

January 25, 2016

Tom Hanlon, Environmental Engineering Manager
Air Quality Permitting
Southcentral Regional Office
Pennsylvania Department of Environmental Protection
909 Elmerton Avenue
Harrisburg, PA 17110

Re: Confidentiality Request
Perdue AgriBusiness LLC ("Perdue")
Plan Approval Application No. 36-05158A
Conoy Township, Lancaster County

Dear Mr. Hanlon:

In accordance with the Department's request, enclosed herewith are a confidential copy and a "public" (redacted) copy of Perdue's response to the Department's July 8, 2015, Technical Deficiency Letter ("TDL"). Certain portions of Perdue's submission contain information, which if made public, would divulge production or sales figures or methods, processes or production unique to Perdue and/or its potential vendors, or would otherwise tend to affect adversely the competitive position of Perdue and/or its potential vendors by revealing trade secrets, including intellectual property rights. Such information relates to proprietary Perdue soybean processing cost information, internal capital investment decision strategies and processes, internal business model strategies and corporate strategy information for the proposed Lancaster plant, in addition to vendor costs, designs, and other information that is considered trade secret and intellectual property, the disclosure of which would tend to affect adversely the competitive position of Perdue and/or the potential vendors with whom Perdue does business. The information is considered trade-secret information because it (1) reflects information of Perdue and/or the potential vendors that derives independent economic value from not being generally known or readily ascertainable by others who can obtain economic value from its disclosure or use and (2) is subject to reasonable efforts by Perdue and/or the potential vendors to maintain their secrecy. Accordingly, such documents are exempt from disclosure under the protective provisions of Section 13.2 of the Pennsylvania Air Pollution Control Act Pennsylvania and under the provisions of the Pennsylvania Right-to-Know Law ("RTKL"), including but not limited to 65 P.S. §§ 67.102, 67.707(b), 67.708(b)(10), 67.708(b)(11), and 67.708(b)(17). Perdue requests that the

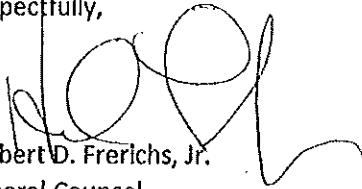


Department provide notification of any request for the disclosure of this information and grant Perdue an opportunity to provide further input justifying the exemption from disclosure.

The specific basis for each confidentiality claim is set forth in the attached **Confidential Information Log**, which provides the location of the confidential information in the document, a description of such information, and the specific basis for the confidentiality claim.

Please call if you have any questions.

Respectfully,



Herbert D. Frerichs, Jr.
General Counsel

Enclosures

cc: Gregory Rowe, Vice President
David Jordan, ERM
Peter Fontaine, Cozen

Perdue Confidential Information Log

Page # in Document	Description	Basis for Confidential Treatment: Pennsylvania Air Pollution Control Act, 35 P.S. 4013.2
Page 65	Identification of low cost vendor and the location of the low cost vendor quote	APCA §13.2 Methods, processes or production unique to vendor
Page 66	Identification of vendor pricing details	APCA §13.2 Methods, processes or production unique to vendor
Page 67	Vendor performance guarantee	APCA §13.2 Methods, processes or production unique to vendor
Page 69	Identification of vendor with highest performance guarantee	APCA §13.2 Methods, processes or production unique to vendor
Page 69	Identification of vendor providing building cost estimate	APCA §13.2 Methods, processes or production unique to vendor
Page 70	Identification of control equipment with the highest performance guarantee	APCA §13.2 Methods, processes or production unique to vendor
Page 70	Identification of vendor providing cost data	APCA §13.2 Methods, processes or production unique to vendor
Page 70	Identification of control equipment with the highest performance guarantee	APCA §13.2 Methods, processes or production unique to vendor
Page 71	Identification of vendor providing building cost estimate	APCA §13.2 Methods, processes or production unique to vendor
Page 72	Identification of vendor performance guarantee	APCA §13.2 Methods, processes or production unique to vendor
Page 73	Identification of control equipment with the highest performance guarantee	APCA §13.2 Methods, processes or production unique to vendor
Pages 103-116	Adwest proposal text	APCA §13.2 Trade Secret, including intellectual property disclosure of which would tend to affect adversely vendor competitive position
Pages 120-160	Anguil proposal text	APCA §13.2 Trade Secret, including intellectual property disclosure of which would tend to affect adversely vendor competitive position
Page 162	NESTEC performance guarantee	APCA §13.2 Methods, processes or production unique to vendor
Pages 163-196	NESTEC proposal text	APCA §13.2 Trade Secret, including intellectual property disclosure of which would tend to affect adversely vendor competitive position
Pages 198-202	Internal Perdue analysis of soybean processing cost information, internal capital investment decision strategies and processes, internal business model strategies, and corporate strategy information.	APCA §13.2 Trade Secret, including intellectual property disclosure of which would tend to affect adversely Perdue's competitive position

Page 220	Vendor particulate matter performance guarantees	APCA §13.2 Methods, processes or production unique to vendor
Page 220	Identification of vendor with lowest control equipment costs	APCA §13.2 Methods, processes or production unique to vendor
Page 220	Identification of vendor quote with lowest control equipment costs	APCA §13.2 Methods, processes or production unique to vendor
Page 222	Vendor particulate matter control guarantee information and identification of vendor with lowest control equipment costs	APCA §13.2 Methods, processes or production unique to vendor