence from Historic Preservation Division

Brian P. Kemp
Governor

Christopher Nunn
Commissioner

Georgia® Department of Community Affairs

October 6, 2020

Dr. Laurel Harmon
Vice President, Government Relations
LanzaTech, Inc.
8045 Lamon Avenue, Suite 400
Skokie, Illinois 60077

RE: Freedom Pines Biorefinery Project, 535 Commerce Drive, Soperton
Treutlen County, Georgia
HP-200908-011

Dear Dr. Harmon:

The Historic Preservation Division (HPD) has reviewed the information submitted concerning the above referenced project. Our comments are offered to assist the U.S. Department of Agricultural (USDA), Rural Development Agency (RDA) and its applicants in complying with the provisions of Section 106 of the National Historic Preservation Act of 1966, as amended (NHPA).

The subject project consists of the expansion of the circa 2009 Freedom Pines Biorefinery complex, including construction of multiple buildings, fuel storage tanks, loading docks, vehicle parking areas, and the addition of new equipment at 535 Commerce Drive in Soperton. Based on the information provided and desktop research, HPD finds that the National Register of Historic Places (NRHP)-eligible Macon, Dublin & Savannah Railroad is within the proposed project's area of potential effects (APE) and that multiple other historic resources are within the APE, some of which may be eligible for listing in the NRHP. However, it is HPD's opinion that the subject project, as proposed, will have **no adverse effect** to historic properties within its APE, as defined in 36 CFR Part 800.5(d)(1), due to distance, intervening vegetation, and existing modern intrusions.

This letter evidences consultation with our office for compliance with Section 106 of the NHPA. It is important to remember that any changes to this project as it is currently proposed may require additional consultation. HPD encourages federal agencies and project applicants to discuss such changes with our office to ensure that potential effects to historic properties are adequately considered in project planning.

Please refer to project number **HP-200908-011** in any future correspondence regarding this project. If we may be of further assistance, please contact Aspen Kemmerlin, Compliance Archaeologist, at 770-389-7877 or aspen.kemmerlin@dca.ga.gov or Moira Church, Environmental Review Historian, at (770) 389-6285 or moira.church@dca.ga.gov.

Sincerely,

Jennifer Dixon, MHP, LEED Green Associate
Program Manager
Environmental Review & Preservation Planning

JAD/smr

cc: Robin Nail, Heart of Georgia Altamaha Regional Commission
Peggy Wade, USDA, Rural Development
Casey Strickland, Department of Energy